## WHEELWRIGHT UTILITY COMMISSION P O Box 353 WHEELWRIGHT, KENTUCKY 41669 September 22, 2006

Public Service Commission 211 Sower Blvd., PO Box 615 Frankfort, Kentucky 40602-0615 RECEIVED SEP 2 5 2006 PUBLIC SERVICE COMMISSION

- Att: Michael Burford, Director Division of Filings
- Re: Case #2004-0039 Alleged Violations of 49 CFR 192

In response to your letter of 9/15/06. In addressing the ten (10 Pipeline Safety violations we find that we have taken the following steps to bring our system in compliance:

First and foremost we have been able to obtain the services of Roger Wingate, Lexington, Ky. to train two of our employees, on-site, to become qualified, certified gas operators. This training for Michael Tackett and Eddie Little allowed them the experience of being trained individually, in the actual surroundings wherein they will be working. Copies of their qualification certificates along with a letter from their instructor, are enclosed.

We are in the process of up-dating our O & M plan and have placed on order a CGI which will allow us to conduct our own leak surveys. This equipment should be delivered within a week or 10 days. The company selling us the equipment has already provided on-site training to both Michael and Eddie and so the leak survey can be conducted upon delivery.

We have put an emergency plan in place, as well as a damage prevention plan, and have begun an on-going education plan, working with other employees and the public. Our odoration check list is current as well as the inspection of relief valves and, we are maintaining flow valve records and have an up-to-date system patrolling schedule.

Also, for your information, we have enclosed copies of our last two annual reports to the Department of Transportation, Pipeline and Hazardous Materials Safety Administration.

We have plans to continue to up-grade the system and keep it within guidelines for compliance standards.

If there are further rules and regulations we should be aware of, please advise.

Sincerely;

Harry Mc Log

Gary McCoy, Supt. Wheelwright Utility Commission Wheelwright, Kentucky 41669

GMcC/ay Enclosures (6)

## R. L. Wingate & Associates, Inc

July 29, 2006

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Gary McCoy, Superintend Wheelwright Utility Commission P. O. Box 353 Wheelwright, Kentucky 41669

Dear Gary

I received the results this weekend from my third party tester who graded the Operator Qualification tests administer to Mike Tackett and Eddie Little in June and July. <u>Mike</u> <u>and Eddie successfully passed the qualifications for the following task as listed in</u> <u>your Operator Qualification Plan:</u>

- F-1 Join Plastic Pipe with Heat Fusion
- F-2 Join Plastic Pipe with Mechanical Fittings
- H-1 Install Domestic Gas Meters and Regulator Sets
- H-2 Install Domestic Gas Service Lines
- L-1 Tap Pipelines Under Pressure
- L-2 Purge Gas Lines (Small Diameter)
- M-1 Perform Patrol and Leakage Surveys on Gas Pipeline Facilities
- M-2 Locate and Mark Underground Pipeline Facilities
- M-3 Test Domestic Gas Service Lines
- M-4 Inspect and Test Pressure Limit Stations, Relief Devices and Pressure Regulating Stations
- M-5 Maintain Line Valves in Gas Transmission/Distribution Piping
- M-7 Prevent Accidental Ignition
- M-10 Abandon/Deactivate Gas Pipeline Systems

Hardcopies documenting these results will follow in a couple of weeks. I have included a folder for Mike and Eddie that shows the task they have qualified on, how they were qualified, who qualified them and when they must be re-qualified. This should take care of having both Mike and Eddie qualified per your OQ plan which I was asked to do. Mike and Eddie did fine on their qualification and I enjoyed working with them. They do need some equipment and supplies to effectively run the gas system.

It is important that any contractors you hire to work on your facilities also be qualified according to your OQ plan and they provide you with that documentation for your files.

 Natural Gar Technical Training • OQ Qualification Onsite Associate Degree Classes Top Drills • Custom

Phone: 859-543-0224 • Cell: 859-806-3451 1112 North Cleveland Rd • Lexington, KY 40509 rlwingate@insightbb.com While working in Wheelwright, I reviewed some of you records and would like to make the following recommendations.

- You OQ plan written in 10-28-2002 appears to be a template where you fill in the names and it needs to be updated
- The following OQ task need to be added to your plan and employees qualified:
  - o L-3 Monitoring Odorization
  - I-1a Monitoring Corrosion Control Methods/Patrolling and Surveillance, Meter readers should also be qualified in this task
  - o M-8 Make Permanent Field Repairs on Distribution Lines
- Emergency Plan located in your O&M manual dated 1990 needs to be updated
- O&M plan needs to be updated

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• I could not find a Public Awareness plan which was required by June 20, 2006

Gary, if I can be of any assistance with the above items, don't hesitate to give me a call.

