COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CITY OF LIBERTY GAS COMPANY	)	
	)	CASE NO.
	)	2017-00053
ALLEGED FAILURE TO COMPLY WITH KRS 278.495 AND 49 C.F.R. PART 192	)	

NOTICE OF FILING

Notice is given to all parties that the following materials have been filed into the record of this proceeding:

- The digital video recording of the evidentiary hearing conducted on March 29, 2017 in this proceeding;

- Certification of the accuracy and correctness of the digital video recording;

- All exhibits introduced at the evidentiary hearing conducted on March 29, 2017 in this proceeding;

- A written log listing, *inter alia*, the date and time of where each witness' testimony begins and ends on the digital video recording of the evidentiary hearing conducted on March 29, 2017.

A copy of this Notice, the certification of the digital video record, hearing log, and exhibits have been electronically served upon all persons listed at the end of this Notice. Parties desiring an electronic copy of the digital video recording of the hearing in Windows Media format may download a copy at http://www.psc.ky.gov/av_broadcast/2017-00053/2017-00053_29Mar17_Inter.asx.

Parties wishing an annotated digital video recording may submit a written request by electronic mail to pscfilings@ky.gov. A minimal fee will be assessed for a copy of this recording.

Done at Frankfort, Kentucky, this 4th day of April 2017.

Talina R. Mathews

Talina R. Mathews
Executive Director
Public Service Commission of Kentucky

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In the Matter of:

CITY OF LIBERTY GAS COMPANY	CASE NO. 2017-00053
ALLEGED FAILURE TO COMPLY WITH KRS 278.495 AND 49 C.F.R. PART 192	

CERTIFICATE

I, Pamela Hughes, hereby certify that:

1. The attached DVD contains a digital recording of the Hearing conducted in the above-styled proceeding on March 29, 2017. Hearing Log, Witness List, Exhibits, and Exhibit List are included with the recording on March 29, 2017.

2. I am responsible for the preparation of the digital recording.

3. The digital recording accurately and correctly depicts the Hearing of March 29, 2017.

4. The "Exhibit List" attached to this Certificate correctly lists all exhibits introduced at the hearing of March 29, 2017.

5. The "Hearing Log" attached to this Certificate accurately and correctly states the events that occurred at the Hearing of March 29, 2017, and the time at which each occurred.

Signed this 30th day of March, 2017.

Pamela Hughes

Pamela Hughes, Notary Public
State at Large
My Commission Expires: April 22, 2019

JAVS Session Report - Detail

2017-00053 29MAR2017

City of Liberty Gas Co.

Date:	Type:	Location:	Department:
3/29/2017	Show Cause Hearing	Hearing Room 1	Hearing Room 1 (HR 1)

Judge: Bob Cicero; Dan Logsdon; Michael Schmitt
Witness: Bridgett Blake; Steven Brown; Joel Grogin; Greg Rodgers; Steve Samples
Clerk: Pam Hughes

Event Time	Log Event	
12:45:47 PM	Session Started	
12:45:49 PM	Session Paused	
2:03:03 PM	Session Resumed	
2:03:05 PM	Chairman Schmitt opening remarks	
	Note: Hughes, Pam	City of Liberty Gas Co. alleged failure to comply with periodic leakage survey regulations.
	Note: Hughes, Pam	Introduction of Commissioners Bob Cicero- Vice Chairman and Dan Logsdon- Commissioner
2:03:49 PM	Introduction of Attorneys	
	Note: Hughes, Pam	Todd Osterloh representing City of Liberty - Nancy Vinsel, Jenny Sanders and Brittany Koening-PSC
2:04:52 PM	Chairman Schmitt	
	Note: Hughes, Pam	Explaining the show cause violations, and the statutes and regulations.
2:12:02 PM	Chairman Schmitt	
	Note: Hughes, Pam	Asks for motions, no oustanding motions.
2:12:15 PM	Atty Vinsel- PSC	
	Note: Hughes, Pam	Steve Samples called to the stand and is sworn in by the Chairman.
2:12:57 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Steve Samples, 211 Sower Blv, Frankfort, Ky- Gas Inspector since 2006.
2:13:32 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	PSC exhibit 1- 2015 Inspection Report
	Note: Hughes, Pam	Inspection took place in July 2015 and a report was made. Page 3 is Mr. Samples signature and true and accurate copy.
2:14:29 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Page 1 of 2015 Inspection report. Interviewed Bridget Blake and Greg Rodgers
2:15:18 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Referencing interview with Ms. Blake
2:15:40 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Referencing records to be kept
2:15:55 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Inspection report Page 3, summary section, 2nd paragraph. 2013, 2014, and 2015 records. Leakage surveys
2:16:38 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Probable findings explanation and check list and what it is based on.
2:17:21 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Line 4 of probable findings- 192.723(b)(1)- what it means
	Note: Hughes, Pam	No records were found of leakage surveys except from 2009
2:18:39 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Referencing anyone telling him no records after 2009 of leakage survey records.

2:19:16 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Line 5, Probable findings-192.723(b)(2)
2:20:08 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Page 3, recommendations and comments- operation changes since last inspection
2:20:48 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Exhibit 2 -2016 Inspection report- a follow-up done in June 27, 2016 and report was made.
2:22:00 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Referencing interviewing Ms. Blake and Mr. Rodgers
2:22:17 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Purpose of June 2016 Inspection was to check progress of 2015 inspection report with 7 deficiencies
2:23:10 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Deficiency 4- leakage survey on business district Deficiency 5- outside business district
2:23:41 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Final page of report, was to have them perform there surveys.
2:24:34 PM	Chairman Schmitt cross exam of Witness Samples	
	Note: Hughes, Pam	Had you surveyed prior to 2015? Witness performed inspection in 2008. Liberty was not in compliance,
2:26:31 PM	Chairman Schmitt cross exam of Witness Samples	
	Note: Hughes, Pam	Page 2 of Inspection report. Findings. Not conducting leakage surveys in business district. In 2015 that he went back to follow-up
	Note: Hughes, Pam	Did City of Liberty ever conduct a leak survey? No Heath Consultants had performed the leak survey. 2 leaks in 2016 were found, grade 2 and 3 leaks. Has Libery sent Witness any documentation from 2016 leak been repaired? No
2:30:13 PM	Atty Osterloh cross exam of Witness Samples	
	Note: Hughes, Pam	Possible that the inspection was in 2008?
	Note: Hughes, Pam	Has witness looked at any documents in this case or 2016 companion case? Witness not aware.
2:31:35 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	Documents that Ms. Blake sent in showing leaks had been repaired
2:32:02 PM	Atty Vinsel- PSC direct exam of Witness Samples	
	Note: Hughes, Pam	June 12, 2009 Letter from Jason Brangers to then Mayor Sweeny. Page 1-2. Do you recall this was in 2009, yes it was. Page 2 of 2, finding 4, no leak surveys in business district.
2:33:17 PM	Witness Samples excused from the stand	
2:33:29 PM	Witness Joel Grugin takes the stand	
	Note: Hughes, Pam	Sworn in by Chairman Schmitt
2:34:12 PM	Atty Vinsel- PSC direct exam of Witness Grugin	
	Note: Hughes, Pam	Joel Grugin, PSC staff, utility gas investigator since Jan 2007.
2:34:43 PM	Atty Vinsel- PSC direct exam of Witness Grugin	
	Note: Hughes, Pam	PSC exhibit 3 March 2012 Inspection report. (2 inspection reports) Is this a true and accurate copy of the 2012 inspection.
	Note: Hughes, Pam	Utility inspection report, page 1- Utility reps, Ronnie Wesley was the superintendant at the time. Mr. Wesely is now deceased. On first page, date of last inspection- May 27, 2009. Leakage surveys and repairs, what were results of inspections? Page 22 of 26. 603 b Satisfactory.
2:38:34 PM	Chairman Schmitt cross exam of Witness Grugin	
	Note: Hughes, Pam	Inspected on more than one occasion. Do you remeber seeing leakage survey performed by anyone other than Heath Consultants.
2:39:25 PM	Witness Grugin excused	

2:39:38 PM	Atty Vinsel -PSC	
	Note: Hughes, Pam	Exhibits 1,2,3 are admitted into the record.
2:39:58 PM	Witness Bridgett Blake is called to the stand	
	Note: Hughes, Pam	Chairman Schmitt swears her in.
2:40:34 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	650 customers in gas, most inside city limits and gas is a department
	Note: Hughes, Pam	City Clerk for 2 weeks. Worked for the City since 2001 for utilities. Class 2 operator licensce for WWTP. Location of Liberty
2:42:20 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Distribution line of 27 miles, 5 field employees, that also maintain water and sewer system. Is there office staff and duties of mayor.
2:43:16 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	PSC exhibit 1-Inspection report, probable findings on page 3.
	Note: Hughes, Pam	First concern about leakage surveys.
2:44:08 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	O&M Manuel. City exhibit 1- operation and maintenance plan. Page 19- leakage surveys outside city district.
	Note: Hughes, Pam	How did city get this O&M plan?
2:45:57 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Any plans to change 3 YR interval?
2:46:20 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	2012 inspection report from WItness Grugin. No def's found for the city. 2nd page-addt'l inspector comments. Mr. Wesely passed away in 2014
2:47:52 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	2010-2012 leakage surveys performed? Not to Witnesses knowledge.
2:49:05 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Def's that had been found outsie city 2015-2016. Witness worked with the maintenance department and there was a miscommunication and no one callled Heath Consultants.
2:50:18 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Heath Consultants responded by sending service agreement. Liberty exhibit 2. Page 2 of contract, section 8. Option for city to renew agreement. Page 6, the option to renew and mayor signed the agreement. Page 5 is executed agreement. Heath was sent this in 6/2016, Heath came in July 2016 to perform leakage survey. PSC staff performed survey in June 2016. Finding of PSC inspection=PSC staff exhibit 2.
2:53:54 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	City's exhibit 3-survey report from Heath Consultants. Results, grade 2 leak found. Repaired within 6 months
2:55:05 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Other than leakage surveys what are other things that the gas system do to check the leaks.
	Note: Hughes, Pam	Heath Consultants will perform leakage survey in 2017. City's exhibit 4-emails between Witness Blake and Heath Consultants. Todd Kelly responded that it would be fine and to contact him when it was closer to time for survey. Contacted in March 2017. Exhibit 5 of city-email between Witness Blake and Todd Kelly. Date for August 1st 2017. Leakage survey is scheduled for entire system for August 1, 2017. Plan for 2017 Heath will survey inside and outside the business district.

2:59:19 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Witness Blake was appoinrted by the Mayor to make sure the surveys are done. Calendars were created, etc. Exhibit 6 of the city-Calendar is kept in City hall and maintenance workers in their trucks. Other documents to help workers remember.
3:00:58 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Ultimate goal with Witness being in charge of keeping the calendar.
3:01:33 PM	Atty Osterloh direct exam of Witness Blake	
	Note: Hughes, Pam	Exhibit 7 of the City- Order from Commission Staff in this Case dated 2/6/2017 Ordering par. 1, requires city to respond, city didn't recieve this Order until several weeks later. Rec'd 2nd notice by mail.
3:03:52 PM	Atty Osterloh	
	Note: Hughes, Pam	City's exhibits 1-7 admitted
3:04:17 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Witness only been city clerk for 2 weeks. Any responsibility with the gas system.
3:05:16 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	650 customers, DR's answered by Witness. Annual revenues of gas system, witness doesn't know. Response to request 1, item 10- budget process for gas department revenue and expenses. Reference to gas fund and transfer to general fund explanation,
3:08:04 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Records are kept at City Hall.
	Note: Hughes, Pam	Any responsibilities for maintaining gas paperwork. Any training in federal pipeline training and federal regulations.
3:10:07 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Witness now primay contact with Heath Consultants for leakage surveys. Not sure who was responsibile before her.
3:10:53 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	City's exhibit 2- 2016 contract with Heath. How was it discovered that the leakage survey hadn't been done.
3:12:41 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Is there a full-time superintendent over the gas system. They are over all the utilities, gas, water and sewer.
3:13:18 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Data responses, question 8, 2017 contract with Heath for leakage surveys, date lined up Aug. 1, 2017 and was confirmed by email yesterday.
	Note: Hughes, Pam	Please provide the Commission with a copy of the leakage survey once it is done. Is it possible to have a contract beyond 1 year.
3:15:17 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	City of Liberty Has to contact Heath Consulting for renewal of leakage surveys.
	Note: Hughes, Pam	Future renewals with Heath on the calendar.
3:16:13 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Copy of calendar is in city hall and in workers trucks. Primary responsibilty of maintaining calendar is Witness Blake. Any back-up and review monthly to make sure things are done?
3:17:32 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	PSC exibit 2- 2016 inspection report. Witness Samples interviewed Witness Blake and she supplied him reports. Miscommunication betweeen Witness Blake and maintenance workers was why the 2015 survey was not done.

3:19:34 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Correspondence from case record. From Liberty to Commission about 2015 and 2016 inspection report. 2016, signed by Mayor Brown. Witness Blake drafted the letter, 1st and 2nd bullitt points about not conducting surveys since 2009. No records were found by Liberty. DId any employees of Liberty conduct the surveys.
3:22:22 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Referencing leakage survey recaps provided to the Commission and they were a mistake. Witness filled them out by mistake.
3:23:25 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	PSC exhibit 1 2015 inspection report. What role Witness played in that inspection. Findings about no leakage surveys since 2009
3:24:47 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	2015 correspondence from Witness Blake. 2nd page par 4 and 5. Leakage surveys inside and outside the district. This was the miscommunication that someone else had contacted Heath Consultants to inspect.
3:26:19 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	PSC exhibit 4- 2009 inspection report. Page 1 of 2- utility report, Mr Wesley and Charlene Rogers. DId Witness Blake have a role in the 2009 inspection. Page 2 of 2 of 2009 report, findings line 4- Libery was not conducting leak surveys in their business district each year.
3:28:27 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	PSC exhibit 5- 7/16 Def tracking report. Page 4 Response-city of Liberty failed to perform survey in 2008 and will begin performing them annually by Heath Consultants. Ronnie Wesley states he will have city employees perform leak surveys in business district each year. Witness Blake understood that would be done by an outside agengy. Libety employees can perform the surveys but they don't.
3:31:59 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	PSC exhibit 6- March 26, 2007 Inspection report. Mr. Wethington is field employee. Page 2 of 2 under findings, line 1. Hasn't performed leak survey had not been conducted since 2003.
3:34:08 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	PSC exhibit 7, Def tracking report, response from Liberty. 1st page- Liberty changed management in 2007.
3:36:05 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	PSC exhibit 8-- Utility inspection-follow-up. Page 2 of 2, all def's were corrected.
3:37:10 PM	Atty Vinsel-PSC cross exam of Witness Blake	
	Note: Hughes, Pam	Referencing O&M date of effect? Page 21, last par. Records must be maintained, how long does Liberty keep leakage surveys? Never thrown out but may be moved to a different storage spot.
3:38:52 PM	Vice Chairman Cicero cross exam of Witness Blake	
	Note: Hughes, Pam	Who monitors the email for City of Liberty. Previous clerk had that email and now Witness Blake keeps that email.
3:40:18 PM	Atty Osterloh redirect of Witness Blake	
	Note: Hughes, Pam	Would city retain records of something that didn't ocur. O&M plan page 22, how long records must be maintained for leak records. Custodian of records is the city clerk. Prior to Winess Blake was Charlene Rodgers
3:41:48 PM	Atty Vinsel redirect of Witness Blake	
	Note: Hughes, Pam	O&M plan
3:42:13 PM	Witness Blake is excused	

3:42:24 PM	Witness Greg Rodgers is called to the stand	
	Note: Hughes, Pam	He is worn in by Chairman Schmitt
3:42:38 PM	Atty Osterloh-Liberty direct exam of Witness Rodgers	
	Note: Hughes, Pam	Maintenance worker and considered one of the supervisors. Would he have interacted with PSC staff inspector?
	Note: Hughes, Pam	PSC exhibit 1-Inspection report 7/13/15. Page 3, def for failing to conduct a leak survey. PSC exhibit 2- 2016 inspection report, last page.
3:45:45 PM	Atty Vinsel-PSC cross exam of Witness Rodgers	
	Note: Hughes, Pam	How long has Mr. Rodgers worked for Liberty? 04-05 Current position is maintenance worker, supervisor duties since 2014, for gas, water and sewer.
3:47:21 PM	Atty Vinsel-PSC cross exam of Witness Rodgers	
	Note: Hughes, Pam	Responsibilities for maintaining Gas system? Aware that leak surveys should be done and how often. Have you received training in pipeline safety regulations. Current responsibilities concerning leak surveys.
3:49:23 PM	Atty Vinsel-PSC cross exam of Witness Rodgers	
	Note: Hughes, Pam	2015 and 2016 inspection reports. (PSC exhibit 1 and 2) What were your responsibilites in the interview and inspection by Mr. Samples?
3:50:38 PM	Atty Vinsel-PSC cross exam of Witness Rodgers	
	Note: Hughes, Pam	Aware that in 2015 and 2016 that leak surveys had not been performed. Explanation as to why not done after the 2015 inspection
3:51:22 PM	Atty Vinsel-PSC cross exam of Witness Rodgers	
	Note: Hughes, Pam	Heath discovered 2 grade 2 leaks in 2016. Leaks have been repaired. Does Liberty forward copy of survey and correspondence to the Commission?
3:52:20 PM	Atty Vinsel-PSC cross exam of Witness Rodgers	
	Note: Hughes, Pam	PSC exhibt 4- 2009 inspection report. Didd Witness play any role in this inspection. Is Charlene Rodgers a relative of his? (His Mother) Was a leak survey done after 2009?
3:53:51 PM	Atty Vinsel-PSC cross exam of Witness Rodgers	
	Note: Hughes, Pam	2007 report, not performed leak survey since 2003. Witness not aware of report.
	Note: Hughes, Pam	PSC exhibit 6, 2007 inspection report. Page 1 of 2. What role did Witness play in this inspection?
3:55:12 PM	Chairman Schmitt cross exam of Witness Rodgers	
	Note: Hughes, Pam	Mr. Wingate states that leak surveys are required. Witness does not know why these are required.
	Note: Hughes, Pam	Mr. Wesely passed in 2014. Training requires and certifications required. Tests performed after the training by Mr. Wingate.
3:57:27 PM	Chairman Schmitt cross exam of Witness Rodgers	
	Note: Hughes, Pam	Are any of City of Liberty employees members of KY Oil and Gas Assoc. Does the City send Witness outside Casey County for training for gas employees.
3:58:33 PM	Chairman Schmitt cross exam of Witness Rodgers	
	Note: Hughes, Pam	Leak survey in 2009, Heath showed 8 grade 1 leaks and 12 grade 2 leaks.
3:59:19 PM	Witness Rodgers excused from the stand	
3:59:32 PM	Witness Steven Brown called to the stand	
	Note: Hughes, Pam	Sworn in by Chairman Schmitt
3:59:50 PM	Atty Osterloh direct exam of Witness Brown	
	Note: Hughes, Pam	Mayor of City of Liberty and role he performs.

4:00:31 PM	Atty Osterloh direct exam of Witness Brown	
	Note: Hughes, Pam	Changes implemented to ensure leak surveys take place.
	Note: Hughes, Pam	Reactions to this case and the prior case against Liberty.
4:01:57 PM	Atty Osterloh direct exam of Witness Brown	
	Note: Hughes, Pam	Calendar system was implemented by Ms. Blake and Witness Brown. Has the city done everything they can to ensure leak surveys are done.
4:03:31 PM	Atty Vinsel-PSC cross exam of Witness Brown	
	Note: Hughes, Pam	Mayor since 2015 and 8 yrs on city council. Steps taken to inform city council.
4:04:52 PM	Atty Vinsel-PSC cross exam of Witness Brown	
	Note: Hughes, Pam	Modeled systems from job at bank to help with Liberty
4:05:21 PM	PHDR	
	Note: Hughes, Pam	Annual statement of revenues for the gas system
4:06:09 PM	Atty Vinsel-PSC cross exam of Witness Brown	
	Note: Hughes, Pam	Day to day basis reponsibility to the gas system.
4:07:16 PM	Atty Vinsel-PSC cross exam of Witness Brown	
	Note: Hughes, Pam	Training for gas system employees---Do you know what training they receive? 1 week long training to his knowledge on annual basis.
4:08:21 PM	Atty Vinsel-PSC cross exam of Witness Brown	
	Note: Hughes, Pam	Committed to do leakage surveys inside and outside the business district. Compliance has not been kept up, what steps have you taken to ensure these steps are to be taken to remain in compliance. Written procedures plan to be done as soon as possible.
4:10:12 PM	Vice Chairman Cicero cross exam of Witness Brown	
	Note: Hughes, Pam	Specific regulations to the Commission. Atty Osterloh answers this question.
4:12:10 PM	Vice Chairman Cicero cross exam of Witness Brown	
	Note: Hughes, Pam	Concerns about the follow-up of events are checked off and that the process is completed.
4:12:50 PM	Commissioner Logsdon cross exam of Witness Brown	
	Note: Hughes, Pam	Concerning city council being notified
4:13:27 PM	Chairman Schmitt cross exam of Witness Brown	
	Note: Hughes, Pam	Concerning living in the city as Mayor. Heath Consultants did survey in 2009 and none done since 2003. 8 grade 1 leaks in 2009.
4:16:16 PM	Chairman Schmitt cross exam of Witness Brown	
	Note: Hughes, Pam	Heath charges 1800.00 for each survey.
	Note: Hughes, Pam	Insurance for the City of Liberty. Call the KY league of cities about leak surveys not being done. Suggests program to send workers to more training in gas safety.
4:18:32 PM	Chairman Schmitt cross exam of Witness Brown	
	Note: Hughes, Pam	Process put in place that ensures everyone ongoing knows that this needs to be done on a regular basis according to the regulations.
	Note: Hughes, Pam	Fines that can be imposed for failure to do leak surveys.
4:20:26 PM	Witness Brown excused	
4:20:39 PM	PHDR	
	Note: Hughes, Pam	PSC will get out tomorrow, City will need at least a week, or file motion for extension.
	Note: Hughes, Pam	Post hearing briefs. Can be filed within 2 weeks after the PHDR but respond in those answers that want to file brief or not. Then have 10 business days.
4:22:31 PM	Atty Osterloh	
	Note: Hughes, Pam	Refers to PSC exhibits. Atty Vinsel Motions to intruduce PSC staff exhibits 4-9

4:23:01 PM	adjourned
4:23:08 PM	Session Paused
10:25:23 AM	Session Ended

JAVS Exhibit List Report

2017-00053 29MAR2017

City of Liberty Gas Co.

Name:	Description:
Liberty Gas Exhibit 01	Operating and Maintenance Plan
Liberty Gas Exhibit 02	Services Agreement effective 6/3/16 between Liberty Gas Co andd Heath Consultants
Liberty Gas Exhibit 03	Leak Survey Report for 2016 by Heath Consultants
Liberty Gas Exhibit 04	Email between Todd Kelley of Heath Consultants andd Briddgett Blake of City of Liberty with attached contract and exhibits. Dated 12/9/16
Liberty Gas Exhibit 05	Email dated March 6 & 7, 2017 between Todd Kelley of Heath Consultants and Bridgett Blake of City of Liberty scheduling leak survey for business district in August.
Liberty Gas Exhibit 06	Calendar used by City of Liberty from June 2016 through June 2018 with specific things dated.
Liberty Gas Exhibit 07	PSC Show Cause Order in Case No. 2017-00053
PSC Exhibit 01	PSC Inspection Report dated 7/13/15
PSC Exhibit 02	PSC Inspection Report dated 6/27/16
PSC Exhibit 03	PSC Inspectiion Report dated 3/27/12
PSC Exhibit 06	PSC Inspection Report dated 3/26/07 w, cover letter to Steve Sweeney, Mayor of Liberty dated 4/2/07
PSC Exhibit 07	Deficiency Tracking Report for City of Liberty Gas, dated 3/21/07
PSC Exhibit 08	PSC Insection Report dated 7/30/07
PSC Exhibit 09	City of Liberty O&M Plan, pages 19-22
PSC Exhibit 4	PSC Inspection Report dated 5/29/2009 w/ cover letter addressed to Steve Sweeney, Mayor of Liberty-dated 6/12/09
PSC Exhibit 5	Deficiency Tracking Report for City of Liberty Gas, dated 5/27/09

City of Liberty

Liberty, Kentucky

Operating and Maintenance Plan

EXHIBIT
1

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City of Liberty
Liberty, Kentucky

Operating and Maintenance Plan

Basic Operating and Maintenance Plan Information

(1) **Purpose of the Plan.** This plan prescribes guidelines and minimum standards for the safe and reliable operation and maintenance of the City of Liberty Gas System.

(2) **Regulatory Requirements.** The Natural Gas Pipeline Safety Act of 1968 required the Department of Transportation to develop and enforce minimum safety regulations for transportation of gases by pipeline. These regulations are published in Title 49, Code of Federal Regulations, Parts 190,191,192, and 199.

Each gas operator is responsible for compliance with the above regulations and must remain familiar with the requirements contained within.

Gas operating and maintenance procedures are specifically required under 49 CFR 192.605.

(3) **Implementing the Plan.** The management of the City of Liberty Gas System is responsible for assuring that all persons having responsibility for operation, maintenance, and periodical inspection of this system are made aware of this plan and are properly trained and qualified, as required by Part 192 Subpart N, to perform as required.

Records must be maintained to verify and document such training and qualifications.

(4) **Omissions from Plan.** This plan is written to specifically include various topics of major significance to a gas distribution operator. All codes and standards incorporated by reference are to be considered as part of this plan to the extent that they are applicable.

No written plan is fully inclusive of all details pertinent to operation, maintenance, and inspection. Therefore industry accepted methods shall apply to those areas not specifically addressed in the plan.

(5) **Periodical Review of the Plan.** This plan shall be reviewed and revised at intervals not exceeding 15 months, but a least once each calendar year to reflect current regulatory requirements and changes in the system.

Each person responsible for implementation of this plan is encouraged to offer suggestions that would make this plan more effective.

(6) **Terminology.** Standard English dictionary definitions shall apply except where industry accepted terminology prevails. As used herein the following meanings and definitions apply:

Employee	Any person employed or authorized by the company to perform operating, maintenance, or construction functions related to the gas distribution system.
Gas	The combustible gas distributed for sale to customers of the company.
Personnel	Same as employee.
Main	A distribution pipe that serves as a common source for more than one service line.
Pipeline	All parts of the physical system that carry gas, including mains, service lines, and district regulator stations.
Company Owned Service Line	The portion of the service line from the company main to the customer's property line.
Customer Owned Service Line	The portion of the service line from the customer's property line to the meter.

Employee Responsibilities

(1) **Recognition of Hazards.** Each employee shall remain aware of potential hazards resulting from natural gas leaks and other gas system malfunctions.

Such hazards include, but are not limited to:

a. Natural gas when mixed with air is combustible. It is easily ignited by open flame, electric spark including static discharge, or by spark from abrasion. The gas has a lower limit of flammability of approximately 5% and an upper flammability limit is approximately 15% by volume mixed with air.

b. Natural gas is lighter than air, with a specific gravity of approximately .6. Escaping gas will tend to rise from the point of escape and accumulate in higher locations.

Before working in an excavation where natural gas may be escaping, the atmosphere must be tested accordingly, and proper measures must be taken to eliminate the hazards and to protect the worker against injury resulting from accidental ignition or insufficient oxygen.

c. Natural gas escaping at high velocity through polyethylene pipe may cause a high voltage static electric discharge to occur, which may produce ignition under certain conditions. Specific precautions as described in "Prevention of Accidental Ignition OQ Task M-7" must be taken to minimize the danger of self-ignition from static electricity whenever a flammable gas is allowed to escape through plastic pipe.

d. Potential hazards exist anytime excavation work is performed or work is performed within an excavation. Damage or injury resulting from interference with underground electric wires, asphyxiation, and ignition of gas or cave-ins are all possible hazards.

e. All applicable company safety standards regarding personal protective equipment and work procedures must be followed to assure the safest possible work environment.

f. All reasonable precautions shall be taken to protect the public from hazards resulting from escaping gas, open excavations, or other dangers resulting from operation and maintenance of the gas distribution system.

(2) **Implementation of Emergency Operating Plan.** As required by 49 CFR 192.615, the City of Liberty has a written emergency plan to address and minimize the hazard resulting from a gas pipeline emergency. The emergency plan specifically addresses for the following emergency situations:

a. Gas detected inside or near a building.

b. Fire located near or directly involving a pipeline facility.

c. Explosion occurring near or directly involving a pipeline facility.

d. Natural disaster affecting a pipeline facility.

e. Safe restoration of any service outage.

f. Any situation which requires prompt and effective response to eliminate potential for injury or property damage resulting from gas.

Customer Meters and Regulators

(1) **Location of Customer Meters and Regulators.** Each meter and service regulator must be installed in a readily accessible location and be protected from corrosion and other damage. Unless absolutely unavoidable, meters shall not be installed in any location where visits of the meter reader or tester will cause annoyance to the customer or severe inconvenience to the utility. Meters and regulators shall be installed outdoors whenever practical.

Meters in or near driveways or parking areas where subject to contact from vehicles shall be protected with suitable barricades.

Each regulator which might release gas in its operation shall be vented to an outside location where gas is not likely to accumulate at or below ground level. All regulators must terminate at least 3 feet any opening into a building or from an ignition source.

Where more than one meter is placed at a single location, each meter shall be marked to identify the customer served.

All meter and meter setting shall be painted at the time of installation or re-installation.

(2) **Specific Requirements for Service Regulators.** Each service regulator used must be capable of reducing distribution line pressure to the pressure recommended for household appliances.

All atmospheric vents on service regulators and relief valves must be insect resistant and protected against entry of rain or accumulation of water from condensation.

(3) **Installation of Customer Meters and Service Regulators.** Each meter and regulator installation must be properly supported and designed to minimize anticipated stresses upon connections and piping. Use of all-thread (close) nipples is prohibited for gas carrying piping. All service shall be insulated at the meter. All meters and regulators shall be painted factory gray either before they leave the meter shop or on the premise at the time of installation by field personnel.

(4) **Meter Valves.** Each service line valve installed above ground must be designed and constructed in a manner in which the possibility of removal of the core with other than specialized tools is minimized.

(5) **Meter Handling.** All meters should be stored in an upright position, connections should be capped, stored in cardboard container when possible, where they will not be subjected to abuse and as close to room temperature as possible.

Meters on trucks should be in the upright position, opening capped and strapped down. Carry only enough meters to do the job. Meters on the truck should be rotated so the oldest meter is used first.

The old meter removed should be handled with the same care as a new meter. Removed meter should be returned to the shop and unloaded as soon as practical.

(6) **Turning Off, Removing or Rotating Meters.**

a. **Verify the Order**
   i. Make sure of the address and the customer's name if possible.
   ii. Read the meter and check the serial number
   iii. If possible, check with the occupant of the house

b. **Interrupting Service**
   i. Meter valve is closed
   ii. Install a blind plate
   iii. Lock valve at the meter if necessary

c. **Restoring Service**
   i. Purge the meter of air and check for meter operation
   ii. Make sure the test hand is on the upstroke
   iii. Check the house piping for tightness by observing the meter test hand for at least five (5) minutes

d. **Changing a Meter**
   i. Make sure you can access the house before rotating a meter
   ii. Make a visual check of all house piping and appliances for proper installation as required by NFPA #54
   iii. Remove the meter
   iv. Install a new meter
   v. Hang the meter by the inlet swivel; crack the meter valve purging the meter while checking it for operation stopping the meter dial on the upstroke.
   vi. Connect the downstream swivel, gently open the meter valve and observe the meter dial, which should be on the upstroke, for five (5) minutes. No dial movement indicates the house lines contains no leakage
   vii. Red tag and advise customer of any unsafe conditions
   viii. Complete all paper work completely and accurate

e. **Inactive Meters**
   i. Meters should be pulled after twelve month period unless restoration of service is indicated. Meters pulled should have both the inlet and outlet lines capped or plugged.

f. **Be alert for the following situations:**
   On rental property during the heating season, if possible, get verification from the owner before discontinuing service. Houses with furniture in them should not have the gas turned off unless the order clearly indicates permission. Good judgment must be used before turning off the gas during the heating season in the situations where, bill is not paid, main line repair or in situation where there is a possibility of the city's liability if a freeze-up occurs.

