COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CLOSURE OF PIPELINE SAFETY)	CASE NO.
INVESTIGATION – EASTERN KENTUCKY)	2020-00077
UNIVERSITY)	

ORDER

The Commission, on its own motion, initiates this proceeding to close the investigation of the master meter system operated by Eastern Kentucky University (EKU) on its campus in Richmond, Kentucky, for alleged violations of minimum federal pipeline safety standards. Staff from the Commission's Division of Inspections (Staff) conducted a periodic inspection of EKU's master meter system on October 22, 2018, and cited the university for two violations of federal pipeline safety standards. Staff performed a follow-up inspection on June 4, 2019, and cited EKU for five additional safety violations. Staff prepared reports of each inspection (Inspection Reports) setting forth its findings of violations.

Based upon the findings of violations, Staff issued EKU a Demand for Remedial Measures and Penalty Assessment, a copy of which is attached to this Order as an Appendix, to resolve all compliance and enforcement matters pertaining to the alleged pipeline safety violations. Staff noted in the letter that EKU had taken appropriate remedial measures to bring its system into compliance with federal safety standards. EKU subsequently paid the proposed penalty.

The Commission finds that EKU has addressed to its satisfaction the probable violations cited by Staff in the Inspection Reports. The Commission further finds that the Commission's investigation of the incident should be closed.

IT IS THEREFORE ORDERED that:

- 1. EKU's payment of Staff's proposed penalty and completion of remedial measures is accepted and resolves any and all alleged violations of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199 as well as all claims for any penalty that could be assessed under KRS 278.992(1), arising out of the pipeline safety violations cited in the Inspection Reports.
- 2. EKU's payment of Staff's proposed penalty is not an admission by EKU that it willfully violated any provision of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199.
 - 3. The Commission's investigation of EKU's master meter system is closed.
 - 4. This case is closed and removed from the Commission's docket.

By the Commission

ENTERED

MAR 16 2020 rcs

KENTUCKY PUBLIC SERVICE COMMISSION

ATTEST:

Executive Director

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2020-00077 DATED $\,MAR\,\,16\,\,2020$

FORTY-NINE PAGES TO FOLLOW

Matthew G. Bevin Governor

Charles G. Snavely Secretary Energy and Environment Cabinet



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

January 15, 2020

Michael J. Schmitt Chairman

> Robert Cicero Vice Chairman

Talina R. Mathews Commissioner

Brian Wilcox Associate Vice President Eastern Kentucky University Richmond, KY 40475

Re: Periodic and Follow-up Inspections

Eastern Kentucky University Master Meter System

DEMAND FOR REMEDIAL MEASURES AND PENALTY ASSESSMENT

Dear Mr. Wilcox:

On October 22, 2018, Commission Staff (Staff) performed a periodic inspection of the master meter system of Eastern Kentucky University (EKU) in Richmond, Kentucky. Based on its review of EKU's operations and management practices, Staff prepared the attached Inspection Report dated November 13, 2018 (Periodic Report). Staff also has received and considered EKU's response to the Periodic Report dated December 20, 2018.

As outlined in the Periodic Report, Staff identified the following violations of federal pipeline safety standards during its inspection of the city's gas distribution system:

- 1. **49 CFR § 192.455(a)** External Corrosion Control: Buried or submerged pipelines installed after July 31, 1971.
 - (a) Except as provided in paragraphs (b), (c), (f) and (g) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following: . . . (2) It must have a cathodic protection system designed to protect the pipeline in accordance with this subpart, installed and placed in operation within 1 year after completion of construction.

<u>Finding</u>: At the time of the periodic inspection, EKU could not provide records to establish that its pipelines have a cathodic protection system.



2. 49 CFR § 192.465 – External corrosion control: Monitoring.

(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of § 192.463.

<u>Finding</u>: EKU did not perform pipe-to-soil readings as required per CFR part 192.465(a).

Because of the regulatory violations cited in the Periodic Inspection Report, Staff performed a follow-up inspection of EKU's master meter system on June 4, 2019. Based on its follow-up inspection, Staff prepared the attached Inspection Report dated June 24, 2019 (Follow-up Report). Staff also has received and considered EKU's response to the Follow-up Report emailed to Staff on July 31, 2019.

As outlined in the Follow-up Report, Staff identified the following additional violations of federal pipeline safety standards during its inspection of the university's gas distribution system:

3. **49 CFR § 192.453** – General.

The corrosion control procedures required by §192.605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods.

<u>Finding</u>: EKU's cathodic protection program is not carried out by, or under the supervision of, a person qualified by experience and training in pipeline corrosion control methods.

4. 49 CFR § 192.465 – External corrosion control: Monitoring.

Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

<u>Finding</u>: Pipe-to-soil readings taken in November 2018 following the initial inspection indicated there were approximately ten sections of pipe with low cathodic protection readings. Some of these segments of pipe had low cathodic protection readings going back to 2015. EKU failed to take prompt remedial action to correct these deficiencies.

5. **49 CFR § 192.625** – Odorization of gas.

(f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible



gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable. Operators of master meter systems may comply with this requirement by: (1) Receiving written verification from their gas source that the gas has the proper concentration of odorant; and (2) Conducting periodic "sniff" tests at the extremities of the system to confirm that the gas contains odorant.

<u>Finding</u>: EKU failed to conduct sniff tests to confirm that the gas contains odorant.

6. **49 CFR § 192.616** – Public Awareness.

(j) Unless the operator transports gas as a primary activity, the operator of a master meter or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of this section. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually.

<u>Finding</u>: At the time of the follow-up inspection, EKU could not provide records to ensure that the public awareness message was being provided to its customers twice annually

7. **49 CFR § 192.615** – Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following: . . . (4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency. . . .

<u>Finding</u>: EKU's Emergency Plan does not provide for the availability of personnel, equipment, tools, and materials needed at the scene of the emergency.

REMEDIAL MEASURES

Staff has determined that EKU has remediated the violations identified in the Periodic and Follow-up Reports.

CIVIL PENALTY

KRS 278.992(1) provides that any person who violates any minimum pipeline safety standard adopted by the United States Department of Transportation or any regulation adopted by the Commission governing the safety of pipeline facilities shall be subject to a civil penalty not to exceed the maximum civil penalty contained in 49



Brian Wilcox January 15, 2020 Page 4

CFR § 190.223, as amended. As of the date of the periodic inspection, the maximum civil penalty under 49 CFR § 190.223 was \$209,002 per violation per day, not to exceed \$2,090,022 for any related series of violations. As of the date of the follow-up inspection, the maximum civil penalty under 49 CFR § 190.223 was \$213,268 per violation per day, not to exceed \$2,132,679 for any related series of violations. The penalty caps in effect as of the date of each inspection apply to the violations identified during that inspection.

In determining the amount of the proposed penalty, Staff considers the assessment factors set forth in KRS 278.992(1): "the size of the business of the person charged, the gravity of the violation, and the good faith of the person charged in attempting to achieve compliance, after notification of the violation." Additionally, Staff considers the assessment factors applied under federal law by the Associate Administrator for Pipeline Safety for PHMSA to determine the amount of the civil penalty for violation of a federal pipeline safety standard.¹

Based on its investigation of this matter and consideration of the penalty assessment factors discussed above, Staff concludes that EKU should be assessed a civil penalty in the amount of \$9,500. Staff considers EKU's failure to perform pipe-to-soil readings to confirm cathodic protection, failure to carry out its cathodic protection program with a qualified operator, and failure to take prompt remedial action to correct cathodic protection deficiencies indicated by monitoring to be serious violations that pose an unacceptable risk to public safety. EKU's record-keeping violations, though less serious, prevent the Commission from determining whether the university is conducting its master meter operations in compliance with minimum federal pipeline safety standards. In calculating the penalty to be assessed, Staff also considered the fact that EKU operates a small system and that it has taken adequate steps to bring its system into compliance with regulatory requirements.

If EKU does not wish to contest the proposed civil penalty, it should mail or deliver a cashier's check or money order made payable to the "**Kentucky State Treasurer**" in the amount of \$9,500 within 30 days of the date of this letter, to:

Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

¹ Federal law provides that PHMSA shall consider: (1) the nature, circumstances and gravity of the violation, including adverse impact on the environment; (2) the degree of the respondent's culpability; (3) the respondent's history of prior offenses; (4) any good faith by the respondent in attempting to achieve compliance; and (5) the effect on the respondent's ability to continue in business. The Associate Administrator also may consider: (1) the economic benefit gained from the violation, if readily ascertainable, without any reduction because of subsequent damages; and (2) such other matters as justice may require. See 49 CFR § 190.225.



Brian Wilcox January 15, 2020 Page 5

Payment of the proposed civil penalty and completion of all remedial measures will satisfy and resolve any and all claims against EKU for violation(s) of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199, as well as for any penalty that could be assessed under KRS 278.992(1), arising out of the pipeline safety violations cited herein. EKU's payment of the proposed civil penalty will not be considered an admission by EKU that it willfully violated any provision of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199. Upon payment of the proposed penalty, the Commission will confirm the resolution of this matter by entry of an order. Payment of the penalty constitutes a waiver by EKU of any right to a hearing in any proceeding initiated to close the investigation.

If EKU does not pay the proposed civil penalty within 30 days of the date of this letter, the Commission will institute an administrative proceeding against EKU and hold a formal hearing during which EKU will have an opportunity to present evidence and show cause why it should not be subject to penalties under KRS 278.992(1) for the pipeline safety violations cited herein.

This demand letter addresses only those matters specifically referred to in this document. This demand letter does not waive or otherwise affect any obligations or liabilities that may result from other activities by EKU. If you have any questions, please contact John Park at 502-782-2589.

Sincerely,

Gwen R. Pinson Executive Director

Muc R. Prense

Attachment



		INSPECTION INFORM	<u>ATION</u>	
KY PSC Inspector(s):	Scott Morris, David Nash		Report Number:	102218
Inspection Date(s):	10/22/2018		Report Date:	11/13/2018
Inspection Type:		Periodic Regulatory Compliance Inspe	ction	
		<u>OPERA</u>	ATOR INFORMA	ATION
Name of	Eastern	-	The state of the state of	

				OPER/	ATOR INFORM	ATION	
Name of Operator:	Eastern Kentucky University				OP ID No.:		
Type of Facility:	Master Meter Operator				Location of Facility:	Madison	County
Area of Operation:	Richmond	11-2-7	Campus	of EKU		N.	A 1
	or Contact and Address	<u>:</u>			Unit Name and	Address	
	ity Compliance Coordinator ociate VP Facilities Services 8	§.			63 buildings, offices campus of EKU.	s and houses	on and around the
521 Lancaster Aver Richmond, KY 4047							
Phone # and Email:	Emergency contact: Tim Wiseman 859-248-4385 Timothy.wiseman@eku.ed	du					
Records Location:	EKU and RussMar						
Persons Interviewed	<u>Title</u>	Ph No	one D.	Em	ail		
Tim Wiseman	Utility Compliance Coordinator	85 43	9-248- 85	Tim	othy.wiseman@eku.e	<u>edu</u>	
Earl Taylor	RussMar Utilities, Systems Compliance Officer	60 07	6-235- 90	<u>Earl</u>	.taylor@russmarutilit	ies.com	
Ronnie Mink	Associate Director Facilities Services	85 29	9-622 <i>-</i> 66	Ron	.mink@eku.edu		*
Brian Wilcox	Associate V.P. Facilitie Services & Capital Planning	es 85 14	9-622- 97	Bria	n.wilcox@eku.edu		
Has the Operat	or provided as and-t						
Emergency Cor	or provided an updated tact List?				Yes ⊠		No
Number of Cus	tomers:		Appro	eximately	4,600 students		
Workforce Sum	mary:				roximately 23 OQ tra EKU that operate this		

					EKU employees are trained on M5, spond in case of emergencies.
Number of Separate Gas Supplied Buildings:		emei dinin cafet	rgency gas ig have a co	powered gene ouple of diners are two rent	d boilers, 8 buildings have erators. The Powell building and Case s that use gas for cooking for the al houses and one office that have
Number of Gas Supplied Units:		63			
Number of Gas Maintenance Employees:		EKU to ti	employees he EKU po	for all emerg lice departm	racting employees, and 4 OQ trained gency responses. Emergency calls go ent, then to EKU employees who and contact RussMar as needed.
Name(s) of Contractor(s):		Russ	Mar Utility N	Management (Company
Gas Supplier(s):		Richr	mond Utilitie	es	
Operating Pressure(s):		32 ps	sig		
Date System Installed:		Appr	oximately 1	960 to preser	nt
Size of Mains:	6 inch down 2 inch	to		Type of Pipe:	Coated steel and plastic
Size of Services:	2 inch and under		100	Type of Pipe:	Coated steel and plastic
	Additi	onal Operato	r Informa	ation:	
	RussMa	r Utility Manage	ement Comp	oany is operat	ing this master meter system.
Date of Last Inspection:	8/17/2017				
Number of Deficiencies:			Towns I wanted	ciencies Cleared:	0

Summary of Areas Inspected

<u>PHM</u>	SA Question Set				
	Emergency Plan		Operations and Maintenance Plan		Critical Valves Maintenance Inspections
	Cathodic Protection		Accidents		Leak Surveys
⊠	Odorization		Operator Qualification	\boxtimes	Damage Prevention
⊠	Pipeline Markers		Regulator Stations		DIMP
×	Field Inspection		Other		
		-			

Summary:

The Operation and Maintenance, Emergency, Operator Qualification, Distribution Integrity Management, and Public Awareness Plan requirements were discussed and reviewed during the office visit. Also inspected were records pertaining to sniff tests, valve inspections and leakage surveys. Corrosion records were not available to review.