Sincerely:

Roger Wingate President R. L. Wingate & Associates 859-543-0224 office 859-806-3451 cell

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R. L. WINGATE & ASSOCIATES, INC. This is to confirm that Eddice Little of Wheelwright Utilities Commission has qualified to perform the following Operator Qualification tasks outlined in their OQ plan dated October, 2002. F-1, F-2, H-1, H-2, L-1, L-2 M-1, M-2, M-3, M-4, M-5, M-7, M-10 Dated the 24 <sup>th</sup> day of July, 2006 Pared the 24 <sup>th</sup> day of July, 2006	
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P 7100.1-1 (12-05)

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4. MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION PRE-1940-1950-1960-1970-1980-1990-2000-UN-TOTAL KNOWN 1940 1949 1959 1969 1979 1989 1999 2009 MILES OF MAIN 4 281 NUMBER OF SERVICES PART C - TOTAL LEAKS ELIMINATED/REPAIRED DURING YEAR PART D - TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED FOR REPAIR CAUSE OF LEAK Mains Services NA CORROSION 5 NATURAL FORCES EXCAVATION OTHER OUTSIDE FORCE PART E - PERCENT OF UNACCOUNTED FOR GAS DAMAGE MATERIAL OR WELDS Unaccounted for gas as a percent of total input for the12 months ending June 30 of the reporting year. EQUIPMENT [(Purchased gas + produced gas) **OPERATIONS** minus (customer use + company use + appropriate adjustments)] divided by (purchased gas + produced gas) equals percent unaccounted for. OTHER NUMBER OF KNOWN SYSTEM LEAKS AT Input for year ending 6/30 \_\_\_\_\_ %. Est 3 END OF YEAR SCHEDULED FOR REPAIR PART F - ADDITIONAL INFORMATION 5 grade 3 an 2 completed 3 scheduled to be completed PART G - PREPARER AND AUTHORIZED SIGNATURE Michael TackeTT (type or print) Preparer's Name and Title (606) 452-4273 Area Code and Telephone Number Area Code and Facsimile Number Preparer's email address Michael Jacket Stas apercetas Name and Title of Person Signing (606) 452 - 4266 Area Code and Telephone Number nichan Jackett Authorized Signature

Form PHMSA F 7100.1-1 (12-05)

ANNUAL REPORT FOR CALENDAR YEAR 200 <sup>11</sup> INITIAL REPORT B   GAS DISTRIBUTION SYSTEM   INITIAL REPORT B   SUPPLIMENTAL REPORT B   SUP	NOTICE: This report is for each day the violation	s required by 49 on continues up	CFR Part 191 to a maximum	Failure to r	eport may resi	ult in a civil pe 1 in 49 USC 60	enalty not to exce 0122.	ed \$100,000	for each viola	lion Form OMB No. 2			
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4. MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION 1950-UN-PRE-1940-1970-1980-1990-1960-2000-TOTAL KNOWN 1940 1949 1959 1969 1979 1989 1999 2009 MILES OF MAIN 4 NUMBER OF SERVICES 251 PART C - TOTAL LEAKS ELIMINATED/REPAIRED DURING YEAR PART D - TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED FOR REPAIR CAUSE OF LEAK Mains Services n/A CORROSION 10 NATURAL FORCES EXCAVATION OTHER OUTSIDE FORCE PART E - PERCENT OF UN CCOUNTED FOR GAS DAMAGE MATERIAL OR WELDS Unaccounted for gas as a pricent of total input for the12 months ending June 30 of the reporting year. EQUIPMENT [(Purchased gas + produced gas) OPERATIONS minus (customer use + company use + appropriate adjustments)] divided by (purchased gas + produced gas) equals percent unaccounted for. OTHER NUMBER OF KNOWN SYSTEM LEAKS AT Input for year ending 6/30 \_\_\_\_\_ %. 55+ 5 END OF YEAR SCHEDULED FOR REPAIR Had I grade one an Fixed it emmediantly 4 grade 3 allready Completed 5 grade 3 on scheduled to be fixed PART F - ADDITIONAL INFORMATION PART G - PREPARER AND AUTHORIZED SIGNATURE M, Ke Tockett (type or print) Preparer's Name and Title  $\frac{(60k) - 462 - 4273}{\text{Area Code and Telephone Number}}$ Preparer's email address Area Code and Facsimile Number Michael Jachell Supt Utilities (606) - 452 - 4266 Name and Title of Person Signing Area Code and Telephone Number Machine Jackett Authorized Signature

Form RSPA F 7100.1-1 (03-05)

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