Excess Flow Valves

The City of Liberty will install excess flow valves on all single residence service lines operating at over 10 PSIG. The valves will be installed at City of Liberty's expense. They will be installed according to 49 CFR 192 Subpart H and the manufacturer's installation instructions.

Service Lines

(1) **Installing Service Lines.** Each service line must be installed and connected to the main by qualified personnel in accordance with the construction specifications set forth in the Appendix A.

All materials used must be of good quality and intended for use with natural gas. All pipe and fittings used must be manufactured and tested in accordance with applicable listed specifications.

(2) **Testing Service Lines.** Each new service line must be pressure tested for leaks using air, inert gas, or other suitable test medium prior to being placed into operation. A good quality mechanical or electronic gauge must be used to monitor the test pressure for as long as necessary to discover any potentially hazardous leaks. If feasible the service line connection to the main must be included in the test; if not reasonable, the connection to the main must be leak tested at operating pressure when placed in service. In conducting pressure tests reasonable precautions shall be taken to protect employees and the general public from injury in the event of a failure of the service line or test apparatus.

Each disconnected service line must be tested in the same manner as a new service line from the point of disconnection to the meter valve prior to being put into operation.

Minimum test pressure for steel service lines intended to operate at 1 PSIG or less shall be 10 PSIG for five minutes.

Minimum test pressure for steel service lines intended to operate from 1 PSIG to 40 PSIG shall be 50 PSIG for not less than five minutes

Minimum test pressure for steel service lines intended to operate from 40 PSIG to 100 PSIG shall be 90 PSIG for not less than five minutes.

Minimum test pressure for steel service lines intended to operate at 100 PSIG or over shall be 1.5 times maximum operating pressure for not less than five minutes

Minimum test pressure for plastic service line shall be 90 PSIG or 1.5 time maximum operating pressure whichever is greater for five minutes.

Existing service lines not physically disconnected shall be tested at operating pressure for not less than 3 minutes.

(3) **Operation of Service Lines.** Service lines, including customer meters and service regulators, must be included in the continuing surveillance program, corrosion control program, and periodic leakage survey.

(4) **Maintenance of Service Lines.** All repairs to service lines must be made by qualified personnel as outlined in Appendix A.

In the event that gas is escaping from a damaged service line, reasonable precautions shall be taken to prevent accidental ignition and to protect employees and the general public from dangers that may result from oxygen deficiency or ignition of gas.

Each service line abandoned in place must be disconnected from the source of gas as close to the main as possible and the pipe ends sealed.

Corrosion Control

(1) **Atmospheric Corrosion Control.** Each above ground pipeline or portion thereof which is exposed to the atmosphere and which carries gas under pressure must be painted, coated or jacketed with a material suitable to prevent atmospheric corrosion. This includes exposed piping at distribution regulator stations, service risers and piping at customer meter and regulator installations, exposed pressure regulators, monitor regulators, relief valves and fittings, and all other exposed gas carrying main or service line piping.

At intervals not to exceed three years, each above ground pipeline or portion thereof must be inspected for atmospheric corrosion. If atmospheric corrosion is found, proper remedial action must be taken to prevent further corrosion. During inspections special attention will be given to soil to air interface, under thermal installations, under disbanded coatings, at pipe supports, in slash zones, at deck penetrations and in spans over water. If a paint or surface coating is used, the manufacturer's instructions should be followed for proper surface preparation and applications.

(2) **External Corrosion Control, Buried Piping.** All buried gas carrying metallic piping must be effectively protected against external corrosion. Such protection may be provided by each of the following:

a. All buried metal surfaces must be coated with a factory applied or field applied coating specifically designed to prevent underground corrosion.

b. Cathodic protection must be provided by maintaining a pipe to soil potential of at least negative .85 volts and measured through a copper sulfate half-cell. Protective voltage is normally provided by means of magnesium anodes.

c. The cathodically protected section must be electrically isolated from other metallic structures above or below ground.

d. All steel line additions from bare mains shall be electrically insulated at point of connection, with test station to test both old and new sections.

e. All buried steel yard lines beyond the meter, 20 feet long or more is to be insulated at point of entry into the building.

f. Test stations shall be provided at insulators, anodes, foreign line crossings and at other locations specified by the cathodic technician.

g. Each continuous electrically bonded coated cathodically protected pipeline section over 100' in length, owned by the city, shall be assigned test station numbers and tested as set forth below and in 49 CFR Part 192.465.

Each distribution pipeline that is under cathodic protection must be tested at least once each calendar year, at intervals not to exceed 15 months. Isolated short sections of cathodically protected piping, such as on service risers, may be tested on a sampling basis if annual testing is not practical. At least 10% must be sampled each year distributed over the entire system, with a different 10% each subsequent year such that the entire system is sampled in a ten-year period.

(3) **Qualifications for Corrosion Control Personnel.** All personnel conducting electrical surveys of catholically protected facilities must be properly trained to use and maintain the instruments and to interpret the results. Corrosion Personnel must be qualified as outlined in City of Liberty Gas System Operator Qualification Plan

Proper procedures must be followed for installation of anodes and application of protective coatings.

(4) **Corrosion Control Records.** Records shall be maintained to show the locations of cathodically protected piping and facilities, and results of surveys and tests including remedial actions, for as long as each facility is in service.

Records must be in sufficient detail to demonstrate the adequacy of the corrosion control program, including control of atmospheric corrosion. However, cathodic protection records may be maintained separately from atmospheric corrosion surveillance records.

A cathodic protection installation report shall be competed in duplicate on all work involving buried steel pipe. This provides a continuing history of each cathodic protection installation.

A monthly rectifier report is to be completed each month on every rectifier. This report shall include reading of the ammeter, voltmeter and Kilowatt hour meter. These reading shall be made on approximately the same date each month. Any unusual conditions noted on the rectifier should be reported under "Remarks". The manager will record the data at the office. Data received on the monthly rectifier report shall be posted each month on the Cathodic Protection Record. The Gas Supervisor shall maintain this record for all rectifiers in his system.

Continuing Surveillance

(1) **Scope of Surveillance Program.** Each employee responsible for operation or maintenance is to remain attentive to conditions affecting the safety and reliability of the gas system and its components, and is to continually observe for such conditions during the performance of duties.

This surveillance is to include conditions surrounding or adjacent to the system which may lead to hazards.

(2) **Specific Surveillance Guidelines.** The continuing surveillance program includes, but is not limited to observation for the following conditions:

- Excavation or construction activities near buried facilities.
- Mains or service lines exposed by soil erosion.
- Evidence of leaking gas from mains or service lines.
- Permanent or mobile dwelling units or other building structures placed or constructed over buried service lines or mains.
- Damaged customer metering facilities.
- Customer metering facilities in need of barricade protection.
- Atmospheric corrosion or rust on customer meters and associated piping.
- Abnormal pressure readings on system gauges.
- Missing locks or ineffective security on bypass valves or other valves, which could cause a system malfunction if operated by, unauthorized personnel.

- Required pipeline markers missing, damaged, or severely faded.
- Rooms, garage, carport, or other structures built over a service line or main

(3) **Remedial Actions.** Any deficiencies must be acknowledged and appropriate remedial action initiated in accordance with the degree of urgency appropriate for the conditions observed.

Serious leaks or other imminent dangers must be given immediate attention, whereas atmospheric corrosion or other conditions not immediately hazardous may be scheduled for timely repair.

(4) **Surveillance Records.** Records shall be maintained of the deficiencies found and the remedial actions taken. Location, date, description, and identity of worker should be included.

Patrolling

For Distribution systems the frequency of patrolling mains must be determined by the severity of the conditions which could cause failure of leakage and the consequent hazards to public safety.

1. Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled
    a. In Business Districts, at intervals not exceeding 4 ½ months, but a least four times each calendar year
    b. Outside business districts, at intervals not exceeding 7 ½ months but a least twice each calendar year.

Line Markers

Line Markers will be placed and maintained as close as practical over each buried main at crossing of a public road, railroad, and navigable waterway, where pipelines makes abrupt turns and wherever necessary to identify the location of the distribution main to reduce the possibility of damage or interference, except those in Class 3 or Class 4 locations where covered by City of Liberty Gas System damage prevention program. Markers shall be placed as often as required where practical so that markers to the front and rear can be seen.

Line markers must be placed and maintained along each section of distribution main and transmission line that is located above ground in an area accessible to the public.

The markers will contain the words, "Warning," Caution" or "Danger" followed by the words "Natural Gas Pipeline along with the name "City of Liberty Gas System" and the phone number where the operator can be reached at all times.

Investigation of Failures

(1) **Scope of the Program.** All accidents and failures directly involving the gas system must be investigated for the purpose of determining their cause, so that appropriate actions may be taken to minimize the probability of recurrence.

(2) **Guidelines for Investigation of Failures.** All leaks in service lines or mains, over pressure conditions, system outages, or inadequate delivery pressure occurrences are considered as failures and should be investigated to determine factors which contributed to or directly caused the failure.

Leaks in polyethylene resulting from failed heat fusion or mechanical joints, or stress cracking in the pipe wall should be thoroughly investigated including laboratory analysis. if the cause of the failure is determined to be from defective material or defective workmanship a plan must be developed to locate other areas which may be affected, and to perform leakage surveys in locations within those areas where failure would present the greatest hazards. Current joining methods are to be reviewed to assure that written procedures are being followed by properly trained and qualified personnel.

Malfunctions of pressure regulating or over pressure protection devices must be investigated to determine whether the failure was caused by poor maintenance, defective material, or outside forces. If other pressure controlling devices are likely to be affected in the same manner, a program shall be implemented to check such devices on a sampling basis.

Maintenance of Mains

If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the City of Liberty shall initiate a program to recondition or phase out the segment involved.

If, at any time, a pipeline or distribution main and/or related structure is found to be damaged or deteriorated and/or leaking to the point of creating a hazardous condition, immediate measures shall be taken to eliminate the hazard. The measures shall consist of repair, replacement or abandonment of the affected facility. Repairs must be made by a trained and qualified employee as outlined in City of Liberty Gas System Operator Qualification Plan.

The three basis reasons for pipeline or main repair or replacement are:

1. Damage by outside parties
2. Leaks due to corrosion
3. Leaks due to improper construction

The following factors shall be considered in determining pipeline or main repair and/or replacement

1. Visual inspection as to severity and spread of deterioration
2. Leak history of pipeline or main
3. Active corrosion in the area
4. Class location pipeline or main is within, such as Class 1 versus Class 4
5. Proximity with other utilities that is capable of encouraging migration of gas such as sewer, telephone conduit, drainage pipe, etc.
6. Operating pressure of system

Repair of Steel piping shall be one of the following

1. Cutting out as a cylinder and replacing the piece of damaged pipe
2. Applying a full encirclement split sleeve
3. Applying a properly designed bolt-on type of leak clamp or sleeve
4. Applying a fillet-welded steel plate patch of similar material of equal or greater thickness and grade with rounded corners.

Repair of plastic pipe shall consist of cutting out as a cylinder and replacing the piece of damaged pipe.

Replacement of pipe shall be installed as outlined in Appendix A.

Tapping Under Pressure

Qualification of Personnel. Each tap made on a pipeline under pressure must be made by personnel properly trained and qualified to make hot taps. Such training shall include recognition of hazards that may result from escaping gas as well as specific knowledge of the procedures for ignition prevention and control, and protection of personnel.

Safety Precautions. All applicable safety procedures shall be followed to assure protection from injury resulting from accidental ignition or oxygen deficiency.

Regulator Inspections

(1) **Pressure Regulators.** Each pressure regulator used for pressure reduction or for pressure limiting should be inspected once each calendar year not to exceed 15 months.

The inspection will ensure that each regulator is in good working order, inlet and outlet pressure verified and recorded, controls at its set pressure, operates or strokes smoothly and shuts off within the expected and accepted limits.

A visual inspection of the orifice and seat will be made annually.

(2) **Additional Inspections.** A visual inspection shall be conducted to assure that building, fences, storm drainage and exposed piping and equipment are in acceptable condition. All exposed piping and equipment should be visually inspected for evidenced of atmospheric corrosion. An inspection or test of stop valves should be made to ensure that the valves will operate and are correctly positioned.

(3) **Relief Valves.** All regulator stations located on gas pipeline shall be provided with a sufficient number of relief valves or other protective devices to insure that the complete failure of one or more regulator stations shall not impose pressure on any part of the system beyond those which it is designed for or protected against

Each relief valve and other overprotection device will be inspected at least once each calendar year not to exceed 15 months.

The inspection shall include but is not limited to:

- Checking the set-point pressure, inspecting the relief valve
- Inspecting the relief valve, branch piping and stack to ascertain they are in good mechanical condition
- Check for evidence of tampering
- Check for signs of atmospheric corrosion.
- Ensure plugs are in the test connectors.
- Make sure the stop valve for the relief is not left in a closed position
- Discharge stacks and vents of all pressure relief devices shall be located where the gas can be discharged into the atmosphere without undue hazard.
- Discharge stacks and vents are protected with rain caps

District reliefs are to be "POP" tested annually and set to relieve:

- If the maximum allowable operating pressure is 60 psig or more, the pressure may not exceed the maximum allowable operating pressure plus 10%, or the pressure that produces hoop stress of 75 % of SMYS, whichever is lower.

- If the maximum allowable operating pressure is 12 psig or more, but less than 60 psig, the pressure may not exceed the maximum allowable operating pressure plus 6 psig.

- If the maximum allowable operating pressure is less than 12 psig, the pressure may not exceed the maximum allowable operating pressure plus 50%.

An annual "POP" test is to be made in place, if feasible, at intervals not exceeding one year, to determine that they have enough capacity to limit pressure on facilities to which they are connected.

Reliefs on commercial and industrial meter sets are to be tested annually

Each relief will be tagged, stating the test date and relief pressure. A running record of all tests will be kept on file at the local office.

Recording Pressure Gauges

The distribution system supplied by more than one district pressure regulator station will be equipped with recording pressure gauges. The charts will be changed regularly, labeled, and filed to be kept as record for at least 5 years.

Maximum Allowable Operating Pressure

The maximum allowable operating pressures (MAOP) for pipelines and pipeline facilities shall be established by using guidelines as set forth in 49 CFR 192.621

City of Liberty Gas System is responsible for insuring the maximum allowable operating pressure, which have been determined for each pipeline, are not exceeded. It shall be responsible for establishing and maintaining system MAOP records on all pipelines.

When Uprating of a system is required, an uprating plan shall be developed by City of Liberty Gas System engineering department which meets at least the minimum requirements of 49 CFR 192 Subpart K.

Emergency Valve Inspections

Designated Emergency Valves shall be inspected each calendar year not to exceed 15 months. The inspection shall include the following:

- Verify that the valve location measurements in valve book is correct
- Clean debris from the valve box to make operating the valve easier
- Verify that the type and size of the operating nut or curb valve type matches the listing can be operated with the keys and tool normally carried by gas company personnel
- Verify the valve box lid is clearly identified with he word "Gas'
- Verify the valve number identification for each valve
- Check the pipeline facilities for atmospheric corrosion
- Partially operate the valve to ensure it is operable
- Lubricate the valve if necessary.

Odorization

(1) **Odorant Requirements.** Combustible gas transported through distribution pipeline, must contain an odorant so that it is readily detectable by a person with normal sense of smell at a concentration of one-fifth its lower explosive limit in air.

The odorant used must not be harmful to the materials used in the piping system or to people, and must not produce harmful products of combustion.

(2) **Sampling for Odorant.** Natural gas is monitored for odorant as required by 49 CFR 192.625~~07 and KAR-000-022~~.

Purging

(1) **Required Purging.** Whenever a main or service line is being put into service, it is necessary for all air or other non-combustible gas to be purged from the line.

(2) **Safety Precautions.** If a polyethylene main is being purged, special precautions must be followed to prevent static electricity from discharging and igniting the escaping gas. Such precautions are described in "Prevention of Accidental Ignition Operator Qualification Task M-7."

Anytime air is being purged with gas, or gas is being purged with air, it is necessary to maintain a rapid flow rate. This will ensure turbulence at the gas/air interface, minimizing the size of the combustible mixture zone.

Care must be taken to ensure that gas is not discharged in an area in which it will accumulate and create a hazard. Potential ignition sources must be kept away.

Leakage Survey

(1) **Frequency of Surveys.** On distribution lines leakage surveys must be conducted as often as needed to discover leaks, which could result in a hazard. Leakage survey with leak detector equipment must be conducted in business districts at intervals not exceeding 15 months, but at least once each calendar year. Outside business districts intervals must have a leakage survey as frequently as necessary but at intervals not exceed 3 years.

Additional surveys are necessary to assure that leaks have not developed following earthquake, major excavation activities, blasting, washout, landslide, or ground settlement near gas pipeline facilities.

Additional survey may be required as a result of investigation of a failure as covered in "Investigation of Failures."

(2) Method of Performance of Leakage Survey.

Leakage survey may be conducted using either the surface or subsurface method.

A surface gas detection survey is a continuous sampling of the atmosphere performed using either portable or mobile equipment. Sampling is conducted at ground level for buried gas facilities and adjacent to above-ground facilities with a gas detector system capable of detecting a concentration of 50 ppm or gas in air at any sampling point.

Subsurface gas detection survey shall consist of testing bar holes with a combustible gas indicator or other instrument capable of detecting 10% or less of the lower explosive limit. The bar holes should penetrate to the depth of the main as close as practical to the main, taking care to avoid damaging the main. The sample should be drawn from near the bottom of each hole, taking care to avoid drawing water into the instrument. The instrument used should be equipped with a device to prevent liquid from being drawn.

Spacing of bar holes may be determined in accordance with the proximity to buildings and underground structures, such as sewers and manholes. In those areas where leaking gas would present the greatest hazard spacing should be closest. In all cases bar hole samples shall be taken near the service riser at the customer's meter. Areas in which service lines are near sewer lines or building foundations shall be sampled at intervals as close as necessary, but not to exceed 20 feet. Catch basins, manholes, and other underground structures near mains and service lines should be tested near the bottom.

Spacing of bar holes for surveying mains in close proximity to buildings or underground structures should be at intervals of twenty feet or less.

Sewers, catch basins, ditch lines and other low areas in the proximity of mains and services shall be tested for gas as part of any leakage

(3) **Grading Leaks.** Each leak discovered must be graded according to the following:

(a) **Grade 1 - Hazardous Leak.** Any leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until conditions are no longer hazardous. A leak which results in a measurable quantity of gas migrating into any buildings used for human occupancy, or concentration of 50% or more of the lower explosive limit in a sewer, manhole, or other underground structure is Grade 1.

(b) **Grade 2 – Non-hazardous Leak.** Any leak that is recognized as being non-hazardous at the time of detection but justifies scheduled repair based on probable future hazard.

Generally an outdoor leak in a main or service line and in which gas is not migrating into or near a building or underground structure is Grade 2. A leak that results in a slight concentration of gas migrating into a sewer, manhole or other underground structure away from any building used for human occupancy may be a Grade 2.

(c) **Grade 3 - Nuisance Leak.** Any leak that is non-hazardous at the time of detection and can be reasonably expected to remain non-hazardous (less severe than a Grade 2.) may be considered to be a Grade 3 leak.

A very small leak, such as a fitting or valve on a meter loop, where the source of the leak is apparent and predictable may be Grade 3.

(4) **Disposition of Leaks.** Any Grade 1 leak must receive immediate action to control the escape of gas or otherwise eliminate likely hazards. Normally the source of gas to the leak will have to be shut off using valves.

A Grade 2 leak may be scheduled for repair in a timely manner. Anticipated cold weather should be considered when scheduling repairs. Freezing ground surface may stop the ventilation of gas and force migration below ground. Also, interruption of service to customers presents greater hardship in cold weather.

Any Grade 2 leak not repaired within 6 months should be rechecked to assure that it has not become more hazardous.

A Grade 3 leak is not required to be repaired, but must be monitored annually to verify its classification. If the leak becomes severe enough to be classified as Grade 2, it must be scheduled for repair accordingly.

Records must be maintained of each leakage survey to document the areas surveyed and results. Survey dates, description of survey area, addresses of locations of leaks and their grades, type of instruments used, survey method, and names of survey technicians should be included.

(5) **Leak Records.** Records must be kept for all leaks reported to the company or discovered by the company or its employees. Records must be retained for at least 5 years and must contain address or location, method of detection or receipt of notice, date of detection, date of repair, follow-up surveillance dates, grade, and description of cause and method of repair for each leak.

The leak records kept should contain information consistent with the annual reporting requirement of 49 CFR 191.11.

Abandonment or Inactivation of Facilities

Each pipeline abandoned in place must be disconnected from all sources of gas and purged if the volume of gas contained is sufficient to present a hazard. The open pipe ends are to be sealed in a gas tight and water tight manner using an appropriate mechanical fitting, heat fusion, expanded foam or other effective method.

Whenever service to a customer is discontinued one or more of the following actions must be taken:

a. The valve that is closed to prevent the flow of gas to the customer must be locked or otherwise prevented from operation by unauthorized persons.

b. A mechanical device or fitting must be installed in the service line or meter assembly to prevent the flow of gas. A disc installed between the meter inlet and swivel is sufficient for this purpose.

c. The customers piping must be disconnected from the supply of gas and the open pipe ends sealed.

If a customer is permanently disconnected or is expected to be discontinued for an extended time period, the service line should be disconnected either at the main or at the entrance to the customer's property.

Records should be maintained of inactive facilities to show the locations, dates, methods of isolation from gas, and other information, which will be needed later to properly return to service.

Preventing Accidental Ignition

(1) **Scope of the Program.** Steps must be taken to minimize the probability of ignition of gas anytime gas is blowing to atmosphere, and in which ignition would present a danger to the public, personnel, or property.

(2) **Specific Precautions to Take.** Whenever a hazardous amount of gas is being discharged into open air the following precautions shall be taken:

a. Avoid discharging natural gas into a confined space.

b. If in an area where public access is likely place barricades, traffic cones, or other controlling devices with suitable warning signs to limit ingress by the public.

c. Remove all apparent sources of ignition from the area of escaping gas. Motor operated equipment, open flame, smoking tobacco, two-way radio equipment, and electric switches are all possible ignition sources.

d. Avoid wearing nylon, polyester, or other synthetic clothing while working around escaping gas. Synthetic materials are capable of producing static electricity, particularly when the humidity is low.

e. Test for presence of combustible gas in excavations before entering. Avoid entering if combustible gas is present at a concentration of greater than 20% of the lower explosive limit. Use mechanical blowers if necessary to maintain less than 20% L.E.L. when working in excavation.

f. Do not perform cutting, welding, heat fusion or other mechanical operations on mains containing gas-air mixtures. Mains must contain 100% gas or 100% air (or inert gas) when construction or maintenance work is performed.

g. Whenever separating metallic pipe, such as at a customer's meter loop, place an electrical bond wire around the area of separation to maintain electrical continuity and eliminate sparking.

h. Whenever gas is discharging from plastic pipe special precautions shall be taken to prevent static discharge and spontaneous ignition.

(3) **Special Precautions for Polyethylene Pipe.** Gas flowing at high velocity through polyethylene pipe may create a static electric charge on the wall of the pipe and on any particles of foreign material carried in the gas stream. This can cause ignition of the flowing gas to occur spontaneously. There are certain precautions that can be taken to minimize this probability of occurrence.

a. When a plastic main or service line is punctured and must be squeezed to stop the flow of gas the squeezing should be done from a second hole a safe distance from the escaping gas.

b. Wet cloth, cotton, canvas, burlap, or other natural fabric should be wrapped around the damaged or open pipe near the point of discharge. The wet fabric must contact the ground, and the ground must be damp or wet. Liquid detergent should be mixed with the water used to wet the rags.

c. A metal pipe should be used as the final discharge stack for purging or otherwise blowing gas to atmosphere. The metal pipe must be electrically grounded using a stranded copper wire and ground rod. The polyethylene pipe exposed proceeding the transition to the metal pipe should be wrapped with wet fabric as stated in (b).

Employee Protection

The City of Liberty will take adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and, making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line

APPENDIX A - CONSTRUCTION AND REPAIR

All construction and repair of gas carrying facilities in the gas distribution system must comply with the requirements of 49 CFR part 192. This appendix contains a summary of construction and maintenance requirements for polyethylene systems that will help to ensure compliance with these regulations.

I. Qualification of Materials

All pipe, fittings, valves, and other components which carry gas under pressure must be chemically compatible with the gas being transported and must be designed to withstand the stresses which result from the intended operation.

All plastic pipe which carries gas must be polyethylene and must be manufactured in accordance with specification ASTM D2513. Pipe qualified under this specification must be marked at intervals of two feet (or less) showing ASTM D2513, brand name, material grade, nominal size, wall thickness or SDR, and other batch identification. Polyethylene grades, PE 2406, and PE 3408 all are acceptable grades. The grade designation will normally be followed by a three-letter suffix that indicates an elevated temperature, its corresponding strength, and the melt index for the material.

Minimum wall thickness should correspond with the following table for polyethylene pipe: (all dimensions in inches)

1/2" CTS (.625 O.D.)	.090 (SDR 7)
1/2" IPS (.840 O.D.)	.090 (SDR 9.3)
3/4" IPS (1.050 O.D.)	.095 (SDR 11)
1" CTS (1.125 O.D.)	.099 (SDR 11.5)
1 1/4" IPS (1.660 O.D.)	.166 (SDR 10)
2" IPS (2.375 O.D.)	.216 (SDR 11)

Each heat fusion fitting for polyethylene must be made of a grade of polyethylene compatible with the pipe used. A qualified written procedure must be available for joining the fitting to the pipe.

Each plastic mechanical fitting used to join polyethylene pipe to polyethylene pipe must be made of a grade of a plastic material compatible with the gas being transported. An internal stiffener must be used to reinforce each pipe end, and must be the proper diameter for the size and wall thickness of the pipe. Gasket or compression ring material must be suitable for use with the natural gas.

Metal-bodied fittings are not desirable for joining polyethylene to

polyethylene pipe below ground due to the need for cathodic protection and corrosion control surveillance.

Metal bodied transition fittings may be used to join polyethylene pipe to cathodically protected steel pipe below ground, or to steel pipe above ground. Each fitting must have a properly designed stiffener and gasket or compression ring material must be suitable for use with natural gas.

Qualified written procedures must be available for all mechanical fittings used with polyethylene pipe.

All steel pipe used at meter loops must be of a listed API or ASTM specification and must be schedule 40 or heavier wall thickness.

All fittings used at meter loops must be marked to show brand name or trademark and must be malleable iron or steel. Fittings must be designed for at least 150 PSIG working pressure and be of standard dimensions.

Meter valves must be tamper proof, such that the core is not easily removed with ordinary hand tools. Marking must include brand or trade name, pressure rating, "G" or other designation for gas, and "T" or other designation for tamper proof construction.

II. Qualification of Personnel

All personnel engaged in the construction and repair of mains and service lines must be qualified as outlined in the City of Liberty's Operator Qualification Plan.

Each person making a joint on polyethylene pipe, whether polyethylene to polyethylene or polyethylene to steel, must be certified in the use of the qualified written procedure for the joint being made. All provisions of 49 CFR 192.285 will be followed.

III. Planning Construction of Mains

Prior to start of construction a comprehensive plan should be made. Limits of public right-of-way or easements and locations of other utilities, which may affect the proposed construction, need to be determined. The location selected for the proposed main must take interference with other utilities and other conflicts into consideration. Affected property owners and other utilities should be advised of proposed construction. Application should be made for state and local permits when required.

The proposed main shall be designed of proper size to supply present and anticipated future demand. The maximum allowable operating pressure for polyethylene mains carrying natural gas may not exceed 60 PS1G.

IV. Installation of Mains

Distribution gas mains must be installed with 24-inch minimum cover. Where an underground structure prevents having 24 inch cover other precautions must be taken to protect the main against damage from anticipated external load or dig-in. Where feasible, a minimum of 12 inches shall be maintained between a main and other underground structure or pipeline.

Polyethylene mains may not be installed above ground unless fully encased in a steel pipe.

Polyethylene mains must be installed resting on well-compacted soil free of foreign objects or sharp rocks that may gouge or puncture the wall of the pipe. Backfill material must be free of sharp rocks or other material that may damage the pipe. If necessary sand backfill shall be compacted 6" minimum in each direction above, below, and beside the pipe to provide a cushion against damaging materials.

Polyethylene pipe must be transported and handled with care to avoid damage. Each section of pipe shall be visually inspected before being lowered into the trench. Any cuts or gouges that are 10% or more of the wall thickness in depth shall be repaired by removal of a section of pipe containing the damage.

Polyethylene pipe must not be stored for extended periods in direct sunlight. The pipe manufacturers' guidelines should be followed.

A tracer wire must be installed with polyethylene pipe. Solid or stranded copper wire, number 12 AWG or larger, insulated with plastic or rubber is recommended. The tracer wire should be electrically continuous with the tracer wire for each service line to provide accessibility for line locating. To the extent practical, physical contact between the tracer wire and main should be avoided to minimize potential damage from lightning.

As additional protection against third-party damage, installation of warning tape approximately 12 inches below the surface and directly above ground is recommended.

V. Inspection of Mains

Each main installed must be inspected by a properly trained and qualified person prior to being put into operation. This inspection is to ensure proper installation and joining and shall include the following:

a. Credentials of each person making joints in polyethylene pipe must be verified to be current for the procedures being performed.

b. All joints must be visually inspected for compliance with qualified written installation

c. The condition of the bottom of the ditch shall be checked to assure the pipe is resting on smooth and well-compacted soil, free of materials which may damage the pipe.

d. The tracer wire must be examined to ensure continuity and accessibility after backfill.

e. Depth of burial shall be checked.

f. Surface of pipe shall be visually inspected for damage. Any pipe containing cuts or scratches penetrating 10% or more into the pipe wall must be cut out and replaced.

g. Marking on pipe and fittings must be checked to verify compliance with material specifications.

h. Backfill material must be checked for metal, sharp rocks, building scraps, or other materials that may damage the pipe surface.

VI. Testing Mains

Each main or section of polyethylene main must be tested to at least 150% of the maximum operating pressure, but not less than 50 P51G. before being placed into operation. Air, carbon dioxide, or nitrogen are acceptable test mediums. The test must be left on long enough to discover any potentially hazardous leaks. The final tie-in to an existing main may be leak tested at operating pressure with gas.

Any leaks discovered must be repaired.

VII. Main Records

Records must be retained for the useful life of each main to include at least the following:

a. The name of the company operating the main.

b. Test results including pressure, duration and medium used.

c. Leaks or failures discovered during test and remedial action taken.

d. Size, wall thickness, material designation, brand

e. Location of main and depth of burial.

f. Date of installation.

g. Name of contractor used for installation and testing.

h. Name of employee inspecting or supervising installation.

i. Any other information deemed appropriate.

VIII. Service Line Installations

Service lines must be installed with a minimum of 18 inches cover in public right-of-way and 12 inches cover in private property.

Polyethylene service lines must be installed on well-compacted soil free of foreign material or sharp rocks that may gouge or damage the wall of the pipe. Backfill material must be free of sharp rocks or other material that may damage the wall of the pipe. If necessary, sand backfill shall be compacted in each direction above, below, and beside the service line for protection.

Polyethylene pipe must be handled and transported with care to avoid damage. Each section shall be inspected before installation for evidence of deep scratches, cuts, or gouges which penetrate 10% or more of the wall thickness. Damaged pipe shall not be installed.

Polyethylene service pipe shall not be stored or exposed to direct sunlight for extended time periods.

A tracer wire must be installed with polyethylene service lines. Solid or stranded copper wire, number 12 AWG or larger, rubber or plastic insulated may be used. The tracer wire should be electrically connected with the tracer wire at the main, and should be brought above ground at the meter riser. Physical contact between the tracer wire and the service line should be avoided to minimize potential damage from lightning.

Connection to the main may be made using approved mechanical fittings or heat fusion fittings. A person certified to be qualified in the use of the procedure must follow qualified written procedures.

Polyethylene pipe must be shielded from exposure to sunlight or physical force when brought above ground. Anodeless risers or service head adaptors that encase the polyethylene pipe to an above ground transition may be used at meters.