Findings

- 1. At the time of the inspection the operator could not provide records to ensure that the pipeline was cathodically protected per CFR 192.455.
- 2. The operator did not perform pipe to soil readings as required per CFR part 192.465(a).

Recommendations

It is recommended that the Emergency Plan be up-dated. At the time of the inspection, RussMar employee Earl Taylor sent me a copy of the Emergency Plan by e-mail.

Submitted by:

11/13/2018

Utility Regulatory & Safety Investigator

OPERATION, MAINTENANCE, AND EMERGENCY PLANS

49 CFR 192.605(a)	Sat+	Sat	Concern	Unsat	NA	NC
		×			-	
Notes		g ³⁷				
2. O&M Plans Does operator review and update	te the O&M Plan annually?	,				
49 CFR 192.605(a)	Sat+	Sat	Concern	Unsat	NA	NC
Notes Reviewed 12-26-17 by Zane Salyers. Sche	duled to be reviewed in D	x ecember	2018.	-		
3. O&M Plans Does operator's O&M Plan requ	ire the reporting of incide	nts by tel	ephone to OPS	and the K	Y PSC?	
49 CFR 191.5	Sat+	Sat	Concern	Unsat	NA	NC
		x				1
49 CFR 192.615(a)	written Emergency Plan? Sat+	Sat x	Concern	Unsat	NA	NC
9 CFR 192.615(a) Notes: At the time of the inspection, RussMar em Emergency Plan needs up-dating, there are person	Sat+ ployee Earl Taylor sent m nel listed in it that are no	x e a copy (of the Emerge	ncy Plan by	e-mail T	he
Notes: At the time of the inspection, RussMar em Emergency Plan needs up-dating, there are person at EKU that are not included, and one person listed. 5. Emergency Plans Does the Emergency Plans mediate response by the operator?	ployee Earl Taylor sent m nel listed in it that are no in it has a title change.	x e a copy o longer w	of the Emerger ith EKU, and s	ncy Plan by ome new pe	e-mail. T ersons tha	he t are no
Notes: At the time of the inspection, RussMar em Emergency Plan needs up-dating, there are person at EKU that are not included, and one person listed. 5. Emergency Plans Does the Emergency Plans	ployee Earl Taylor sent m nel listed in it that are no in it has a title change.	x e a copy o longer w	of the Emerger ith EKU, and s	ncy Plan by ome new pe	e-mail. T ersons tha	he t are no
Notes: At the time of the inspection, RussMar em Emergency Plan needs up-dating, there are person at EKU that are not included, and one person listed. 5. Emergency Plans Does the Emergency Plans mediate response by the operator?	ployee Earl Taylor sent m nel listed in it that are no in it has a title change. an provide for: receiving,	x e a copy (longer w identifyii	of the Emerger ith EKU, and so ng, and classify	ncy Plan by ome new po	e-mail. Tersons tha	he t are no requirii
Notes: At the time of the inspection, RussMar em Emergency Plan needs up-dating, there are person at EKU that are not included, and one person listed. 5. Emergency Plans Does the Emergency Plans mediate response by the operator? 19 CFR 192.615(a)	ployee Earl Taylor sent m nel listed in it that are no in it has a title change. an provide for: receiving,	x e a copy of longer w identifyii	of the Emerger ith EKU, and so ng, and classify	ncy Plan by ome new po	e-mail. Tersons tha	he t are no requirii
Notes: At the time of the inspection, RussMar em Emergency Plan needs up-dating, there are person at EKU that are not included, and one person listed. 5. Emergency Plans Does the Emergency Plans mediate response by the operator?	ployee Earl Taylor sent m nel listed in it that are no in it has a title change. an provide for: receiving,	x e a copy of longer w identifyin Sat	of the Emerger ith EKU, and so	oncy Plan by ome new periods wing notices	e-mail. Tersons tha	he t are no requirin
Notes: At the time of the inspection, RussMar em Emergency Plan needs up-dating, there are person at EKU that are not included, and one person listed. 5. Emergency Plans Does the Emergency Plans mmediate response by the operator? 19 CFR 192.615(a) Notes 6. Emergency Plans Does the Emergency Plans Does Does Does Does Does Does Does Doe	ployee Earl Taylor sent m nel listed in it that are no in it has a title change. an provide for: receiving,	x e a copy of longer w identifyin Sat	of the Emerger ith EKU, and so	oncy Plan by ome new periods wing notices	e-mail. Tersons tha	he t are no requirin

19 CFR 192.615(a)	Sat+	Sat	Concern	Unsat	NA	NC
		x	Concern	Onsut		110
Notes						
					35	
3. Emergency Plans Does the Emergency Plan preeded at the scene of the emergency?	provide for: the availa	ability of p	personnel, equi	ipment, too	ls, and ma	aterials
9 CFR 192.615(a)	Sat+	Sat	Concern	Unsat	NA	NC
		×				
Notes					14	
D. Emergency Plans Does the Emergency Plan property?	provide for: actions d	irected to	ward protectin	g people fir:	st and the	n
9 CFR 192.615(a)	Sat+	Sat	Concern	Unsat	NA	NC
		X				
.O. Emergency Plans Does the Emergency Plan the operator's pipeline system necessary to minimize h	provide for: emerge azards to life or prope Sat+	ncy shutc	down and press	sure reduction	on in any	
.O. Emergency Plans Does the Emergency Plan the operator's pipeline system necessary to minimize h	azards to life or prope	ncy shutc erty?				section N C
LO. Emergency Plans Does the Emergency Plans he operator's pipeline system necessary to minimize he generated (a) 9 CFR 192.615(a)	sat+	ncy shutc erty? Sat x	Concern	Unsat	NA	NC
LO. Emergency Plans Does the Emergency Plans he operator's pipeline system necessary to minimize his 9 CFR 192.615(a) Notes L1. Emergency Plans Does the Emergency Plans	sat+ provide for: making	ncy shutc erty? Sat x safe any	Concern actual or poten	Unsat ntial hazard	NA to life or	N C
.0. Emergency Plans Does the Emergency Plans he operator's pipeline system necessary to minimize his 9 CFR 192.615(a) Notes 1. Emergency Plans Does the Emergency Plan	sat+	ncy shutc erty? Sat x safe any	Concern	Unsat ntial hazard	NA	N C
.0. Emergency Plans Does the Emergency Plans to operator's pipeline system necessary to minimize his 9 CFR 192.615(a) Notes 1. Emergency Plans Does the Emergency Plans 9 CFR 192.615(a)	sat+ provide for: making	ncy shutc erty? Sat x safe any	Concern actual or poten	Unsat ntial hazard	NA to life or	N C
LO. Emergency Plans Does the Emergency Plans he operator's pipeline system necessary to minimize he operator's pipeline system necessary pipeline sy	sat+ provide for: making	ncy shutc erty? Sat x safe any	Concern actual or poten	Unsat ntial hazard	NA to life or	N C
A.O. Emergency Plans Does the Emergency Plans he operator's pipeline system necessary to minimize his 9 CFR 192.615(a) Notes 1. Emergency Plans Does the Emergency Plans 9 CFR 192.615(a) Notes Notes	sat+ provide for: making Sat+ provide for: notifying	ncy shutce erty? Sat x safe any Sat x	Concern actual or poter	Unsat ntial hazard Unsat	NA to life or	propert N C
LO. Emergency Plans Does the Emergency Plans he operator's pipeline system necessary to minimize he operator's pipeline system necessary to minimize he operator's pipeline system necessary to minimize he operator's pipeline he operator's pipeline emergency Plans Does the Emergency Plans operator's pipeline emergencies and coordinating with them do	sat+ provide for: making Sat+ provide for: notifying	ncy shutce erty? Sat x safe any Sat x	Concern actual or poter	Unsat ntial hazard Unsat	NA to life or	propert N C
Notes 1.0. Emergency Plans Does the Emergency Plans the operator's pipeline system necessary to minimize has 9 CFR 192.615(a) Notes 1.1. Emergency Plans Does the Emergency Plans 9 CFR 192.615(a) Notes 1.2. Emergency Plans Does the Emergency Plans as pipeline emergencies and coordinating with them does 9 CFR 192.615(a)	sat+ provide for: making Sat+ provide for: notifying uring an emergency?	ncy shutcerty? Sat x safe any Sat x	actual or poter Concern	Unsat ntial hazard Unsat	NA to life or NA	propert N C

investigation Concern of the person	on under 19 Unsat	NA	N C
concern the person	Unsat	NA le for eme	N C
concern the person	Unsat	NA le for eme	N C
o the person	n responsibl	le for eme	
			rgency
			rgency
			rgency
oncern	Unsat	NI A	
		NA	NC
-			
el to assure	e that they a	are knowle	edgeab
oncern	Unsat	NA	NC
ergency to d	determine if	^r procedure	es were
oncern	Unsat	NA	NC
			e) necessary for the safe operati

49 CFR 192.747 Sat+ Sat Concern Unsat NA NC X

Maintenance performed by: **Date of Last Check:** 6-27-18 Marvin Anderson

EKU has 5 critical valves, there are approximately 50 non-critical valves. There were 9 new valves installed recently on Park Drive near the Whitlock building and Powell buildings.

19 CFR 192.747	Sat+	Sat	Concern	Unsat	NA	NC
3 6.11.23.27.77	Juli	x		• iio a c		-
Notes						
3. Cathodic Protection Is the cathodic protection as the cathodic protection are carried as a control of the carrosion co		ıt by, or u	nder the direc	tion of, a pe	erson qual	ified by
P9 CFR 192.453	Sat+	Sat	Concern	Unsat	NA	N C
			x			
EKU has contracted with RussMar to conduct pipe to so cathodic protection inspections as required.	oil readings. At the ti	me of the	inspection Rus	ssMar had n	ot provide	ed
1. Cathodic Protection Pipelines installed after	July 31, 1971, are ca	thodically	protected and	have an ex	ternal coa	ting?
9 CFR 192.455(a)	Sat+	Sat	Concern	Unsat	NA	N C
Notes The rectifier was taken out in 2017, and anodes were s to soil readings were not available to review. Accordin	supposed to be install	ed accord	ing to the 201	x 7 inspection	report. 2	2018 p
Notes The rectifier was taken out in 2017, and anodes were s to soil readings were not available to review. According Anderson in July 2017. 5. Cathodic Protection Pipelines installed before	supposed to be install g to the 2017 inspect	ed accord ion, pipe l	ing to the 201 to soil reading:	x 7 inspections s last taken	report. 2 by Marvin	2018 p
Notes The rectifier was taken out in 2017, and anodes were s to soil readings were not available to review. According Anderson in July 2017.	supposed to be install g to the 2017 inspect	ed accord ion, pipe l	ing to the 201 to soil reading:	x 7 inspections last taken	report. 2 by Marvin	2018 p
Notes The rectifier was taken out in 2017, and anodes were so to soil readings were not available to review. According Anderson in July 2017. 5. Cathodic Protection Pipelines installed before active corrosion?	supposed to be install g to the 2017 inspect e August 1, 1971 that	ed accord ion, pipe i	ing to the 201 to soil readings	x 7 inspections last taken	report. 2 by Marvin	2018 p
Notes The rectifier was taken out in 2017, and anodes were so to soil readings were not available to review. According Anderson in July 2017. 5. Cathodic Protection Pipelines installed before active corrosion?	supposed to be install g to the 2017 inspect e August 1, 1971 that	ed accord ion, pipe i	ing to the 201 to soil readings	x 7 inspections last taken	protected in	2018 p
Notes The rectifier was taken out in 2017, and anodes were so to soil readings were not available to review. According Anderson in July 2017. 5. Cathodic Protection Pipelines installed before active corrosion? 19 CFR 192.457(b)	supposed to be install g to the 2017 inspect e August 1, 1971 that Sat+	ed accord ion, pipe i is bare o Sat	ing to the 201 to soil readings or coated are co	x 7 inspections last taken athodically p	protected of X	2018 p
Notes The rectifier was taken out in 2017, and anodes were sto soil readings were not available to review. According Anderson in July 2017. 5. Cathodic Protection Pipelines installed before active corrosion? 19 CFR 192.457(b) Notes 6. Cathodic Protection Does the cathodic protection.	supposed to be install g to the 2017 inspect e August 1, 1971 that Sat+	ed accord ion, pipe i is bare o Sat	ing to the 201 to soil readings or coated are co	x 7 inspections last taken athodically purpose the control of the	protected of X	2018 p in area N (
Notes The rectifier was taken out in 2017, and anodes were sto soil readings were not available to review. According Anderson in July 2017. 5. Cathodic Protection Pipelines installed before active corrosion? 19 CFR 192.457(b) Notes 6. Cathodic Protection Does the cathodic protestore of the applicable criteria contained in Appendix D	supposed to be install g to the 2017 inspect e August 1, 1971 that Sat+ ction system provide of the Regulations?	ed accord ion, pipe is bare o Sat	ing to the 201 to soil readings r coated are co	x 7 inspections last taken athodically purpose the control of the	protected and a x	2018 p
Notes The rectifier was taken out in 2017, and anodes were sto soil readings were not available to review. According Anderson in July 2017. 5. Cathodic Protection Pipelines installed before active corrosion? 19 CFR 192.457(b) Notes 6. Cathodic Protection Does the cathodic protestore of the applicable criteria contained in Appendix D	supposed to be install g to the 2017 inspect e August 1, 1971 that Sat+ ction system provide of the Regulations?	ed accord ion, pipe is bare o Sat	ing to the 201 to soil readings r coated are co	x 7 inspections last taken athodically purpose the control of the	n report. 2 by Marvin protected of NA x omplies w	2018 p

49 CFR 192.465(a)		Sat+	Sat	Cor	ncern	Uns	at NA	NC	
							x			
Date of Last Check:	7/10/2017	Survey p	erformed b	y:	Marv	vin Ande	rson			
installed to provid	where they take reading e CP protection. No reco soil readings were not co	ords on CP reading	gs and anode	in 2017 install	, and ation l	anodes v ocations	were s were	upposed to available to	be review.	
8. Cathodic P	rotection Are the cath	hodic protection s	survey record	s adeq	uate?					
49 CFR 192.465(a)		Sat	+	Sat	Conc	ern	Unsat	NA	N
				-				x		
Notes Follow up	la voiTs						37			
9. Cathodic P	rotection Is each burn he cathodic protection sy	ied pipeline electr stem?	rically isolate	d from	other	undergro	ound s	tructures th	nat may ca	use
49 CFR 192.467(a)		Sat	+	Sat	Conc	ern	Unsat	NA	N
				-					×	
	Protection Inspection	n and electrical te			ure tha	1		olation is ad	equate?	
19 CFR 192.467(d			Sat	+ :	Sat	Conc	ern	Unsat	NA	N
				-		1			X	
Notes					ther c	ontact p	oints f	or electrica	measuren	nent
	Protection Does oper	rator have sufficie	ent test statio	ns or o						3
11. Cathodic	Protection Does oper	rator have sufficie	ent test statio	-	Sat	Conc	ern	Unsat	NA	N (
L1. Cathodic ourposes?	Protection Does oper	rator have sufficie	-	-	Sat	Conc	ern	Unsat	NA	N

ACCIDENTS, LEAK SURVEYS, AND ODORIZATION

1. Accidents Are there established procedures for analyzing accidents and failures including samples of the failed facility or equipment for the purpose of determining the cause of the failure and minimizing the possibility of recurrence?