Underground connections between service lines and mains or other fittings may be protected against shearing force from ground settlement with a sleeve of larger rigid plastic pipe. This sleeve may be any commercial grade of plastic.

Meter locations, meter supports, barricading. pressure testing, and record-keeping shall be in accordance with information included in "Customer Meters and Regulators" and "Service Lines."

IX. Repairs to Mains and Service Lines

All repairs to polyethylene mains and service shall be made by removal and replacement of the damaged pipe. As with initial installation only approved mechanical or heat fusion fittings may be used by qualified personnel in accordance with qualified written procedures.

All applicable precautions shall be taken to ensure safety to the public and personnel.

SERVICES AGREEMENT (INDEPENDENT CONTRACTOR)

This Services Agreement ("Agreement"), effective June 3, 2016, is between Liberty Gas Company, ("Client") and Heath Consultants Incorporated ("Contractor").

SECTION ONE-SCOPE OF WORK:

The work to be performed by Contractor will be set forth in Exhibit A, Scope of Work.

SECTION TWO-PRICE/PAYMENT:

Client will pay Contractor for work performed as set forth in Exhibit B, Price Schedule. Heath Consultants Incorporated reserves the right to invoice the client for additional items required, but not disclosed in the RFP/Quote process as an additional pass through cost to the client as agreed to by both parties. Terms are Net 30 days.

SECTION THREE-RELATIONSHIP OF PARTIES:

The parties intend that an independent contractor relationship will be created by this Agreement. Performance and control of the work will lie solely with Contractor. The Contractor is not to be considered an agent or employee of Client for any purpose.

SECTION FOUR-CONTRACTOR'S EMPLOYEES QUALIFIED TO PERFORM THE WORK REQUIRED UNDER THIS AGREEMENT UNDER SUBPART N OF SECTION 192 OF THE FEDERAL PIPELINE SAFETY REGULATIONS/WARRANTIES

Contractor warrants and represents that it has an Operator Qualification Program as required by Subpart N of Section 192 of the Federal Pipeline Safety Regulations and that the employees who will perform the Work required under this Agreement have been evaluated and are qualified to perform the tasks required under this Agreement.

SECTION FIVE-INSURANCE TO BE SECURED:

Contractor agrees to maintain such insurance acceptable to Client as set forth on Exhibit C, Insurance Requirements.

SECTION SIX-INDEMNIFICATION

Contractor shall indemnify and hold Client and its agents, employees, partners, parents, subsidiaries, insurers and affiliates harmless from any losses, costs, claims (including claims of Contractor's employees), expenses (including attorneys' fees and court costs), suits, actions, judgments, fines, penalties or damages of every nature and description (collectively "losses") arising out of or resulting from the Contractor's Work under this Agreement, except that Contractor's obligation to indemnify Client shall not apply to any losses or liabilities arising from Client's sole negligence, or that portion of any liabilities that arise out of Client's contributing negligent acts or negligent omissions.

Client shall indemnify and hold Contractor and its agents, employees, partners, parents, subsidiaries, insurers and affiliates harmless from any losses, costs, claims (including claims of

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Client's employees). expenses (including attorneys' fees and court costs), suits, actions, judgments, fines, penalties or damages of every nature and description (collectively "losses") arising out of or alleged to arise out of the action or inaction of Client in connection with the Work under this Agreement except that Client's obligation to indemnify Contractor shall not apply to any losses or liabilities arising from Contractor's sole negligence. or that portion of any liabilities that arise out of Contractor's contributing negligent acts or negligent omissions.

This indemnification obligation shall survive the expiration or termination of the Agreement.

This indemnification obligation shall extend to all costs, expenses and damages arising from any infringement, misappropriation or claim of infringement or misappropriation of any process. product, apparatus or combination patent resulting from the use of any designs or other information furnished by the other party and incorporated in the Work or Ancillary Work.

SECTION SEVEN-COMPLIANCE WITH LAW AND SAFETY REQUIREMENTS:

All Work will be performed in accordance with the Federal Pipeline Safety Regulations. NFPA 58 and all applicable propane and pipeline industry safety practices and standards. and in accordance with federal. state and local statutes. rules regulations and ordinances.

SECTION EIGHT-DURATION/RENEWAL/CANCELLATION:

This Agreement expires December 31. 2016. Under this agreement, Client will have the option to renew the Agreement on a year-to-year basis by completing and returning the Option to Renew attached hereto. Client or Contractor may cancel the Agreement upon one (1) week's advance notice. In the event this Agreement is terminated under the foregoing provision, Client shall pay Contractor any amounts due for Work performed by Contractor and/or materials or supplies ordered prior to the date that the termination notice is provided to the non-terminating party.

SECTION NINE-CONFIDENTIALITY:

Contractor will not disclose to third parties any information concerning its work for Client, including. but not limited to, confidential or trade secret information or information regarding Client's customers or potential customers. business and marketing plans, customer lists, credit information, gas usage patterns, pricing and marketing policies and practices. financial information and other operating policies and procedures. Contractor understands that if it violates this Agreement. Client will suffer irreparable harm. Therefore, in addition to any other remedies available to it. Client will be entitled to seek and obtain injunctive or equitable relief. including orders prohibiting violations of this Agreement.

Client will not disclose to third parties any information concerning its work with Contractor. including, but not limited to. confidential or trade secret information or information. business and marketing plans. customer lists. credit information. pricing and marketing policies and practices. financial information and other operating policies and procedures. Client understands that if it violates this Agreement. Contractor will suffer irreparable harm. Therefore, in addition to any other remedies available to it. Contractor will be entitled to seek and obtain injunctive or equitable relief. including orders prohibiting violations of this agreement.

SECTION TEN-MISCELLANEOUS:

(a) Waiver. Neither the failure nor any delay on the part of either party to exercise any right, remedy, power or privilege under this Agreement shall operate as a waiver thereof, nor shall any single or partial exercise of any right, remedy, power or privilege preclude any other or further exercise of the same or of any other right, remedy, power or privilege, nor shall any waiver of any right, remedy, power or privilege with respect to any occurrence be construed as a waiver of such right, remedy, power or privilege with respect to any other occurrence. No waiver shall be effective unless it is in writing and is signed by the party asserted to have granted such waiver.

(b) Binding Nature of Agreement. This Agreement shall be binding upon and inure to the benefit of Client and its successors and assigns and shall be binding upon and inure to the benefit of Contractor, its successors and assigns.

(c) Provisions Separable. The provisions of this Agreement are independent of and separable from each other, and no provision shall be affected or rendered invalid or unenforceable by virtue of the fact that for any reason any other or others of them may be invalid or unenforceable in whole or in part.

(d) Entire Agreement. This Agreement contains the entire understanding among the parties hereto with respect to the subject matter hereof, and supersedes all prior and contemporaneous agreements and understandings, inducements or conditions, express or implied, oral or written, except as herein contained. The express terms hereof control and supersede any course of performance and/or usage of the trade inconsistent with any of the terms hereof. This Agreement may not be modified or amended other than by an agreement in writing.

(e) Paragraph Headings. The paragraph headings in this Agreement are for convenience only; they form no part of this Agreement and shall not affect its interpretation.

(f) Gender, Etc. Words used herein, regardless of the number and gender specifically used, shall be deemed and construed to include any other number, singular or plural, and any other gender, masculine, feminine or neuter, as the context indicates is appropriate.

(g) Number of Days. In computing the number of days for purposes of this Agreement, all days shall be counted, including Saturdays, Sundays and holidays; provided, however, that if the final day of any time period falls on a Saturday, Sunday or holiday on which federal banks are or may elect to be closed, then the final day shall be deemed to be the next day which is not a Saturday, Sunday or holiday.

(h) This Agreement may be executed in multiple counterparts, each of which shall be deemed an original for all purposes and all of which shall be deemed collectively to be one agreement. The parties agree that execution of this Agreement by a

party and the delivery of such party's signature by mail, facsimile transmission, or electronic (e-mail) transmission shall be fully effective as the original signature of such party to the fullest extent as if it were the original copy thereof.

(i) This Agreement shall be governed and interpreted in accordance with the laws of the State of Texas. Venue of any dispute shall lie in Harris County, Texas.

SECTION ELEVEN-FORCE MAJEURE

Neither party hereto shall be liable for any failure to perform the terms of this Agreement when such a failure is due to "force majeure" as hereinafter defined. The term "force majeure" as used in this Agreement shall mean any delay or default in performance due to any cause beyond the control of the party claiming force majeure and without such party's fault or negligence, including but not restricted to acts of God or the public, civil disturbances, arrests and restraints by rulers and people; acts of the public enemy, wars, riots, insurrections, sabotage; acts, requests or interruptions of the federal, state or local government or any agency thereof; court orders, present and future valid orders of any governmental authority, or nay officer, agency or any instrumentality thereof; floods, fires, storms, epidemics, landslides, lightning, earthquakes, washouts, explosions, quarantine, strikes, lockouts, or industrial disturbances; interruption of transportation, freight embargos or delays in delivery of equipment or service necessary to the performance of any provision of this Agreement; inability to secure right of way, labor shortages, breakage or accident to machinery or lines of pipe, or any other cause, whether of the kind herein enumerated or otherwise, not reasonable within the control of the party claiming force majeure. Nothing contained in this section, however, shall be construed to require either party to settle a labor dispute against its will.

If as a result of force majeure wither party is unable, wholly or in part, to carryout its obligation under this Agreement, other than the obligation to make payment of money due, then, upon such party's giving notice and a description of such cause in writing to the other party as soon as possible after the occurrence of the cause, the obligation of the party giving such notice, so far as it is affected by the cause specified in such notice, shall be suspended for the duration of the cause. Such cause shall, as far as possible, be remedied with all reasonable dispatch.

SECTION TWELVE--NOTICES

All notices, except verbal or email notices with respect to minor questions, shall be in writing and shall be delivered by United States first class mail, postage prepaid, personal delivery, facsimile (with printed confirmation), electronic transmission (e-mail) or nationally recognized overnight carrier to the appropriate party using the following respective addresses:

For Client: Liberty Gas Company
Bridgett Blake
P.O. Box 127
Liberty, KY 42539
Phone: 606-787-9973
Email: LIBERTYBB@WINDSTREAM.NET

For Contractor: Heath Consultants Incorporated
9030 Monroe Road
Houston, Texas 77061
Attention: Gary Lape, Vice President-Operations
Phone: 713-844-1303
Email: contractsadmin@heathus.com

All notices shall be effective on the party addressee from the time received by such party.

IN WITNESS WHEREOF, the parties have executed this Agreement on the day and year shown beneath their signatures.

HEATH CONSULTANTS INCORPORATED

WITNESS: _____

By: _____

Name: Gary Lape (Print)

Title: VP Operations (Print)
Thereunto duly authorized

Date: 6-22-16

LIBERTY GAS COMPANY

WITNESS: Bridgett Blake

By: _____

Name: Steven Brown (Print)

Title: Mayor (Print)
Thereunto duly authorized

Date: 06/13/16

PLEASE RETURN EXECUTED CONTRACT TO: *contractsadmin@heathus.com*

-OR-

by mail to Contracts Administrator, Heath Consultants Incorporated, 9030 Monroe Rd., Houston, TX 77061

Option to Renew

Client hereby exercises its option to renew its Independent Contractor Agreement between itself and _____. Dated _____. for one (1) year ending on _____.

HEATH CONSULTANTS INCORPORATED

BY:

WITNESS:_____ _____

_____
Signature

Name: _____(Print)

Title: _____(Print)
Thereunto duly authorized

Date: _____

LIBERTY GAS COMPANY

BY:

WITNESS: Barbara Blake _____

_____
Signature

Name: Steven Brown (Print)

Title: Mayor (Print)
Thereunto duly authorized

Date: 06/13/16

PLEASE RETURN EXECUTED CONTRACT TO: [illegible]

-OR-

by mail to Contracts Administrator, Heath Consultants Incorporated, 9030 Monroe Rd., Houston, TX 77061

EXHIBIT A

SCOPE OF WORK

Leak Survey of Facilities, to include leakage inspection and leakage classification. The inspection will be performed with the use of a DP-IR™, or an RMLD-IS®. All leaks are classified with the use of a Combustible Gas Indicator to GPTC Standards. All leakage and Abnormal Operating Conditions will be documented and reported to the client on Heath forms.

Heath Consultants Incorporated will provide one fully trained and Operator Qualified Technician, along with transportation and all equipment required to perform the Leak Survey, including but not limited to; Heath Consultants Incorporated DP-IR™, RMLD-IS®, Combustible Gas Indicator, and Plunger Bar.

EXHIBIT B

PRICE SCHEDULE

The price for this service will be **$75 per hour per Technician** and **$75 per hour** for drive time to and from the project (portal to portal). This price is inclusive of all technician, equipment, vehicle and administrative costs.

See attached Proposal Letter

EXHIBIT C

INSURANCE REQUIREMENTS

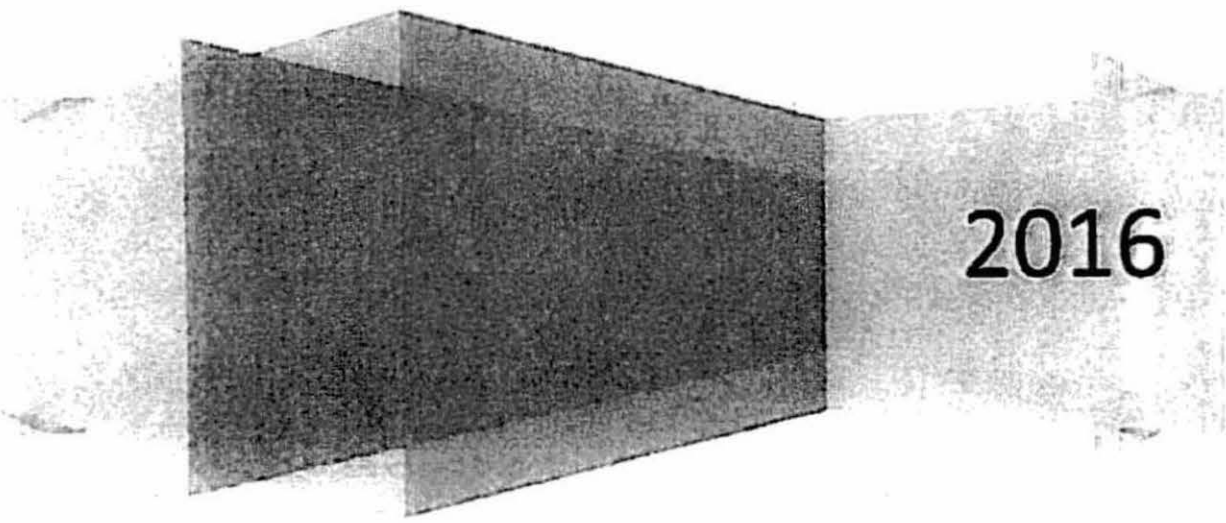
PLEASE SEE ATTACHED HEATH STANDARD CERTIFICATES.

Leak Survey Report

CITY OF LIBERTY GAS DEPARTMENT

LIBERTY, KY.

Heath Consultants



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HEATH CONSULTANTS

Heath Consultants, Incorporated

1645 Murfreesboro Rd. Suite E.
Nashville, Tennessee 37217
Office: 615.361.8306

8-5-16

Bridgett Blake
City of Liberty Gas Dept.
P.O. Box 127
Liberty, KY. 42539

Ms. Blake,

This is your final report of the results obtained during the recently completed gas leakage control survey.

The summary page following will give you further details concerning your survey. Should you have any questions or comments regarding the survey or this report, please contact us @ 615.361.8306.

We appreciate this opportunity to be of service to you and look forward to serving you again in the near future.

Sincerely,

William Luttrell

William Luttrell
w.luttrell@heathus.com
Director of Services, Southeast U.S.
Heath Consultants Incorporated

HEATH CONSULTANTS

SUMMARY OF Gas Leak Survey

LEAKAGE CONTROL SURVEY

Liberty Gas Department	Liberty, KY.	40
Client	City and State	District or Division

Conducted by our Consultant(s) Nathan Miller

Date Start 7/19/2016 Date Completed 7/21/2016 Total Day 3

Number of Days 3

Miles of Main Surveyed 27.6

Number of Leak Indications 2

Under Ground Classification*		
GR-1	GR-2	GR-3
0	2	0

Above Ground Classification*		
GR-1	GR-2	GR-3
0	0	0

Key Map Symbols
x Indicates Leak Indication
/// Estimated Area Affected
Δ Catch Basin
' Tree
[] House & Building
—Indicates the Main
____Represents curbe line or edge of road unless designated as property line.

Leak Indication Classification*
Grade 1- Schedule for Immediate Repair
Grade 2- Schedule for Repair after Grade 1 Indications are completed. Recheck mandatory if leak cannot be repaired within six months or before frost.
Grade 3- Repair as work scheduled permit if Indications cannot be repaired within one year, Indication should be checked.

Special Cases

Contact HEATH CONSULTANTS INCORPORATED for further information regarding any Special Cases such as analysis, sample collecting, investigation, verification, survery recheck, etc. Our Consultant will be available on 24-hour notice to assist you.

*Leak indication is not an exact science in spite of use of the most modern instruments plus complete training and experience by the Consultant it is impossible to determine the exact condition of underground piping and equipment without actually exposing same. In view of this limitation our Consultant is intended as an aid in scheduling repairs based upon the information available, the Consultants judgment and and site conditions at the time the report is prepared. Variable factors beyond our control may alter this Classification at any time. Main and servide line leak indications are classified individually. Classifications for buildings where leakage is found refer to the situation as it applies to the entire building. Individual building leaks are not classified.

CONSULTANT'S WEEKLY RESUME

ORDER NO.: _____

CLIENT: City of Liberty

WEEK ENDING: 07/23/16

LOCATION: Liberty, KY

DAYS TO COMPLETE SURVEY: 3

				UNDERGROUND LEAKS				ABOVE GROUND LEAKS								BILLABLE HOURS
Date	Town	Miles	Services	1 or C	2 or B	3 or A	Reports	Buildings	Negative	Positive	1 or C	2 or B	3 or A	Leaks	Reports	
7/17																
7/18																
7/19	Liberty, KY	9.2														8
7/20	Liberty, KY	9.2														8
7/21	Liberty, KY	9.2			2		2									8
7/22																
7/23																
	TOTAL FOR WEEK	27.6	0	0	2	0	2	0	0	0	0	0	0	0	0	24
	TOTAL THRU LAST WEEK	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOTAL TO DATE	27.6	0	0	2	0	2	0	0	0	0	0	0	0	0	24

Day		DPIR PPM	DPIR Alarm	Passed Test?	RMLD PPM-M	RMLD Alarm	Passed Test?	OMD PPM	OMD Alarm	Passed Test?
Sunday										
Monday										
Tuesday		134	5	Y						
Wednesday		138	5	Y						
Thursday		135	5	Y						
Friday										
Saturday										

Calibration Verified: (delete one Yes or No) S/N

RMLD _____

DPIR _____

OMD _____

Consultant

Leakage Control Report

Field Survey

HEATH CONSULTANTS

9030 Monroe Rd

Houston, TX 77061

Address 49 Scanlon Dr

City/County Liberty State KY

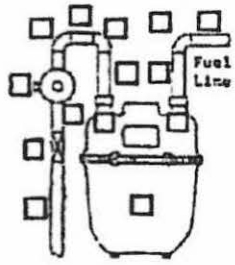
Leak Survey Area Business

Page Number

Field Case Number 2016-001

GRADE OF CASE

GRADE 1 [ ]
GRADE 2 [X]
GRADE 3 [ ]



LEAK DATA

DETECTED BY		COLLECTING		SOURCE		ASSET NUMBER	SOIL		PRESSURE		SURFACE		PIPE & SIZE	
OHD		In Building		Main			Rock		Low		Soil		Steel	
DPIR	X	Near Bldg		Service			Cinders		I.P.	X	Gravel	X	Plastic	
Visual/Vegetation		In Man Hole		Service Tap			Clay		High		Paved		Cast Iron	
Combustible Meter		In Soil	X	Valve			Loam				Other		Ductile	
Odor		In Air		Meter Set			Sand						Other	
Other		Other		Regulator			Other	X					Sleeved	
RMLD				Other										

Remarks: 50% gas detected in gravel lot 6 ft from EOP. Leak appears to be at tap tee.

AREA LOCATION: Commercial [ ] Industrial [ ] Other Non-Residential [X] Residential [ ]

TECHNICIAN Nathan R Miller (Heath Consultants) DATE 7-21-16

(to be completed by qualified field personnel)

LEAK CAUSE		COMPONENT AND EXPLANATION			PART OF SYSTEM		PIPE & SIZE		REPAIR DATA	
Corrosion		Pipe			Main		Steel		Number of Leaks	
Natural Forces		Valve			Service		Cast Iron		Bare	
Material & Welds		Mechanical Fitting			Meter Set		Ductile Iron		Coated	
Excavation		Cap			Customer Pipe		Copper		Date Repaired	
Other Outside Force		Electrofusion			Other		Plastic		Date Rechecked	
Equipment		Tap					Other		Positive [ ]	Negative [ ]
Operations		Other								
Other										

Remarks

Asset # _____

TECHNICIAN _____ DATE _____

Leakage Control Report

Field Survey

HEATH CONSULTANTS
9030 Monroe Rd
Houston, TX 77061

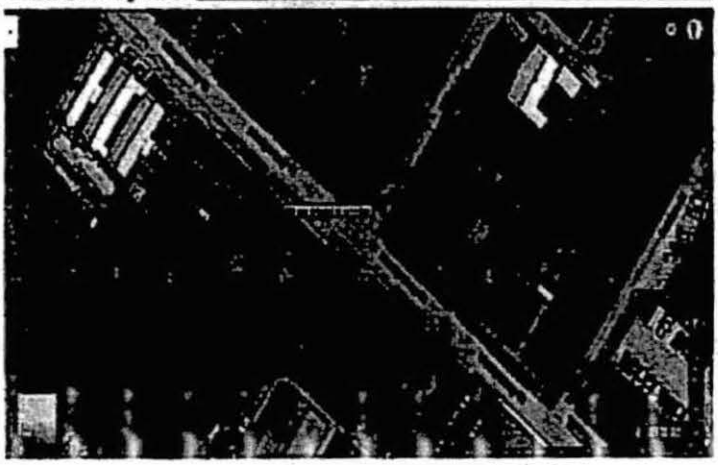
Address Montgomery St @ Whipp Ave

City/County Liberty State KY

Leak Survey Area Residential

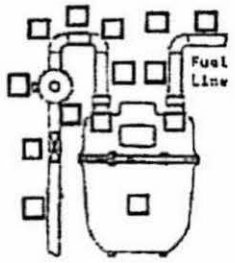
Page Number

Field Case Number 2016-002



GRADE OF CASE

GRADE 1 ☐
GRADE 2 ☒
GRADE 3 ☐



LEAK DATA

DETECTED BY		COLLECTING		SOURCE		ASSET NUMBER	SOIL		PRESSURE		SURFACE		PIPE & SIZE	
OHD	☐	In Building	☐	Main	☐		Rock	☐	Low	☐	Soil	☐	Steel	☐
DPIR	☒	Near Bldg	☐	Service	☐		Cinders	☐	I.P.	☒	Gravel	☐	Plastic	☐
Visual/Vegetation	☐	In Man Hole	☐	Service Tap	☐		Clay	☐	High	☐	Paved	☒	Cast Iron	☐
Combustible Meter	☐	In Soil	☐	Valve	☐		Loam	☐			Other	☐	Ductile	☐
Odor	☐	In Air	☐	Meter Set	☐		Sand	☐					Other	☐
Other	☐	Other	☒	Regulator	☐		Other	☒					Sleeved	☐ ☐
RMLD	☐		☐	Other	☐			☐						☐

Remarks: 20% gas detected in valve box

AREA LOCATION: Commercial ☐ Industrial ☐ Other Non-Residential ☐ Residential ☒

TECHNICIAN Nathan R Miller (Heath Consultants) DATE 7-21-16

to be completed by qualified field personnel

LEAK CAUSE		COMPONENT AND EXPLANATION			PART OF SYSTEM		PIPE & SIZE		REPAIR DATA	
Corrosion	☐	Pipe	☐		Main	☐	Steel	☐	Number of Leaks	
Natural Forces	☐	Valve	☐		Service	☐	Cast Iron	☐	Bare	
Material & Welds	☐	Mechanical Fitting	☐		Meter Set	☐	Ductile Iron	☐	Coated	
Excavation	☐	Cap	☐		Customer Pipe	☐	Copper	☐	Date Repaired	
Other Outside Force	☐	Electrofusion	☐		Other	☐	Plastic	☐	Date Rechecked	
Equipment	☐	Tap	☐				Other	☐	Positive ☐ Negative ☐	
Operations	☐	Other	☐							
Other	☐									

Remarks

Asset # _____

TECHNICIAN _____ DATE _____

On Friday, December 9, 2016 12:44 PM, Todd Kelley <t.kelley@heathus.com> wrote:

I'm sorry Ms. Blake I missed your original email. Thank you for the follow up. This should be easy as we have an opinion to renew in our contract. Attached is the fully executed contract, on page 6 you have already signed. I'll send this to our contract depart and let them know you would like to have this option to renew executed. When it comes time for your survey next please reach out to me and we can get your survey scheduled.

Thank you
Todd

From: bridgett blake [mailto:bnblake80@yahoo.com]
Sent: Friday, December 9, 2016 9:34 AM
To: Todd Kelley <t.kelley@heathus.com>
Subject: Fw: City of Liberty

CAUTION - THIS IS AN EXTERNAL E-MAIL. Do not open attachments or click links from unknown sources or unexpected e-mail.
Just wondering if you've had a chance to check into my previous email? I have to respond to the Public Service Commission by next week about contracting future leakage surveys, and we'd prefer to use Heath again. Is that something that is a possibility with Heath Consultants?

Thanks,
Bridgett Blake
City of Liberty

EXHIBIT
4

SERVICES AGREEMENT (INDEPENDENT CONTRACTOR)

This Services Agreement ("Agreement"), effective June 3, 2016, is between Liberty Gas Company, ("Client") and Heath Consultants Incorporated ("Contractor").

SECTION ONE-SCOPE OF WORK:

The work to be performed by Contractor will be set forth in Exhibit A, Scope of Work,

SECTION TWO-PRICE/PAYMENT:

Client will pay Contractor for work performed as set forth in Exhibit B, Price Schedule. Heath Consultants Incorporated reserves the right to invoice the client for additional items required, but not disclosed in the RFP/Quote process as an additional pass through cost to the client as agreed to by both parties. Terms are Net 30 days.

SECTION THREE-RELATIONSHIP OF PARTIES:

The parties intend that an independent contractor relationship will be created by this Agreement. Performance and control of the work will lie solely with Contractor. The Contractor is not to be considered an agent or employee of Client for any purpose.

SECTION FOUR-CONTRACTOR'S EMPLOYEES QUALIFIED TO PERFORM THE WORK REQUIRED UNDER THIS AGREEMENT UNDER SUBPART N OF SECTION 192 OF THE FEDERAL PIPELINE SAFETY REGULATIONS/WARRANTIES

Contractor warrants and represents that it has an Operator Qualification Program as required by Subpart N of Section 192 of the Federal Pipeline Safety Regulations and that the employees who will perform the Work required under this Agreement have been evaluated and are qualified to perform the tasks required under this Agreement.

SECTION FIVE-INSURANCE TO BE SECURED:

Contractor agrees to maintain such insurance acceptable to Client as set forth on Exhibit C, Insurance Requirements.

SECTION SIX-INDEMNIFICATION

Contractor shall indemnify and hold Client and its agents, employees, partners, parents, subsidiaries, insurers and affiliates harmless from any losses, costs, claims (including claims of Contractor's employees), expenses (including attorneys' fees and court costs), suits, actions, judgments, fines, penalties or damages of every nature and description (collectively "losses") arising out of or resulting from the Contractor's Work under this Agreement, except that Contractor's obligation to indemnify Client shall not apply to any losses or liabilities arising from Client's sole negligence, or that portion of any liabilities that arise out of Client's contributing negligent acts or negligent omissions.

Client shall indemnify and hold Contractor and its agents, employees, partners, parents, subsidiaries, insurers and affiliates harmless from any losses, costs, claims (including claims of

Client's employees), expenses (including attorneys' fees and court costs), suits, actions, judgments, fines, penalties or damages of every nature and description (collectively "losses") arising out of or alleged to arise out of the action or inaction of Client in connection with the Work under this Agreement except that Client's obligation to indemnify Contractor shall not apply to any losses or liabilities arising from Contractor's sole negligence, or that portion of any liabilities that arise out of Contractor's contributing negligent acts or negligent omissions.

This indemnification obligation shall survive the expiration or termination of the Agreement.

This indemnification obligation shall extend to all costs, expenses and damages arising from any infringement, misappropriation or claim of infringement or misappropriation of any process, product, apparatus or combination patent resulting from the use of any designs or other information furnished by the other party and incorporated in the Work or Ancillary Work.

SECTION SEVEN-COMPLIANCE WITH LAW AND SAFETY REQUIREMENTS:

All Work will be performed in accordance with the Federal Pipeline Safety Regulations, NFPA 58 and all applicable propane and pipeline industry safety practices and standards, and in accordance with federal, state and local statutes, rules regulations and ordinances.

SECTION EIGHT-DURATION/RENEWAL/CANCELLATION:

This Agreement expires December 31, 2016. Under this agreement, Client will have the option to renew the Agreement on a year-to-year basis by completing and returning the Option to Renew attached hereto. Client or Contractor may cancel the Agreement upon one (1) week's advance notice. In the event this Agreement is terminated under the foregoing provision, Client shall pay Contractor any amounts due for Work performed by Contractor and/or materials or supplies ordered prior to the date that the termination notice is provided to the non-terminating party.

SECTION NINE-CONFIDENTIALITY:

Contractor will not disclose to third parties any information concerning its work for Client, including, but not limited to, confidential or trade secret information or information regarding Client's customers or potential customers, business and marketing plans, customer lists, credit information, gas usage patterns, pricing and marketing policies and practices, financial information and other operating policies and procedures. Contractor understands that if it violates this Agreement, Client will suffer irreparable harm. Therefore, in addition to any other remedies available to it, Client will be entitled to seek and obtain injunctive or equitable relief, including orders prohibiting violations of this Agreement.

Client will not disclose to third parties any information concerning its work with Contractor, including, but not limited to, confidential or trade secret information or information, business and marketing plans, customer lists, credit information, pricing and marketing policies and practices, financial information and other operating policies and procedures. Client understands that if it violates this Agreement, Contractor will suffer irreparable harm. Therefore, in addition to any other remedies available to it, Contractor will be entitled to seek and obtain injunctive or equitable relief, including orders prohibiting violations of this agreement.

SECTION TEN-MISCELLANEOUS:

(a) Waiver. Neither the failure nor any delay on the part of either party to exercise any right, remedy, power or privilege under this Agreement shall operate as a waiver thereof, nor shall any single or partial exercise of any right, remedy, power or privilege preclude any other or further exercise of the same or of any other right, remedy, power or privilege, nor shall any waiver of any right, remedy, power or privilege with respect to any occurrence be construed as a waiver of such right, remedy, power or privilege with respect to any other occurrence. No waiver shall be effective unless it is in writing and is signed by the party asserted to have granted such waiver.

(b) Binding Nature of Agreement. This Agreement shall be binding upon and inure to the benefit of Client and its successors and assigns and shall be binding upon and inure to the benefit of Contractor, its successors and assigns.

(c) Provisions Separable. The provisions of this Agreement are independent of and separable from each other, and no provision shall be affected or rendered invalid or unenforceable by virtue of the fact that for any reason any other or others of them may be invalid or unenforceable in whole or in part.

(d) Entire Agreement. This Agreement contains the entire understanding among the parties hereto with respect to the subject matter hereof, and supersedes all prior and contemporaneous agreements and understandings, inducements or conditions, express or implied, oral or written, except as herein contained. The express terms hereof control and supersede any course of performance and/or usage of the trade inconsistent with any of the terms hereof. This Agreement may not be modified or amended other than by an agreement in writing.

(e) Paragraph Headings. The paragraph headings in this Agreement are for convenience only; they form no part of this Agreement and shall not affect its interpretation.

(f) Gender, Etc. Words used herein, regardless of the number and gender specifically used, shall be deemed and construed to include any other number, singular or plural, and any other gender, masculine, feminine or neuter, as the context indicates is appropriate.

(g) Number of Days. In computing the number of days for purposes of this Agreement, all days shall be counted, including Saturdays, Sundays and holidays; provided, however, that if the final day of any time period falls on a Saturday, Sunday or holiday on which federal banks are or may elect to be closed, then the final day shall be deemed to be the next day which is not a Saturday, Sunday or holiday.

(h) This Agreement may be executed in multiple counterparts, each of which shall be deemed an original for all purposes and all of which shall be deemed collectively to be one agreement. The parties agree that execution of this Agreement by a

party and the delivery of such party's signature by mail, facsimile transmission, or electronic (e-mail) transmission shall be fully effective as the original signature of such party to the fullest extent as if it were the original copy thereof.

(i) This Agreement shall be governed and interpreted in accordance with the laws of the State of Texas. Venue of any dispute shall lie in Harris County, Texas.

SECTION ELEVEN-FORCE MAJEURE

Neither party hereto shall be liable for any failure to perform the terms of this Agreement when such a failure is due to "force majeure" as hereinafter defined. The term "force majeure" as used in this Agreement shall mean any delay or default in performance due to any cause beyond the control of the party claiming force majeure and without such party's fault or negligence, including but not restricted to acts of God or the public, civil disturbances, arrests and restraints by rulers and people; acts of the public enemy, wars, riots, insurrections, sabotage; acts, requests or interruptions of the federal, state or local government or any agency thereof; court orders, present and future valid orders of any governmental authority, or nay officer, agency or any instrumentality thereof; floods, fires, storms, epidemics, landslides, lightning, earthquakes, washouts, explosions, quarantine, strikes, lockouts, or industrial disturbances; interruption of transportation, freight embargos or delays in delivery of equipment or service necessary to the performance of any provision of this Agreement; inability to secure right of way, labor shortages, breakage or accident to machinery or lines of pipe, or any other cause, whether of the kind herein enumerated or otherwise, not reasonable within the control of the party claiming force majeure. Nothing contained in this section, however, shall be construed to require either party to settle a labor dispute against its will.

If as a result of force majeure wither party is unable, wholly or in part, to carryout its obligation under this Agreement, other than the obligation to make payment of money due, then, upon such party's giving notice and a description of such cause in writing to the other party as soon as possible after the occurrence of the cause, the obligation of the party giving such notice, so far as it is affected by the cause specified in such notice, shall be suspended for the duration of the cause. Such cause shall, as far as possible, be remedied with all reasonable dispatch.

SECTION TWELVE--NOTICES

All notices, except verbal or email notices with respect to minor questions, shall be in writing and shall be delivered by United States first class mail, postage prepaid, personal delivery, facsimile (with printed confirmation), electronic transmission (e-mail) or nationally recognized overnight carrier to the appropriate party using the following respective addresses:

For Client: Liberty Gas Company
Bridgett Blake
P.O. Box 127
Liberty, KY 42539
Phone: 606-787-9973
Email: LIBERTYBB@WINDSTREAM.NET

For Contractor: Heath Consultants Incorporated
9030 Monroe Road
Houston, Texas 77061
Attention: Gary Lape, Vice President-Operations
Phone: 713-844-1303
Email: contractsadmin@heathus.com

All notices shall be effective on the party addressee from the time received by such party.

IN WITNESS WHEREOF, the parties have executed this Agreement on the day and year shown beneath their signatures.

HEATH CONSULTANTS INCORPORATED

WITNESS: _____

By: _____

Name: Gary Lape (Print)

Title: VP Operations (Print)
Thereunto duly authorized

Date: 6-22-16

LIBERTY GAS COMPANY

WITNESS: Bridgett Blake

By: _____

Name: Steven Brown (Print)

Title: Mayor (Print)
Thereunto duly authorized

Date: 06/13/16

PLEASE RETURN EXECUTED CONTRACT TO: *contractsadmin@heathus.com*

-OR-

by mail to Contracts Administrator, Heath Consultants Incorporated, 9030 Monroe Rd., Houston, TX 77061

Option to Renew

Client hereby exercises its option to renew its Independent Contractor Agreement between itself and _____. Dated _____, for one (1) year ending on _____.

HEATH CONSULTANTS INCORPORATED

BY:

WITNESS:_____ _____

_____
Signature

Name: _____(Print)

Title: _____(Print)
Thereunto duly authorized

Date: _____

LIBERTY GAS COMPANY

BY:

WITNESS: Budgett Blake Steven Brown

_____
Signature

Name: Steven Brown (Print)

Title: Mayor (Print)
Thereunto duly authorized

Date: 06/13/16

PLEASE RETURN EXECUTED CONTRACT TO: contractsadmin@heathusa.com

-OR-

by mail to Contracts Administrator, Heath Consultants Incorporated, 9030 Monroe Rd., Houston, TX 77061

EXHIBIT A

SCOPE OF WORK

Leak Survey of Facilities, to include leakage inspection and leakage classification. The inspection will be performed with the use of a DP-IR™, or an RMLD-IS®. All leaks are classified with the use of a Combustible Gas Indicator to GPTC Standards. All leakage and Abnormal Operating Conditions will be documented and reported to the client on Heath forms.

Heath Consultants Incorporated will provide one fully trained and Operator Qualified Technician, along with transportation and all equipment required to perform the Leak Survey, including but not limited to, Heath Consultants Incorporated DP-IR™, RMLD-IS®, Combustible Gas Indicator, and Plunger Bar.

EXHIBIT B

PRICE SCHEDULE

The price for this service will be **$75 per hour per Technician** and **$75 per hour** for drive time to and from the project (portal to portal). This price is inclusive of all technician, equipment, vehicle and administrative costs.

See attached Proposal Letter

EXHIBIT C

INSURANCE REQUIREMENTS

PLEASE SEE ATTACHED HEATH STANDARD CERTIFICATES.

Heath Consultants Incorporated

June 3, 2016

Bridgett Blake
Liberty Gas Company
P.O. Box 127
Liberty, KY 42539

Ms. Blake,

Heath Consultants Incorporated is pleased to submit the following proposal to perform a Natural Gas Leakage Detection Survey for Liberty Gas Company in Liberty, Kentucky.

The survey will be conducted utilizing the latest leak survey equipment. All leakage detected will be classified according to hazard, and documented on a diagrammatic report.

The price for this service will be **$75 per hour per Technician** and **$75 per hour** for drive time to and from the project (portal to portal). This price is inclusive of all technician, equipment, vehicle and administrative costs.

Ms. Blake, if you have any questions regarding this proposal, please feel free to contact me at 615-361-8306, or by email at t.kelley@heathus.com . We at Heath Consultants Incorporated thank you for the opportunity to submit this proposal.

Sincerely,

Todd Kelley
Field Services Manager

Cc: Jessie Spires
William Luttrell
Nashville Office File

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 6/16/2016

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER	CONTACT NAME: Linda Fontenot
Insgroup, Inc. 1455 W. Loop South, 9th Floor Houston TX 77027	PHONE (A/C, No, Ext): (713) 541-7272 FAX (A/C, No): (713) 772-5224 E-MAIL ADDRESS: lfontenot@insgroup.net

INSURED	INSURER(S) AFFORDING COVERAGE	NAIC #
Heath Consultants Inc. 9030 Monroe Rd. Houston TX 77061	INSURER A: Liberty Mutual Fire Ins. Co.	23035
	INSURER B: Steadfast Insurance Company	26387
	INSURER C:	
	INSURER D:	
	INSURER E:	
	INSURER F:	

COVERAGES **CERTIFICATE NUMBER:** CL1572271989 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY CLAIMS-MADE [X] OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: POLICY [X] PRO-JECT [ ] LOC OTHER:			TB2Z91452436035	7/30/2015	7/30/2016	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG Employee Benefits	$ 2,000,000 $ 1,000,000 $ 10,000 $ 2,000,000 $ 2,000,000 $ 2,000,000 $
A	AUTOMOBILE LIABILITY X ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS			AS2Z91452436025	7/30/2015	7/30/2016	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)	$ 1,000,000 $ $ $
A	X UMBRELLA LIAB X OCCUR EXCESS LIAB CLAIMS-MADE DED X RETENTION $ 10,000			TH7Z91452436065	7/30/2015	7/30/2016	EACH OCCURRENCE AGGREGATE	$ 10,000,000 $ 10,000,000
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y/N [ ] N/A If yes, describe under DESCRIPTION OF OPERATIONS below						PER STATUTE / OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	$ $ $
B	Professional Liability			EOC5932316	7/30/2015	7/30/2016	Aggregate Each Limit	$10,000,000 $10,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

CERTIFICATE HOLDER

Liberty Gas Company
ATTN: Bridgett Blake
P.O. Box 127
Liberty, KS 42539

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Henry Hochman/JR02

SOI7913

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 6/16/2016

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER	CONTACT NAME:	
Commercial Lines Wells Fargo Insurance Services USA, Inc. 6100 Fairview Road Charlotte, NC 28210	PHONE (A/C, No, Ext): 888-572-2412	FAX (A/C, No):
	E-MAIL ADDRESS: certs@trinet.com	
	INSURER(S) AFFORDING COVERAGE	NAIC #
	INSURER A : Indemnity Insurance Company of North America	43575
INSURED Strategic Outsourcing, Inc PO Box 241448 Charlotte, NC 28224 RE: Heath Consultants Incorporated	INSURER B :	
	INSURER C :	
	INSURER D :	
	INSURER E :	
	INSURER F :	

COVERAGES **CERTIFICATE NUMBER:** 10583975 **REVISION NUMBER:** See below

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
	COMMERCIAL GENERAL LIABILITY						EACH OCCURRENCE	$
	☐ CLAIMS-MADE ☐ OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence)	$
							MED EXP (Any one person)	$
							PERSONAL & ADV INJURY	$
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE	$
	☐ POLICY ☐ PRO-JECT ☐ LOC						PRODUCTS - COMP/OP AGG	$
	OTHER:							$
	AUTOMOBILE LIABILITY						COMBINED SINGLE LIMIT (Ea accident)	$
	ANY AUTO						BODILY INJURY (Per person)	$
	ALL OWNED AUTOS / SCHEDULED AUTOS						BODILY INJURY (Per accident)	$
	HIRED AUTOS / NON-OWNED AUTOS						PROPERTY DAMAGE (Per accident)	$
								$
	UMBRELLA LIAB ☐ OCCUR						EACH OCCURRENCE	$
	EXCESS LIAB ☐ CLAIMS-MADE						AGGREGATE	$
	DED ☐ RETENTION $							$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y/N: N / N/A If yes, describe under DESCRIPTION OF OPERATIONS below			WLRC48767448	03/01/2016	03/01/2017	X PER STATUTE / OTH-ER	
							E.L. EACH ACCIDENT	$ 1,000,000
							E.L. DISEASE - EA EMPLOYEE	$ 1,000,000
							E.L. DISEASE - POLICY LIMIT	$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Workers' Compensation Insurance is limited to employees of Health Consultants Incorporated through a co-employment contract with Strategic Outsourcing, Inc.

CERTIFICATE HOLDER

Liberty Gas Company
P.O. Box 127
Liberty, KY 42539
ATTN: Bridgett Blake

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

On Tuesday, March 7, 2017 8:41 AM, bridgett blake <bnblake80@yahoo.com> wrote:

I'm assuming this year we will only need the "business district", but I'm not completely sure which part of our area is outside the business district.

On Monday, March 6, 2017 4:44 PM, Todd Kelley <t.kelley@heathus.com> wrote:

Bridgett,
I've sent this to our Management group we should be able to work with this date. Will you have roughly the same amount of work this year?

From: bridgett blake [mailto:bnblake80@yahoo.com]
Sent: Monday, March 6, 2017 3:33 PM
To: Todd Kelley <t.kelley@heathus.com>
Subject: City of Liberty

CAUTION - THIS IS AN EXTERNAL E-MAIL. Do not open attachments or click links from unknown sources or unexpected e-mail.
Todd,

Could we go ahead and schedule the city's leakage survey for the business districts for the first of August?

Thanks,
Bridgett Blake
City of Liberty

EXHIBIT
5

EXHIBIT 9

July 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4 Independence Day	5	6	7	8	9
10	11	12	13	14	15 Odorant Monitoring	16
17	18	19	20	21	22	23
24	25 Rectifier Reading – Pipe-to-Soil	26	27	28	29	30

August 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15 Odorant Monitoring	16	17	18	19	20
21	22	23	24	25 Rectifier Reading – Pipe-to-Soil	26	27
28	29	30	31			

September 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	5
4	5 **Labor Day**	6 Critical Valve Inspection	7	8	9	10
11	12	13	14	15 Odorant Monitoring	16	17
18	19	20	21	22	23 Rectifier Reading – Pipe-to-Soil	24
25	26 Patrolling – Business Districts and Outside Business Districts	27	28	29	30 Corrosion Control – Cathodic Protection	

Schedule Regulator Inspections with Cox Meter Service

October 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10 Columbus Day	11	12	13	14 Odorant Monitoring	15
16	17	18	19	20	21	22
23 30	27 31	25 Rectifier Reading – Pipe-to-Soil	26	27	28	29

November 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11 Veterans Day	12
13	14	15 Odorant Monitoring	16	17	18	19
20	21	18	23 Rectifier Reading – Pipe-to-Soil	24	25	26
27	28	29	30			

December 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15 Odorant Monitoring	16	17
18	19	20	21	22	23 Rectifier Reading – Pipe-to-Soil	24
25 **Christmas**	26 Patrolling – Business Districts	27	28	29	30	31

January 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2 Public Awareness Notices (BB)	3	4	5	6	7
8	9	10	11	12	13	14
15	16 Odorant Monitoring	17	18	19	20	21
22	23	24	25 Rectifier Reading – Pipe-to-Soil	26	27	28
29	30	31				

February 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15 Odorant Monitoring	16	17	18
19	20	21	22	23	24 Rectifier Reading – Pipe-to-Soil	25
26	27	28				

March 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1 EIA-176 Report Due (BB)	2	3	4
5	6	7	8	9	10	11
12	13	14 Odorant Monitoring	15 Annual Gas Report Due (BB)	16	17	18
19	20	21	22	23	24 Rectifier Reading – Pipe-to-Soil	25
26	27 Patrolling – Business Districts and Outside Business Districts	28	29	30	31	

Call and schedule Leakage Survey on Business District with Heath Consultants for July 2017

April 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14 Odorant Monitoring	15
16	17	18	19	20	21	22
23	24	25 Rectifier Reading – Pipe-to-Soil	26	27	28	29
30						

May 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15 Odorant Monitoring	16	17	18	19	20
21	22	23	24	25 Rectifier Reading – Pipe-to-Soil	26	27
28	29	30	31			

June 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15 Odorant Monitoring	16	17
18	19	20	21	22	23 Rectifier Reading – Pipe-to-Soil	24
25	26 Patrolling – Business Districts	27	28	29 Review O&M & Emergence Plan (BB)	30	

July 2017 - Public Awareness Notices (BB)

July 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14 Odorant Monitoring	15
16	17	18	19	20	21	22
23	24	25	26	27	28 Rectifier Reading – Pipe-to-Soil	29
30	31					

August 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15 Odorant Monitoring	16	17	18	19
20	21	22	23	24	25 Rectifier Reading – Pipe-to-Soil	26
27	28	29	30	31		

September 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5 Critical Valve Inspection	6	7	8	9
10	11	12	13	14	15 Odorant Monitoring	16
17	18	19	20	21	22 Rectifier Reading – Pipe-to-Soil	23
24	25 Patrolling – Business Districts and Outside Business Districts	26	27	28	29 Corrosion Control – Cathodic Protection	30

Schedule Regulator Inspections with Cox Meter Service

October 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16 Odorant Monitoring	17	18	19	20	21
22	23	24	25	26	27 Rectifier Reading – Pipe-to-Soil	28
29	30	31				

November 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15 Odorant Monitoring	16	17	18
19	20	21	22	23	24 Rectifier Reading – Pipe-to-Soil	25
26	27	28	29	30		

December 2017

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15 Odorant Monitoring	16
17	18	19	20	21	22	23
24	25	26	27	28	29 Rectifier Reading – Pipe-to-Soil	30
31						

January 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1 Public Awareness Notices (BB)	2	3	4	5	6
7	8	9	10	11	12	13
14	15 Odorant Monitoring	16	17	18	19	20
21	22	23	24	25	26 Rectifier Reading – Pipe-to-Soil	27
28	29	30	31			

February 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15 Odorant Monitoring	16	17
18	19	20	21	22	23 Rectifier Reading – Pipe-to-Soil	24
25	26	27	28			

March 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1 EIA-176 Report Due (BB)	2	3
4	5	6	7	8	9	10
11	12	13	14	15 Annual Gas Report Due (BB) Odorant Monitoring	16	17
18	19	20	21	22	23 Rectifier Reading – Pipe-to-Soil	24
25	26 Patrolling – Business Districts and Outside Business Districts	27	28	29	30	31

Call and schedule Leakage Survey on Business District with Heath Consultants for July 2018
(Leakage Survey in both Business and non-Business Districts to be completed in summer 2019)

April 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16 Odorant Monitoring	17	18	19	20	21
22	23	24	25	26	27 Rectifier Reading – Pipe-to-Soil	28
29	30					

May 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15 Odorant Monitoring	16	17	18	19
20	21	22	23	24	25 Rectifier Reading – Pipe-to-Soil	26
27	28	29	30	31		

June 2018

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15 Odorant Monitoring	16
17	18	19	20	21	22 Rectifier Reading – Pipe-to-Soil	23
24	25 Patrolling – Business Districts	26	27	28 Review O&M & Emergence Plan (BB)	29	30

July 2017 - Public Awareness Notices (BB)

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CITY OF LIBERTY GAS COMPANY	)	
	)	
	)	CASE NO. 2017-00053
ALLEGED FAILURE TO COMPLY WITH KRS 278.495 AND 49 C.F.R. PART 192	)	

ORDER

City of Liberty Gas Company ("Liberty Gas') is a city-owned gas system engaged in the distribution of natural gas at retail and, pursuant to KRS 278.495(2), is subject to Commission jurisdiction.

KRS 278.495(2)(a) authorizes the Commission to regulate the safety of natural gas facilities that are owned or operated by any city, and used to distribute natural gas at retail. In addition, KRS 278.495(2) authorizes the Commission to enforce the minimum safety standards adopted by the United States Department of Transportation ("USDOT") pursuant to federal pipeline safety laws, 49 U.S.C. Section 60101, *et seq.*, and amendments thereto. KRS 278.992(1) establishes the penalties for violations of any minimum safety standard adopted by the USDOT pursuant to federal pipeline safety laws.

The USDOT adopted minimum safety standards for periodic leakage control programs for gas distribution systems located within a business district and outside a business district. 49 C.F.R. Section 192.723(b)(1) requires that a leakage survey must be conducted for gas distribution systems located within a business district "at intervals not exceeding 15 months, but at least once each calendar year." 49 C.F.R. Section

EXHIBIT
7

192.723(b)(2) requires that a leakage survey be conducted for gas distribution systems located outside a business district "as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months." However, 49 C.F.R. Section 192.605(a) requires a utility to prepare and follow written procedures for conducting operations and maintenance activities, including periodic leakage surveys, in its operating and maintenance plan ("O&M Plan"). Because the time-based requirements for conducting leakage surveys in 49 C.F.R. Section 192.723(b)(1)-(2) are minimum requirements, when a utility prepares an O&M Plan that establishes a shorter interval for conducting a leakage survey than the regulations require, the shorter interval established in the O&M Plan controls. Relevant to this matter, Liberty Gas's O&M Plan required leakage surveys to be conducted outside its business districts every three years.[1]

On December 1, 2016, the Commission entered an Order in Case No. 2016-00391, ("December 1, 2016 Order") which initiated an investigation to review Liberty Gas's compliance with the leakage survey requirements pursuant to federal minimum safety standards and Liberty Gas's O&M Plan.[2] The December 1, 2016 Order is attached as Appendix A to this Order.

As set forth in the December 1, 2016 Order, Liberty Gas was cited in a Commission Staff periodic inspection for failure to perform and document leakage surveys in 2007 and 2009.[3] In the periodic regulatory compliance inspection conducted

[1] *See* Appendix A.

[2] Case No. 2016-00391, *Investigation in to City of Liberty Gas Company Compliance with KRS 278.495 and 49 C.F.R. Part 192* (Ky. PSC Dec. 1, 2016).

[3] December 1, 2016 Order, Appendices G and H.

in 2012, the Commission investigator found that Liberty Gas had timely conducted periodic leakage surveys as required ("2012 Inspection Report").[4]

On July 13, 2015, Commission Staff submitted to the Commission an Inspection Report ("2015 Inspection Report") that alleged, among other deficiencies, that Liberty Gas failed to comply with periodic leakage survey requirements, as follows:

> 1. **49 C.F.R. Section 192.723(b)(1) Distribution Systems: Leakage Surveys.** A leakage survey with leak detector equipment must be conducted in business districts . . . at intervals not exceeding 15 months, but at least once each calendar year.

The 2015 Inspection Report contained a finding that Liberty Gas had not performed leakage surveys in its business districts since 2009.

> 2. **49 C.F.R. Section 192.605(a) Procedural Manual for Operations, Maintenance, and Emergency Operations - General.** Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities.

The 2015 Inspection Report contained a finding that Liberty Gas's O&M Plan required leakage surveys to be conducted outside its business districts every three years, and that Liberty Gas had not conducted leakage surveys outside its business districts since 2009.

On August 18, 2015, a cover letter and copy of the 2015 Inspection Report were mailed to Liberty Gas.[5] On September 21, 2015, Liberty Gas filed its response stating that it would schedule Heath Consultants ("Heath") to perform leakage surveys both

[4] *Id.*, Appendix F.

[5] *Id.*, Appendix B.

inside and outside the business district before the end of 2015, and that Liberty Gas planned to contract with Heath to perform annual leakage surveys.[6]

On June 23, 2016, Commission Staff conducted a follow-up inspection of Liberty Gas and subsequently submitted to the Commission an Inspection Report ("2016 Inspection Report") finding that Liberty Gas had failed to correct the two deficiencies regarding conducting leakage surveys inside and outside Liberty's business district. On September 6, 2016, a cover letter and copy of the 2016 Inspection Report were mailed to Liberty Gas.[7] On September 16, 2016, Liberty Gas filed its response, confirming that leakage surveys had not been conducted since 2009, and providing a copy of the leakage survey conducted by Heath inside and outside Liberty's business district on July 19-21, 2016.[8] Liberty Gas asserted that the failure to conduct the leakage surveys since 2009 was an oversight and that it was taking steps to ensure that future leakage surveys were conducted at intervals that complied with federal minimum safety standards and Liberty Gas's O&M Plan.

Due to the discrepancy between the 2012 Inspection Report, the 2015 and 2016 Inspection Reports, the Commission Executive Director wrote to Liberty Gas on August 22, 2016, requesting a copy of all leakage surveys conducted both in and outside Liberty's business district since 2009. In response, Liberty Gas faxed a copy of the 2016 leak survey report conducted by Heath. After a second request was made to Liberty Gas to ensure that all leakage surveys had been forwarded to the Commission,

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[6] *Id.*, Appendix C.

[7] *Id.*, Appendix D.

[8] *Id.*, Appendix E.

Liberty Gas faxed leakage survey recaps for 2011, 2012, 2013, and 2014 ("Leakage Survey Recaps") that were conducted by Liberty Gas employees.[9] In its responses to a data request filed in Case No. 2016-00391 ("Response to Data Request"), Liberty Gas stated that the Leakage Survey Recaps were based upon pipeline patrolling[10] and were not based upon leakage surveys. Liberty Gas further stated that an employee had misunderstood the difference between patrolling and leakage surveys, and erroneously filled out the incorrect form.[11]

Based upon its review of the 2012, 2015, and 2016 Inspection Reports and Liberty Gas's Response to Data Request, and being otherwise sufficiently advised, the Commission finds that *prima facie* evidence exists that Liberty Gas has failed to comply with periodic leakage survey regulations in accordance with 49 C.F.R. Section 192.723(b)(1), 49 C.F.R. Section 192.723(b)(2), and 49 C.F.R. Section 192.605(a). The Commission further finds that a formal investigation into Liberty Gas's compliance with federal requirements for periodic leakage surveys that is the subject matter of the 2012, 2015, and 2016 Inspection Reports should be conducted.

The Commission, on its own motion, HEREBY ORDERS that:

1. Liberty Gas shall submit to the Commission a written response to the allegations contained in the Staff Report within 20 days of the date of this Order.

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[9] *Id.*, Appendix I.

[10] *See* 49 C.F.R. Section 192.721. Pipeline patrolling is an inspection of natural gas pipelines to identify irregularities that are or can become a hazard so that they can be repaired. Its minimum safety requirement differs from the requirement of leakage surveys, which are conducted to identify natural gas leaks.

[11] Case No. 2016-00391, Liberty Gas Response to December 1, 2016 Order Appendix A Request for Information (filed Dec. 21, 2016), paragraphs 1–3.

2. Liberty Gas shall appear on March 29, 2017, at 2:00 p.m. Eastern Daylight Time, in Hearing Room 1 of the Commission's offices at 211 Sower Boulevard, in Frankfort, Kentucky, for the purpose of presenting evidence concerning the alleged violations of 49 C.F.R. Section 192.723(b)(1), 49 C.F.R. Section 192.723(b)(2), and 49 C.F.R. Section 192.605(a), and showing cause why it should not be subject to the penalties prescribed in KRS 278.992(1) for these alleged violations.

3. The March 29, 2017 hearing shall be recorded by videotape only.

4. At the scheduled hearing in this matter, Liberty Gas shall also present evidence on the adequacy, safety, and reasonableness of its practices related to conducting periodic leakage surveys of its gas distribution system as they relate to the facts of this case and whether such practices require revision as related to this incident.

By the Commission

ATTEST:

Executive Director

*City of Liberty Gas Company
Courthouse Square
P. O. Box 127
Liberty, KY 42539

*City of Liberty
City of Liberty
P. O. Box 127
Liberty, KY 42539

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Steve Samples	Report Number:	Liberty Gas 07102015
Inspection Date(s):	July 6-10, 2015	Report Date:	7/13/15
Inspection Type:	☒ Standard ☐ Integrity Management x Operator Qualification ☐ Compliance Follow-up ☐ Construction		

OPERATOR INFORMATION

Name of Operator:	City of Liberty Gas System	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	11472
Type of Facility:	Municipal	Location of Facility:	Liberty, KY.
Area of Operation:	Liberty , KY.		

Official Operator Contact and Address: (Contact for Inspection Letter)	Unit Name and Address
Steven Brown (Mayor) City of Liberty 518 Middleburg St. Liberty, KY. 42539	

Phone # and Email:	606-787-9973 Libertybb@windstream.net
Records Location:	Same as above

Persons Interviewed	Title	Phone No.	Email
Bridget Blake	Clerk	606-787-9973	libertybb@windstream.net
Greg Rodgers	Superintendent		

Has the Operator provided an updated Emergency Contact List?	☒	Yes	☐	No	

Number of Customers:	650	
Number of Gas Employees:	5	
Gas Supplier:	Texas Eastern Transmission	
Unaccounted for Gas:	4%	
Services:	Residential: 650 Commercial: Industrial: Other:	
Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)
Feeder:	250 psig	240 PSIG
Town:	150 psig	100 psig
Other:	27	50
Does the Operator have any transmission pipeline (above 20% SMYS):	No	

Additional Operator Information:

Operator advised and will meet with Texas Eastern Transmission and determine exact point of ownership of pipe at the delivery point and Liberty Gas will maintain piping from that point on.

Date of Last Inspection:	3/12/12		
Number of Deficiencies:	0	Deficiencies not Cleared:	0

PSC Exhibit 1

Summary of Areas Inspected

PHMSA Question Set

☒	Emergency Plan	☒	Operations and Maintenance Plan	☒	Critical Valves Maintenance Inspections
☒	Cathodic Protection	☐	Accidents	☒	Leak Surveys
☒	Odorization	☒	Operator Qualification	☒	Damage Prevention
☒	Pipeline Markers	☐	Regulator Stations	☒	DIMP
☒	Field Inspection	☐	Other		

Other:

State Question Set

☒	Cybersecurity	☐	Other

Other:

Summary

On July 6,7,8,9 and10, 2015 a standard periodic inspection was conducted on the City of Liberty. The last inspection was a standard inspection on March 12, 2012 and resulted in 0 deficiencies. The piping system consists of 4" and under coated steel and plastic piping with pressures ranging from 27 to 240 PSIG. City of Liberty has 1 point of delivery from Texas Eastern Gas Transmission.

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Drug and Alcohol, Distribution Integrity Management, and Public Awareness Plans were reviewed during the office visit. Also inspected were samples of 2013, 2014, and 2015 records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, pressure recordings, distribution integrity management, public awareness, and odorant verifications. The field portion of the inspection consisted of inspecting town border regulator stations, pipeline markers, mainline valve locations, and meter installations. Also inspected the point of delivery from Texas Eastern Transmission and performed a protocol 9 field check on corrosion field test points to verify corrosion protection for the City of Liberty.

Probable Findings

(1) 192.465(a) – The City of Liberty has not tested its test points for external corrosion monitoring since 2013.
(2) 192.739(a) – The City of Liberty has not inspected its 4 regulator stations since 2013.
(3) 192.747(a) - The City of Liberty has not inspected its safety distribution valves since 2013.
(4) 192.723(b)(1) – The City of Liberty has not conducted leakage surveys on its business district each year. Last records were 2009 from Heath Contractors.
(5) 192.723(b)(2) – The City of Liberty has not conducted leakage surveys outside its business district. Last records were 2009 from Heath Contractors. The City of Liberty Operation and Maintenance interval is every 3 years.
(6) 192.616(c) – The City of Liberty was not sending the baseline public awareness message to its customers 2 times per year according to their Public Awareness Plan.
(7) 192.225 – The City of Liberty did not produce welding procedures for their system.

Recommendations and Comments

City of Liberty has experienced operation changes since the last inspection. The City of Liberty should correct the stated deficiencies in a timely manner.