49 CFR 192.617	Sat+	Sat	Concern	Unsat	NA	NC
		×				

Notes Robert Barrett – RussMar employee performed this 10-16-18, and 2-3 days prior or after this, found 5 grade 3 leaks and one valve that was repaired on 10/15/18. Previous leak survey performed July 2017.

			Sat+	Sat	Concern	Unsat	NA	NO
				×				
Notes	64							
3. Leak Surveys the ends?	Does operator disconi	nect abandoned pip	elines from a	ll sources	and supplies of	of gas, purg	e of gas a	nd sea
49 CFR 192.727			Sat+	Sat	Concern	Unsat	NA	NO
				×				
Notes		5 5						
4. Leak Surveys	Does operator lock se	rvice lines that are	inactive?					
49 CFR 192.727			Sat+	Sat	Concern	Unsat	NA	NO
				x				
5. Leak Surveys	Does operator patrol i	mains where anticip	ated physica	l moveme	nt or external	loading cou	ld cause f	ailure (
eakage?					_			1
49 CFR 192.721			Sat+	Sat	Concern	Unsat	NA	NC
					1		X	
Date of Last Check:		Survey p	erformed by	/ :			X	
Notes	re patrolling is require		erformed by	/ :			x	
Notes EKU has no areas whe		d.		/ :			X	
Date of Last Check: Notes EKU has no areas when 6. Leak Surveys 49 CFR 192.721		d.		: Sat	Concern	Unsat	X NA	NC
Notes EKU has no areas whe		d.	?		Concern	Unsat		NC
Notes EKU has no areas whe 6. Leak Surveys 49 CFR 192.721		d.	?		Concern	Unsat	NA	NC
Notes EKU has no areas when 6. Leak Surveys 49 CFR 192.721 Notes	Are the main patrollin	d. g records adequate	? Sat+	Sat			NA x	NC
Notes EKU has no areas when 6. Leak Surveys 49 CFR 192.721 Notes 7. Leak Surveys	Are the main patrollin	d. g records adequate	? Sat+	Sat			NA x	
Notes EKU has no areas when 5. Leak Surveys 19 CFR 192.721 Notes 7. Leak Surveys	Are the main patrollin	d. g records adequate	? Sat+ with leak dete	Sat ctor equiµ	oment with the	required in	NA x	NC
Notes EKU has no areas whe	Are the main patrollin	nd. g records adequate n leakage surveys w	? Sat+ with leak dete	Sat ctor equip Sat x	oment with the	required in Unsat	NA x	

8. Leak Surveys	Are the leakage survey reco	ords adequate:	?					
49 CFR 192.723			Sat+	Sat	Concern	Unsat	NA	NC
				x				
Notes					-			
					emingle diff. A right per contract garden have			
9. Odorization Is	the gas in the operator's pi	peline odorized	d?					,
49 CFR 192.625(a)			Sat+	Sat	Concern	Unsat	NA	NC
		0 4		×				
Notes Richmond Util	lities provides gas to EKU	J.						
10. Leak Surveys odorant?	Does operator have writte	en verification i	from their ga	as supplie	r that the gas	has the pro	per concei	ntration (
49 CFR 192.625(f)			Sat+	Sat	Concern	Unsat	NA	NC
							×	
system to confirm that	Ooes operator conduct perio the gas contains odorant?	odic (recomme					extremitie	s of the
49 CFR 192.625(f)			Sat+	Sat	Concern	Unsat	NA	NC
	T. L. C.	L		x				
Date of Last Check:	10/9/18	Test perfo	ormed by:		Robert Barre	ett		
Notes Sniff tests are performe	ed monthly when odorant to	esting is perfor	rmed.					
12. Odorization A	re the "sniff" test records a	adequate?						
49 CFR 192.625(f)			Sat+	Sat	Concern	Unsat	NA	NC
							x	
Notes Robert Barrett performs	s odorant testing monthly v	with an odorom	neter. Last p	performed	10-9-18.			
•	JALIFICATION ification Does operator I	have a written	qualification	program	(OQ Program))?		
49 CFR 192.805			Sat+	Sat	Concern		NA	NC
					1		1777	

Notes OQ records reviewed for everyone who has performed work at EKU since 2017 inspection. 7 EKU employees OQ records for EKU employees qualified to shut down services as needed. Earl sent me records on 4 EKU employees 9/15/16. Anglin, Frazier, Kirby, Wiseman.

2. Operator Qualification Does the OQ Progra	m include provisions	to identify	covered tasks	5?	1.7	
49 CFR 192.805	Sat+	Sat	Concern	Unsat	NA	NC
		x				
Notes						
3. Operator Qualification Does the OQ Progra performing covered tasks are qualified?	m include provisions i	to ensure	through evalu	ation that ir	ndividuals	
49 CFR 192.805	Sat+	Sat	Concern	Unsat	NA	NC
		x				
Notes						
1. Operator Qualification Does the OQ Progra his subpart to perform a covered task if directed and o	m include provisions t bserved by an individ	o allow ir ual that is	ndividuals that s qualified?	are not qua	alified purs	uant to
49 CFR 192.805	Sat+	Sat	Concern	Unsat	NA	NC
		x				
i. Operator Qualification Does the OQ Programelieve that the individual's performance of a covered to SCFR 192.805	ask contributed to an	incident a	Concern	art 191?	N A	N C
3		×				
Notes			-			
5. Operator Qualification Does the OQ Programelieve that the individual is no longer qualified to perfo	m include provisions t orm a covered task?	o evaluat	e an individua	if the opera	ator has re	eason to
9 CFR 192.805	Sat+	Sat	Concern	Unsat	NA	NC
		×				
Notes	No.					
7. Operator Qualification Does the OQ Program individuals performing those covered tasks?	m include provisions t	o commu	nicate changes	that affect	covered t	asks to
9 CFR 192.805	Sat+	Sat	Concern	Unsat	NA	NC
		x				
Notes						

49 CFR 192.805	Sat+	Sat	Concern	Unsat	NA	NC
		×				
Notes						
	G 100 100 B			200		
9. Operator Qualification Does operator keep reco						
49 CFR 192.807	Sat+	Sat	Concern	Unsat	NA	NC
		x				
Notes						
10. Operator Qualification Does operator's qualif.	ication records inc	lude iden	tification of au	alified indiv	iduals?	
49 CFR 192.807(a)	Sat+	Sat	Concern		NA	NC
		×				
Notes			-			
11. Operator Qualification Does operator's qualification	ication records inc	lude iden	tification of the	e covered ta	sks the in	dividua
qualified to perform?						
40 CED 100 007/-)		40.00	_			T
49 CFR 192.807(a)	Sat+	Sat	Concern	Unsat	NA	NC
	Sat+	Sat x	Concern	Unsat	NA	NC
	Sat+		Concern	Unsat	NA	NC
49 CFR 192.807(a) Notes	Sat+		Concern	Unsat	NA	NC
		x			NA	NC
Notes		x		ualification?	N A	
Notes 12. Operator Qualification Does operator's qualification	ication records inc	x lude date	s of current qu	ualification?		NC
Notes 12. Operator Qualification Does operator's qualification	ication records inc	x lude date Sat	s of current qu	ualification?		
Notes 12. Operator Qualification Does operator's qualifity 49 CFR 192.807(a)	ication records inc	x lude date Sat	s of current qu	ualification?		
Notes 12. Operator Qualification Does operator's qualifit 49 CFR 192.807(a) Notes	cation records inc	x lude date Sat x	s of current qu Concern	ualification? Unsat		
Notes 12. Operator Qualification Does operator's qualifity 49 CFR 192.807(a)	cation records inc	x lude date Sat x	s of current qu Concern	ualification? Unsat		
Notes 12. Operator Qualification Does operator's qualifit 49 CFR 192.807(a) Notes	cation records inc	x lude date Sat x	s of current qu Concern	ualification? Unsat		
Notes 12. Operator Qualification Does operator's qualifit 49 CFR 192.807(a) Notes 13. Operator Qualification Does operator's qualifit	Sat+	x lude date Sat x	s of current que Concern	ualification? Unsat	NA	NC
Notes 12. Operator Qualification Does operator's qualified of the property of	Sat+	x lude date Sat x lude quali	s of current que Concern	ualification? Unsat	NA	NC
Notes 12. Operator Qualification Does operator's qualified of the property of	Sat+	x lude date Sat x lude quali	s of current que Concern	ualification? Unsat	NA	NC
Notes 12. Operator Qualification Does operator's qualified Pour Pour Pour Pour Pour Pour Pour Pour	Sat+ Cation records inc Sat+ Cation records inc Sat+	x lude date Sat x lude quali Sat x	s of current que Concern ification metho	ualification? Unsat	NA NA	NC
Notes 12. Operator Qualification Does operator's qualified of the policy of the polic	Sat+ Cation records inc Sat+ Cation records inc Sat+	x lude date Sat x lude quali Sat x	s of current que Concern ification metho	ualification? Unsat	NA NA	NC
Notes 12. Operator Qualification Does operator's qualifit 49 CFR 192.807(a) Notes 13. Operator Qualification Does operator's qualifit	Sat+ Cation records inc Sat+ Cation records inc Sat+	x lude date Sat x lude quali Sat x	s of current que Concern ification metho	ualification? Unsat	NA NA	NC

49 CFR 192.807(b)		Sat+	Sat	Concern	Unsat	NA	NC
				x			
Notes Not available for revie	ew during the inspection.						
							-
16. Operator Qualificat	ion Has operator completed th	e qualification	n of indivi	duals performi	ng covered	tasks?	
49 CFR 192.809(b)		Sat+	Sat	Concern	Unsat	NA	NC
9000			×				
Notes							
DAMAGE BREVENITT	ON DUDITO AWAR						
DAMAGE PREVENTI	ON, PUBLIC AWAR	ENESS,	LINE	MARKERS	s, AND	REGUL	ATC
STATIONS	. was all and a larger	722.3	m 6	122 N W 522			
1. Damage Prevention	is the operator a member of a q			-			
49 CFR 192.614		Sat+	Sat	Concern	Unsat	NA	NC
			х				
Who located your buried pip	elines in the area of excavat	ion activity	before th	ne activity be	gins?		
RussMar employees perform loc	cates, 4 locates performed in 20	18.					
Is the locator OQ qualified?	Yes						
Notes							
		plemented a	written p	rocedure to pro	ovide to its	customer's	s public
awareness messages twice annu		plemented a				100000	
awareness messages twice annu			Sat	Concern	Unsat	customer's	s public
awareness messages twice annu 49 CFR 192.616(j)	ally?	Sat+	Sat	Concern	Unsat	100000	
awareness messages twice annu 49 CFR 192.616(j)	ally?	Sat+	Sat	Concern	Unsat	100000	
awareness messages twice annu 49 CFR 192.616(j)	ally?	Sat+	Sat	Concern	Unsat	100000	
awareness messages twice annu 49 CFR 192.616(j) Notes Sent out once a semeste	er September 2018, due again Ja	Sat+ an. 2019. Br	Sat x ian Wilcox	Concern	Unsat	NA	NC
wareness messages twice annual specific process of the series of the ser	er September 2018, due again Ja	Sat+ an. 2019. Br	Sat x ian Wilcox	Concern	Unsat	NA	N C
wareness messages twice annual specific process of the series of the ser	er September 2018, due again Ja	Sat+ an. 2019. Br	Sat x ian Wilcon	Concern s sent me this. of the purpose	Unsat	NA ility of the	N C
Notes Sent out once a semeste 2. Public Awareness Does 49 CFR 192.616(j)	er September 2018, due again Ja	Sat+ an. 2019. Br	Sat x ian Wilcon escription Sat	Concern s sent me this. of the purpose	Unsat	NA ility of the	NC
Notes Sent out once a semeste 2. Public Awareness Does 49 CFR 192.616(j)	er September 2018, due again Ja	Sat+ an. 2019. Br	Sat x ian Wilcon escription Sat	Concern s sent me this. of the purpose	Unsat	NA ility of the	N C
Notes Sent out once a semeste 2. Public Awareness Does 49 CFR 192.616(j)	er September 2018, due again Ja	Sat+ an. 2019. Br	Sat x ian Wilcon escription Sat	Concern s sent me this. of the purpose	Unsat	NA ility of the	N C
Notes Sent out once a semeste 2. Public Awareness Doe 49 CFR 192.616(j) Notes 3. Public Awareness Doe	er September 2018, due again Ja	Sat+ an. 2019. Br e include a de Sat+	Sat x ian Wilcon escription Sat x	Concern s sent me this. of the purpose Concern	Unsat e and reliabi Unsat	NA ility of the NA	N C
Notes Sent out once a semester	er September 2018, due again Ja	Sat+ an. 2019. Br e include a de Sat+	Sat x ian Wilcon escription Sat x	Concern sees sent me this. of the purpose Concern of the hazards	Unsat e and reliable Unsat of the pipel	NA ility of the NA	N C
2. Public Awareness Has awareness messages twice annual 49 CFR 192.616(j) Notes Sent out once a semester as a sem	er September 2018, due again Ja	Sat+ an. 2019. Br e include a de Sat+	Sat x ian Wilcon escription Sat x	Concern s sent me this. of the purpose Concern	Unsat e and reliabi Unsat	NA ility of the NA	N C