Submitted By:

Steve Samples 7/13/15
Utility Regulatory and Safety Investigator IV

Procedures - Reporting

*** 1. Immediate Reporting: Incidents (detail)** *Is there a process to immediately report incidents to the National Response Center?* (RPT.RR.IMMEDREPORT.P) (detail)

191.5(b) (191.7)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 2. Incident Reports (detail)** *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?* (RPT.RR.INCIDENTREPORT.P) (detail)

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Supplemental Incident Reports (detail) *Does the process require preparation and filing of supplemental incident reports?* (RPT.RR.INCIDENTREPORTSUPP.P) (detail)

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 4. National Registry of Pipeline and LNG Operators (OPID) (detail)** *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs)?* (RPT.RR.OPID.P) (detail)

191.22

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Safety Related Condition Reports (detail) *Do the procedures require reporting of safety-related conditions?* (RPT.RR.SRCR.P) (detail)

192.605(a) (191.23(a); 191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Offshore Pipeline Condition Reports (detail) *Does the process require reports to be submitted within 60 days after completing inspection of underwater pipelines in GOM and its inlets?* (RPT.RR.OPCR.P) (detail)

191.27(a) (191.27(b); 192.612(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Safety Related Conditions (detail) *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?* (MO.GO.SRC.P) (detail)

192.605(d)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Customer and EFV Installation Notification

1. Customer Notification (detail) *Is a customer notification process in place that satisfies the requirements of 192.16?* (MO.GO.CUSTNOTIFY.P) (detail)

192.13(c) (192.16(a); 192.16(b); 192.16(c); 192.16(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. EFV Installation (detail) *Is there an adequate excess flow valve (EFV) installation and performance program in place?* (MO.GO.EFVINSTALL.P) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Normal Operating And Maintenance

1. Normal Maintenance and Operations (detail) *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?* (MO.GO.OMANNUALREVIEW.P) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Normal Operations and Maintenance Procedures - History (detail) *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.P) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Normal Operations and Maintenance Procedures (detail) *Does the process include procedures for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?* (MO.GOMAOP.MAOPLIMIT.P) (detail)

192.605(a) (192.605(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Normal Operations and Maintenance Procedures - Review (detail) *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found?* (MO.GO.OMEFFECTREVIEW.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Safety While Making Repairs (detail) *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?* (AR.RMP.SAFETY.P) (detail)

192.605(b)(9) (192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Holders (detail) *Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders?* (MO.GM.HOLDER.P) (detail)

192.605(a) (192.605(b)(10))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Gas Odor Response (detail) *Does the process require prompt response to the report of a gas odor inside or near a building?* (MO.GO.ODDOR.P) (detail)

192.605(a) (192.605(b)(11))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Change In Class Location

1. Change in Class Location Required Study (detail) *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?* (MO.GOCLASS.CLASSLOCATESTUDY.P) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 2. Change in Class Location Confirmation or Revision of MAOP (detail)** *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?* (MO.GOCLASS.CLASSLOCATEREV.P) (detail)

192.605(b)(1) (192.611(a); 192.611(b); 192.611(c); 192.611(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Continuing Surveillance

1. Continuing Surveillance (detail) *Does the process include procedures for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?* (MO.GO.CONTSURVEILLANCE.P) (detail)

192.605(e) (192.613(a); 192.613(b); 192.703(b); 192.703(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Damage Prevention Program

1. Damage Prevention Program (detail) *Is a damage prevention program approved and in place?* (PD.OC.PDPROGRAM.P) (detail)

192.614(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Emergency

1. Receiving Notices (detail) *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?* (EP.ERG.NOTICES.P) (detail)

192.615(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Emergency Response Communication (detail) *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?* (EP.ERG.COMMSYS.P) (detail)

192.615(a) (192.615(a)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 3. Emergency Response (detail)** *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?* (EP.ERG.RESPONSE.P) (detail)

192.615(a) (192.615(a)(3); 192.615(a)(11); 192.615(b)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Emergency Response (detail) *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?* (EP.ERG.READINESS.P) (detail)

192.615(a) (192.615(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Emergency Response - Actions (detail) *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?* (EP.ERG.PUBLICPRIORITY.P) (detail)

192.615(a) (192.615(a)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Emergency Response (detail) *Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?* (EP.ERG.PRESSREDUCESD.P) (detail)

192.615(a) (192.615(a)(6))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Emergency Response - Hazards (detail) *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?* (EP.ERG.PUBLICHAZ.P) (detail)

192.605(a) (192.615(a)(7))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Public Official Notification (detail) *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?* (EP.ERG.AUTHORITIES.P) (detail)

192.615(a) (192.615(a)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Service Outage Restoration (detail) *Does the emergency plan include procedures for safely restoring any service outage?* (EP.ERG.OUTAGERESTORE.P) (detail)

192.615(a) (192.615(a)(9))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Incident Investigation Actions (detail) *Does the process include procedures for beginning action under §192.617, if applicable, as soon after the end of the emergency as possible?* (EP.ERG.INCIDENTACTIONS.P) (detail)

192.615(a) (192.615(a)(10))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Emergency Response Training (detail) *Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective?* (EP.ERG.TRAINING.P) (detail)

192.615(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Emergency Response Performance (detail) *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?* (EP.ERG.POSTEVNTREVIEW.P) (detail)

192.615(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Liaison with Public Officials (detail) *Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?* (EP.ERG.LIAISON.P) (detail)

192.615(c) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Public Awareness Program

1. Public Education Program (detail) *Has the continuing public education (awareness) program been established as required?* (PD.PA.PROGRAM.P) (detail)

192.616(a) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Management Support of Public Awareness Program (detail) *Does the operator's program documentation demonstrate management support?* (PD.PA.MGMTSUPPORT.P) (detail)

192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Asset Identification (detail) *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?* (PD.PA.ASSETS.P) (detail)

192.616(b) (API RP 1162 Section 2.7 Step 4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Audience Identification (detail) *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?* (PD.PA.AUDIENCEID.P) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Messages, Delivery Methods, and Frequencies (detail) *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?* (PD.PA.MESSAGES.P) (detail)

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
The baseline public awareness message was not being sent to the customers 2 times per year according to their plan.

6. Consideration of Supplemental Enhancements (detail) *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?* (PD.PA.SUPPLEMENTAL.P) (detail)

192.616(c) (API RP 1162 Section 6.2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Other Languages (detail) *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?* (PD.PA.LANGUAGE.P) (detail)

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Evaluation Plan (detail) *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?* (PD.PA.EVALPLAN.P) (detail)

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Master Meter and Petroleum Gas Systems (detail) *Does the master meter or petroleum gas system operator's process meet the requirements of 192.616(j)?* (PD.PA.MSTRMETER.P) (detail)

192.616(j) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Failure Investigationn

1. Incident Investigation (detail) *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?* (EP.ERG.INCIDENTANALYSIS.P) (detail)

192.617

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - MAOP

1. Maximum Allowable Operating pressure Determination (detail) *Does the process include procedures for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?* (MO.GOMAOP.MAOPDETERMINE.P) (detail)

192.605(b)(1) (192.619(a); 192.619(b); 192.621(a); 192.621(b); 192.623(a); 192.623(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pressure Test

1. Test Acceptance Criteria and Procedures (detail) *Were test acceptance criteria and procedures sufficient to assure the basis for an acceptable pressure test?* (AR.PTI.PRESSTESTACCEP.P) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d); 192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e); 192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Odorization Of Gas

1. Odorization of Gas (detail) *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with §192.625?* (MO.GOODOR.ODORIZE.P) (detail)

192.605(b)(1) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Tapping Pipelines Under Pressure

1. Tapping Pipelines Under Pressure (detail) *Is the process adequate for tapping pipelines under pressure?* (AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Qualification of Personnel Tapping Pipelines under Pressure (detail) *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?* (TQ.QU.HOTTAPQUAL.P) (detail)

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pipeline Purging

1. Pipeline Purging (detail) *Does the process include requirements for purging of pipelines in accordance with 192.629?* (MO.GOODOR.PURGE.P) (detail)

192.605(b)(1) (192.629(a); 192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures – Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

1. Patrolling Requirements (detail) *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?* (PD.RW.PATROL.P) (detail)

192.705(a) (192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Leakage Surveys (detail) *Does the process require leakage surveys to be conducted?* (PD.RW.LEAKAGE.P) (detail)

192.706 (192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Distribution System Patrolling & Leakage Survey

1. Distribution System Leakage Surveys (detail) *Does the process require distribution system patrolling and leakage surveys to be conducted?* (PD.RW.DISTLEAKAGE.P) (detail)

192.721 (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Line Marker

1. ROW Markers Requirements (detail) *Does the process adequately cover the requirements for placement of ROW markers?* (PD.RW.ROWMARKER.P) (detail)

192.707(a) (192.707(b); 192.707(c); 192.707(d); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Transmission Record Keeping

1. Transmission Lines Record Keeping (detail) *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?* (MO.GM.RECORDS.P) (detail)

192.605(b)(1) (192.709(a); 192.709(b); 192.709(c); 192.743(f))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Transmission Field Repair

1. Transmission Lines Permanent Field Repair of Defects (detail) *Is the process adequate for the permanent field repair of defects in transmission lines?* (AR.RMP.FIELDREPAIRDEFECT.P) (detail)

192.605(b)(1) (192.713(a); 192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Transmission Lines Permanent Field Repair of Welds (detail) *Is the process adequate for the permanent field repair of welds?* (AR.RMP.FIELDREPAIRWELDS.P) (detail)

192.605(b) (192.715(a); 192.715(b); 192.715(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Transmission Lines Permanent Field Repair of Leaks (detail) *Is there an adequate process for the permanent field repair of leaks on transmission lines?* (AR.RMP.FIELDREPAIRLEAK.P) (detail)

192.605(b) (192.717(a); 192.717(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Transmission Lines Testing of Repairs (detail) *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTEST.P) (detail)

192.605(b) (197.719(a); 197.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Test Requirements For Reinstating Service Lines

1. Test Reinstated Service Lines (detail) *Is the process adequate for the testing of disconnected service lines?* (AR.RMP.TESTREINSTATE.P) (detail)

192.605(b) (197.725(a); 197.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Abandonment Or Deactivation Of Facilities

1. Abandonment or Deactivation of Pipe and Facilities (detail) *Does the process include procedures for the abandonment and deactivation of pipelines that are in accordance with 192.727?* (MO.GM.ABANDONPIPE.P) (detail)

192.605(b)(1) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pressure Limiting And Regulating Station

1. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment at intervals not exceeding 15 months, but at least once each calendar year as required?* (MO.GMOPP.PRESSREGTEST.P) (detail)

192.605(b)(1) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Pressure Telemetering or Recording Gauges (detail) *Does the process require telemetering or recording gauges be utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.P) (detail)

192.605(b)(1) (192.741(a); 192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Does the process include procedures for ensuring, either by testing or a review of calculations, at intervals not exceeding 15 months, but at least once each calendar year, that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations has sufficient capacity, and for installing a new or additional device if a relief device is determined to have insufficient capacity?* (MO.GMOPP.PRESSREGCAP.P) (detail)

192.605(b)(1) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Valve And Vault Maintenance

1. Valve Maintenance Transmission Lines (detail) *Does the process include procedures for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.VALVEINSPECT.P) (detail)

192.605(b)(1) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Valve Maintenance Distribution Lines (detail) *Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.DISTVALVEINSPECT.P) (detail)

192.605(b)(1) (192.747(a); 192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Vault Inspection

1. Vault Inspection (detail) *Does the process provide adequate direction for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment and are inspections to be performed at the required interval?* (FS.FG.VAULTINSPECTFAC.P) (detail)

192.605(b)(1) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Prevention Of Accidental Ignition

1. Prevention of Accidental Ignition (detail) *Does the manual include procedures for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?* (MO.GM.IGNITION.P) (detail)

192.605(b)(1) (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Caulked Bell And Spigot Joints

1. Bell and Spigot Joints (detail) *Does the process require that caulked bell and spigot joints be correctly sealed?* (MO.GM.BELLSPIGOTJOINT.P) (detail)

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Protecting Cast-Iron Pipeline

1. Protecting Cast-Iron Pipeline (detail) *Does the process require adequate protection for segments of a buried cast-iron pipeline for which support has been disturbed?* (MO.GM.CASTIRONPROTECT.P) (detail)

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Welding And Weld Defect Repair/Removal

1. Welding Procedures (detail) *Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?* (DC.WELDPROCEDURE.WELD.P) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No welding procedures

*** 2. Qualification of Welders (detail)** *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?* (TQ.QUOMCONST.WELDER.P) (detail)

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
No welding performed in last few years. Welding procedures needed.

3. Qualification of Welders for Low Stress Pipe (detail) *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?* (TQ.QUOMCONST.WELDERLOWSTRESS.P) (detail)

192.227(b) (192.225(a); 192.225(b); 192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

4. Limitations on Welders (detail) *Does the process require certain limitations be placed on welders?* (DC.WELDERQUAL.WELDERLIMITNDT.P) (detail)

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

5. Welding Weather (detail) *Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld?* (DC.WELDPROCEDURE.WELDWEATHER.P) (detail)

192.303 (192.231)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

6. Miter joints (detail) *Does the process prohibit the use of certain miter joints?* (DC.WELDPROCEDURE.MITERJOINT.P) (detail)

192.303 (192.233(a); 192.233(b); 192.233(c))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

7. Preparation for Welding (detail) *Does the process require certain preparations for welding, in accordance with §192.235?* (DC.WELDPROCEDURE.WELDPREP.P) (detail)

192.303 (192.235)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

8. Inspection and Test of Welds (detail) *Does the process require visual inspections of welds to be conducted by qualified inspectors?* (DC.WELDINSP.WELDVISUALQUAL.P) (detail)

192.303 (192.241(a); 192.241(b); 192.241(c))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

9. Repair or Removal of Weld Defects (detail) *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?* (DC.WELDINSP.WELDREPAIR.P) (detail)

192.303 (192.245(a); 192.245(b); 192.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

Procedures - Nondestructive Testing

1. Nondestructive Test and Interpretation Procedures (detail) *Is there a process for nondestructive testing and interpretation?* (DC.WELDINSP.WELDNDT.P) (detail)

192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243(e).)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

Procedures - Joining Of Pipeline Materials

1. Plastic Pipe Joints (detail) *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?* (DC.CO.PLASTICJOINT.P) (detail)

192.303 (192.273(b); 192.281(a); 192.281(b); 192.281(c); 192.281(d); 192.281(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Plastic pipe - Qualifying Joining Procedures (detail) *Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints?* (DC.CO.PLASTICJOINTPROCEDURE.P) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Plastic pipe - Qualifying Joining Procedures (detail) *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?* (DC.CO.PLASTICJOINTQUAL.P) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.805)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?* (DC.CO.PLASTICJOINTINSP.P) (detail)

192.287 (192.805(h))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Corrosion Control

1. Corrosion Control Personnel Qualification (detail) *Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel?* (TQ.QU.CORROSION.P) (detail)

192.453 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. New Buried Pipe Coating (detail) *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)?* (TD.COAT.NEWPIPE.P) (detail)

192.605(b)(2) (192.455(a); 192.461; 192.463; 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Conversion to Service - Pipe Coating (detail) *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)?* (TD.COAT.CONVERTPIPE.P) (detail)

192.605(b)(2) (192.452(a); 192.455(a); 192.455(b); 192.461(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Cathodic Protection post July 1971 (detail) *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?* (TD.CP.POST1971.P) (detail)

192.605(b)(2) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Use of Aluminum (detail) *Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline?* (TD.CP.ALUMINUM.P) (detail)

192.605(b)(2) (192.455(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Cathodic Protection pre August 1971 (detail) *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found in accordance with Subpart I or Part 192?* (TD.CP.PRE1971.P) (detail)

192.605(b)(2) (192.457(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Examination of Exposed Portions of Buried Pipe (detail) *Does the process require that exposed portions of buried pipeline must be examined for external corrosion?* (TD.CPEXPOSED.EXPOSEINSPECT.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Further Examination of Exposed Portions of Buried Pipe (detail) *Does the process require further examination of exposed buried pipe if corrosion is found?* (TD.CPEXPOSED.EXPOSECORRODE.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Cathodic Protection Monitoring Criteria (detail) *Does the process require CP monitoring criteria to be used that is acceptable?* (TD.CPEXPOSED.MONITORCRITERIA.P) (detail)

192.605(b)(2) (192.463(a); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Cathodic Protection of Amphoteric Metals (detail) *Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline?* (TD.CP,AMPHOTERIC.P) (detail)

192.605(b)(2) (192.463(b); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Cathodic Protection Monitoring (detail) *Does the process adequately describe how to monitor CP that has been applied to pipelines?* (TD.CPMONITOR.TEST.P) (detail)

192.605(b)(2) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Rectifiers or other Impressed Current Sources (detail) *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?* (TD.CPMONITOR.CURRENTTEST.P) (detail)

192.605(b)(2) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Bonds, Diodes and Reverse Current Switches (detail) *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?* (TD.CPMONITOR.REVCURRENTTEST.P) (detail)

192.605(b)(2) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Correction of Corrosion Control Deficiencies (detail) *Does the process require that the operator correct any identified deficiencies in corrosion control?* (TD.CPMONITOR.DEFICIENCY.P) (detail)

192.605(b)(2) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?* (TD.CP.UNPROTECT.P) (detail)

192.605(b)(2) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. Isolation from Other Metallic Structures (detail) *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?* (TD.CP.ELECISOLATE.P) (detail)

192.605(b)(2) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Test Leads Installation (detail) *Does the process provide adequate instructions for the installation of test leads?* (TD.CPMONITOR.TESTLEAD.P) (detail)

192.605(b)(2) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

18. Interference Currents (detail) *Does the process give sufficient guidance and detail for identifying areas of potential stray current so the detrimental effects of stray currents can be minimized through a continuing program?* (TD.CPMONITOR.INTFRCURRENT.P) (detail)

192.605(b)(2) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

19. Internal Corrosion (detail) *If the process does not preclude corrosive gas to be transported by pipeline, does the process also require that the corrosive effect of the gas on the pipeline be investigated and steps be taken to minimize internal corrosion?* (TD.ICP.CORRGAS.P) (detail)

192.605(b)(2) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

20. Internal Corrosion in Cutout Pipe (detail) *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?* (TD.ICP.EXAMINE.P) (detail)

192.605(b)(2) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

21. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of §192.476?* (DC.DPC.INTCORRODE.P) (detail)

192.453 (192.476(a); 192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

22. Internal Corrosion Corrosive Gas Actions (detail) *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.P) (detail)

192.605(b)(2) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

23. Atmospheric Corrosion (detail) *Does the process give adequate guidance for protecting above ground pipe from atmospheric corrosion?* (TD.ATM.ATMCORRODE.P) (detail)

192.605(b)(2) (192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

24. Atmospheric Corrosion Monitoring (detail) *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?* (TD.ATM.ATMCORRODEINSP.P) (detail)

192.605(b)(2) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

25. Repair of Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?* (AR.RCOM.REPAIR.P) (detail)

192.491(c) (192.485(a); 192.485(b); 192.487(a); 192.487(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

26. Evaluation of Internally Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?* (TD.ICP.EVALUATE.P) (detail)

192.605(b)(2) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

27. Graphitization of Cast Iron and Ductile Iron (detail) *Does the process give adequate guidance for remediation of graphitization of cast iron or ductile iron pipe?* (TD.CP.GRAPHITIZE.P) (detail)

192.605(b)(2) (192.489(a); 192.489(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

28. Corrosion Control Records (detail) *Does the process include records requirements for the corrosion control activities listed in 192.491?* (TD.CP.RECORDS.P) (detail)

192.605(b)(2) (192.491(a); 192.491(b); 192.491(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Field Review - Pipeline Inspection (Field)

1. Transmission Line Valve Spacing (detail) *Are transmission line valves being installed as required of 192.179?* (DC.DPC.VALVESPACE.O) (detail)

192.141 (192.179(a); 192.179(b); 192.179(c); 192.179(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Cathodic Protection Monitoring Criteria (detail) *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?* (TD.CPMONITOR.MONITORCRITERIA.O) (detail)

192.463(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Rectifier or other Impressed Current Sources (detail) *Are impressed current sources properly maintained and are they functioning properly?* (TD.CPMONITOR.CURRENTTEST.O) (detail)

192.465(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the transmission project's design and construction comply with 192.476?* (DC.DPC.INTCORRODE.O) (detail)

192.476(a) (192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected?* (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Normal Operations and Maintenance Procedures - Review (detail) *Are operator personnel knowledgeable of the procedures used in normal operations?* (MO.GO.OMEFFECTREVIEW.O) (detail)

192.605(b)(8)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?* (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Transmission Lines Testing of Repairs (detail) *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTEST.O) (detail)

192.719(a) (192.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Pressure Telemetering or Recording Gauges (detail) *Are telemetering or recording gauges properly utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.O) (detail)

192.741(a) (192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?* (MO.GMOPP.PRESSREGTEST.O) (detail)

192.739(a) (192.739(b); 192.743)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Valve Maintenance Transmission Lines (detail) *Are field inspection and partial operation of transmission line valves adequate?* (MO.GM.VALVEINSPECT.O) (detail)

192.745(a) (192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Prevention of Accidental Ignition (detail) *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.* (AR.RMP.IGNITION.O) (detail)

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Regulatory Reporting Performance

1. Immediate Reporting: Incidents (detail) *Do records indicate immediate notifications of incidents were made in accordance with 191.5?* (RPT.RR.IMMEDREPORT.R) (detail)

191.5(a) (191.7(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Incident Reports (detail) *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe?* (RPT.RR.INCIDENTREPORT.R) (detail)

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Supplemental Incident Reports (detail) *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?* (RPT.RR.INCIDENTREPORTSUPP.R) (detail)

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Annual Report Records (detail) *Have complete and accurate Annual Reports been submitted?* (RPT.RR.ANNUALREPORT.R) (detail)

191.17(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Safety Related Condition Reports (detail) *Do records indicate safety-related condition reports were filed as required?* (RPT.RR.SRCR.R) (detail)

191.23(a) (191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Customer Notification (detail) *Do records indicate the customer notification process satisfies the requirements of 192.16?* (MO.GO.CUSTNOTIFY.R) (detail)

192.16(d) (192.16(a); 192.16(b); 192.16(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. NPMS: Abandoned Underwater Facility Reports (detail) *Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway?* (RPT.RR.NPMSABANDONWATER.R) (detail)

192.727(g)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Construction Performance

1. Welding Procedures (detail) *Do records indicate weld procedures are being qualified in accordance with 192.225?* (DC.WELDPROCEDURE.WELD.R) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
No welding procedures

2. Qualification of Welders (detail) *Do records indicate adequate qualification of welders?* (TQ.QUOMCONST.WELDER.R) (detail)

192.227(a) (192.227(b); 192.229(a); 192.229(b); 192.229(c); 192.229(d); 192.328(a); 192.328(b); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Inspection and Test of Welds (detail) *Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)?* (DC.WELDINSP.WELDVISUALQUAL.R) (detail)

192.241(a) (192.241(b); 192.241(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Qualification of Nondestructive Testing Personnel (detail) *Do records indicate the qualification of nondestructive testing personnel?* (TQ.QUOMCONST.NDT.R) (detail)

192.243(b)(2) (192.807(a); 192.807(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Nondestructive Test and Interpretation Procedures (detail) *Do records indicate that NDT implementation is adequate?* (DC.WELDINSP.WELDNDT.R) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Transmission Lines Record Keeping (detail) *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?* (MO.GM.RECORDS.R) (detail)

192.605(b)(1) (192.243(f); 192.709(a); 192.709(b); 192.709(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Plastic pipe - Qualifying Joining Procedures (detail) *Have plastic pipe joining procedures been qualified in accordance with 192.283?* (DC.CO.PLASTICJOINTPROCEDURE.R) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Plastic pipe - Qualifying Joining Procedures (detail) *Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?* (DC.CO.PLASTICJOINTQUAL.R) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?* (DC.CO.PLASTICJOINTINSP.R) (detail)

192.287 (192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Underground Clearance (detail) *Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe?* (DC.CO.CLEAR.R) (detail)

192.325(a) (192.325(b); 192.325(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Depth of Cover - Onshore (detail) *Is onshore piping minimum cover as specified in 192.327?* (DC.CO.COVER.R) (detail)

192.327(a) (192.327(b); 192.327(c), 192.327(d); 192.327(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. EFV Installation (detail) *Do records indicate the EFV program satisfies the requirements for installation and performance?* (MO.GO.EFVINSTALL.R) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Cathodic Protection post July 1971 (detail) *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?* (TD.CP.POST1971.R) (detail)

192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Operations And Maintenance Performance

1. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with 192.505?* (DC.PT.PRESSTESTHIGHSTRESS.R) (detail)

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Strength Test Duration Requirements for SMYS < 30% (detail) *Do records indicate that pressure testing is conducted in accordance with 192.507?* (DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R) (detail)

192.517(a) (192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Strength Test Requirements for Operations < 100 psig (detail) *Do records indicate that pressure testing is conducted in accordance with 192.509(a)?* (DC.PTLOWPRESS.PRESSTEST100PSIG.R) (detail)

192.517(a) (192.509(a); 192.509(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Test Requirements for Plastic Pipe (detail) *Do records indicate that pressure testing is conducted in accordance with 192.513?* (DC.PT.PRESSTESTPLASTIC.R) (detail)

192.517(a) (192.513(a); 192.513(b); 192.513(c); 192.513(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Normal Maintenance and Operations (detail) *Has the operator conducted annual reviews of the written procedures in the manual as required?* (MO.GO.OMANNUALREVIEW.R) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.R) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Normal Operations and Maintenance Procedures - Review (detail) *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found?* (MO.GO.OMEFFECTREVIEW.R) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Abnormal Operations (Review) (detail) *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation procedures and corrective action taken where deficiencies are found?* (MO.GOABNORMAL.ABNORMALREVIEW.R) (detail)

192.605(a) (192.605(c)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Damage Prevention Program (detail) *Does the damage prevention program meet minimum requirements specified in 192.614(c)?* (PD.OC.PDPROGRAM.R) (detail)

192.614(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Change in Class Location Required Study (detail) *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?* (MO.GOCLASS.CLASSLOCATESTUDY.R) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Emergency Response Performance (detail) *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?* (EP.ERG.POSTEVNTREVIEW.R) (detail)

192.605(a) (192.615(b)(1); 192.615(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Emergency Response Training (detail) *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?* (EP.ERG.TRAINING.R) (detail)

192.605(a) (192.615(b)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Liaison with Public Officials (detail) *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?* (EP.ERG.LIAISON.R) (detail)

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Incident Investigation (detail) *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?* (EP.ERG.INCIDENTANALYSIS.R) (detail)

192.605(a) (192.617)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. General - Testing Requirements (detail) *Do records indicate that pressure testing is conducted in accordance with 192.503?* (DC:PT:PRESSTEST:R) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. Audience Identification Records (detail) *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?* (PD.PA.AUDIENCEID.R) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Educational Provisions (detail) *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?* (PD.PA.EDUCATE.R) (detail)

192.616(d) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

18. Maximum Allowable Operating pressure (detail) *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?* (MO.GOMAOP.MAOPDETERMINE.R) (detail)

192.709 (192.619; 192.621; 192.623)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

19. Messages on Pipeline Facility Locations (detail) *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?* (PD.PA.LOCATIONMESSAGE.R) (detail)

192.616(e) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

20. Odorization of Gas (detail) *Do records indicate appropriate odorization of its combustible gases in accordance with its procedures and conduct of the required testing to verify odorant levels met requirements?* (MO.GOODOR.ODORIZE.R) (detail)

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

21. Baseline Message Delivery Frequency (detail) *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?* (PD.PA.MESSAGEFREQUENCY.R) (detail)

192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Did not send customers baseline message (their brochure) to customers 2 times per year.

22. Patrolling Requirements (detail) *Do records indicate that ROW surface conditions have been patrolled as required?* (PD.RW.PATROL.R) (detail)

192.709(c) (192.705(a); 192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

23. Liaison with Emergency and Other Public Officials (detail) *Have liaisons been established and maintained with appropriate fire, police, and other public officials?* (PD.PA.LIAISON.R) (detail)

192.616(c) (API RP 1162 Section 4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

24. Leakage Surveys (detail) *Do records indicate leakage surveys conducted as required?* (PD.RW.LEAKAGE.R) (detail)

192.709(c) (192.706; 192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

25. Other Languages (detail) *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?* (PD.PA.LANGUAGE.R) (detail)

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

26. Distribution Leakage Surveys (detail) *Do records indicate distribution leakage surveys were conducted as required?* (PD.RW.DISTLEAKAGE.R) (detail)

192.603(b) (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Leakage survey conducted by Heath Contractors last time in 2009. ???

27. Test Reinstated Service Lines (detail) *From the review of records, did the operator properly test disconnected service lines?* (AR.RMP.TESTREINSTATE.R) (detail)

192.603(b) (192.725(a), 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

28. Evaluate Program Implementation (detail) *Has an audit or review of the operator's program implementation been performed annually since the program was developed?* (PD.PA.EVALIMPL.R) (detail)

192.616(c) (192.616(l); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

29. Acceptable Methods for Program Implementation Audits (detail) *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?* (PD.PA.AUDITMETHODS.R) (detail)

192.616(c) (192.616(l); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

30. Abandonment or Deactivation of Pipeline and Facilities (detail) *Do records indicate pipelines were abandoned or deactivated as required?* (MO.GM.ABANDONPIPE.R) (detail)

192.709(c) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

31. Program Changes and Improvements (detail) *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?* (PD.PA.PROGRAMIMPROVE.R) (detail)

192.616(c) (API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

32. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals?* (MO.GMOPP.PRESSREGTEST.R) (detail)

192.709(c) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Last regulator inspection performed by Cox contractors on 10-14-13. 4 stations overdue to be inspected.

33. Evaluating Program Effectiveness (detail) *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?* (PD.PA.EVALEFFECTIVENESS.R) (detail)

192.616(c) (API RP 1162 Section 8.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

34. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity?* (MO.GMOPP.PRESSREGCAP.R) (detail)

192.709(c) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

35. Measure Program Outreach (detail) *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?* (PD.PA.MEASUREOUTREACH.R) (detail)

192.616(c) (API RP 1162 Section 8.4.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

36. Valve Maintenance Transmission Lines (detail) *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?* (MO.GM.VALVEINSPECT.R) (detail)

192.709(c) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

37. Measure Understandability of Message Content (detail) *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?* (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)

192.616(c) (API RP 1162 Section 8.4.2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

38. Valve Maintenance Distribution Lines (detail) *Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?* (MO.GM.DISTVALVEINSPECT.R) (detail)

192.603(b) (192.747)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No records of valves being checked since 2013.

39. Vault Inspection (detail) *Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment?* (FS.FG.VAULTINSPECTFAC.R) (detail)

192.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

40. Measure Desired Stakeholder Behavior (detail) *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?* (PD.PA.MEASUREBEHAVIOR.R) (detail)

192.616(c) (API RP 1162 Section 8.4.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

41. Prevention of Accidental Ignition (detail) *Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?* (MO.GM.IGNITION.R) (detail)

192.709 (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

42. Measure Bottom-Line Results (detail) *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?* (PD.PA.MEASUREBOTTOM.R) (detail)

192.616(c) (API RP 1162 Section 8.4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

43. Bell and Spigot Joints (detail) *Do records indicate that caulked bell and spigot joints were correctly sealed?* (MO.GM.BELLSPIGOTJOINT.R) (detail)

192.603(b) (192.753(a); 192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

44. Program Changes (detail) *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?* (PD.PA.CHANGES.R) (detail)

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

45. Master Meter and Petroleum Gas Systems (detail) *Do records indicate the master meter or petroleum gas system operator has met the requirements of 192.616(j)?* (PD.PA.MSTRMETER.R) (detail)

192.616(j) (192.616(h); API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Operator Qualification

1. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?* (TQ.OQ.RECORDS.R) (detail)

192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Corrosion Control Performance

1. Corrosion Control Records (detail) *Do records indicate the location of all items listed in 192.491(a)?* (TD.CP.RECORDS.R) (detail)

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Examination of Exposed Portions of Buried Pipe (detail) *Do records adequately document that exposed buried piping was examined for corrosion?* (TD.CPEXPOSED.EXPOSEINSPECT.R) (detail)

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Cathodic Protection Monitoring (detail) *Do records adequately document cathodic protection monitoring tests have occurred as required?* (TD.CPMONITOR.TEST.R) (detail)

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not checked since 2013.

4. Rectifier or other Impressed Current Sources (detail) *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?* (TD.CPMONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Checking every month.