4. Public Awareness Does the public aware	3					
49 CFR 192.616(j)	Sat+	Sat	Concern	Unsat	NA	NC
	1	×				
Notes						
5. Public Awareness Does the public aware	eness message include hov	v to recog	nize and respo	ond to a leal	k?	
49 CFR 192.616(j)	Sat+	Sat	Concern	Unsat	NA	NC
		×				
Notes				-		
5. Public Awareness Does the public aware	eness message include hov	v to recog	nize and respo	ond to a leal	k?	
49 CFR 192.616(j)	Sat+	Sat	Concern	Unsat	NA	NC
		x				
Notes						
6. Public Awareness Does the public aware	eness message include hov	v to get a	dditional inform	nation?		
49 CFR 192.616(j)	Sat+	Sat	Concern	Unsat	NA	NC
49 CFR 192.616(j)		Sat x	Concern	Unsat	NA	NC
Notes 7. Line Markers Are line markers placed and	Sat+	x				
Notes 7. Line Markers Are line markers placed and public?	Sat+	x ction of ab	poveground ma	ain in an are	ea accessii	ble to ti
Notes 7. Line Markers Are line markers placed and	Sat+ maintained along each sec	x			ea accessii N A	
Notes 7. Line Markers Are line markers placed and public? 49 CFR 192.707(c)	Sat+ maintained along each sec	x ction of ab	poveground ma	ain in an are	ea accessii	ble to ti
Notes 7. Line Markers Are line markers placed and public? 49 CFR 192.707(c) No Notes	Sat+ maintained along each sec	x ction of al Sat	Concern	ain in an are	ea accessii N A	ble to ti
Notes 7. Line Markers Are line markers placed and public? 49 CFR 192.707(c) No Notes 8. Regulator Stations Is the operator response.	Sat+ maintained along each sec	x ction of al Sat	Concern	ain in an are Unsat of supply?	ea accessii N A	ble to t
Notes 7. Line Markers Are line markers placed and public? 49 CFR 192.707(c) No Notes 8. Regulator Stations Is the operator response.	Sat+ maintained along each sec Sat+ onsible for the regulator ar	x ction of at Sat nd setting	Concern Concern	ain in an are Unsat of supply?	ea accessii NA X	ble to t
Notes 7. Line Markers Are line markers placed and public? 49 CFR 192.707(c) No Notes 8. Regulator Stations Is the operator response.	Sat+ maintained along each sec Sat+ onsible for the regulator ar	x ction of at Sat nd setting	Concern Concern	ain in an are Unsat of supply?	n A x	ble to ti
Notes 7. Line Markers Are line markers placed and public? 49 CFR 192.707(c) No Notes 8. Regulator Stations Is the operator responses	Sat+ maintained along each see Sat+ onsible for the regulator ar Sat+	x Sat Sat	Concern at the source Concern	oin in an are Unsat of supply? Unsat	NA X	N C
Notes 7. Line Markers Are line markers placed and public? 49 CFR 192.707(c) No Notes 8. Regulator Stations Is the operator response. 49 CFR 192.739 Notes	Sat+ maintained along each see Sat+ onsible for the regulator ar Sat+	x Sat Sat	Concern at the source Concern	oin in an are Unsat of supply? Unsat	NA X	N C

49 CFR 192.739		Sat+	Sat	Concern	Unsat	NA	NC
						x	
Notes							
11. Regulator Station and reliability of operation for	S Do inspection and test reco the service in which it is emp	ords indicațe that i ployed?	regulators	are adequate	from the st	andpoint (of capac
49 CFR 192.739		Sat+	Sat	Concern	Unsat	NA	NC
			7			x	
Notes							
12. Regulator Station	S Do inspection and test reco	rds indicate that i	regulators	are set to fun	ction at the	correct p	ressurei
49 CFR 192.739	To the second se	Sat+	Sat	Concern		NA	N C
						x	
13. Regulator Stations	S Do inspection and test reco	rds indicate that i	regulators	are properly i	nstalled and	l protected	d from
dirt, liquids, or other condition	S Do inspection and test reco s that might prevent proper o	rds indicate that i operation? Sat+	regulators Sat	are properly i		l protected	d from
13. Regulator Station : dirt, liquids, or other condition 49 CFR 192.739	S Do inspection and test reco s that might prevent proper o	operation?					
13. Regulator Station : dirt, liquids, or other condition 49 CFR 192.739	S Do inspection and test reco s that might prevent proper o	operation?				NA	
13. Regulator Stations dirt, liquids, or other condition 49 CFR 192.739 Notes	is that might prevent proper o	Sat+	Sat	Concern	Unsat	NA	
13. Regulator Stations dirt, liquids, or other condition 19 CFR 192.739 Notes 14. Regulator Stations	is that might prevent proper o	Sat+	Sat	Concern	Unsat	NA	
13. Regulator Stations dirt, liquids, or other condition 49 CFR 192.739 Notes 14. Regulator Stations	is that might prevent proper o	sat+ Sat+ eing performed by	Sat an indivi	Concern dual that is OC	Unsat	NA X	NC
13. Regulator Stations dirt, liquids, or other condition 19 CFR 192.739 Notes 14. Regulator Stations 19 CFR 192.739	is that might prevent proper o	sat+ Sat+ eing performed by	Sat an indivi	Concern dual that is OC	Unsat	NA x	NC
13. Regulator Stations dirt, liquids, or other condition 49 CFR 192.739 Notes 14. Regulator Stations 49 CFR 192.739 Notes Notes	S Are regulator inspections be	eing performed by Sat+ EMENT (DI	Sat an indivi	Concern dual that is OC	Unsat	NA x	NC
Notes 13. Regulator Stations dirt, liquids, or other conditions 49 CFR 192.739 Notes 14. Regulator Stations 49 CFR 192.739 Notes DISTRIBUTION IN 1. DIMP Has the operator of 49 CFR 192.1015(a)	S Are regulator inspections be	eing performed by Sat+ EMENT (DI	Sat an indivi	Concern dual that is OC	Unsat Qualified? Unsat	NA x	NC

49 CFR 192.1015(a)	Sat+	Sat	Concern	Unsat	NA	NC
		×				100
Notes Effective date of DIMP plan was 9/11/2014. Last reviewed on 3	3-5-18 by Za	ne Salyer:	S.			ii.
3. DIMP Does the written plan address knowledge of pipeline for gaining knowledge through normal activities conducted on the	e system, inc he pipeline (i	luding app .e. design	proximate loca , construction,	tion and ma O and M)?	iterial, and	d a plan
49 CFR 192.1015(b)	Sat+	Sat	Concern	Unsat	NA	NC
Notes						
4. DIMP Does the written plan address identification of threa excavation damage, other outside force damage, material weld	ts (existing of failure, equip	or potentia oment fail	al) including co ure, and incori	rrosion, nat ect operatio	tural force on?	s,
49 CFR 192.1015(b)	Sat+	Sat	Concern	Unsat	NA	NC
		x		The state of the s		
5. DIMP Does the written plan rank risks (the operator must	evaluate the	risks to it	ts pipeline and	' estimate th	ne relative	
importance of each identified threat)? 49 CFR 192.1015(b)	Sat+	6-1	Concern	11	N 4	No
49 CI N 192.1013(b)	Satt	Sat	Concern	Unsat	NA	NC
Notes The number one threat listed is excavation damage.		19				
6. DIMP Does the written plan identify and implement measu	ıres designed	to reduc	e the risks fror	n failure of	its pipeline	e?
49 CFR 192.1015(b)	Sat+	Sat	Concern	Unsat	NA	NC
		×				
Notes						
7. DIMP Does the written plan measure performance, monito eliminated or repaired on its pipeline and their causes?	or results, and	d evaluate	e effectiveness	, including t	he numbe	r of leaks
49 CFR 192.1015(b)	Sat+	Sat	Concern	Unsat	NA	NC
		×				
Notes 2017 1 leak external corrosion, RussMarr scheduled to c	ome to EKU	n Decemb	oer 2018 revie	w plans.		
8. DIMP Does the written plan address the operation determi evaluations and re-evaluation of the entire program at least eve	ination of the ry five (5) ve	appropria ars?	ate period for o	conducting 1	M progran	n
49 CFR 192.1015(b)	Sat+	Sat	Concern	Unsat	NA	NC

2. **DIMP** Does the IM program include a written plan?

Notes

49 CFR 192.1015(c)	Sat+	Sat	Concern	Unsat	NA	NC
					x	
Notes Not Due until 2024						
10. DIMP Has the operator maintained the following record identification?	ds for a period	of at leas	t 10 years: Do	ocuments su	upporting (threat
49 CFR 192.1015(c)	Sat+	Sat	Concern	Unsat	NA	NC
					x	
Notes					1 7	
11. DIMP Has the operator maintained the following record and material of all piping and appurtenances installed after the location and material of all pipe and appurtenances that were	e effective date	of its IM	program and,	to the exte	nowing the nt known,	location the
49 CFR 192.1015(c)	Sat+	Sat	Concern	Unsat	NΑ	NC
					X	
				*/		
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a	nticipated?				ected from	corrosi
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a	installed in a i nticipated? Sat+	readily acc	cessible locatio		ected from	corrosi N C
FIELD INSPECTION 1. Field Inspection <i>Is each meter and service regulator and other damage (including vehicular damage) that may be a</i> 49 CFR 192.353(a)	nticipated?					
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a	nticipated?	Sat				
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a 49 CFR 192.353(a) Notes 2. Field Inspection Is each service regulator, installed v	sat+	Sat	Concern	Unsat	NA	NC
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a 49 CFR 192.353(a) Notes 2. Field Inspection Is each service regulator, installed ventrance?	sat+	Sat	Concern	Unsat	NA	NC
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a 49 CFR 192.353(a) Notes 2. Field Inspection Is each service regulator, installed ventrance?	sat+ Sat+ vith a building,	Sat x	Concern s near as prac	Unsat	NA point of se	N C
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a 49 CFR 192.353(a) Notes 2. Field Inspection Is each service regulator, installed ventrance? 49 CFR 192.353(b)	sat+ Sat+ vith a building,	Sat x located a	Concern s near as prac	Unsat	NA point of se	N C
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a 49 CFR 192.353(a) Notes 2. Field Inspection Is each service regulator, installed ventrance? 49 CFR 192.353(b) Notes 3. Field Inspection Is each meter, installed within a built	vith a building, Sat+ Sat+	Sat x located a Sat x	Concern s near as prac	Unsat	NA point of se	N C
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a 49 CFR 192.353(a) Notes 2. Field Inspection Is each service regulator, installed ventrance? 49 CFR 192.353(b) Notes 3. Field Inspection Is each meter, installed within a buildource of ignition or any source of heat which might damage the source of ignition or any source of heat which might damage the source of ignition or any source of heat which might damage the source of ignition or any source of heat which might damage the source of hea	vith a building, Sat+ Sat+	Sat x located a Sat x	Concern s near as prac	Unsat	NA point of se	N C
1. Field Inspection Is each meter and service regulator and other damage (including vehicular damage) that may be a 49 CFR 192.353(a)	vith a building, Sat+ Sat+ Iding, located in meter?	Sat x located a Sat x	Concern s near as prac Concern ated place and	Unsat tical to the Unsat	NA point of se NA	NC ervice lii NC