5. Bonds, Diodes and Reverse Current Switches (detail) *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?* (TD.CPMONITOR.REVCURRENTTEST.R) (detail)

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Correction of Corrosion Control Deficiencies (detail) *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?* (TD.CPMONITOR.DEFICIENCY.R) (detail)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?* (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Isolation from Other Metallic Structures (detail) *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?* (TD.CP.ELECISOLATE.R) (detail)

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Test Leads Installation (detail) *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?* (TD.CPMONITOR.TESTLEAD.R) (detail)

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Interference Currents (detail) *Do records document that the operator has minimized the detrimental effects of stray currents when found?* (TD.CPMONITOR.INTFRCURRENT.R) (detail)

192.491(c) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Internal Corrosion (detail) *Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion?* (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Internal Corrosion in Cutout Pipe (detail) *Do records document examination of removed pipe for evidence of internal corrosion?* (TD.ICP.EXAMINE.R) (detail)

192.491(c) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Internal Corrosion Control: Design and Construction (192.476) (detail) *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?* (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Internal Corrosion Corrosive Gas Actions (detail) *Do records document the actions taken when corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.R) (detail)

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. Atmospheric Corrosion Monitoring (detail) *Do records document inspection of aboveground pipe for atmospheric corrosion?* (TD.ATM.ATMCORRODEINSP.R) (detail)

192.491(c) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. New Buried Pipe Coating (detail) *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)?* (TD.COAT.NEWPIPE.R) (detail)

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Repair of Internally Corroded Pipe (detail) *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?* (TD.ICP.REPAIR.R) (detail)

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

18. Evaluation of Internally Corroded Pipe (detail) *Do records document adequate evaluation of internally corroded pipe?* (TD.ICP.EVALUATE.R) (detail)

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service?* (FS.CS.CMPMAINT.P) (detail)

192.605(b)(6)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?* (FS.CS.CMPSUSD.P) (detail)

192.605(b)(5) (192.605(b)(7))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks?* (FS.CSSYSPROT.CMPRELIEF.P) (detail)

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)?* (DC.COCMP.CMPCOMBUSTIBLE.P) (detail)

192.303 (192.735(a); 192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - Permanent Gas Detection (detail) *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings?* (FS.CSSYSPROT.CMPGASDETREQ.P) (detail)

192.605(b) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?* (FS.CS.BLDGEXITS.O) (detail)

192.163(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Fence Gates (detail) *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?* (FS.CS.FENCEGATES.O) (detail)

192.163(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - NFPA 70 (detail) *Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station?* (FS.CS.CMPNFPA70.O) (detail)

192.163(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations Liquid Removal (detail) *Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165?* (DC.DPCCMP.CMPLIQPROT.O) (detail)

192.141 (192.165(a); 192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?* (FS.CSSYSPROT.ESDGASDISCH.O) (detail)

192.167(a)(2)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Compressor Station Design/Construction - ESD Gas Block (detail) *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less.* (FS.CSSYSPROT.ESDGASBLK.O) (detail)

192.167(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Compressor Station Design/Construction - ESD (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings?* (FS.CSSYSPROT.ESDGASSD.O) (detail)

192.167(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Compressor Station Design/Construction - ESD Electrical (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings?* (FS.CSSYSPROT.ESDELECSD.O) (detail)

192.167(a)(3)(i) (192.167(a)(3)(ii))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Compressor Station Design/Construction - ESD Locations (detail) *Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station?* (FS.CSSYSPROT.ESDLOCATION.O) (detail)

192.167(a)(4)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) *Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages?* (FS.CSSYSPROT.ESDDISTSD.O) (detail)

192.167(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Compressor Station Design/Construction - Unattended Platform ESD (detail) *Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform.* (FS.CSSYSPROT.UNATTPLATCMPSD.O) (detail)

192.167(c)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Compressor Station Design/Construction - Fire Protection (detail) *Do compressor stations have adequate fire protection facilities?* (FS.CSSYSPROT.CMPFP.O) (detail)

192.171(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Compressor Station Design/Construction - Over-Speed Protection (detail) *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven?* (FS.CSSYSPROT.CMPOVSPD.O) (detail)

192.171(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Compressor Station Design/Construction - Lubrication (detail) *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication?* (FS.CSSYSPROT.CMPLUBPROT.O) (detail)

192.171(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented?* (FS.CSSYSPROT.CMPGASENGSD.O) (detail)

192.171(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler?* (FS.CSSYSPROT.CMPGASENGMFL.O) (detail)

192.171(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

17. Compressor Station Design/Construction - Ventilation (detail) *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas?* (FS.CS.CMPBLDGVENT.O) (detail)

192.173

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

18. Cathodic Protection of Underground Piping (detail) *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?* (TD.CP.PRE1971.O) (detail)

192.457(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

19. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected?* (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?* (DC.MO.MAOPLIMIT.O) (detail)

192.605(b)(5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

21. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.O) (detail)

192.605(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site?* (FS.CS.CMPERP.O) (detail)

192.605(a) (192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619?* (MO.GOMAOP.MAOPRECORDING.O) (detail)

192.605(b)(1) (192.619(a); 192.619(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

24. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?* (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

25. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly?* (FS.CSSYSPROT.CMPRELIEF.O) (detail)

192.199 (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?* (DC.COCMP.CMPCOMBUSTIBLE.O) (detail)

192.735(a) (192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?* (FS.CSSYSPROT.CMPGASDET.O) (detail)

192.736(a) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval?* (FS.CSSYSPROT.CMPRELIEF.R) (detail)

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required?* (FS.CSSYSPROT.CMPGASDETOM.R) (detail)

192.709(c) (192.736(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	City of Liberty	**Op ID #**	11472
Inspector	Steve Samples	**Unit #**	
Date of Inspection	7/8/15		
Inspection Location City & State	Liberty, KY.		
Operator Employee Interviewed	**Bridgett Blake**	**Phone #**	
Position/Title	**Operations**		
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)	**Premier Drug Testing**		
DER Phone #	**606-787-9973**		

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	**1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?**	x		
Comments				
.3 .105(c) .225(b)	**2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.**	**x**		
Comments				
.3 .105(b)	**3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.**	x		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	**4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?**	x		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	**5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.**	x		
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* (TQ.OQ.OQPLAN.P) (detail)

192.805(a) (192.801(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task?* (TQ.OQ.REEVALINTERVAL.P) (detail)

192.805(g)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Contractors Adhering to OQ Plan (detail) *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan?* (TQ.OQ.OQPLANCONTRACTOR.P) (detail)

192.805(b) (192.805(f); 192.805(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified?* (TQ.OQ.OQCONTRACTOR.P) (detail)

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Management of Other Entities Performing Covered Tasks (detail) *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task?* (TQ.OQ.OTHERENTITY.R) (detail)

192.805(b) (192.805(c); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Evaluation Methods (detail) *Are evaluation methods established and documented appropriate to each covered task?* (TQ.OQ.EVALMETHOD.P) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Evaluation Methods (detail) *Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records?* (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Abnormal Operating Conditions (detail) *Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals?* (TQ.OQ.ABNORMAL.P) (detail)

192.803

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Abnormal Operating Conditions (detail) *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?* (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?* (TQ.OQ.RECORDS.R) (detail)

192.807

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition?* (TQ.OQ.MERGERACQ.P) (detail)

192.805(b) (192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?* (TQ.OQ.TRAINING.P) (detail)

192.805(h)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. Covered Task Performed by Non-Qualified Individual (detail) *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?* (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Personnel Performance Monitoring (detail) *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

19. Program Performance and Improvement (detail) *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

21. Management of Changes (detail) *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

22. Notification of Significant Plan Changes (detail) *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Darren Atwood and Greg Rodgers. O.k.

2. Qualification Status (detail) *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
I-1 Monitor Corrossion task. Last qualified 2/13/13. Due every 3 years. O.k.

3. Abnormal Operating Condition Recognition and Reaction (detail) *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Verification of Qualification (detail) *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Program Inspection Deficiencies (detail) *Have potential issues identified by the headquarters inspection process been corrected at the operational level?* (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Checked test points on high pressure line. Readings well above -.85 criteria (-1.06) (on rectifier) New personnel in charge not checking since 2013. See report deficiencies.

Distribution Integrity Management Program

Implementation Inspection Form

This inspection form is for the evaluation of an operator's implementation of its gas distribution integrity management program (DIMP) through a review of its records and actions performed on pipeline facilities. This inspection form is applicable to operators, other than Master Meter and Small LPG operators, that have developed and implemented a DIMP under §192.1005. The form asks inspectors to review records and perform field observations regarding the implementation of the DIMP required elements. Following a review of the operator's DIMP plan, inspectors will observe actions taken by the operator to ensure that procedures have been followed. There are instances when actions by an operator could be deemed satisfactory by an inspector for an implementation question while still not meeting the procedural requirements in the DIMP plan resulting in an unsatisfactory rating for a corresponding procedural question.

Questions with code references beside them are enforceable. "S/Y" stands for "satisfactory" or "yes"; "U/N" stands for "unsatisfactory" or "no"; "N/A" stands for "not applicable"; and "N/C" stands for "not checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section. Due to the unique characteristics of some operator's system, there are instances where an operator is not required to perform an action, and some of the questions requesting a review of documents may not apply and would be rated as "N/A" (rather than rating "U/N"). For instance, in Question #8, if the operator has NOT acquired any new information relevant to threat identification, rate as "N/A". Correspondingly, if the operator had acquired new information that needed to be included in the threat identification and had not, then the rating would be "U/N".

This inspection form includes two types of activities – records review and field observation activities:

- The Records Review questions are to be performed on records used by an operator for implementing its DIMP plan. Not all parts of this form may be applicable to a specific Records Review Inspection, and only those applicable portions of this form need to be completed.
- The Field Observation questions are to be used on field activities being performed by an operator in support of its DIMP plan. Field Observation inspection activities may also include review of data, environmental conditions, and assumptions being used by an operator in support of its DIMP plan. Not all parts of this form may be applicable to a specific Field Observation Inspection, and only those applicable portions of this form need to be completed.

A review of applicable Operations and Maintenance (O&M) and DIMP processes and procedures applicable to the field activity being inspected should be considered by the inspector to ensure the operator is implementing its O&M Manuals and DIMP in a consistent manner.

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):	City of Liberty
PHMSA Operator ID:	11472
Type of Operator:	☐ Investor Owned x Municipal ☐ Private ☐ LPG ☐ Other (identify - e.g., cooperative)
State(s) included in this inspection	Kentucky
Headquarters Address:	518 Middleburg St.
Company Contact:	Greg Rodgers
Phone Number:	
Email:	
Date(s) of Inspection	7/8,9/15
Date of this Report	7/13/15
Date of Current DIMP Plan/Revision	

Persons Interviewed:

Persons Interviewed *(list primary contact first)*	Title	Phone Number	Email
Greg Rodgers	Operations		
Darren Atwood	Operations		

State/Federal Representatives:

Inspector Name and Agency	Phone Number	Email
Steve Samples	502-330-5985	Stevend.samples@ky.gov

System Description Narrative:

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1005	**Issues Identified in previous Integrity Management Inspection(s)**				
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	x	☐	☐	☐
Inspector Comments						
	192.1007(a)	**Knowledge of the system**				
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	x	☐	☐	☐
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	x	☐	☐	☐
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	x	☐	☐	☐
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	x	☐	☐	☐
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	x	☐	☐	☐
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	x	☐	☐	☐
Inspector Comments						
10	.1007 (b)	Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following: • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below)	x	☐	☐	☐
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	x	☐	☐	☐
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	x	☐	☐	☐
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	x	☐	☐	☐
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	x	☐	☐	☐
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	x	☐	☐	☐
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(d)	Identify and implement measures to address risks				
18	.1007 (d)	Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan?	x	☐	☐	☐
19	.1007 (d)	Has the operator completed any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat? (e.g., pipe replacement program completed, etc.)	x	☐	☐	☐
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	x	☐	☐	☐
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	x	☐	☐	☐
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: Locate the leaks in the distribution system; Evaluate the actual or potential hazards associated with these leaks; Act appropriately to mitigate these hazards; Keep records; and Self-assess to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(e)	Measure performance, monitor results, and evaluate effectiveness				
23	.1007 (e)	Is the operator collecting data for the required performance measures in §192.1007(e)?				
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	x	☐	☐	☐
		ii) Number of excavation damages?	x	☐	☐	☐
		iii) Number of excavation tickets?	x	☐	☐	☐
		iv) Total number of leaks either eliminated or repaired, categorized by cause?	x	☐	☐	☐
		v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1)	x	☐	☐	☐
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1)	x	☐	☐	☐
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	x	☐	☐	☐
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	x	☐	☐	☐
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	**Periodic Evaluation and Improvement**				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	x	☐	☐	☐
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary?	x x x x x x x x	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	x	☐	☐	☐
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
31	.1007 (f)	Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures? If not, were performance measures modified, deleted or added? (describe in Inspector comments)	x	☐	☐	☐
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	x	☐	☐	☐
Inspector Comments						
	192.1007 (g)	**Report results**				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	x	☐	☐	☐
Inspector Comments						
	192.1009	**What must an operator report when mechanical fittings fail?**				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
35	.1009	Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year? Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?	x x	☐ ☐	☐ ☐	☐ ☐
Inspector Comments						
36	.1009	Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following: • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1011	**What records must an operator keep?**				
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	x	☐	☐	☐
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	x	☐	☐	☐
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	x	☐	☐	☐
Inspector Comments						
	192.1013	**When may an operator deviate from required periodic inspections under this part?**				
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	x	☐	☐	☐
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	x	☐	☐	☐
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	.1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	x	☐	☐	☐
Inspector Comments						
44	.1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	x	☐	☐	☐
Inspector Comments						

Additional Inspector Comments:

SUPPLEMENTAL INSPECTION QUESTIONS

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked (U, N/A, or N/C must include an explanation if checked

SUPPLEMENTAL INSPECTION QUESTIONS	S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS				
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.			x	
If necessary, was remedial action taken?			x	
Review operator procedures for surveillance of cast iron pipelines			x	
Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)			x	
Review operator emergency response procedures for leaks caused by excavation damage near buildings.	x			
Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)	x			
Review operator records of previous accidents and failures (including reported third party damage and leak response) to ensure appropriate operator response as required by 192.617.	x			
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS				
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?	x			
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?	x			
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?	x			
If no, encourage and promote the adoption of CGA Best Practices document.	x			
Review operators records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617.	x			
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS				
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?			x	
If yes, what is operator doing to mitigate the safety concerns?				
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?			x	
Comments:				

CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. *Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?*

Yes	No	NA	NC
	x		

Notes
No control pressure gas computer systems in place at this time.

2. *Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.*

Yes	No	NA	NC
	x		

Notes

3. *Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.*

Yes	No	NA	NC
	x		

Notes

4. *Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?*

Yes	No	NA	NC
	x		

Notes

5. *Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.*

Yes	No	NA	NC
	x		

Notes

6. *Identify personnel with specific responsibilities for cybersecurity within your organization?*

Yes	No	NA	NC
		x	

Notes

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Steve Samples	Report Number:	Liberty Gas 06232016
Inspection Date(s):	6/23/16	Report Date:	6/27/16
Inspection Type:	Standard Comprehensive ☐ Integrity Management ☐ Operator Qualification x☐ Compliance Follow-up ☐ Construction		

OPERATOR INFORMATION

Name of Operator:	City of Liberty Gas system	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	11472
Type of Facility:	Municipal	Location of Facility:	Liberty, KY.
Area of Operation:	Liberty , KY.		

Official Operator Contact and Address: (Contact for Inspection Letter)	Unit Name and Address
Steven Brown (Mayor) City of Liberty 518 Middleburg St. Liberty, KY. 42539	

Phone # and Email:	606-787-9973 Libertybb@windstream.net
Records Location:	Same as above

Persons Interviewed	Title	Phone No.	Email
Bridget Blake	Clerk	606-787-9973	libertybb@windstream.net
Greg Rodgers	Superintendent		

Has the Operator provided an updated Emergency Contact List?	☒	Yes	☐	No	

Number of Customers:	650			
Number of Gas Employees:	5			
Gas Supplier:	Texas Eastern Transmission			
Unaccounted for Gas:	4%			
Services:	Residential	Commercial	Industrial	Other
	650			

Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)
Feeder:	250 psig	240 PSIG
Town:	150 psig	100 psig
Other:	27	50

Does the Operator have any transmission pipeline (above 20% SMYS):	No

Additional Operator Information:

Operator advised and will meet with Texas Eastern Transmission and determine exact point of ownership of pipe at the delivery point and Liberty Gas will maintain piping from that point on.

PSC Exhibit 2

Date of Last Inspection:	7/7/15		
Number of Deficiencies:	7	Deficiencies not Cleared:	2

Summary of Areas Inspected

PHMSA Question Set

☒	Emergency Plan	☒	Operations and Maintenance Plan	☒	Critical Valves Maintenance Inspections
☒	Cathodic Protection	☐	Accidents	☒	Leak Surveys
☒	Odorization	☒	Operator Qualification	☒	Damage Prevention
☒	Pipeline Markers	☐	Regulator Stations	☒	DIMP
☒	Field Inspection	x ☐	Other		

Other:

State Question Set

☒	Cybersecurity	☐	Other

Other: This was a follow-up inspection only to check progress of previous deficiencies.

Summary

This inspection was to check the progress of the previous 7 deficiencies found in 2015.

Probable Findings

(1) 192.465(a) – The City of Liberty has not tested its test points for external corrosion monitoring since 2013.
(2) 192.739(a) – The City of Liberty has not inspected its 4 regulator stations since 2013.
(3) 192.747(a) - The City of Liberty has not inspected its safety distribution valves since 2013.
(4) 192.723(b)(1) – The City of Liberty has not conducted leakage surveys on its business district each year. Last records were 2009 from Heath Contractors.
(5) 192.723(b)(2) – The City of Liberty has not conducted leakage surveys outside its business district. Last records were 2009 from Heath Contractors. The City of Liberty Operation and Maintenance Interval is every 3 years.
(6) 192.616(c) – The City of Liberty was not sending the baseline public awareness message to its customers 2 times per year according to their Public Awareness Plan.
(7) 192.225 – The City of Liberty did not produce welding procedures for their system.

All deficiencies had been corrected except deficiency number 4 and number 5. The City of Liberty is trying to contract Heath Consultants to perform the leakage survey.

Recommendations and Comments

City of Liberty should perform the leakage surveys required as soon as possible.

Submitted By:

Steve Samples

Steve Samples 6/27/16

Utility Regulatory and Safety Investigator IV

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/27/2012

Report Number: City of Liberty Gas Company 031212

BRIEF

Inspector:	Joel Grugin
Inspection Date:	3/12/2012
Type of Inspection:	Periodic Regulatory Compliance Inspection
Type of Facility:	Municipal
Name of Utility:	City of Liberty Gas Company
Location of Facility:	Liberty, KY
Purpose of Inspection:	Periodic inspection of a municipal operator's facilities and management practices to verify compliance with federal pipeline safety regulations.
Applicable Regulations	49 CFR Part 191, 192, and 199.

INSPECTION

Description of Utility:	Municipal operator serving the City of Liberty and surrounding area.
Number of Customers:	547
Area of Operation:	Liberty and some rural accounts in Casey County along the HP feeder line from Texas Eastern's delivery point.
Supply Source:	Texas Eastern
Distribution Description:	Steel and plastic distribution gas system operating at 240 PSIG to 20 PSIG.
Workforce Summary:	6 Operator qualified employees
Utility Reps in Insp:	Ronnie Wesley
Date of Last Inspection:	5/27/2009
DTR from Last Insp:	9
DTRs not Cleared:	0

Summary of items and facilities Inspected:

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Public Awareness, DIMP and Drug and Alcohol Plans were reviewed during the office visit. Also inspected were records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, and odorant verification tests. The field portion of the inspection consisted of inspecting regulator settings, pipeline markers, mainline valve locations, meter installations, and the point of delivery at Texas Eastern facility.

PSC Exhibit 3

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/27/2012

Report Number: City of Liberty Gas Company 031212

FINDINGS

RECOMMENDATIONS

ADDITIONAL INSPECTOR COMMENTS

Ronnie Wesley has done an excellent job in correcting all of the deficiencies from the previous inspection and in maintaining Liberty's natural gas system. The new DIMP regulations which went into effect last year will require more accurate record keeping in the future and I encourage the City of Liberty Gas Company to learn those requirements and to follow the implementation of their plan. No deficiencies were found during this inspection.

Submitted by

Joel Grugin

Joel Grugin
Utility Regulatory and Safety Investigator III

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

A completed **Standard Inspection Report** is to be submitted to the Director within 60 days from completion of the inspection. A **Post Inspection Memorandum (PIM)** is to be completed and submitted to the Director within 30 days from the completion of the inspection, or series of inspections, and is to be filed as part of the **Standard Inspection Report.**

Inspection Report	Post Inspection Memorandum
Inspector/Submit Date:	**Inspector/Submit Date:**
	Peer Review/Date:
	Director Approval/Date:

POST INSPECTION MEMORANDUM (PIM)

Name of Operator:	Liberty Natural GAS	**OPID #:**	11472
Name of Unit(s):		**Unit #(s):**	
Records Location:	518 Middleburg ST Liberty 42539	**Activity #**	
Unit Type & Commodity:			
Inspection Type:	Standard Periodic	**Inspection Date(s):**	3-12,13,14 - 2012
PHMSA Representative(s):	Joel Grugin	**AFO Days:**	

Company System Maps (copies for Region Files):

Validate SMART Data (components, miles, etc): ☐ **Acquisition(s), Sale or New Construction** (submit SMART update): ☐

Validate Additional Requirements Resulting From Waiver(s) or Special Permit(s):

Summary:

Findings:

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

Name of Operator:			
OP ID No. [1]		**Unit ID No.** [1]	
HQ Address:		**System/Unit Name & Address:** [1]	
Co. Official:	Ronnie Wesley	**Activity Record ID No.:**	
Phone No.:		**Phone No.:**	
Fax No.:	606-787-7992	**Fax No.:**	
Emergency Phone No.:	911	**Emergency Phone No.:**	

Persons Interviewed	Title	Phone No.
Ronnie Wesley	Supervisor Public Works	606-303-1327

PHMSA Representative(s) [1]		**Inspection Date(s)** [1]	
Company System Maps (Copies for Region Files):			

Unit Description

Portion of Unit Inspected: [1]

For gas transmission and distribution pipeline inspections, the attached evaluation form should be used in conjunction with 49CFR Parts 191 and 192.

[1] Information not required if included on page 1.

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked

If an item is marked U, N/A, or N/C, an explanation must be included in this report.

GAS SYSTEM OPERATIONS

Gas Supplier	Texas Eastern	**Date:**				
Unaccounted for gas:	7%?	**Services:**	*Residential*	*Commercial*	*Industrial*	*Other*
			410	136	1	

	Operating Pressure(s):	**MAOP (Within last year)**	**Actual Operating Pressure (At time of Inspection)**
Feeder:	240	250	
Town:	110		
Other:	@ 25		

Does the operator have any transmission pipelines?	
For compressor station inspections, use Attachment 4.	

49CFR PART 191

	REPORTING PROCEDURES	**S**	**U**	**N/A**	**N/C**
.605(b)(4)	Procedures for gathering data for incident reporting				
	191.5 Immediate Notice of certain incidents to **NRC (800) 424-8802,** or electronically at http://www.nrc.uscg.mil/nrchp.html. *(191.3 - A release of gas from a pipeline, that results in a death or personal injury necessitating in-patient hospitalization, estimated property damage of $50,000 or more, including loss to the operator and others, or both, but excluding cost of gas lost, unintentional estimated gas loss of three million cubic feet or more, or an event that is significant in the judgment of the operator.)*	✓			
	191.7 Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	✓			
	191.15(a) 30-day follow-up written report **(Form 7100-2)** Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov	✓			
	191.15(c) Supplemental report (to 30-day follow-up)	✓			
.605(a)	191.17 Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(NOTE: June 15, 2011 [may change to August 15] for the year 2010).*	✓			
	191.22 Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov	✓			
	191.23 Reporting safety-related condition (SRCR)	✓			
	191.25 Filing the SRCR within 5 days of determination, but not later than 10 days after discovery	✓			
	191.27 Offshore pipeline condition reports – filed within 60 days after the inspections	✓			
.605(d)	Instructions to enable operation and maintenance personnel to recognize potential **Safety Related Conditions**	✓			

Comments:

49CFR PART 192

.13(c)		**CUSTOMER AND EFV INSTALLATION NOTIFICATION PROCEDURES**	**S**	**U**	**N/A**	**N/C**
	.16	Procedures for notifying new customers, within **90 days**, of their responsibility for those selections of service lines not maintained by the operator.	✓			
	.381	If EFVs are installed, they must meet the performance requirements of §192.381	✓			
	.383	If the operator has a voluntary installation program for excess flow valves, the program must meet the requirements outlined in §192.383.	✓			
	.383	If the operator does not have a voluntary program for EFV installations, customers must be notified in accordance with §192.383.	✓			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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.605(a)	NORMAL OPERATING and MAINTENANCE PROCEDURES		S	U	N/A	N/C
	.605(a)	O&M Plan review and update procedure (1 per year/15 months)	✓			
	.605(b)(3)	Making construction records, maps, and operating history available to appropriate operating personnel	✓			
	.605(b)(5)	Start up and shut down of the pipeline to assure operation within **MAOP** plus allowable buildup	✓			
	.605(b)(8)	Periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found	✓			
	.605(b)(9)	Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line	✓			
	.605(b)(10)	Routine inspection and testing of pipe-type or bottle-type holders	✓			
	.605(b)(11)	Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency proced. under §192.615(a)(3) specifically apply to these reports.	✓			
	.605(b)(12)	Implementing the applicable control room management procedures required by 192.631.	✓			

Comments:

.605(a)	CHANGE in CLASS LOCATION PROCEDURES		S	U	N/A	N/C
	.609	Class location study	✓			
	.611	Confirmation or revision of MAOP	✓			

Comments:

.613	CONTINUING SURVEILLANCE PROCEDURES		S	U	N/A	N/C
	.613(a)	Procedures for surveillance and required actions relating to change in class location, failures (including cast iron circumferential cracking), leakage history, corrosion, substantial changes in CP requirements, and unusual operating and maintenance conditions (NTSB B.8)	✓			
	.613(b)	Procedures requiring **MAOP** to be reduced, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition	✓			

Comments:

.605(a)	DAMAGE PREVENTION PROGRAM PROCEDURES		S	U	N/A	N/C
	.614(c)	Participation in a qualified one-call program, or if available, a company program that complies with the following:				

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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.605(a)	DAMAGE PREVENTION PROGRAM PROCEDURES	S	U	N/A	N/C
	(1) Identify persons who engage in excavating	✓			
	(2) Provide notification to the public in the One Call area	✓			
	(3) Provide means for receiving and recording notifications of pending excavations	✓			
	(4) Provide notification of pending excavations to the members	✓			
	(5) Provide means of temporary marking for the pipeline in the vicinity of the excavations	✓			
	(6) Provides for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged	✓			
	(i) Inspection must be done to verify integrity of the pipeline	✓			
	(ii) After blasting, a leak survey must be conducted as part of the inspection by the operator	✓			

Comments:

.615		EMERGENCY PROCEDURES	S	U	N/A	N/C
	.615(a)(1)	Receiving, identifying, and classifying notices of events which require immediate response by the operator	✓			
	.615(a)(2)	Establish and maintain communication with appropriate public officials regarding possible emergency	✓			
	.615(a)(3)	Prompt response to each of the following emergencies:				
		(i) Gas detected inside a building	✓			
		(ii) Fire located near or directly involving a pipeline	✓			
		(iii) Explosion near or directly involving a pipeline	✓			
		(iv) Natural disaster	✓			
	.615(a)(4)	Availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency	✓			
	.615(a)(5)	Actions directed towards protecting people first, then property.	✓			
	.615(a)(6)	Emergency shutdown or pressure reduction to minimize hazards to life or property	✓			
	.615(a)(7)	Making safe any actual or potential hazard to life or property. Response should consider the possibility of leaks in multiple locations caused by excavation damage and underground migration of gas into nearby buildings. (NTSB B.9)	✓			
	.615(a)(8)	Notifying appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials	✓			
	.615(a)(9)	Instructions for restoring service outages after the emergency has been rendered safe	✓			
	.615(a)(10)	Investigating accidents and failures as soon as possible after the emergency	✓			
	.615(a)(11)	Actions required to be taken by a controller during an emergency in accordance with 192.631.	✓			
	.615(b)(1)	Furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action	✓			
	.615(b)(2)	Training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training	✓			
	.615(b)(3)	Reviewing activities following emergencies to determine if the procedures were effective	✓			
	.615(c)	Establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies	✓			

Comments:

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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Comments:

		PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)					
				S	U	N/A	N/C
.605(a)	.616	Public Awareness Program also in accordance with API RP 1162 (Amdt 192-99 pub. 5/19/05 eff. 06/20/05 and Amdt 192-not numbered pub 12/13/07 eff. 12/13/07).					
	.616(d)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:					
		(1)	Use of a one-call notification system prior to excavation and other damage prevention activities;	✓			
		(2)	Possible hazards associated with unintended releases from a gas pipeline facility;	✓			
		(3)	Physical indications of a possible release;	✓			
		(4)	Steps to be taken for public safety in the event of a gas pipeline release; and	✓			
		(5)	Procedures to report such an event (to the operator).	✓			
	.616(e)	The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.		✓			
	.616(f)	The operator's program and the media used must be comprehensive enough to reach all areas in which the operator transports gas.		✓			
	.616(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area?		✓			
	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than **June 20, 2010.**		✓			
	.616(j)	Operators of a master meter or petroleum gas system (unless the operator transports gas as a primary activity) must develop/implement a written procedure to provide its customers public awareness messages twice annually that includes: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. (See this subpart for requirements for master meter or petroleum gas system operators not located on property controlled by the operator.)				✓	

Comments:

.617	FAILURE INVESTIGATION PROCEDURES		S	U	N/A	N/C
	.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence	✓			

Comments:

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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.605(a)	MAOP PROCEDURES	S	U	N/A	N/C
.619	Establishing **MAOP** so that it is commensurate with the class location	✓			
	MAOP cannot exceed the lowest of the following:				
	(a)(1) Design pressure of the weakest element	✓			
	(a)(2) Test pressure divided by applicable factor	✓			
	(a)(3) The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in second column, unless the segment was tested according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K.	✓			
	(a)(4) Maximum safe pressure determined by operator.	✓			
	(b) Overpressure protective devices must be installed if .619(a)(4) is applicable	✓			
	(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with § 192.611	✓			
.621	MAOP - High Pressure Distribution Systems Note: **D F** =0.32, or = 0.40 for PA-11 pipe produced after January 23, 2009 with a nominal pipe size (IPS or CTS) 4-inch or less, and a SDR of 11 or greater (i.e. thicker pipe wall), PA-11 design criteria in 192.121 & .123, (Final Rule Pub. 24 December, 2008)	✓			
.623	Max./Min. Allowable Operating Pressure - Low Pressure Distribution Systems				

Pipeline segment	Pressure date	Test date
- Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.
All other pipelines.	July 1, 1970.	July 1, 1965.

Comments:

.13(c)	PRESSURE TEST PROCEDURES	S	U	N/A	N/C
	.503 Pressure testing	✓			

Comments:

.605(a)	ODORIZATION of GAS PROCEDURES	S	U	N/A	N/C
.625(a)	Distribution lines must contain odorized gas. – must be readily detectable by person with normal sense of smell at $^{1}/_{5}$ of the LEL	✓			
.625(b)	Odorized gas in **Class 3** or **4** locations (if applicable).	✓			
.625(f)	Periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.	✓			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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Comments:

.605(a)		TAPPING PIPELINES UNDER PRESSURE PROCEDURES	S	U	N/A	N/C
	.627	Hot taps must be made by a qualified crew NDT testing is suggested prior to tapping the pipe. Reference API RP 2201 for **Best Practices.**	✓			

Comments:

.605(a)		PIPELINE PURGING PROCEDURES	S	U	N/A	N/C
	.629	Purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline				
		(a) Lines containing air must be properly purged.	✓			
		(b) Lines containing gas must be properly purged	✓			

Comments:

			CONTROL ROOM MANAGEMENT PROCEDURES (Applies to Operator with greater than 250,000 services)	S	U	N/A	N/C
.605(a)	.631(a)		605(b)(12) Each operator must have and follow written control room management procedures. NOTE: *An operator must develop the procedures no later than August 1, 2011 and implement the procedures no later than February 1, 2013.*				
	.631(b)		The operator's program must define the roles and responsibilities of a controller during normal, abnormal and emergency conditions including a definition of:				
		(1)	Controller's authority and responsibility.				
		(2)	Controller's role when an abnormal operating condition is detected.				
		(3)	Controller's role during an emergency				
		(4)	A method of recording shift change responsibilities between controllers.				
	.631(c)		The operator's program must provide its controllers with the information, tools, processes and procedures necessary to perform each of the following:				
			(1) Implement sections 1, 4, 8,9,11.2, and 11.3 of API RP 1165 whenever a SCADA System is added, expanded or replaced.				
			(2) Conduct point-to-point verification between SCADA displays and related equipment when changes that affect pipeline safety are made.				
			(3) Test and verify any internal communications plan – at least once a year NTE 15 months.				
			(4) Test any backup SCADA system at least once each year but NTE 15 months.				
			(5) Establish and implement procedures for when a different controller assumes responsibility.				
	.631(d)		Each operator must implement and follow methods to reduce the risk associated with controller fatigue, including:				
			(1) Establishing shift lengths and schedule rotations that provide time sufficient to achieve eight hours of continuous sleep.				
			(2) Educating controllers and supervisors in fatigue mitigation strategies.				

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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		CONTROL ROOM MANAGEMENT PROCEDURES (Applies to Operator with greater than 250,000 services)	S	U	N/A	N/C
		(3) Training of controllers and supervisors to recognize the effects of fatigue.				
		(4) Establishing a maximum limit on controller hours-of-service.				
	.631(e)	Each operator must have a written alarm management plan including these provisions:				
		(1) Reviewing alarms using a process that ensures that they are accurate and support safe operations.				
		(2) Identifying at least once a year, points that have been taken off SCADA scan or have had alarms inhibited, generated false alarms, or have had forced or manual values for periods of time exceeding that required for maintenance activities.				
		(3) Verifying the alarm set-point values and alarm descriptions once each year NTE 15 months.				
		(4) Reviewing the alarm management plan at least once every calendar year NTE 15 months.				
		(5) Monitoring the content and volume of activity being directed to and required of each controller once each year NTE 15 months.				
		(6) Addressing deficiencies identified through implementation of 1-5 of this section.				
	.631(f)	Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing the following:				
		(1) Establishing communications between controllers, management and field personnel when implementing physical changes to the pipeline.				
		(2) Requiring field personnel to contact the control room when emergency conditions exist and when field changes could affect control room operations.				
		(3) Seeking control room or management participation in planning prior to implementation of significant pipeline changes.				
	.631(g)	Each operator must assure that lessons learned from its experience are incorporated in to its procedures by performing the following:				
		(1) Reviewing reportable incidents to determine if control room actions contributed to the event and correcting any deficiencies.				
		(2) Including lessons learned from the operator's training program required by this section.				
	.631(h)	Each operator must establish a controller training program and review its contents once a year NTE 15 months which includes the following elements:				
		(1) Responding to abnormal operating conditions (AOCs).				
		(2) Using a computerized simulator or other method for training controllers to recognize AOCs				
		(3) Training controllers on their responsibilities for communication under the operator's emergency response procedures.				
		(4) Training that provides a working knowledge of the pipeline system, especially during AOCs.				
		(5) Providing an opportunity for controllers to review relevant procedures for infrequently used operating setups.				

Comments:

.605(a)		MAINTENANCE PROCEDURES	S	U	N/A	N/C
	.703(b)	Each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service	✓			
	(c)	Hazardous leaks must be repaired promptly	✓			

Comments:

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Comments:

.605(b)	TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES	S	U	N/A	N/C
.705(a)	Patrolling ROW conditions				
(b)	Maximum interval between patrols of lines:				

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	2/yr (7½ months)	1/yr (15 months)
3	4/yr (4½ months)	2/yr (7½ months)
4	4/yr (4½ months)	4/yr (4½ months)

.706	Leakage surveys – **1 year/15 months**				
	Leak **detector equipment** survey requirements for lines transporting un-odorized gas				
	(a) **Class 3** locations - **7½ months** but at least **twice each calendar year**				
	(b) **Class 4** locations - **4½ months** but at least **4 times each calendar year**				

Comments:

.605(b)	DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES	S	U	N/A	N/C
.721(a)	Frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage (i.e., consider cast iron, weather conditions, known slip areas, etc.)	✓			
.721(b)	Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled . . .				
(b)(1)	In business districts at intervals not exceeding 4½ months, but at least four times each calendar year; and	✓			
(b)(2)	Outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year	✓			
.723(a) & (b)	Periodic leak surveys determined by the nature of the operations and conditions.	✓			
(b)(1)	In business districts as specified, **1/yr (15 months)**	✓			
(b)(2)	Outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	✓			

Comments:

.605(b)	LINE MARKER PROCEDURES	S	U	N/A	N/C
.707	Line markers installed and labeled as required	✓			

Comments:

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Comments:

.605(b)		TRANSMISSION RECORD KEEPING PROCEDURES	S	U	N/A	N/C
	.709	Records must be maintained...				
		(a) Repairs to the pipe – **life of system**				
		(b) Repairs to "other than pipe" – **5 years**				
		(c) Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests – **5 years** or until next one				

Comments:

.605(b)		TRANSMISSION FIELD REPAIR PROCEDURES	S	U	N/A	N/C
		Imperfections and Damages				
	.713(a)	Repairs of imperfections and damages on pipelines operating above **40% SMYS**				
		(1) Cut out a cylindrical piece of pipe and replace with pipe of ∃ design strength				
		(2) Use of a reliable engineering method				
	.713(b)	Reduce operating pressure to a safe level during the repair				
		Permanent Field Repair of Welds				
	.715	Welds found to be unacceptable under §192.241(c) must be repaired by:				
		(a) Taking the line out of service and repairing in accordance with **§192.245:**				
		▪ Cracks longer than **8%** of the weld length (except offshore) must be removed				
		▪ For each weld that is repaired, the defect must be removed down to clean metal and the pipe preheated if conditions demand it				
		▪ Repairs must be inspected to ensure acceptability				
		▪ Crack repairs or defect repairs in previously repaired areas must be done in accordance with qualified written welding procedures				
		(b) If the line remains in service, the weld may be repaired in accordance with **§192.245** if:				
		(1) The weld is not leaking				
		(2) The pressure is reduced to produce a stress that is **20% of SMYS or less**				
		(3) Grinding is limited so that **⅛ inch** of pipe weld remains				
		(c) If the weld cannot be repaired in accordance with **(a) or (b)** above, a full encirclement welded split sleeve must be installed				
		Permanent Field Repairs of Leaks				
	.717	Field repairs of leaks must be made as follows:				
		(a) Replace by cutting out a cylinder and replace with pipe similar or of greater design				
		(b)(1) Install a full encirclement welded split sleeve of an appropriate design unless the pipe is **joined by mechanical couplings** and **operates at less than 40% SMYS**				
		(b)(2) A leak due to a corrosion pit may be repaired by installing **a bolt on leak clamp**				
		(b)(3) For a corrosion pit leak, if a pipe is not more than **40,000 psi SMYS**, the pits may be repaired by **fillet welding a steel plate**. The plate must have **rounded corners** and the same **thickness or greater** than the pipe, and **not more than ½ D** of the pipe size				

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.605(b)	TRANSMISSION FIELD REPAIR PROCEDURES	S	U	N/A	N/C
	(b)(4) Submerged offshore pipe or pipe in inland navigable waterways may be repaired with a mechanically applied full encirclement split sleeve of appropriate design				
	(b)(5) Apply reliable engineering method				
	Testing of Repairs				
.719(a)	Replacement pipe must be pressure tested to meet the requirements of a new pipeline				
(b)	For lines of **6-inch diameter or larger** and that **operate at 20% of more of SMYS,** the repair must be nondestructively tested in accordance with **§192.241©**				

Comments:

.605(b)	TEST REQUIREMENTS FOR REINSTATING SERVICE LINES	S	U	N/A	N/C
.725(a)	Except for .725(b), disconnected service lines must be tested the same as a new service line.	✓			
(b)	Service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect. See code for exception to this.	✓			

Comments:

.605(b)	ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES	S	U	N/A	N/C
.727(b)	Operator must disconnect both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained. Offshore abandoned pipelines must be filled with water or an inert material, with the ends sealed	✓			
(c)	Except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end.	✓			
(d)	Whenever service to a customer is discontinued, do the procedures indicate one of the following:				
	(1) The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator	✓			
	(2) A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly	//			
	(3) The customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed	✓			
(e)	If air is used for purging, the operator shall ensure that a combustible mixture is not present after purging	//			
.727(g)	Operator must file reports upon abandoning underwater facilities crossing navigable waterways, including offshore facilities.	/			

Comments:

.605(b)	PRESSURE LIMITING and REGULATING STATION PROCEDURES	S	U	N/A	N/C
.739(a)	Inspection and testing procedures for pressure limiting stations, relief devices, pressure regulating stations and equipment **(1 per yr/15 months)**	✓			
	(1) In good mechanical condition	✓			

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.605(b)	PRESSURE LIMITING and REGULATING STATION PROCEDURES	S	U	N/A	N/C
	(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	✓			
	(3) Set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	✓			
	(4) Properly installed and protected from dirt, liquids, and other conditions that may prevent proper oper.	✓			
	.739(b) For steel lines if MAOP is determined per .619(c) and the MAOP is 60 psi (414 kPa) gage or more . . .				
	If MAOP produces hoop stress that / Then the pressure limit is: Is greater than 72 percent of SMYS / MAOP plus 4 percent Is unknown as a percent of SMYS / A pressure that will prevent unsafe operation of the pipeline considering its operating and maintenance history and MAOP	✓			
	.741 Telemetering or Recording Gauges				
	(a) In place to indicate gas pressure in the district that is supplied by more than one regulating station	✓			
	(b) Determine the need in a distribution system supplied by only one district station	✓			
	(c) Inspect equipment and take corrective measures when indications of abnormally high or low pressure	✓			
	.743 Testing of Relief Devices				
	.743 (a) Capacity must be consistent with .201(a) except for .739(b), and be determined **1 per yr/15 mo.**	✓			
	(b) If calculated, capacities must be compared; annual review and documentation are required.	✓			
	(c) If insufficient capacity, new or additional devices must be installed to provide required capacity.	✓			

Comments:

.605(b)	VALVE AND VAULT MAINTENANCE PROCEDURES	S	U	N/A	N/C
	Transmission Valves				
	.745 (a) Inspect and partially operate each transmission valve that might be required during an emergency **(1 per yr/15 months)**			✓	
	.745 (b) Prompt remedial action required, or designate alternative valve.			✓	
	Distribution Valves				
	.747 (a) Check and service each valve that may be necessary for the safe operation of a distribution system **(1 per yr/15 months)**	✓			
	(b) Prompt remedial action required, or designate alternative valve.	✓			

.605(b)	VAULT INSPECTION PROCEDURES	S	U	N/A	N/C
	.749 Inspection of vaults greater than **200 cubic feet** and housing pressure regulating or limiting devices (**1 per yr NTE 15 months**). NO VAULTS			✓	

Comments:

.605(b)	PREVENTION of ACCIDENTAL IGNITION PROCEDURES	S	U	N/A	N/C
	.751 Reduce the hazard of fire or explosion by:				
	(a) Removal of ignition sources in presence of gas and providing for a fire extinguisher	✓			

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.605(b)	PREVENTION of ACCIDENTAL IGNITION PROCEDURES	S	U	N/A	N/C
	(b) Prevent welding or cutting on a pipeline containing a combustible mixture	✓			
	(c) Post warning signs	✓			

Comments:

.605(b)	CAULKED BELL AND SPIGOT JOINTS PROCEDURES	S	U	N/A	N/C
.753	Cast-iron caulked bell and spigot joint repair:				
	(a) When subject to more than 25 psig, sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)			✓	
	(b) When subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking			✓	

.605(b)	PROTECTING CAST-IRON PIPELINE PROCEDURES	S	U	N/A	N/C
.755	Operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection.				
	(a) Vibrations from heavy construction equipment, trains, trucks, buses or blasting?			✓	
	(b) Impact forces by vehicles?			✓	
	(c) Earth movement?			✓	
	(d) Other foreseeable outside forces which might subject the segment of pipeline to a bending stress			✓	
	(e) Provide permanent protection for the disturbed section as soon as feasible			✓	

.13(c)	WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	S	U	N/A	N/C
.225	(a) Welding procedures must be qualified under **Section 5 of API 1104** or **Section IX of ASME Boiler and Pressure Code** by destructive test.	✓			
	(b) Retention of welding procedure – details and test	✓			
.227	(a) Welders must be qualified by **Section 6 of API 1104 (19th Ed., 1999, including errata October31, 2001; and 20th edition 2007, including errata 2008)** or **Section IX of ASME Boiler and Pressure Code** (2004 ed. Including addenda through July 1, 2005) See exception in .227(b).	✓			
	(b) Welders may be qualified under **section I of Appendix C** to weld on lines that operate at **< 20% SMYS.**	✓			
.229	(a) To weld on compressor station piping and components, a welder must successfully complete a destructive test	✓			
	(b) Welder must have used welding process within the preceding **6 months**	✓			
	(c) A welder qualified under .227(a)–				
.229(c)	(1) May not weld on pipe that operates at ≥ 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the **sections 6 or 9 of API Standard 1104**; may maintain an ongoing qualification status by performing welds tested and found acceptable at least **twice per year**, not exceeding **7½ months**; may not requalify under an earlier referenced edition.	✓			
	(2) May not weld on pipe that operates at < 20% SMYS unless is tested in accordance with .229(c)(1) or requalifies under .229(d)(1) or (d)(2).	✓			
	(d) Welders qualified under .227(b) may not weld unless:				
	(1) Requalified within **1 year/15 months**, or	✓			
	(2) Within **7½ months** but at least **twice per year** had a production weld pass a qualifying test	✓			
.231	Welding operation must be protected from weather	✓			

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.13(c)		WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	S	U	N/A	N/C
	.233	Miter joints (**consider pipe alignment**)	✓			
	.235	Welding preparation and joint alignment	✓			
	.241	(a) Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure:	✓			
		(1) Compliance with the welding procedure	✓			
		(2) Weld is acceptable in accordance with **Section 9 of API 1104**	✓			
		(b) Welds on pipelines to be **operated at 20% or more of SMYS** must be nondestructively tested in accordance with **192.243** except welds that are visually inspected and approved by a qualified welding inspector if:	✓			
		(1) The nominal pipe diameter is less than **6 inches**, or	✓			
		(2) The pipeline is to operate at a pressure that produces a hoop stress of less than **40% of SMYS** and the welds are so limited in number that nondestructive testing is impractical	✓			
	.241	(c) Acceptability based on visual inspection or NDT is determined according to **Section 9 of API 1104.** If a girth weld is unacceptable under **Section 9** for a reason other than a crack, and if **Appendix A to API 1104** applies to the weld, the acceptability of the weld may be further determined under that appendix.	✓			
		Repair and Removal of Weld Defects				
	.245	(a) Each weld that is unacceptable must be removed or repaired. Except for offshore pipelines, a weld must be removed if it has a crack that is more than **8%** of the weld length	✓			
		(b) Each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair. After repair, the weld must be inspected and found acceptable.	✓			
		(c) Repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure, qualified under **§192.225**	✓			
		Note: Sleeve Repairs – use low hydrogen rod **(Best Practices –ref. API 1104 App. B, In Service Welding)**				

Comments:

.13(c)		NONDESTRUCTIVE TESTING PROCEDURES	S	U	N/A	N/C
	.243	(a) Nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld	✓			
		(b) Nondestructive testing of welds must be performed:				
		(1) In accordance with a written procedure, and	✓			
		(2) By persons trained and qualified in the established procedures and with the test equipment used	✓			
		(c) Procedures established for proper interpretation of each nondestructive test of a weld to ensure acceptability of the weld under **192.241©**	✓			
		(d) When nondestructive testing is required under **§192.241(b),** the following percentage of each day's field butt welds, selected at random by the operator, must be nondestructively tested over the entire circumference				
		(1) In **Class 1** locations at least **10%**	✓			
		(2) In **Class 2** locations at least **15%**	✓			
		(3) In **Class 3** and **4** locations, at crossings of a major navigable river, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, **100%** unless impractical, then **90%**. Nondestructive testing must be impractical for each girth weld not tested.	✓			
		(4) At pipeline tie-ins, **100%**	✓			

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.13(c)	NONDESTRUCTIVE TESTING PROCEDURES	S	U	N/A	N/C
	(e) Except for a welder whose work is isolated from the principal welding activity, a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b)	✓			
	(f) Nondestructive testing – the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds.	✓			

Comments:

.273(b)	JOINING of PIPELINE MATERIALS	S	U	N/A	N/C
.281	(a) A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint.	✓			
	(b) Each solvent cement joint on plastic pipe must comply with the following:				
	(1) The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint.	✓			
	(2) The solvent cement must conform to ASTM Designation: D 2513.	✓			
	(3) The joint may not be heated to accelerate the setting of the cement.	✓			
	(c) Each heat-fusion joint on plastic pipe must comply with the following:				
	(1) A butt heat-fusion joint must be joined by a device that holds the heater element square to the ends of the piping, compresses the heated ends together, and holds the pipe in proper alignment while the plastic hardens.	✓			
	(2) A socket heat-fusion joint must be joined by a device that heats the mating surfaces of the joint uniformly and simultaneously to essentially the same temperature.	✓			
	(3) An electrofusion joint must be joined utilizing the equipment and techniques of the fittings manufacturer or equipment and techniques shown, by testing joints to the requirements of §192.283(a)(1)(iii), to be at least equivalent to those of the fittings manufacturer.	✓			
	(4) Heat may not be applied with a torch or other open flame.	✓			
	(d) Each adhesive joint on plastic pipe must comply with the following:				
	(1) The adhesive must conform to ASTM Designation: D 2517.	✓			
	(2) The materials and adhesive must be compatible with each other.	✓			
	(e) Each compression type mechanical joint on plastic pipe must comply with the following:				
	(1) The gasket material in the coupling must be compatible with the plastic.	✓			
	(2) A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling.	✓			
.283	(a) Before any written procedure established under §192.273(b) is used for making plastic pipe joints by a heat fusion, solvent cement, or adhesive method, the procedure must be qualified by subjecting specimen joints made according to the procedure to the following tests:				
	(1) The burst test requirements of–				
	(i) Thermoplastic pipe: paragraph 6.6 (sustained pressure test) or paragraph 6.7 (Minimum Hydrostatic Burst Test) or paragraph 8.9 (Sustained Static pressure Test) of ASTM D2513	✓			
	(ii) Thermosetting plastic pipe: paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517; or	✓			
	(iii) Electrofusion fittings for polyethylene pipe and tubing: paragraph 9.1 (Minimum Hydraulic Burst Pressure Test), paragraph 9.2 (Sustained Pressure Test), paragraph 9.3 (Tensile Strength Test), or paragraph 9.4 (Joint Integrity Tests) of ASTM Designation F1055.	✓			

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.273(b)	JOINING of PIPELINE MATERIALS	S	U	N/A	N/C
	(2) For procedures intended for lateral pipe connections, subject a specimen joint made from pipe sections joined at right angles according to the procedure to a force on the lateral pipe until failure occurs in the specimen. If failure initiates outside the joint area, the procedure qualifies for use; and,	✓			
	(3) For procedures intended for non-lateral pipe connections, follow the tensile test requirements of ASTM D638, except that the test may be conducted at ambient temperature and humidity If the specimen elongates no less than 25 percent or failure initiates outside the joint area, the procedure qualifies for use.	✓			
	(b) Before any written procedure established under §192.273(b) is used for making mechanical plastic pipe joints that are designed to withstand tensile forces, the procedure must be qualified by subjecting five specimen joints made according to the procedure to the following tensile test:				
	(1) Use an apparatus for the test as specified in ASTM D 638 (except for conditioning).	✓			
	(2) The specimen must be of such length that the distance between the grips of the apparatus and the end of the stiffener does not affect the joint strength.	✓			
	(3) The speed of testing is 0.20 in. (5.0 mm) per minute, plus or minus 25 percent.	✓			
	(4) Pipe specimens less than 4 inches (102 mm) in diameter are qualified if the pipe yields to an elongation of no less than 25 percent or failure initiates outside the joint area.	✓			
	(5) Pipe specimens 4 inches (102 mm) and larger in diameter shall be pulled until the pipe is subjected to a tensile stress equal to or greater than the maximum thermal stress that would be produced by a temperature change of 100° F (38° C) or until the pipe is pulled from the fitting. If the pipe pulls from the fitting, the lowest value of the five test results or the manufacturer's rating, whichever is lower must be used in the design calculations for stress.	✓			
	(6) Each specimen that fails at the grips must be retested using new pipe.	✓			
	(7) Results pertain only to the specific outside diameter, and material of the pipe tested, except that testing of a heavier wall pipe may be used to qualify pipe of the same material but with a lesser wall thickness.	✓			
	(c) A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints.	✓			
	(d) Pipe or fittings manufactured before July 1, 1980, may be used in accordance with procedures that the manufacturer certifies will produce a joint as strong as the pipe.	✓			
.285	(a) No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by:				
	(1) Appropriate training or experience in the use of the procedure; and	✓			
	(2) Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section.	✓			
	(b) The specimen joint must be:				
	(1) Visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure; and	✓			
	(2) In the case of a heat fusion, solvent cement, or adhesive joint;	✓			
	(i) Tested under any one of the test methods listed under §192.283(a) applicable to the type of joint and material being tested;	✓			
		✓			
	(ii) Examined by ultrasonic inspection and found not to contain flaws that may cause failure; or				
	(A) Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and	✓			
	(B) Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area.	✓			
	(c) A person must be requalified under an applicable procedure, if during any 12-month period that person:				
	(1) Does not make any joints under that procedure; or	✓			
	(2) Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513.	✓			
	(d) Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section.	✓			

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.273(b)		JOINING of PIPELINE MATERIALS	S	U	N/A	N/C
	.287	No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure.	✓			

Comments:

.605(b)		CORROSION CONTROL PROCEDURES	S	U	N/A	N/C
	.453	Are corrosion procedures established and carried out by or under the direction of a qualified person for:				
		▪ Design	✓			
		▪ Operations	✓			
		▪ Installation	✓			
		▪ Maintenance	✓			
	.455	(a) For pipelines installed **after July 31, 1971,** buried segments must be externally coated and (b) cathodically protected within **one year** after construction (see exceptions in code)	✓			
		(c) Aluminum may not be installed in a buried or submerged pipeline if exposed to an environment with a natural **pH in excess of 8** (see exceptions in code)	✓			
	.457	(a) All effectively coated steel transmission pipelines installed prior to **August 1, 1971,** must be cathodically protected	✓			
		(b) If installed **before August 1, 1971,** cathodic protection must be provided in areas of active corrosion for: bare or ineffectively coated transmission lines, and bare or coated c/s, regulator sta., meter sta. piping, and (except for cast iron or ductile iron) bare or coated distribution lines.	✓			
	.459	Examination of buried pipeline when exposed: if corrosion is found, further investigation is required (Note: To include graphitization on cast iron or ductile iron pipe. NTSB B.7)	✓			
	.461	Procedures must address the protective coating requirements of the regulations. External coating on the steel pipe must meet the requirements of this part.	✓			
	.463	Cathodic protection level according to **Appendix D** criteria	✓			
	.465	(a) Pipe-to-soil monitoring **(1 per yr/15 months)** or short sections **(10% per year, all in 10 years)**	✓			
		(b) Rectifier monitoring **(6 per yr/2½ months)**	✓			
		(c) Interference bond monitoring **(as required)**	✓			
		(d) Prompt remedial action to correct any deficiencies indicated by the monitoring	✓			
	.465	(e) Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas **(1 per 3 years/39 months)**	✓			
	.467	Electrical isolation **(include casings)**	✓			
	.469	Sufficient test stations to determine CP adequacy	✓			
	.471	Test lead maintenance	✓			
	.473	Interference currents	✓			
	.475	(a) Proper procedures for transporting corrosive gas?	✓			
		(b) Removed pipe must be inspected for internal corrosion. If found, the adjacent pipe must be inspected to determine extent. Certain pipe must be replaced. Steps must be taken to minimize internal corrosion.	✓			
	.476	Systems designed to reduce internal corrosion Amdt 192-(no number) Pub. 4/23/07, eff. 5/23/07 (a) New construction	✓			
		(b) Exceptions – offshore pipeline and systems replaced before 5/23/07	✓			
		(c) Evaluate impact of configuration changes to existing systems	✓			
	.477	Internal corrosion control coupon (or other suit. Means) monitoring **(2 per yr/7½ months)**	✓			
	.479	(a) Each exposed pipe must be cleaned and coated (see exceptions under **.479(c)**)	✓			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

.605(b)		CORROSION CONTROL PROCEDURES	S	U	N/A	N/C
		Offshore splash zones and soil-to-air interfaces must be coated	✓			
		(b) Coating material must be suitable	✓			
		Coating is not required where operator has proven that corrosion will:				
		(c) (1) Only be a light surface oxide, or	✓			
		(2) Not affect safe operation before next scheduled inspection	✓			
	.481	(a) Atmospheric corrosion control monitoring (**1 per 3 yrs/39 months onshore; 1 per yr/15 months offshore**)	✓			
	.481	(b) Special attention required at soil/air interfaces, thermal insulation, under disbonded coating, pipe supports, splash zones, deck penetrations, spans over water	✓			
	.481	(c) Protection must be provided if atmospheric corrosion is found (**per §192.479**)	✓			
	.483	Replacement and required pipe must be coated and cathodically protected (see code for exceptions)	✓			
	.485	(a) Procedures to replace pipe or reduce the **MAOP** if general corrosion has reduced the wall thickness?	✓			
		(b) Procedures to replace/repair pipe or reduce **MAOP** if localized corrosion has reduced wall thickness (unless reliable engineering repair method exists)?	✓			
		(c) Procedures to use **Rstreng or B-31G** to determine remaining wall strength?	✓			
	.487	Remedial measures (distribution lines other than cast iron or ductile iron)	✓			
	.489	(a) Each segment of cast iron or ductile iron pipe on which general graphitization is found to a degree where a fracture or any leakage might result, must be replaced.	✓			
		(b) Each segment of cast iron or ductile iron pipe where localized graphitization is found it must be assessed and remediated according to this subpart.	✓			
	.491	Corrosion control maps and record retention (**pipeline service life or 5 yrs**)	✓			

Comments:

.801-.809	Subpart N — Qualification of Pipeline Personnel Procedures	S	U	N/A	N/C
	Refer to Operator Qualification Inspection Forms and Protocols (OPS web site)				

.901-.951	Subpart O — Pipeline Integrity Management	S	U	N/A	N/C
	This form does not cover Gas Pipeline Integrity Management Programs				

Subparts A - C	PART 199 – DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES	S	U	N/A	N/C
	Drug & Alcohol Testing & Alcohol Misuse Prevention Program – Use PHMSA Form # 13, PHMSA 2008 Drug and Alcohol Program Check.				

Comments: Drug testing is Performed Quarterly - At least one is tested at that time and they have 6 OQ trained employees

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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	PIPELINE INSPECTION (Field)	S	U	N/A	N/C
.179	Valve Protection from Tampering or Damage 5 valves	✓			
.463	Cathodic Protection	✓			
.465	Rectifiers	✓			
.476	Systems designed to reduce internal corrosion	✓			
.479	Pipeline Components Exposed to the Atmosphere	✓			
.605	Knowledge of Operating Personnel	✓			
.707	ROW Markers, Road and Railroad Crossings	✓			
.719	Pre-pressure Tested Pipe **(Markings and Inventory)**	✓			
.741	Telemetering, Recording gauges				
.739/.743	Pressure Limiting and Regulating Devices (spot-check field installed equipment vs. inspection records) 3 stations	✓			
.745	Valve Maintenance	✓			
.751	Warning Signs	✓			
.801 - .809	Operator Qualification - Use PHMSA Form 15 Operator Qualification Field Inspection Protocol Form				

Comments: Hollis Murphy, Columbia Gulf, S.T.W. (Ave) Tr. Station, Price Lumber
Pipe to soil readings. Check these

	REGULATORY REPORTING PERFORMANCE AND RECORDS	S	U	N/A	N/C
191.5	Telephonic reports to NRC	✓			
191.15	Written incident reports; supplemental incident reports **(Form F 7100.2)**	✓			
191	Annual Reports **(Forms 7100.1-1, 7100.2-1)**	✓			
191.23	Safety related condition reports	✓			
192.16	Customer Notification **(Verification – 90 days – and Elements)**	✓			
192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports	✓			

	CONSTRUCTION PERFORMANCE AND RECORDS	S	U	N/A	N/C
.225	Test Results to Qualify Welding Procedures				
.227	Welder Qualification				
.241 (a)	Visual Weld Inspector Training/Experience				
.243 (b)(2)	Nondestructive Technician Qualification				
(c)	NDT procedures				
(f)	Total Number of Girth Welds				
(f)	Number of Welds Inspected by NDT				
(f)	Number of Welds Rejected				
(f)	Disposition of each Weld Rejected				
.273/.283	Qualified Joining Procedures Including Test Results				
.285	Personnel Joining Qualifications				
.287	Joining Inspection Qualifications				
.303	Construction Specifications				
.325	Underground Clearance				

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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	CONSTRUCTION PERFORMANCE AND RECORDS	S	U	N/A	N/C
.327	Amount, Location, Cover of each Size of Pipe Installed	✓			
.383(e)	EFV customer notification	✓			
.455	Cathodic Protection	✓			

		OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS	S	U	N/A	N/C
.517 (a)		Pressure Testing (operates at or above 100 psig) – **useful life of pipeline**	✓			
.517 (b)		Pressure Testing (operates below 100 psig, service lines, plastic lines) – **5 years**	✓			
.603(b)	.605(a)	Procedural Manual Review – Operations and Maintenance **(1 per yr/15 months)**	✓			
	.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	✓			
	.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures	✓			
	.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures	✓			
.709	.614	Damage Prevention **(Miscellaneous)**	✓			
	.609	Class Location Study **(If Applicable)**	✓			
.603(b)	.615(b)(1)	Location Specific Emergency Plan	✓			
	.615(b)(2)	Emergency Procedure training, verify effectiveness of training	✓			
	.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	✓			
	.615(c)	Liaison Program with Public Officials	✓			
	.616	Public Awareness Program				
	.616(e & f)	Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:				

API RP 1162 Baseline* Recommended Message Deliveries

Stakeholder Audience (Natural Gas Transmission Line Operators)	Baseline Message Frequency (starting effective date of Plan)
Residents Along Right-of-Way and Places of Congregation	2 years
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual
One-Call Centers	As required of One-Call Center
Stakeholder Audience (Gathering Line Operators)	**Baseline Message Frequency (starting from effective date of Plan)**
Residents and Places of Congregation	Annual
Emergency Officials	Annual
Public Officials	3 years
Excavators and Contractors	Annual
One-Call Centers	As required of One-Call Center
Stakeholder Audience (LDCs)	**Baseline Message Frequency (starting from effective date of Plan)**
Residents Along Local Distribution System	Annual
LDC Customers	Twice annually
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual
One-Call Centers	As required of One-Call Center

* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.

	.616(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.				
	.616(h)	Effectiveness Review of operator's program.				

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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	OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS	S	U	N/A	N/C
	.616(j) Operators of a master meter or petroleum gas systems - public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information.			✓	
	.617 Failure Investigation Reports (Note: Also include reported third party damage and leak response records. NTSB B.10)			✓	
.517	Pressure Testing				
.709	.619 .621 .623 Maximum Allowable Operating Pressure (**MAOP**) Note: New PA-11 design criteria is incorporated into 192.121 & .123. (Final Rule Pub. 24 December, 2008)	✓			
	.625 Odorization of Gas	✓			
	.705 Patrolling (**Refer to Table Below**)	✓			

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	2/yr (7½ months)	1/yr (15 months)
3	4/yr (4½ months)	2/yr (7½ months)
4	4/yr (4½ months)	4/yr (4½ months)

.709	.706	Leak Surveys (**Refer to Table Below**)				

Class Location	Required	Not Exceed
1 and 2	1/yr	15 months
3	2/yr*	7½ months
4	4/yr*	4½ months

* Leak **detector equipment** survey required for lines transporting un-odorized gas.