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

Sat+ Sat Concern Unsat NA

2 2 2			X				
Notes							
5. Field Inspectio	n Are service regulator ve	ents and relief vents rain a	nd insect	resistant?			
49 CFR 192.355(b)		Sat+	Sat	Concern	Unsat	NA	NC
			x				
Notes							
6. Field Inspection into the atmosphere and	n Are service regulator ve I away from an opening in	ents and relief vents locate nto the building?	d at a pla	ce where gas f	rom the ver	nt can esc	ape fre
49 CFR 192.355(b)		Sat+	Sat	Concern	Unsat	NA	NC
			×				
Notes							
7. Field Inspection Where flooding may occur		ents and relief vents protec	ted from	damage cause	d by subme	ergence in	areas
							7
19 CFR 192.355(b)		Sat+	Sat	Concern	Unsat	NA	NC
49 CFR 192.355(b) Notes		Sat+	Sat	Concern	Unsat	N A X	NC
Notes	n Are any meter sets four	Sat+			Unsat		NC
Notes	n Are any meter sets four				Unsat		NC
Notes	n Are any meter sets four	nd where customers are ab	ousing me	ters?		X	The second secon
Notes	n Are any meter sets four	nd where customers are ab	ousing me Sat	ters?		X	The second secon
Notes 8. Field Inspection Notes No		nd where customers are ab	ousing me Sat x	ters? Concern	Unsat	N A	NC
Notes 8. Field Inspection Notes No 9. Field Inspection		nd where customers are at Sat+	ousing me Sat x	ters? Concern	Unsat	N A	NC
Notes 8. Field Inspection Notes No 9. Field Inspection		nd where customers are at Sat+	ousing me Sat X Leak det	ters? Concern	Unsat	X NA	NC
Notes 8. Field Inspection Notes No 9. Field Inspection 19 CFR 192.723		nd where customers are at Sat+	ousing me Sat x Leak det	ters? Concern	Unsat	X NA	NC
Notes Notes No P. Field Inspection PORT 192.723 Notes There was no leak inspection	n Were any leaks found d	nd where customers are at Sat+ during the field inspection? Sat+	ousing me Sat x Leak det	ters? Concern	Unsat	X NA	NC
Notes 8. Field Inspection Notes No 9. Field Inspection 49 CFR 192.723 Notes There was no leak inspection 10. Field Inspection	n <i>Were any leaks found d</i> ction performed during th	nd where customers are at Sat+ during the field inspection? Sat+	ousing me Sat x Leak det	ters? Concern	Unsat	X NA	NC
Notes Notes No P. Field Inspection PORT 192.723 Notes There was no leak inspection	n <i>Were any leaks found d</i> ction performed during th	nd where customers are at Sat+ during the field inspection? Sat+ de field inspection. Solocated and marked?	ousing me Sat X Leak det Sat x	ters? Concern ector equipment Concern	Unsat nt used? Ve	X NA egetation?	NC
Notes 8. Field Inspection Notes No 9. Field Inspection 49 CFR 192.723 Notes There was no leak inspection 10. Field Inspection	n <i>Were any leaks found d</i> ction performed during th	nd where customers are at Sat+ during the field inspection? Sat+ de field inspection. Solocated and marked?	cusing me Sat X Leak det Sat X	ters? Concern ector equipment Concern	Unsat nt used? Ve	X NA egetation?	NC

4. Field Inspection Do service regulator vents and relief vents terminate outdoors?

49 CFR 192.355(b)

10 000 100 707			-		Lucio 2	1
49 CFR 192.707	Sat+	Sat	Concern	Unsat	NA	NC
					x	
Notes				,		
None						
12. Field Inspection Is information of	on line markers correct and legibl	le?				
49 CFR 192.707	Sat+	Sat	Concern	Unsat	NA	NC
					x	
Notes			(2)			
	uisher provided when a hazardous	s amount	of gas is being	vented into	o open air	?
13. Field Inspection Is a fire extingu		Sat	Concern	Unsat	NA	NC
13. Field Inspection <i>Is a fire extingu</i> 49 CFR 192.751(a)	Sat+				x	
	Sat+					
	Sat+					

* 90	

		INSPEC	TIC	<u>NI NC</u>	<u>IFORN</u>	<u>IOITAN</u>	<u> </u>			
KY PSC Inspector(s):	Scott Morris					Repo Num		06	52419	
Inspection Date(s):	06/04/2019	-0				Repo	rt Date:	06	5/24/20	19
Inspection Type:		Follow-up Periodic	c Re	gulatory	y Compli	iance Insp	ection			
		OPERAT	OF	RINF	ORMA	TION				
Name of Operator:	Eastern Kentucky University				5	OP IC	No.:	n/a		
Type of Facility:	Master Meter O	erator			Location		Ма	dison C	ounty	
Area of Operation:	Richmond		Campus of EKU							
Official Operator Contact and Address: (Contact for Inspection Letter)						Unit Na	ame and A	ddre	SS	
Tim Wiseman - Utilit Brian Wilcox - Assoc Capital Planning Gentry Building						use natu dormitor in the lo	iral gas heat a ies (Martin Ha	and he all, No and S	ot water orth Hal	at, two houses r. Two l) have gas logs cafeterias use
521 Lancaster Aveni Richmond, KY 4047!						30				
Phone # and Email:	Emergency cont 859-248-4385 Timothy.wisema 2 nd contact Glen 859-200-9096 Glen.adams@ek	Adams				r g				
Records Location:	EKU							_		
Persons Interviewed	Title	Pt No	non	е	Em	ail				
Tim Wiseman	Utility Comp Coordinator	MOVE SO	9-24 85	48-	Time	othy.wise	man@eku.edu	<u>1</u>		
Has the Operato Emergency Cont		updated					Yes ⊠			No
Number of Custo	omers:			Approx	ximately	4,600 stu	ıdents			
Workforce Sumr	nary:			M5, M Inspec Ignitio Condit	7, M11 a ct, Servic n, Recog cions, an	and M13 to ce and Op- gnize and d Investig		nd in ves, l ves, l eric A gas l	case of or Prevent bnorma eaks and	l Operating d odors in

operations.

contractor to help run the master meter system and emergency

Number of Separate Gas Supplied Buildings:		emergency dining have cafeterias.	y gas powered gene e a couple of diners	ed boilers, 8 buildings have erators. The Powell building and Case is that use gas for cooking for the tal houses and one office that have
Number of Gas Supplied Units:		63		
Number of Gas Maintenance Employees:		Emergency		vees for all emergency responses. EKU police department, then to EKU mergency calls.
Name(s) of Contractor(s):		None curre		
Gas Supplier(s):		Richmond	Utilities	
Operating Pressure(s):		32 psig		
Date System Installed:		Approxima	tely 1960 to preser	nt
Size of Mains:	6 inch down to 2 inch		Type of Pipe:	Coated steel and plastic
Size of Services:	2 inch and under		Type of Pipe:	Coated steel and plastic
Extraction to the second	Additional (Operator Info	ormation:	Contain the second seco
		5 1, 12		
Date of Last Inspection:	10/22/2018			
Date of Last Inspection: Number of Deficiencies: 2	10/22/2018		Deficiencies	1

Summary of Areas Inspected

1

not Cleared:

Number of Deficiencies:

PHN	1SA Question Set				
\boxtimes	Emergency Plan	⊠	Operations and Maintenance Plan		Critical Valves Maintenance Inspections
\boxtimes	Cathodic Protection	\boxtimes	Accidents	\boxtimes	Leak Surveys
	Odorization	⊠	Operator Qualification	\boxtimes	Damage Prevention
	Pipeline Markers	\boxtimes	Regulator Stations	\boxtimes	DIMP
\boxtimes	Field Inspection		Other		
			50		

Summary:

The Operation and Maintenance, Emergency, Operator Qualification, Distribution Integrity Management, and Public Awareness Plan requirements were discussed and reviewed during the office visit. Also inspected were records pertaining to sniff tests, valve inspections, cathodic protection records and leakage surveys. A protocol 9 inspection was performed with Utility Compliance Coordinator Tim Wiseman on emergency valve shut off procedures.

This was a follow-up inspection from the previous inspection conducted on October 22, 2018. There were 2 violations as a result of the 2018 inspection, one of the two were corrected:

- 1. At the time of the inspection the operator could not provide records to ensure that the pipeline was cathodically protected per CFR 192.455 not corrected.
- 2. The operator did not perform pipe to soil readings as required per CFR part 192.465(a) corrected.

The operator addressed the 49 CFR part 192.465(a) deficiency by having contract personnel from RussMar perform pipe to soil readings on 11-30-18.

The results of those tests indicated 10 locations with low cathodic protection readings. Some of those dating back to 2015 and possibly longer. At the time of this inspection, the cathodic protection on the piping with low cathodic protection readings had not been corrected as stated in EKU's response to the October 22, 2018, inspection.

Findings

The 2019 follow-up inspection resulted in 6 total deficiencies, one deficiency from the 2018 inspection, and five new deficiencies. The deficiencies were discussed during the exit interview.

- 1. The cathodic protection program is not carried out by, or under the direction of, a person qualified by experience and training in pipeline corrosion control methods per 49 CFR 192.453.
- 2. At the time of the inspection the operator could not provide records to ensure that the pipeline was cathodically protected per 49 CFR 192.455.
- 3. The operator did not take prompt remedial action to correct any deficiencies by the monitoring per 49 CFR 192.465(d).
- 4. The operator had not conducted sniff tests to confirm that the gas contains odorant as required per 49 CFR 192.625(f).
- 5. At the time of the inspection the operator could not provide records to ensure that the public awareness message was being provided to its customers twice annually per 49 CFR 192.616(j).
- 6. The Emergency Plan does not provide for the availability of personnel, equipment, tools, and materials needed at the scene of the emergency as required per 49 CFR 192.615(a).

Area of Concerns

The operator ended their contract with RussMar in March of 2019, and this left the operator without qualified persons to perform the required tasks associated with the operation and maintenance of the master meter system. Listed below are areas of concerns of required tasks that EKU no longer has qualified personnel to perform that was previously performed by RussMar.

- 1. The operator does not have a qualified person to perform locates as required per 49 CFR 192.614
- 2. The operator does not have a qualified person to perform leakage surveys as required per 49 CFR 192.723.
- 3. The written qualification program required per 49 CFR 192.805 was under the direction of contractor RussMar previously, including training and re-qualification of EKU maintenance persons for operator qualified tasks.

Recommendations

It is recommended that the Public Awareness message be provided to students, faculty, and staff, more than twice a year, not just for the fall and spring semesters, but any time school is in session, including intercession, summer school, and summer camps.

Submitted by:

Scott Morris Utility Inspector

OPERATION, MAINTENANCE, AND EMERGENCY PLANS

19 CFR 192.605(a)	Sat +	Sat	Concern	Unsat	NA	NC
79		x				
Notes The O&M Plan was up-dated in 2019.						
2. O&M Plans Does operator review and update	the O&M Plan annually?					
49 CFR 192.605(a)	Sat+	Sat	Concern	Unsat	NA	NC
		х				
Notes.				- 28		
3. O&M Plans Does operator's O&M Plan requ 49 CFR 191.5	ire the reporting of incid Sat +	lents by to Sat	Concern	S and the k	Y PSC?	NC
49 CI K 191.3	Salt	x	Concern	Unsat	NA	NC
Notes:		^	-			
		x			mana	
Notes:						
5. Emergency Plans Does the Emergency Plan	provide for: receiving,	identifyin	g, and classify	ing notices	of events i	equirin
5. Emergency Plans Does the Emergency Plan mmediate response by the operator?	provide for: receiving,	identifyin Sat	g, and classify	ing notices	of events i	requiring N C
5. Emergency Plans Does the Emergency Plan mmediate response by the operator?						
Notes: 5. Emergency Plans Does the Emergency Plans mmediate response by the operator? 49 CFR 192.615(a) Notes		Sat				
5. Emergency Plans Does the Emergency Plan mmediate response by the operator? 19 CFR 192.615(a)	Sat+	Sat x	Concern	Unsat	NA	NC
5. Emergency Plans Does the Emergency Plans mmediate response by the operator? 9 CFR 192.615(a) Notes 5. Emergency Plans Does the Emergency Plans and other public officials?	Sat+	Sat x	Concern	Unsat	NA	NC
5. Emergency Plans Does the Emergency Plans mmediate response by the operator? 9 CFR 192.615(a) Notes 6. Emergency Plans Does the Emergency Plans	Sat + provide for: Establishin	Sat x g and ma	Concern intaining comm	Unsat nunication w	N A	N C

49 CFR 192.615(a)	Sat+	Sat	Concern	Unsat	NA	NC
		×				
N					-	
Notes						
8. Emergency Plans Does the Emergency needed at the scene of the emergency?	Plan provide for: the availa	bility of p	ersonnel, equip	oment, tools	, and mate	erials
49 CFR 192.615(a)	Sat +	Sat	Concern	Unsat	NA	NC
				x		
Notes						
The Emergency plan lists contract personnel Russ RussMar). Personnel to perform all of the operation. 9. Emergency Plans Does the Emergency property?	tor qualified tasks are not ide	entified in	the Emergence	y Plan.		
49 CFR 192.615(a)	*Sat +	Sat	Concern	Unsat	NA	NC
15 611(152.615(0)	Suci		concern	Olisat	NA.	NC
		X				
10. Emergency Plans Does the Emergence	Dia	acu chutd	own and press	ure reduction		
the operator's pipeline system necessary to minin	mize hazards to life or proper	ty?				
the operator's pipeline system necessary to minin		Sat	Concern	Unsat	N A	N C
the operator's pipeline system necessary to minin	mize hazards to life or proper	ty?				
the operator's pipeline system necessary to minin 49 CFR 192.615(a)	mize hazards to life or proper	Sat				
the operator's pipeline system necessary to minin 49 CFR 192.615(a)	mize hazards to life or proper	Sat				
the operator's pipeline system necessary to mining 149 CFR 192.615(a) Notes	nize hazards to life or proper Sat +	ty? Sat x	Concern	Unsat	NA	NC
the operator's pipeline system necessary to mining 49 CFR 192.615(a) Notes 11. Emergency Plans Does the Emergence	sat + Cy Plan provide for: making	ty? Sat x safe any a	Con cern	Un sat	NA to life or p	N C
the operator's pipeline system necessary to mining 49 CFR 192.615(a) Notes 11. Emergency Plans Does the Emergence	nize hazards to life or proper Sat +	safe any a	Concern	Unsat	NA	NC
the operator's pipeline system necessary to minin 49 CFR 192.615(a)	sat + Cy Plan provide for: making	ty? Sat x safe any a	Con cern	Un sat	NA to life or p	N C
the operator's pipeline system necessary to mining 49 CFR 192.615(a) Notes 11. Emergency Plans Does the Emergence	sat + Cy Plan provide for: making	safe any a	Con cern	Un sat	NA to life or p	N C
the operator's pipeline system necessary to minimal of the operator's pipeline system necessary to minimal of the operator's pipeline system necessary to minimal of the operator of the opera	cy Plan provide for: making Sat +	safe any a	Concern actual or poten Concern	Unsat otial hazard	NA to life or p NA	n c
the operator's pipeline system necessary to minimal of the Property of the Property of the Emergency Plans Does the Emergency of the Property of the Emergency Plans Does the Emergency Plans Does the Emergency Plans Does the Emergency plans pipeline emergencies and coordinating with the Property of the Emergency Plans Does the Emergency pipeline emergencies and coordinating with the Property of the Property Plans Does the Emergency pipeline emergencies and coordinating with the Property of	cy Plan provide for: making Sat +	safe any a	Concern actual or poten Concern	Unsat otial hazard	NA to life or p NA	n c
the operator's pipeline system necessary to minimal 19 CFR 192.615(a) Notes 11. Emergency Plans Does the Emergency Portion (Property of the Company of the Emergency Plans Does Does Does Does Does Does Does Doe	cy Plan provide for: making Sat + Cy Plan provide for: making Sat + Cy Plan provide for: notifying them during an emergency?	safe any a Sat x safe any a Sat x	Concern actual or poten Concern iate fire, police	Unsat otial hazard Unsat	NA to life or p NA	roperty NC

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

49 CFR 192.615(a)		Sat +	Sat	Concern	Unsat	NA	NO
2		Jacr	x	Concern	Olisat	IIA	140
Notes							
14. Emergency Plans	Does the Emergency Plan pro	ovide for: starting	an accide	nt investigatio	n under 192	.617 as so	oon as
49 CFR 192.615(a)		Sat+	Sat	Concern	Unsat	NA	NO
			x				- 22
15. Emergency Plans	Does the Operator: furnish a	copy of the emerg	ency plar	to the person	responsible	e for emer	gency
action? 49 CFR 192.615(b)		Sat +	Sat	Concern	Unsat	NA	NC
			x				
Notes							
16. Emergency Plans of the emergency procedures?	Does the Operator: train the	appropriate operat	ting perso	nnel to assure	that they a	re knowled	dgeable
49 CFR 192.615(b)		Sat +	Sat	Concern	Unsat	NA	NC
			×				
Notes							
17. Emergency Plans I	Does the Operator: review er	mployee activities a	after an e	mergency to d	etermine if p	procedures	s were
Onovcu:		Sat +	Sat	Concern	Unsat	NA	NC
49 CFR 192.615(b)							
			X				

1. Critical Valves Does operator check and maintain each valve (critical or key valve) necessary for the safe operation of the system at intervals not exceeding 15 months, but at least once each calendar year?

49 CFR 192.747			Sat+	Sat	Concern	Unsat	NA	NC
				Х				
Date of Last Check:	6-27-18	Maintenan	ce perforn	ned by:	Marvin Ande	rson		

Notes

EKU has identified 6 critical valves, and approximately 50 non-critical valves. There were 9 new valves installed on Park Drive near the Whitlock building and Powell buildings. Three EKU maintenance employees are operator qualified for Service and Operate Line Valves.

2. Critical Valves Are the critical valve reco	rds adequate?	

49 CFR 192.747	Sat+	Sat	Concern	Unsat	NA	NC
		x				
Notes						

3. Cathodic Protection *Is the cathodic protection program carried out by, or under the direction of, a person qualified by experience and training in pipeline corrosion control methods?*

49 CFR 192.453	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes

EKU did contract with RussMar to conduct pipe to soil readings, last performed 11/3/18, found 10 locations with low readings. RussMar no longer is contracted by EKU.

4. Cathodic Protection Pipelines installed <u>after</u> July 31, 1971, are cathodically protected and have an external coating?

49 CFR 192.455(a)	Sat +	Sat	Concern	Unsat	NA	NC
				x		

Notes

The rectifier was taken out in 2017, and anodes were supposed to be installed according to the 2017 inspection report. CP readings taken by RussMar contract person Marvin Anderson on 11/3/18 identified 10 locations found with low CP readings. RussMar is no longer contracted by EKU.

5. Cathodic Protection Pipelines installed <u>before</u> August 1, 1971 that is bare or coated are cathodically protected in areas of active corrosion?

49 CFR 192.457(b)	Sat+	Sat	Concern	Unsat	NA	NC
					×	
Notes					200	

6. Cathodic Protection Does the cathodic protection system provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of the Regulations?

192.463(a)	Sat +	Sat	Concern	Unsat	NA	NC	
				v			-

Notes

CP readings taken by RussMar contract person Marvin Anderson on 11/3/18 identified 10 locations found with low CP readings.

49 CFR 192.465(a)			Sat+	Sat	Cor	cern	Uns	at NA	N	С
				х						
Date of Last Check:	11/30/2018	Survey	performed l	by:	Marv	vin Ande	rson			
	where they take reading ction. The 2018 pipe to						ere su _l	oposed to	be insta	led
8. Cathodic Pr	otection Are the cath	nodic protection s	survey record	ds adequ	uate?					
49 CFR 192.465(a)			Sa	t +	Sat	Cond	cern	Unsat	NA	N
					x					
	otection Is each burn		rically isolate	ed from	other u	ndergro	und str	ructures tl	at may	cause
	otection Is each burn e cathodic protection sy.		rically isolate		other u	Con		ructures ti	nat may	cause N
interference with th					-					
interference with th					-				NA	
interference with th 49 CFR 192.467(a) Notes		stem?	Sa	t +	Sat	Cond	cern	Unsat	N A	
interference with th 49 CFR 192.467(a) Notes	e cathodic protection sy.	stem?	Sa	t +	Sat	Cond	c ern cal isola	Unsat	N A	
interference with th 49 CFR 192.467(a) Notes 10. Cathodic F	e cathodic protection sy.	stem?	Sa ests are mad	t +	Sat ure tha	Con o	c ern cal isola	Un sat	N A x equate?	N
interference with th 49 CFR 192.467(a) Notes 10. Cathodic F	e cathodic protection sy.	stem?	Sa ests are mad	t +	Sat ure tha	Con o	c ern cal isola	Un sat	NA × equate?	N
interference with the 49 CFR 192.467(a) Notes 10. Cathodic F 49 CFR 192.467(d) Notes	e cathodic protection sy.	stem? n and electrical te	ests are mad	t +	Sat ure tha Sat	Con o	cern cal isola	Unsat ation is ad Unsat	NA x equate?	N
interference with the 49 CFR 192.467(a) Notes 10. Cathodic F 49 CFR 192.467(d) Notes	e cathodic protection sy. Protection Inspection	stem? n and electrical te	ests are mad	t +	Sat ure tha Sat	Con o	cern cal isola cern	Unsat ation is ad Unsat	NA x equate?	N
Notes 10. Cathodic F 49 CFR 192.467(d) Notes 11. Cathodic F burposes?	e cathodic protection sy. Protection Inspection	stem? n and electrical te	ests are mad Sa	t +	Sat ure tha Sat	t electric	cern cal isola cern	Unsat ation is ad Unsat r electrica	NA x equate? NA x	N

ACCIDENTS, LEAK SURVEYS, AND ODORIZATION

1. Accidents Are there established procedures for analyzing accidents and failures including samples of the failed facility or equipment for the purpose of determining the cause of the failure and minimizing the possibility of recurrence?

49 CFR 192.617	Sat +	Sat	Concern	Unsat	NA	NC
		х		120		

B.	-	-	_	_
N	O	L	н	ĸ

Procedures are in the O&M Plan and the Emergency Plan.

49 CFR 192.725			Sat +	Sat	Concern	Unsat	NA	NC
				x				
Notes								12
3. Leak Surveys ! the ends?	Does operator discon	nect abandoned pipel	ines from al	l sources	and supplies o	f gas, purge	of gas an	d seal a
49 CFR 192.727			Sat+	Sat	Concern	Unsat	NA	NC
		- 3		×				
Notes								
4. Leak Surveys	Does operator lock se	ervice lines that are in	active?					
49 CFR 192.727			Sat +	Sat	Concern	Unsat	NA	NC
				×				
Notes								
5. Leak Surveys	Does operator patrol i	mains where anticipat	ed physical	moveme	nt or external l	oading could	d cause fa	ilure or
5. Leak Surveys (leakage?	Does operator patrol i	mains where anticipal						1
'eakage?	Does operator patrol i	mains where anticipal	ed physical	Sat	Con cern	Oading could	NA	1
eakage? 19 CFR 192.721	Does operator patrol i		Sat +	Sat				1
eakage? 19 CFR 192.721 Date of Last Check:	Does operator patrol i	mains where anticipal	Sat +	Sat			NA	N C
		Survey pe	Sat +	Sat			NA	1
Peakage? 19 CFR 192.721 Date of Last Check: Notes	reas where patrolling	Survey pe is required.	Sat +	Sat			NA	1
eakage? PP CFR 192.721 Date of Last Check: Notes EKU has identified no an	reas where patrolling	Survey pe is required.	Sat +	Sat			NA	NC
eakage? PP CFR 192.721 Date of Last Check: Notes EKU has identified no an	reas where patrolling	Survey pe is required.	Sat +	Sat 7:	Concern	Unsat	N A X	1
eakage? 49 CFR 192.721 Date of Last Check: Notes EKU has identified no an	reas where patrolling	Survey pe is required.	Sat +	Sat 7:	Concern	Unsat	NA X	NC
eakage? 19 CFR 192.721 Date of Last Check: Notes EKU has identified no and the company of the c	reas where patrolling Are the main patrollin	Survey pe is required.	Sat + rformed by	Sat	Concern	Unsat	NA X	NC
eakage? 49 CFR 192.721 Date of Last Check: Notes EKU has identified no and the second	reas where patrolling Are the main patrollin	Survey pe is required.	Sat + rformed by	Sat	Concern	Unsat	NA X	NC
eakage? 19 CFR 192.721 Date of Last Check: Notes EKU has identified no and the second	reas where patrolling Are the main patrollin	Survey pe is required.	Sat + rformed by Sat +	Sat Sat	Concern Concern	Unsat Unsat	NA X NA X	NC
eakage? 19 CFR 192.721 Date of Last Check: Notes EKU has identified no and the second	reas where patrolling Are the main patrollin	Survey pe is required.	Sat + Sat +	Sat Sat ctor equip Sat	Concern Concern ment with the	Unsat Unsat required into	NA X NA X	NC

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

8. Leak Surveys Are the leakage survey records adequate?

9 CFR 192.723	Sat +	Sat	Concern	Unsat	NA	NC
		×				
Notes						

9. Odorization Is the gas in the operator's pipeline odorized?

49 CFR 192.625(a)	Sat +	Sat	Concern	Unsat	NA	NC
		x				
						-

Notes Richmond Utilities provides gas to EKU.

10. Leak Surveys Does operator have written verification from their gas supplier that the gas has the proper concentration of odorant?

49 CFR 192.625(f)	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Letter dated October 10, 2002 from Richmond Utilities stating they do not have an odorant injection station within their system. They rely on the odorant injection station that Columbia Gas Transmission has on their system identified as KA 1 LN Lexington. They take sniff tests four times a month at nine different locations within their system one of which is at the EKU purchase station located at the corner or Crabbe Street at the Richmond City Park.

11. Odorization Does operator conduct periodic (recommend at least once per month) "sniff" tests at the extremities of the system to confirm that the gas contains odorant?

49 CFR 192.625(f)			Sat+	Sat	Concern	Unsat	NA	NC
					-	x		
Date of Last Checks	3/13/10	Test perfo	emad by		Robert Barre	s++		distance of the last of the la

Notes

Sniff tests were being performed monthly when odorant testing was performed by RussMar. Since the contract with RussMar was discontinued in March 2019, sniff test records indicated that this was not performed in April and May of 2019.

12. Odorization Are the "sniff" test records adequate?

9 CFR 192.625(f)	Sat +	Sat	Concern	Unsat	NA	NC
				x	-	

Notes

Last performed 3/13/19. Sniff tests were being performed monthly when odorant testing was performed by RussMar. Since the contract with RussMar was discontinued in March 2019, sniff test records indicated that this was not performed in April and May of 2019.