.603(b)	.721(b)(1)	Patrolling Business District (**4 per yr/4½ months**)	✓			
	.721(b)(2)	Patrolling Outside Business District (**2 per yr/7½ months**)	✓			
	.723(b)(1)	Leakage Survey – business District (**1 per yr/15 months**)	✓			
	.723(b)(2)	Leakage Survey				
		• Outside Business District (**5 years**)	✓			
		• Cathodically unprotected distribution lines (**3 years**)	✓			
	.725	Tests for reinstating service lines	✓			
.603b/.727g	.727	Abandoned Pipelines; Underwater Facility Reports	✓			
.709	.739	Pressure Limiting and Regulating Stations (**1 per yr/15 months**)	✓			
	.743	Pressure Limiting and Regulator Stations – Capacity (**1 per yr/15 months**)	✓			
	.745	Valve Maintenance Transmission Lines (**1 per yr/15 months**)			✓	
.603(b)	.747	Valve Maintenance Distribution Lines (**1 per yr/15 months**)	✓			
.709	.749	Vault Maintenance (**∃200 cubic feet**)(**1 per yr/15 months**)			✓	
.603(b)	.751	Prevention of Accidental Ignition (hot work permits)	✓			
	.755	Caulked Bell and Spigot Joint Repair			✓	
	.225(b)	Welding – Procedure		✓		
	.227/.229	Welding – Welder Qualification		✓	✓	
	.243(b)(2)	NDT – NDT Personnel Qualification			✓	
	.283	Joining - Procedures	✓			
	.285	Joining - Personnel Qualifications	✓			
	.287	Joining - Inspector Qualifications	✓			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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		OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS	S	U	N/A	N/C
.709	.243(f)	NDT Records (**Pipeline Life**)	✓			
		Repair: pipe (**Pipeline Life**); Other than pipe (**5 years**)	✓			
.807(b)		Refer to PHMSA Form # 15 to document review of operator's employee covered task records				

Comments:

		CORROSION CONTROL PERFORMANCE AND RECORDS	S	U	N/A	N/C
.491	.491(a)	Maps or Records				
.491	.459	Examination of Buried Pipe when Exposed				
.491	.465(a)	Annual Pipe-to-soil Monitoring (**1 per yr/15 months**) for short sections (**10% per year; all in 10 years**)				
.491	.465(b)	Rectifier Monitoring (**6 per yr/2½ months**)				
.491	.465(c)	Interference Bond Monitoring – Critical (**6 per yr/2½ months**)				
.491	.465(c)	Interference Bond Monitoring – Non-critical (**1 per yr/15 months**)				
.491	.465(d)	Prompt Remedial Actions				
.491	.465(e)	Unprotected Pipeline Surveys, CP active corrosion areas (**1 per 3 cal yr/39 months**)				
.491	.467	Electrical Isolation (**Including Casings**)				
.491	.469	Test Stations – Sufficient Number				
.491	.471	Test Lead Maintenance				
.491	.473	Interference Currents				
.491	.475(a)	Internal Corrosion; Corrosive Gas Investigation				
.491	.475(b)	Internal Corrosion; Internal Surface Inspection; Pipe Replacement				
.491	.476 (d)	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems				
.491	.477	Internal Corrosion Control Coupon Monitoring (**2 per yr/7½ months**)				
.491	.481	Atmospheric Corrosion Control Monitoring (**1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore**)				
.491	.483/.485	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions				

Comments:

Attachment 1
Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked

If an item is marked U, N/A, or N/C, an explanation must be included in this report.

.605(b)		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
	.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service				
	.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units				
	.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices (**1 per yr/15 months**), prompt repair or replacement				
	.735	(a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings				
		(b) Tank must be protected according to **NFPA #30**				
	.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems (**must be performance tested**), unless:				
		▪ **50% of the upright side areas** are permanently open, or				
		▪ It is an unattended field compressor station of **1000 hp or less**				

Comments:

		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits				
		Door latch must open from inside without a key				
		Doors must swing outward				
	(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit				
		Each gate located within 200 ft of any compressor plant building must open outward				
		When occupied, the door must be opened from the inside without a key				
	(e)	Does the equipment and wiring within compressor stations conform to the **National Electric Code, ANSI/NFPA 70?**				
.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?				
	(b)	Do the liquid separators have a manual means of removing liquids?				
		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?				
.167	(a)	ESD system must:				
		- Discharge blowdown gas to a safe location				
		- Block and blowdown the gas in the station				
		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers				
		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage				
		ESD system must be operable from at least two locations, each of which is:				
		- Outside the gas area of the station				
		- Not more than 500 feet from the limits of the station				
		- ESD switches near emergency exits?				
	(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?				
	(c)	Are ESDs on platforms designed to actuate automatically by…				
		- For unattended compressor stations, when:				

Attachment 1
Distribution Operator Compressor Station Inspection

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If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
		▪ The gas pressure equals MAOP plus 15%?				
		▪ An uncontrolled fire occurs on the platform?				
		- For compressor station in a building, when				
		▪ An uncontrolled fire occurs in the building?				
		▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC **Class 1, Group D** is not a source of ignition)?				
.171	(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.				
	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?				
	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?				
	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?				
	(e)	Are the mufflers equipped with vents to vent any trapped gas?				
.173		Is each compressor station building adequately ventilated?				
.457		Is all buried piping cathodically protected?				
.481		Atmospheric corrosion of aboveground facilities				
.603		Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?				
		Are facility maps current/up-to-date?				
.615		Emergency Plan for the station on site?				
.619		Review pressure recording charts and/or SCADA				
.707		Markers				
.731		Overpressure protection – reliefs or shutdowns				
.735		Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?				
		Are aboveground oil or gasoline storage tanks protected in accordance with **NFPA standard No. 30?**				
.736		Gas detection – location				

Comments:

		COMPRESSOR STATION O&M PERFORMANCE AND RECORDS	S	U	N/A	N/C
.709	.731(a)	Compressor Station Relief Devices (**1 per yr/15 months**)				
	.731(c)	Compressor Station Emergency Shutdown (**1 per yr/15 months**)				
	.736(c)	Compressor Stations – Detection and Alarms (**Performance Test**)				

Comments:

Steven L. Beshear
Governor

Leonard K. Peters
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
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David L. Armstrong
Chairman

James Gardner
Vice-Chairman

John W. Clay
Commissioner

June 12, 2009

Honorable Steve Sweeney
Mayor of Liberty
Courthouse Square
P.O. Box 127
Liberty, KY 42539

PERIODIC REGULATORY COMPLIANCE INSPECTION OF LIBERTY NATURAL GAS

On May 27, 2009, Steve Samples conducted a periodic regulatory compliance inspection of the natural gas facilities of Liberty Natural Gas in Liberty, Kentucky. A copy of the inspection report is attached for your review. Nine deficiencies were documented during this periodic inspection. The previous inspection of this utility was conducted on March 21, 2007. Six deficiencies were documented during that periodic inspection and were corrected in a timely manner.

As noted, nine deficiencies were documented during the inspection. You are requested to respond to this report, outlining corrective actions for the nine cited deficiencies by July 17, 2009. Please provide your responses on the copies of the Deficiency Tracking Reports sent with this letter by completing the three separate sections under the Response heading for the cited deficiency.

If you have any questions or need additional information, you are welcome to contact me at (502) 564-3940. We appreciate your continued interest in the safe operation of your gas facilities.

JASON R. BRANGERS, P.E., MANAGER, GAS BRANCH, DIVISION OF ENGINEERING

Attachment: LibertyNaturalGas 052709 Inspection Report

PSC Exhibit 4

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 5/29/2009

Report Number: Liberty Natural Gas 052709

BRIEF

Inspector:	Steve Samples
Inspection Date:	5/27/2009
Type of Inspection:	Periodic Regulatory Compliance Inspection
Type of Facility:	Municipal
Name of Utility:	City of Liberty Gas Company
Location of Facility:	Liberty, KY
Purpose of Inspection:	Periodic inspection of a municipal operator's facilities and management practices to verify compliance with federal pipeline safety regulations.
Applicable Regulations:	49 CFR Part 191,192, and 199.

INSPECTION

Description of Utility:	Municipal operator serving city of Liberty and surrounding area.
Number of Customers:	556
Area of Operation:	Liberty, KY
Supply Source:	Texas Eastern Transmission
Distribution Description:	Steel and plastic distribution gas system in Casey County operating at 240 PSIG to 20 PSIG.
Workforce Summary:	4 Gas Operator Qualified Employees and office personnel.
Utility Reps in Insp:	Ronnie Wesley, Supervisor, and Charlene Rodgers (City Clerk)
Date of Last Inspection:	3/21/2007
DTR from Last Insp:	6
DTRs not Cleared:	0

Summary of items and facilities Inspected:

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Public Awareness and Drug and Alcohol Plans were reviewed during the office visit. Also inspected were records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, and odorant verification tests. The field portion of the inspection consisted of inspecting regulator settings, pipeline markers, mainline valve locations, meter installations, and the point of delivery at Texas Eastern facility.

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 5/29/2009

Report Number: Liberty Natural Gas 052709

FINDINGS

1 Liberty Natural Gas was not a member of Kentucky one-call system.

2 Liberty Natural Gas was not taking adequate precautions when working in hazardous situations.

3 Liberty Natural Gas system did not have a Public Awareness Plan or records to indicate following a plan.

4 Liberty Natural Gas was not conducting leakage surveys in their business district each year.

5 Liberty Natural Gas did not have records to indicate their critical valves have been inspected each year.

6 Liberty Natural Gas did not take corrosion readings in 2008.

7 Rectifier readings were taken by Mike White. He did not have corrosion operator qualifications.

8 Liberty Natural Gas did not have records to show they had tested their new segments of main after a dig in.

9 Liberty Natural Gas did not review and update their manuals annually.

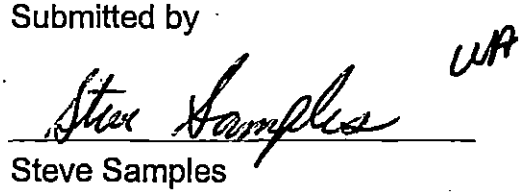
RECOMMENDATIONS

City of Liberty should correct the stated deficiencies in a timely manner.

ADDITIONAL INSPECTOR COMMENTS

Ronnie Wesley was advised of the plastic squeeze off box at the Woodrum Ridge Regulator Station were they are squeezing off plastic in the same place periodically. It is standard practice in the gas industry, and normally a pipe manufacturer recommmendation, not to squeeze off pipe more than once in the same location. This should be replaced with a plastic valve. A follow up inspection will be scheduled.

Submitted by



Steve Samples
Utility Regulatory and Safety Investigator III

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 1

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.614 Damage prevention program...each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities...

Deficiency:

Liberty Natural Gas was not a member of Kentucky one-call system.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 2

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.605(b)(9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathin

Deficiency:

Liberty Natural Gas was not taking adequate precautions when working in hazardous situations.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 3

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.616 Public awareness. Each operator shall establish a continuing educational program to enable customers, the public, appropriate government organizations, and persons engaged in excavation...

Deficiency:

Liberty Natural Gas system did not have a Public Awareness Plan or records to indicate following a plan.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 4

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.723 (b)(1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at

Deficiency:

Liberty Natural Gas was not conducting leakage surveys in their business district each year.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 5

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.747 Each valve...must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

Deficiency:

Liberty Natural Gas did not have records to indicate their critical valves have been inspected each year.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 6

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.465 External corrosion control: Monitoring...(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year...

Deficiency:

Liberty Natural Gas did not take corrosion readings in 2008.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 7

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.805(b) Qualification program... (b) Ensure through evaluation that individuals performing covered tasks are qualified;

Deficiency:

Rectifier readings were taken by Mike White. He did not have corrosion operator qualifications.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 8

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.503(a)(1) No person may operate a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until - It has been tested in accordance with this subpart and Sections 192.619 to substantiate

Deficiency:

Liberty Natural Gas did not have records to show they had tested their new segments of main after a dig in.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 9

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.605(a) Procedural manual for operations, maintenance, and emergencies...

Deficiency:

Liberty Natural Gas did not review and update their manuals annually.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 **Due Date:** 7/17/2009
DTR Number: 1

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.614 Damage prevention program...each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities...

Deficiency:

Liberty Natural Gas was not a member of Kentucky one-call system.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty had completed all the necessary paperwork to become a member of Kentucky one-call except for filling in and uploading our service areas on a map. This was a result of miscommunication and has now been resolved.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

City employee's Ronnie Wesley and Bridgett Blake spoke with a representative from Kentucky one-call on July 13, 2009. She is currently highlighting our system on a map and should have it completed by July 15, 2009.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Employee's Ronnie Wesley and Bridgett Blake will ensure that all revisions to the city's system will be reported to Kentucky one-call immediately

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

PSC Exhibit 5

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 2

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.605(b)(9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathin

Deficiency:

Liberty Natural Gas was not taking adequate precautions when working in hazardous situations.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty had failed to discuss with the fire department the importance of their presence.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The Liberty Fire Department will now respond to all gas leaks. The City employee's will use their protective gear.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Mayor Sweeney and maintenance supervisor Ronnie Wesley will ensure that all adequate precautions are taken when working in a hazardous situation. Safety for our workers and for the public is of the upmost importance.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 3

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.616 Public awareness. Each operator shall establish a continuing educational program to enable customers, the public, appropriate government organizations, and persons engaged in excavation...

Deficiency:

Liberty Natural Gas system did not have a Public Awareness Plan or records to indicate following a plan.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty does have a public awareness plan and records. City employee, Bridgett Blake, is responsible for that plan, and she was out of town at the time of inspection.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The City will organize all paperwork related to the public awareness plan and make sure it is easily accessible.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

We will make sure all employees know where the records for the public awareness plan are kept.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 4

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.723 (b)(1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at

Deficiency:

Liberty Natural Gas was not conducting leakage surveys in their business district each year.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The city of Liberty had failed to perform leakage surveys in the business district in 2008.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The city will begin performing leakage surveys annually. We will also have an outside company to perform a leakage survey for us.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Maintenance Supervisor, Ronnie Wesley, will make sure that the city employees perform a leakage survey in the business district every year.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 5

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.747 Each valve...must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

Deficiency:

Liberty Natural Gas did not have records to indicate their critical valves have been inspected each year.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty failed to keep records of inspections of critical valves.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

City gas employees will begin keeping detailed records of critical valves that are inspected annually.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Maintenance Supervisor, Ronnie Wesley, will ensure that all gas employees record inspections of critical valves.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 6

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.465 External corrosion control: Monitoring...(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year...

Deficiency:

Liberty Natural Gas did not take corrosion readings in 2008.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty did not record corrosion reading in 2008.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The City employees will begin recording all corrosion readings.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Maintenance Supervisor, Ronnie Wesley, will have all gas employees record corrosion readings.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 7

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.805(b) Qualification program... (b) Ensure through evaluation that individuals performing covered tasks are qualified;

Deficiency:

Rectifier readings were taken by Mike White. He did not have corrosion operator qualifications.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty mistakenly had rectifier readings taken by Mike White, who did not have corrosion operator qualifications.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The City of Liberty employees, who have corrosion operator qualifications will now be getting the rectifier readings.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The City of Liberty will ensure that anyone taking rectifier readings have corrosion operator qualifications.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 8

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.503(a)(1) No person may operate a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until - It has been tested in accordance with this subpart and Sections 192.619 to substantiate

Deficiency:

Liberty Natural Gas did not have records to show they had tested their new segments of main after a dig in.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The city of Liberty did not realize that testing new segments of main after a dig in was a procedure that we had to follow.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Now that the employees understand this rule, we will begin testing the new segments.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The City of Liberty will work diligently to remain in compliance. We will begin keeping records of all tests performed on new segments of main after a dig in.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 9

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.605(a) Procedural manual for operations, maintenance, and emergencies...

Deficiency:

Liberty Natural Gas did not review and update their manuals annually.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty failed to review and update the O & M manual and the emergency manual.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

We are currently reviewing and updating the City's O & M manual. We have also reviewed the emergency plan, which was recently updated.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

City Services Clerk, Bridgett Blake, will review and update all manuals annually.

Response Provided By: Ronnie Wesley Response Date: 7/14/09

Signature: Ronnie Wesley

Ernie Fletcher
Governor

Teresa J. Hill, Secretary
Environmental and Public
Protection Cabinet

Timothy J. LeDonne
Commissioner
Department of Public Protection

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Mark David Goss
Chairman

John W. Clay
Commissioner

April 2, 2007

The Honorable Steve Sweeney
Mayor of Liberty
P.O. Box 127
Liberty, KY 42539

RE: Natural Gas Facilities Inspection of the City of Liberty Gas Company

Dear Mayor Sweeney:

On March 21, 2007, Joel Grugin conducted a periodic regulatory compliance inspection of the natural gas facilities of the City of Liberty Gas Company in Liberty, Kentucky. A copy of the inspection report is attached for your review. Six deficiencies were documented during this comprehensive inspection. The previous inspection of this facility was conducted on April 21, 2004. During that comprehensive inspection, two deficiencies were documented, and one was not corrected in a timely manner.

Please review the attached report. As noted, six deficiencies were documented during the inspection. You are requested to respond to this report, outlining corrective actions for the cited deficiencies by May 1, 2007. Please provide your responses on the copies of the Deficiency Tracking Reports sent with this letter by completing the three sections under the Response heading for the cited deficiency.

If you have any questions or need additional information, you are welcome to contact me at (502) 564-3940. We appreciate your continued interest in the safe operation of your gas facilities.

Sincerely,

Jason R. Brangers, P.E.
Manager
Gas Branch
Division of Engineering

JRB:SS:mae
Attachment: City of Liberty 032107 Inspection Report

PSC Exhibit 6

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/26/2007

Report Number: City of Liberty 032107

BRIEF

Inspector: Joel Grugin

Inspection Date: 3/21/2007

Type of Inspection: Periodic Regulatory Compliance Inspection

Type of Facility: Municipal

Name of Utility: City of Liberty Gas Company

Location of Facility: Liberty, KY

Purpose of Inspection: Periodic inspection of a municipal's facilities and management practices to verify compliance with federal pipeline safety regulations.

Applicable Regulations 49 CFR Part 192

INSPECTION

Description of Utility: City distribution system serving 614 customers in the city of Liberty and areas along distribution pipeline from Texas Eastern.

Number of Customers: 614

Area of Operation: Liberty, KY

Supply Source: Texas Eastern Transmission Corp.

Distribution Description: Distribution gas system operating in Liberty, KY operating at pressures from 240 psig to 20 psig supplied through steel and plastic pipelines.

Workforce Summary: Ronnie Wesley, Supervisor; Bridget Blake, Office Personnel; Greg Rodgers and Jeff Wethington, Maintenance.

Utility Reps in Insp: Ronnie Wesley, Bridget Blake, and Jeff Wethington

Date of Last Inspection: 4/21/2004

DTR from Last Insp: 2

DTRs not Cleared: 1

Summary of items and facilities Inspected:

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Drug and Alcohol, and Public Awareness Plans were reviewed during the office visit. Also inspected were records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, and odorant verification tests. The field portion of the inspection consisted of inspecting corrosion pipeline readings, regulator settings, pipeline markers, mainline valve locations, and meter installations.

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/26/2007

Report Number: City of Liberty 032107

FINDINGS

1 City of Liberty had not performed a leakage survey since 2003. (This is a repeat deficiency.)

2 City of Liberty did not review and update operation, maintenance, and emergency plan as required .

3 City of Liberty improperly tested a broken service line on Highway 1547. A bubble test was performed instead of a pressure test .

4 City of Liberty did not perform periodic odorant tests.

5 City of Liberty had not identified or documented critical valve inspections.

6 City of Liberty did not perform corrosion tests for 2006.

RECOMMENDATIONS

To correct the findings noted in this report it is necessary for the City of Liberty Gas Company to take the following actions: (1) Perform and document leak surveys as required in 192.723. (2) Review, update, and document their operations, maintenance, and emergency plans annually. (3) Test all disconnected service lines as new. (4) Perform and document periodic odor tests. (5) Identify, inspect, and document critical valve inspections annually. (6) Perform and document corrosion readings annually.

ADDITIONAL INSPECTOR COMMENTS

One previous deficiency had not been corrected. We have scheduled a reinspection to verify compliance with the noted deficiencies for 7/20/2007.

Submitted by

Joel Grugin

Joel Grugin
Utility Regulatory and Safety Investigator III

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 1

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.723 Distribution systems: Leakage surveys... Each operator of a distribution system shall conduct periodic leakage surveys...

Deficiency:

City of Liberty had not performed a leakage survey since 2003. (This is a repeat deficiency.)

If Repeat Deficiency, Date of Last DTR: 4/21/2004

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 2

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.605(a) Procedural manual for operations, maintenance, and emergencies... Each operator...a manual of written procedures for conducting operations and maintenance activities and for emergency response...

Deficiency:

City of Liberty did not review and update operation, maintenance, and emergency plan as required .

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 **Due Date:** 5/1/2007
DTR Number: 3

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.725 (b) Each service line temporarily disconnected from the main must be tested from the point of disconnection to the service line valve in the same manner as a new service line, before reconnecting...

Deficiency:

City of Liberty improperly tested a broken service line on Highway 1547. A bubble test was performed instead of a pressure test .

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 **Due Date:** 5/1/2007
DTR Number: 4

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.625(f) Odorization of gas. ...(f) Each operator shall conduct periodic sampling of combustible gases to assure the proper concentration of odorant in accordance with this section...

Deficiency:

City of Liberty did not perform periodic odorant tests.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 **Due Date:** 5/1/2007

DTR Number: 5

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.747

Deficiency:

City of Liberty had not identified or documented critical valve inspections.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 **Due Date:** 5/1/2007
DTR Number: 6

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.465 External corrosion control: Monitoring...(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year...

Deficiency:

City of Liberty did not perform corrosion tests for 2006.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 **Due Date:** 5/1/2007
DTR Number: 1

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.723 Distribution systems: Leakage surveys... Each operator of a distribution system shall conduct periodic leakage surveys...

Deficiency:

City of Liberty had not performed a leakage survey since 2003. (This is a repeat deficiency.)

If Repeat Deficiency, Date of Last DTR: 4/21/2004

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The City of Liberty experienced a change in management in the maintenance department and also in record keeping. The new management was not aware of the regulations on the leak survey.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Ronnie Wesley is now our maintenance supervisor. Mr. Wesley is now aware of the requirements, and we are currently performing our leakage survey.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The City of Liberty is now keeping records on leakage surveys. Mr. Wesley will now be sure that the leakage survey is performed according to our O & M manual.

Response Provided By: Ronnie Wesley & Bridgett Blake Response Date: 4/30/07

Signature: Ronnie Wesley, Bridgett Blake

PSC Exhibit 7

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 2

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.605(a) Procedural manual for operations, maintenance, and emergencies...Each operator...a manual of written procedures for conducting operations and maintenance activities and for emergency response...

Deficiency:

City of Liberty did not review and update operation, maintenance, and emergency plan as required .

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The new maintenance Supervisor, as well as the record Keeper, were both unaware that reviews and updates on the O+M Plan and the Emergency Plan were to be performed yearly.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Bridgett Blake, record Keeper for gas distribution, will now review + update the O+M Plan and the emergency plan on a yearly basis. Ms. Blake is currently in the process of reviewing.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

We are now more organized with our records + Ms. Blake + Mr. Wesley will be responsible for making sure reviews + updates are completed yearly.

Response Provided By: Ronnie Wesley, Bridgett Blake Response Date: 4/30/07

Signature: Ronnie Wesley, Bridgett Blake

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 3

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.725 (b) Each service line temporarily disconnected from the main must be tested from the point of disconnection to the service line valve in the same manner as a new service line, before reconnecting...

Deficiency:

City of Liberty improperly tested a broken service line on Highway 1547. A bubble test was performed instead of a pressure test .

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

New management was unaware of requirements that stated a pressure test had to be performed on a broken servia line. We thought that a bubble test was adequate.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Any further broken service lines will be properly tested by Ronnie Wesley.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Ronnie Wesley is now aware of the regulations and will be performing the proper tests.

Response Provided By: Ronnie Wesley, Bridgett Blake Response Date: 4/30/07

Signature: Ronnie Wesley, Bridgett Blake

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 4

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.625(f) Odorization of gas. ...(f) Each operator shall conduct periodic sampling of combustible gases to assure the proper concentration of odorant in accordance with this section...

Deficiency:

City of Liberty did not perform periodic odorant tests.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

New management did not know requirements. Also thought odorant tester did not work properly.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The City of Liberty has purchased a new odorant tester. Ronnie Wesley will be responsible in making sure testing is performed regularly.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Ronnie Wesley will be testing weekly and we will be keeping adequate records.

Response Provided By: Ronnie Wesley, Bridgett Blake Response Date: 4/30/07

Signature: Ronnie Wesley, Bridgett Blake

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 5

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.747

Deficiency:

City of Liberty had not identified or documented critical valve inspections.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

Once again, new management was not aware of critical valve inspections.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The city is now uncovering critical valves, and performing inspections and documenting findings. We are also trying to get our system GPS'd and a new mapping system.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

We are now aware of requirements and will follow regulations on critical valve inspections. We are also keeping records of inspections.

Response Provided By: Ronnie Wesley, Bridgett Blake Response Date: 4/30/07

Signature: Ronnie Wesley, Bridgett Blake

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 6

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.465 External corrosion control: Monitoring...(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year...

Deficiency:

City of Liberty did not perform corrosion tests for 2006.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

The new supervisor did not know that corrosion tests needed to be performed.

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Ronnie Wesley is now in charge of performing corrosion test and will make sure they are done per regulations.

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

The city will perform & Keep records of required corrosion tests.

Response Provided By: Ronnie Wesley, Bridgett Blake Response Date: 4/30/07

Signature: Ronnie Wesley, Bridgett Blake

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 7/30/2007

Report Number: City of Liberty Gas Company 072007

BRIEF

Inspector:	Joel Grugin
Inspection Date:	7/20/2007
Type of Inspection:	Follow-Up Inspection
Type of Facility:	Municipal
Name of Utility:	City of Liberty Gas Company
Location of Facility:	Liberty, Kentucky
Purpose of Inspection:	Follow-up inspection to verify actions taken to correct deficiencies from this operator's March 21, 2007 periodic regulatory compliance inspection.
Applicable Regulations	49 CFR Part 192

INSPECTION

Description of Utility:	City distribution system serving 614 customers in the City of Liberty and rural areas of Casey County.
Number of Customers:	614
Area of Operation:	Liberty, Kentucky
Supply Source:	Texas Eastern Transmission Corp.
Distribution Description:	Distribution gas system operating in Liberty, KY with operating at pressures ranging from 240 psig to 20 psig supplied through steel and plastic pipelines.
Workforce Summary:	Ronnie Wesley, Supervisor; Bridget Blake, Office Personnel; Greg Rodgers and Jeff Wethington, Maintenance.
Utility Reps in Insp:	Ronnie Wesley, Bridget Blake, and Jeff Wethington
Date of Last Inspection:	3/21/2007
DTR from Last Insp:	6
DTRs not Cleared:	0

Summary of items and facilities Inspected:

The only items reviewed in this inspection were the six deficiencies noted in the periodic inspection made on March 21, 2007.

PSC Exhibit

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 7/30/2007

Report Number: City of Liberty Gas Company 072007

FINDINGS

RECOMMENDATIONS

ADDITIONAL INSPECTOR COMMENTS

All deficiencies were corrected.

Submitted by

Joel Grugin

Utility Regulatory and Safety Investigator III

Purging

(1) **Required Purging.** Whenever a main or service line is being put into service, it is necessary for all air or other non-combustible gas to be purged from the line.

(2) **Safety Precautions.** If a polyethylene main is being purged, special precautions must be followed to prevent static electricity from discharging and igniting the escaping gas. Such precautions are described in "Prevention of Accidental Ignition Operator Qualification Task M-7."

Anytime air is being purged with gas, or gas is being purged with air, it is necessary to maintain a rapid flow rate. This will ensure turbulence at the gas/air interface, minimizing the size of the combustible mixture zone.

Care must be taken to ensure that gas is not discharged in an area in which it will accumulate and create a hazard. Potential ignition sources must be kept away.

Leakage Survey

(1) **Frequency of Surveys.** On distribution lines leakage surveys must be conducted as often as needed to discover leaks, which could result in a hazard. Leakage survey with leak detector equipment must be conducted in business districts at intervals not exceeding 15 months, but at least once each calendar year. Outside business districts intervals must have a leakage survey as frequently as necessary but at intervals not exceed 3 years.

Additional surveys are necessary to assure that leaks have not developed following earthquake, major excavation activities, blasting, washout, landslide, or ground settlement near gas pipeline facilities.

Additional survey may be required as a result of investigation of a failure as covered in "Investigation of Failures."

PSC Exhibit 9

(2) Method of Performance of Leakage Survey.

Leakage survey may be conducted using either the surface or subsurface method.

A surface gas detection survey is a continuous sampling of the atmosphere performed using either portable or mobile equipment. Sampling is conducted at ground level for buried gas facilities and adjacent to above-ground facilities with a gas detector system capable of detecting a concentration of 50 ppm or gas in air at any sampling point.

Subsurface gas detection survey shall consist of testing bar holes with a combustible gas indicator or other instrument capable of detecting 10% or less of the lower explosive limit. The bar holes should penetrate to the depth of the main as close as practical to the main, taking care to avoid damaging the main. The sample should be drawn from near the bottom of each hole, taking care to avoid drawing water into the instrument. The instrument used should be equipped with a device to prevent liquid from being drawn.

Spacing of bar holes may be determined in accordance with the proximity to buildings and underground structures, such as sewers and manholes. In those areas where leaking gas would present the greatest hazard spacing should be closest. In all cases bar hole samples shall be taken near the service riser at the customer's meter. Areas in which service lines are near sewer lines or building foundations shall be sampled at intervals as close as necessary, but not to exceed 20 feet. Catch basins, manholes, and other underground structures near mains and service lines should be tested near the bottom.

Spacing of bar holes for surveying mains in close proximity to buildings or underground structures should be at intervals of twenty feet or less.

Sewers, catch basins, ditch lines and other low areas in the proximity of mains and services shall be tested for gas as part of any leakage

(3) **Grading Leaks.** Each leak discovered must be graded according to the following:

(a) **Grade 1 - Hazardous Leak.** Any leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until conditions are no longer hazardous. A leak which results in a measurable quantity of gas migrating into any buildings used for human occupancy, or concentration of 50% or more of the lower explosive limit in a sewer, manhole, or other underground structure is Grade 1.

(b) **Grade 2 – Non-hazardous Leak.** Any leak that is recognized as being non-hazardous at the time of detection but justifies scheduled repair based on probable future hazard.

Generally an outdoor leak in a main or service line and in which gas is not migrating into or near a building or underground structure is Grade 2. A leak that results in a slight concentration of gas migrating into a sewer, manhole or other underground structure away from any building used for human occupancy may be a Grade 2.

(c) **Grade 3 - Nuisance Leak.** Any leak that is non-hazardous at the time of detection and can be reasonably expected to remain non-hazardous (less severe than a Grade 2.) may be considered to be a Grade 3 leak.

A very small leak, such as a fitting or valve on a meter loop, where the source of the leak is apparent and predictable may be Grade 3.

(4) **Disposition of Leaks.** Any Grade 1 leak must receive immediate action to control the escape of gas or otherwise eliminate likely hazards. Normally the source of gas to the leak will have to be shut off using valves.

A Grade 2 leak may be scheduled for repair in a timely manner. Anticipated cold weather should be considered when scheduling repairs. Freezing ground surface may stop the ventilation of gas and force migration below ground. Also, interruption of service to customers presents greater hardship in cold weather.

Any Grade 2 leak not repaired within 6 months should be rechecked to assure that it has not become more hazardous.

A Grade 3 leak is not required to be repaired, but must be monitored annually to verify its classification. If the leak becomes severe enough to be classified as Grade 2, it must be scheduled for repair accordingly.

Records must be maintained of each leakage survey to document the areas surveyed and results. Survey dates, description of survey area, addresses of locations of leaks and their grades, type of instruments used, survey method, and names of survey technicians should be included.

(5) Leak Records. Records must be kept for all leaks reported to the company or discovered by the company or its employees. Records must be retained for at least 5 years and must contain address or location, method of detection or receipt of notice, date of detection, date of repair, follow-up surveillance dates, grade, and description of cause and method of repair for each leak.

The leak records kept should contain information consistent with the annual reporting requirement of 49 CFR 191.11.

Abandonment or Inactivation of Facilities

Each pipeline abandoned in place must be disconnected from all sources of gas and purged if the volume of gas contained is sufficient to present a hazard. The open pipe ends are to be sealed in a gas tight and water tight manner using an appropriate mechanical fitting, heat fusion, expanded foam or other effective method.

Whenever service to a customer is discontinued one or more of the following actions must be taken:

a. The valve that is closed to prevent the flow of gas to the customer must be locked or otherwise prevented from operation by unauthorized persons.

b. A mechanical device or fitting must be installed in the service line or meter assembly to prevent the flow of gas. A disc installed between the meter inlet and swivel is sufficient for this purpose.

c. The customers piping must be disconnected from the supply of gas and the open pipe ends sealed.

If a customer is permanently disconnected or is expected to be discontinued for an extended time period, the service line should be disconnected either at the main or at the entrance to the customer's property.

Records should be maintained of inactive facilities to show the locations, dates, methods of isolation from gas, and other information, which will be needed later to properly return to service.

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