OPERATOR QUALIFICATION

PHMSA Question Set STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

49 CFR 192.805		Sat +	Sat	Concern	Unsat	NA	NC
				x			
Notes							-
There are 3 EKU maintenance employe Inspect, Service and Operate Line Valva Conditions, and Investigate Reported Since RussMar is no longer is contracte concern.	ves, Prevent Accidental I gas leaks and odors in b	gnition, Recog uildings.	gnize and	React to Gene	ric Abnormal	Operating	9
2. Operator Qualification Does	s the OQ Program includ	e provisions t	o identify	covered tasks	?		1 -
49 CFR 192.805		Sat +	Sat	Concern	Unsat	NA	NC
			×	7			
Notes							
Notes							
3. Operator Qualification Does performing covered tasks are qualified?		e provisions to	o ensure t	hrough evalua	tion that ind	lividuals	
berrorning covered tasks are qualifica.							
		Sat +	Sat	Concern	Unsat	NA	NC
49 CFR 192.805		Sat+	Sat x	Concern	Unsat	NA	NC
49 CFR 192.805 Notes 4. Operator Qualification Does	s the OQ Program include	e provisions to	x allow inc	dividuals that a			
49 CFR 192.805 Notes 4. Operator Qualification Does this subpart to perform a covered task in the content of the content of the covered task in the covered task ind	s the OQ Program include	e provisions to by an individu	x o allow inc ual that is	dividuals that a qualified?	ere not quali	fied pursu	ant to
49 CFR 192.805	s the OQ Program include	e provisions to	x allow inc	dividuals that a			
Notes 4. Operator Qualification Does this subpart to perform a covered task if the task of the task o	s the OQ Program include if directed and observed	e provisions to by an individo Sat +	x o allow included that is Sat x	dividuals that a qualified? Con cern	ere not quali	fied pursu	ant to
49 CFR 192.805 Notes 4. Operator Qualification Does this subpart to perform a covered task in the content of the content of the covered task in the covered task ind	s the OQ Program include if directed and observed s the OQ Program include	e provisions to by an individu Sat +	x o allow included that is Sat x	dividuals that a qualified? Con cern	un sat	fied pursu	ant to
Notes 4. Operator Qualification Does this subpart to perform a covered task in the subpart task in the subpart to perform a covered task in the subpart task i	s the OQ Program include if directed and observed s the OQ Program include	e provisions to by an individu Sat +	x o allow included that is Sat x	dividuals that a qualified? Concern	un sat	fied pursu	ant to
Notes 4. Operator Qualification Does this subpart to perform a covered task in the subpart task in the subpart to perform a covered task in the subpart task i	s the OQ Program include if directed and observed s the OQ Program include	e provisions to by an individu Sat + e provisions to ibuted to an i	x o allow included that is Sat x o evaluate	dividuals that a qualified? Con cern	ore not qualing Un sat in the operator of the	N A Tor has rea	n C
Notes 4. Operator Qualification Does this subpart to perform a covered task in the subpart to perform and the subpart to perform a covered task in the subpart task in	s the OQ Program include if directed and observed s the OQ Program include	e provisions to by an individu Sat + e provisions to ibuted to an i	x o allow included that is Sat x o evaluate incident as	dividuals that a qualified? Con cern	ore not qualing Un sat in the operator of the	N A Tor has rea	n C
Notes 4. Operator Qualification Does this subpart to perform a covered task if the task i	s the OQ Program include if directed and observed is the OQ Program include e of a covered task contr	e provisions to by an individu Sat + e provisions to ibuted to an i Sat +	x o allow included that is Sat x o evaluate ncident as Sat x	dividuals that a qualified? Concern	unsat Unsat if the operate 191? Unsat	N A Tor has rea	eson to
Notes 4. Operator Qualification Does this subpart to perform a covered task if 49 CFR 192.805 Notes 5. Operator Qualification Does	s the OQ Program include if directed and observed is the OQ Program include e of a covered task contr	e provisions to by an individu Sat + e provisions to ibuted to an i Sat +	x o allow included that is Sat x o evaluate ncident as Sat x	dividuals that a qualified? Concern	unsat Unsat if the operate 191? Unsat	N A Tor has rea	eson to

49 CFR 192.805	Sat +	Sat	Concern	Unsat	NA	NO
		×				
Notes				-		
B. Operator Qualification Does the OQ Progra which evaluation of the individual's qualifications is near		identify	those covered	tasks and th	ne interval	s at
9 CFR 192.805	Sat +	Sat	Concern	Unsat	NA	NC
	10	×				
Notes						
O. Operator Qualification Does operator keep	o records that demonstr	rate comp	liance with OQ	regulations	?	
9 CFR 192.807	Sat +	Sat	Concern	Unsat	NA	NC
		x				
Notes						
0. Operator Qualification Does operator's q	qualification records incl	ude identi	ification of qua	lified individ	uals?	
9 CFR 192.807(a)	Sat+	Sat	Concern	Unsat	NA	NC
	Sat+	Sat	Concern	Unsat	NA	NC
Notes 1. Operator Qualification Does operator's q		x				The second secon
Notes 1.1. Operator Qualification Does operator's qualified to perform?	qualification records incl	x ude identi	ification of the	covered tas	ks the indi	
Notes 1.1. Operator Qualification Does operator's qualified to perform?		x				ividual
Notes 1. Operator Qualification Does operator's qualified to perform? 9 CFR 192.807(a)	qualification records incl	x ude identi Sat	ification of the	covered tas	ks the indi	ividual
Notes 1. Operator Qualification Does operator's qualified to perform? 9 CFR 192.807(a)	qualification records incl	x ude identi Sat	ification of the	covered tas	ks the indi	The second secon
Notes 1.1. Operator Qualification Does operator's qualified to perform? 1.9 CFR 192.807(a) Notes 1.2. Operator Qualification Does operator's qualified Does operator's qualification D	qualification records incl Sat +	x ude identi Sat x	fication of the	covered tas. Un sat	ks the indi	ividual
Notes 1.1. Operator Qualification Does operator's qualified to perform? 9 CFR 192.807(a) Notes	qualification records incl Sat +	x ude identi Sat x	fication of the	covered tas. Un sat	ks the indi	ividual
Notes 1. Operator Qualification Does operator's qualified to perform? 9 CFR 192.807(a) Notes 2. Operator Qualification Does operator's qualification Doe	qualification records incl Sat +	x ude identi Sat x ude dates	fication of the Concern of current qua	covered tas. Un sat lification?	ks the indi	ividual N C
Notes 1. Operator Qualification Does operator's qualified to perform? 9 CFR 192.807(a) Notes 2. Operator Qualification Does operator's qualification Doe	qualification records incl Sat +	x ude identi Sat x ude dates Sat	fication of the Concern of current qua	covered tas. Un sat lification?	ks the indi	ividual N C
Notes 1. Operator Qualification Does operator's qualified to perform? 9 CFR 192.807(a) Notes 2. Operator Qualification Does operator's qualified to perform the perform the performance of the performa	gualification records included and services	x ude identi Sat x ude dates Sat x	of current qua	covered task Un sat lification? Un sat	ks the indi	ividual N C
Notes 1.1. Operator Qualification Does operator's qualified to perform? 9 CFR 192.807(a) Notes 1.2. Operator Qualification Does operator's qualification Does operator's qualification Does operator's qualification Does	gualification records included and services	x ude identi Sat x ude dates Sat x	of current qua	covered task Un sat lification? Un sat	ks the indi	ividual N C

NC

Concern

Unsat

NA

15. Operator Qualification of the state of t		of prior qua	lification a	and records of	individuals ı	no longer	
49 CFR 192.807(b)		Sat+	Sat	Concern	Unsat	NA	NC
							х
Notes Not available for review d	uring the inspection.						
16. Operator Qualificati	on Has operator completed the	qualification	of individ	uals performin	g covered ta	asks?	
49 CFR 192.809(b)		Sat+	Sat	Concern	Unsat	NA	NC
			×				
Notes							
STATIONS	ON, PUBLIC AWARI					REGUI	.ATO
STATIONS 1. Damage Prevention Is	5					REGUI Na	NC
STATIONS 1. Damage Prevention Is 49 CFR 192.614	s the operator a member of a qu	sat +	all system Sat	(Kentucky 81 Con cern	1)? Unsat		
STATIONS 1. Damage Prevention Is 49 CFR 192.614 Who located your buried pipe	s the operator a member of a quality of the operator a member of a quality of the operation of the operator of the oper	Sat +	all system Sat efore the	(Kentucky 81 Concern x activity beg	1)? Un sat	NA	
STATIONS 1. Damage Prevention Is 49 CFR 192.614	s the operator a member of a quality of the operator a member of a quality of the operation of the operator of the oper	Sat +	all system Sat efore the	(Kentucky 81 Concern x activity beg	1)? Un sat	NA	
STATIONS 1. Damage Prevention Is 49 CFR 192.614 Who located your buried pipe The operator is a member of Ker	s the operator a member of a quality of the operator a member of a quality of the operation of the operator of the oper	Sat + on activity b	Sat efore the	(Kentucky 81 Concern x activity begins locates perfo	1)? Unsat ins? rmed in 201	N A 8.	NC
STATIONS 1. Damage Prevention Is 49 CFR 192.614 Who located your buried pipe	elines in the area of excavation of the strucky 811. RussMar employees RussMar did perform locates	Sat + on activity b	Sat efore the	(Kentucky 81 Concern x activity begins locates perfo	1)? Unsat ins? rmed in 201	N A 8.	NC
STATIONS 1. Damage Prevention Is 49 CFR 192.614 Who located your buried pipe The operator is a member of Ker Is the locator OQ qualified?	sthe operator a member of a qualification in the area of excavation tucky 811. RussMar employees RussMar did perform locates in the future.	Sat + on activity be did perform for the opera	Sat efore the locates, 4 tor previous	(Kentucky 81 Concern x activity beging locates performsly, not sure	unsat ins? rmed in 201 who will be	N A 8. performin	NC
STATIONS 1. Damage Prevention Is 49 CFR 192.614 Who located your buried pipe The operator is a member of Ker Is the locator OQ qualified? Notes 2. Public Awareness Has	sthe operator a member of a qualification in the area of excavation tucky 811. RussMar employees RussMar did perform locates in the future.	Sat + on activity be did perform for the opera	Sat efore the locates, 4 tor previous	(Kentucky 81 Concern x activity beging locates performsly, not sure	unsat ins? rmed in 201 who will be	N A 8. performin	NC

14. Operator Qualification Does operator maintain an individual's current qualifications while the individual is performing the covered task?

Sat +

Sat

X

49 CFR 192.807(b)

49 CFR 192.616(j)		Sat +	Sat	Concern	Unsat	NA	NC
			×				
Notes							
3. Public Awareness Does the public awareasures used?	areness message incl	lude an o	verview o	of the hazards	of the pipeli	ne and pre	ventio
49 CFR 192.616(j)	13	Sat+	Sat	Concern	Unsat	NA	NO
			x				
Notes							
4. Public Awareness Does the public awa	areness message incl	ude infor	mation ab	out damage p	revention?		
49 CFR 192.616(j)		Sat+	Sat	Concern	Unsat	NA	NC
	85 - 7		×				
5. Public Awareness Does the public awa	areness message incl	lude how	to recogi	nize and respon	nd to a leak	?	
		lude how Sat +	to recogi Sat	Concern	nd to a leak Unsat	? NA	NC
					1		N C
5. Public Awareness Does the public awareness Does Does the public awareness Does Does Does Does Does Does Does D	areness message incl	Sat+	Sat	Concern	Unsat	NA	
49 CFR 192.616(j) Notes 5. Public Awareness Does the public awa	areness message incl	Sat +	Sat x to recogn	Concern	Un sat	NA	
Notes 5. Public Awareness Does the public awa 49 CFR 192.616(j) Notes	areness message incl	Sat + lude how Sat +	Sat x to recogn Sat x	Concern	Unsat nd to a leak Unsat	NA	
Notes 5. Public Awareness Does the public awareness 49 CFR 192.616(j) Notes 6. Public Awareness Does the public awareness	areness message incl	Sat + Jude how Sat + ude how	Sat x to recogn Sat x	con cern nize and respon Con cern	Unsat nd to a leak Unsat	NA ?	NC
Notes 5. Public Awareness Does the public awareness 49 CFR 192.616(j) Notes 6. Public Awareness Does the public awareness	areness message incl	Sat + lude how Sat +	sat x to recogn sat x to get add sat	Concern	Unsat nd to a leak Unsat	NA	
Notes 5. Public Awareness Does the public awareness Does Does the public awareness Does Does Does Does Does Does Does D	areness message incl	Sat + Jude how Sat + ude how	Sat x to recogn Sat x	con cern nize and respon Con cern	Unsat nd to a leak Unsat	NA ?	NC
49 CFR 192.616(j) Notes 5. Public Awareness Does the public awa 49 CFR 192.616(j)	areness message incl g areness message inclu	Sat + Jude how Sat + ude how Sat +	sat x to recogn Sat x to get add Sat x	Concern nize and respon Concern ditional informational concern	unsat nd to a leak Unsat ation? Unsat	NA NA	NC
Notes 5. Public Awareness Does the public awareness Does the public awareness Does the public awareness 6. Public Awareness Does the public awareness Does the public awareness Does the public awareness 7. Line Markers Are line markers placed and	areness message incl eareness message inclu areness message inclu	Sat + Jude how Sat + ude how Sat +	sat x to recogn Sat x to get add Sat x	Concern nize and respon Concern ditional informational concern	unsat nd to a leak Unsat ation? Unsat	NA NA	NC

49 CFR 192.739	Sat +	Sat	Concern	Unsat	NA	NC
				1	×	
Notes						
9. Regulator Stations Are regulators bel	ing inspected and tested once	each cale	endar year (not	to exceed	15 months)?
49 CFR 192.739	Sat +	Sat	Concern	Unsat	NA	NC
					×	
Notes						
10. Regulator Stations Do inspection ar	nd test records indicate that re	egulators	are in good me	echanical co	ndition?	
19 CFR 192.739	Sat+	Sat	Concern	Unsat	NA	NO
					×	
Notes L1. Regulator Stations Do inspection as	nd test records indicate that r	egulators	are adequate f	from the sta	ndpoint of	capaci
and reliability of operation for the service in which	ch it is employed?					
9 CFR 192.739	Sat +	Sat	Concern	Unsat	NA	NC
Notes					X	
12. Regulator Stations Do inspection an	nd test records indicate that r	egulators Sat	are set to func	tion at the c		
Notes 12. Regulator Stations Do inspection and Points of the Points of			1		correct pre	ssure?
12. Regulator Stations Do inspection an	Sat +	Sat	Concern	Unsat	correct pre NA x	N C
L2. Regulator Stations Do inspection and 19 CFR 192.739 Notes L3. Regulator Stations Do inspection and 19 cfr, liquids, or other conditions that might prevention.	Sat +	Sat	Concern	Unsat	correct pre NA x	N C
L2. Regulator Stations Do inspection and Page 192.739 Notes L3. Regulator Stations Do inspection and Infinity	Sat + nd test records indicate that rent proper operation?	Sat egulators	Con cern	Un sat	correct pre NA x protected	N C
12. Regulator Stations Do inspection and 19 CFR 192.739 Notes 13. Regulator Stations Do inspection and 19 CFR 192.739	Sat + nd test records indicate that rent proper operation?	Sat egulators	Con cern	Un sat	correct pre NA x protected NA	N C
L2. Regulator Stations Do inspection and 19 CFR 192.739 Notes L3. Regulator Stations Do inspection and irt, liquids, or other conditions that might prevented the process of the conditions of the conditions of the conditions that might prevented the conditions of the conditions that might prevented the conditions that might prevented the conditions of	Sat + nd test records indicate that rent proper operation? Sat +	Sat egulators Sat	Concern are properly in	unsat stalled and unsat	correct pre NA x protected NA	N C
12. Regulator Stations Do inspection and Page 192.739 Notes 13. Regulator Stations Do inspection and Page 192.739	Sat + nd test records indicate that rent proper operation? Sat +	Sat egulators Sat	Concern are properly in	unsat stalled and unsat	correct pre NA x protected NA	N C

PHMSA Question Set STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

DISTRIBUTION INTEGRITY MANAG	EMENT	(DIMP)
-------------------------------------	-------	--------

49 CFR 192.1015(a)	Sat +	Sat	Concern	Unsat	NA	NO
		x				
Notes					-	
2. DIMP Does the IM program include a written pla	n?					
49 CFR 192.1015(a)	Sat +	Sat	Concern	Unsat	NA	NC
		×				
Notes	12. 14.					
Effective date of DIMP plan was 9/11/2014. Last revie	ewed on 3-5-18 by form	er RussM	ar employee Z	ane Salyers	Si	
3. DIMP Does the written plan address knowledge for gaining knowledge through normal activities condu	of pipeline system, inclu acted on the pipeline (i.e	ıding appı e. design,	roximate locati construction, (on and mate O and M)?	erial, and	a plan
49 CFR 192.1015(b)	Sat +	Sat	Concern	Unsat	NA	NC
		×				
Notes						
4. DIMP Does the written plan address identification excavation damage, other outside force damage, mate	n of threats (existing or erial weld failure, equipi	potential nent failu) including cori ire, and incorre	rosion, natu ect operation	ral forces, 1?	
49 CFR 192.1015(b)	Sat +	Sat	Concern	Unsat	NA	NC
		x				
Notes						
5 DTMP Door the written plan rank ricks (the energy	ator must evaluate the r	isks to its	pipeline and e	stimate the	relative	
			_			NC
mportance of each identified threat)?	Sat+	Sat	Concern	Unsat	NA	MC
mportance of each identified threat)?	Sat+	Sat x	Concern	Unsat	NA	NC
mportance of each identified threat)? 49 CFR 192.1015(b)			Concern	Unsat	NA	NC
mportance of each identified threat)? 49 CFR 192.1015(b) Notes The number one threat listed is excavation dan	nage.	x				
mportance of each identified threat)? 9 CFR 192.1015(b) Notes The number one threat listed is excavation dan 5. DIMP Does the written plan identify and implementation.	nage.	x				
mportance of each identified threat)? 49 CFR 192.1015(b) Notes The number one threat listed is excavation dan 5. DIMP Does the written plan identify and implementations.	nage. ent measures designed (x to reduce	the risks from	failure of its	s pipeline?	
 5. DIMP Does the written plan rank risks (the operation portance of each identified threat)? 49 CFR 192.1015(b) Notes The number one threat listed is excavation dans 6. DIMP Does the written plan identify and implementation in the plan identify and implementation. 49 CFR 192.1015(b) Notes 	nage. ent measures designed (x to reduce Sat	the risks from	failure of its	s pipeline?	

NC

NA

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

Concern

Unsat

Sat

		^				
Notes Robert Barrett – RussMar employee performed this in Ocrepaired on 10/15/18. Previous leak survey performed July 201. Not sure who will be responsible for monitoring DIMP plan going	7. Not sure v	and found who will be	5 grade 3 leal e performing le	ks and one veakage surve	valve that eys going f	was ^T orward
8. DIMP Does the written plan address the operation determine evaluations and re-evaluation of the entire program at least ever			te period for c	onducting II	M program	
49 CFR 192.1015(b)	Sat+	Sat	Concern	Unsat	NA	NC
(2)		x	- Concern	Onsuc	110	1,10
Notes						
9. DIMP Has the operator maintained the following records fo with this section, including superseded IM plans?	or a period of	at least 1	0 years: A wr	itten IM plaı	n in accord	lance
49 CFR 192.1015(c)	Sat +	Sat	Concern	Unsat	NA	NC
And the second s					х	
Notes	-					
LO. DIMP Has the operator maintained the following records addentification?	for a period o	of at least	10 years: Doo	cuments sup	pporting th	reat
9 CFR 192.1015(c)	Sat+	Sat	Concern	Unsat	NA	NC
					X	
Notes						
Notes						
L1. DIMP Has the operator maintained the following records in and material of all piping and appurtenances installed after the eocation and material of all pipe and appurtenances that were ex	ffective date	of its IM	program and, t	o the extent	wing the let known, ti	ocation he
9 CFR 192.1015(c)	Sat+	Sat	Concern	Unsat	NA	NC
	120				X	
Notes						
			TOO THE LOCAL DESIGNATION OF THE PARTY OF TH	1888. Phillips of S. War. (1988)		
FIELD INSPECTION						
L. Field Inspection Is each meter and service regulator in and other damage (including vehicular damage) that may be ant	stalled in a re	eadily acc	essible location	n and proted	cted from o	corrosio
9 CFR 192.353(a)	Sat +	Sat	Concern	Unsat	NA	NC
		x	2200111	3.1.541		110
Notes						
Notes						

7. DIMP Does the written plan measure performance, monitor results, and evaluate effectiveness, including the number of leaks eliminated or repaired on its pipeline and their causes?

Sat +

49 CFR 192.1015(b)

NC

NA

Concern Unsat

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

Sat

X

3. Field Inspection Is each meter, installe source of ignition or any source of heat which mu	ed within a building, located i ight damage the meter?	n a ventil	ated place and	not less tha	an 3 feet fi	rom any
49 CFR 192.353(c)	Sat+	Sat	Concern	Unsat	NA	NC
					×	
Notes No inside meters.						
4. Field Inspection Do service regulator v	ents and relief vents termina	ate outdoo	ors?	1.		
49 CFR 192.355(b)	Sat+	Sat	Concern	Unsat	NA	NC
		×				
Notes			10			
5. Field Inspection Are service regulator	vents and relief vents rain an	d insect r	esistant?			
49 CFR 192.355(b)	Sat +	Sat	Concern	Unsat	NA	NC
		×				
		-				
into the atmosphere and away from an opening i	nto the building?					I same
nto the atmosphere and away from an opening i	vents and relief vents located into the building? Sat +	Sat x	Concern	om the vent	r can esca _l	n C
into the atmosphere and away from an opening i	nto the building?	Sat				I 200000
into the atmosphere and away from an opening in the street of the street	sat +	Sat x	Concern	Unsat	NA	NC
into the atmosphere and away from an opening in the street of the street	sat +	Sat x	Concern	Unsat	NA	NC
into the atmosphere and away from an opening in the street of the street	vents and relief vents protect	Sat x	Con cern	Unsat I by submer	N A	NC areas
6. Field Inspection Are service regulator of into the atmosphere and away from an opening in 49 CFR 192.355(b) Notes 7. Field Inspection Are service regulator of where flooding may occur? 49 CFR 192.355(b) Notes	vents and relief vents protect	Sat x	Con cern	Unsat I by submer	NA gence in a	NC areas
into the atmosphere and away from an opening in the street of the street	yents and relief vents protect Sat +	Sat x ted from o	Concern damage caused Concern	Unsat I by submer	NA gence in a	NC areas
into the atmosphere and away from an opening in the service service regulator where flooding may occur? Notes Notes Notes	yents and relief vents protect Sat +	Sat x ted from o	Concern damage caused Concern	Unsat I by submer	NA gence in a	NC areas
into the atmosphere and away from an opening in the service service regulator where flooding may occur? Notes Notes Notes	yents and relief vents protect Sat + Sat +	Sat x ted from to	Concern damage caused Concern ers?	Unsat by submer	NA gence in a NA x	n c

2. Field Inspection Is each service regulator, installed with a building, located as near as practical to the point of service line

Sat+

entrance?

Notes

49 CFR 192.353(b)

PHMSA Question Set STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

19 CFR 192.723	Sat +	Sat	Concern	Unsat	NA	NC
		x				
Notes There was no leak inspection performed during the	e field inspection.		1 v			
LO. Field Inspection Were main line valves	located and marked?					
9 CFR 192.707	Sat +	Sat	Concern	Unsat	NA	NC
		x				
Notes						
11. Field Inspection Are line markers place of the public?	ed and maintained along eac	ch section	of abovegroui	nd main in a	n area acc	essible
9 CFR 192.707	Sat +	Sat	Concern	Unsat	NA	NC
					x	
Notes None	177		1		- 3	
2. Field Inspection Is information on line	markers correct and legible	?			•	. 3
9 CFR 192.707	Sat +	Sat	Concern	Unsat	NA	NC
					×	
Notes						
3. Field Inspection Is a fire extinguisher p	provided when a hazardous	amount o	of gas is being	vented into	open air?	
	Sat+	Sat	Concern	Unsat	NA	NC
9 CFR 192.751(a)					x	
9 CFR 192.751(a)						

OPERATOR QUALIFICATION FIELD INSPECTION PROTOCOL FORM

Inspection Date(s):	6/4/19
Name of Operator:	Eastern Kentucky University
Operator ID (OPID):	n/a
Supervisor(s) Contacted:	Tim Wiseman
# Qualified Employees Observed:	1
# Qualified Contractors Observed:	0

Individual Observed	Title/Organization	Phone Number	Email Address		
Tim Wiseman	Utility Compliance Coordinator	859-248-4385	Timothy.wiseman@eku.edu		
		t			

To add rows, press TAB with cursor in last cell.

PHMSA/State Representative	Region/State	Email Address
Scott Morris	Southern/Kentucky	Scotta.morris@ky.gov
	1 2/2 21	

To add rows, press TAB with cursor in last cell.

Remarks:

A table for recording specific tasks performed and the individuals who performed the tasks is on the last page of this form. This form is to be uploaded on to the OQBD for the appropriate operator, then imported into the file.

9.1 Covered Task Performance

Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.

	Inspection Results an X in exactly one cell below)	Inspection Notes		
X	No Issue Identified	Oualified for: Inspect, Service and Operate Line Valves on 9/15/16		
	Potential Issue Identified (explain)	6 critical valves on EKU campus		
24	N/A (explain)			
	Not Inspected			

9.2 Qualification Status

Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.

	Inspection Results an X in exactly one cell below)	Inspection Notes			
X	No Issue Identified	OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating			
	Potential Issue Identified (explain)				
	N/A (explain) Condi	Conditions, and Investigate Reported gas leaks and odors in buildings.			
	Not Inspected				

9.3 Abnormal Operating Condition Recognition and Reaction

Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.

	Inspection Results an X in exactly one cell below)	Inspection Notes			
X	No Issue Identified	OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and			
	Potential Issue Identified (explain)	Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating			
	N/A (explain)	Conditions, and Investigate Reported gas leaks and odors in buildings.			
	Not Inspected				

9.4 Verification of Qualification

Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.

	Inspection Results an X in exactly one cell below)	Inspection Notes			
X	Potential Issue Identified (explain) N/A (explain)	OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings.			
2					

9.5 Program Inspection Deficiencies

Have potential issues identified by the headquarters inspection process been corrected at the operational level?

	Inspection Results an X in exactly one cell below)	Inspection Notes
X	No Issue Identified	
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

Field Inspection Notes

The following table is provided for recording the covered tasks observed and the individuals performing those tasks.

	E SEE BOOKER	Name/ID of Individual Observed				
		Tim Wiseman				
No	Task Name	Correct Performance (Y/N)	Correct Performance (Y/N)	Correct Performance (Y/N)	Comments	
1	Emergency shut off valves	Y				
2						
3						
4						
5					1 34	
6						
7						
8			10 X			

Operations and Maintenance Records Review

If performing an operations and maintenance records review in the course of your inspection, please review a sample of the qualifications of the individuals performing those O&M tasks that are covered under Operator Qualification and check the records for compliance to 192.807 or 195.507.

192.807 or 195.507	Records supporting an individual's current qualifications shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.	Sat.	Unsat.	Not Checked
0	Comments: OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings.			

*Eastern Kentucky University Coates Building Room 205, CPO 40A 521 Lancaster Avenue Richmond, KY 40475-3102

*Eastern Kentucky University Eastern Kentucky University Coates Building Room 205, CPO 40A 521 Lancaster Avenue Richmond, KY 40475-3102