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Governor

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December 3, 2021

Mr. Mike Jones, Mayor
City of Drakesboro
P. O. Box 129
Drakesboro, KY 42337

Re: City of Drakesboro Records Inspection

Dear Mayor Jones:

Public Service Commission staff performed an inspection of the City of Drakesboro gas system on October 26, 28, 29, 2021 reviewing utility practices pursuant to Commission regulations. The report of this inspection covering the City of Drakesboro records is enclosed with this letter.

Based on the inspector's observations, no violations were identified. This closes the 2021 inspection and no further action is required.

Please review the enclosed inspection report in its entirety as you will find further information noted in regard to the inspection. If you have any questions regarding this inspection, feel free to contact Mike Nantz at 502-791-0237 or via email at Michael.Nantz@ky.gov.

Sincerely,

Melissa C. Holbrook
Assistant Director DOI
Public Service Commission

Enclosure(s)

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Mike Nantz	Report Number:	11162021
Inspection Date(s):	10/26,28,29/2021	Report Date:	11/16/2021
Inspection Type:	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	City of Drakesboro	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	3538	
Type of Facility:	Municipal	Location of Facility:	Drakesboro, KY	
Area of Operation:	City of Drakesboro and vicinity			
Official Operator Contact and Address: (Contact for Inspection Letter) Mr. Mike Jones, Mayor City of Drakesboro P.O. Box 129 Drakesboro, KY 42337		Unit Name and Address		
Phone # and Email:	270-476-8986 jonesy0120@gmail.com			
Records Location:	City of Drakesboro offices			
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>	
Jeff Roberts	RussMar Compliance	606-875-4655	Jeff.roberts@russmarutilities.com	
Has the Operator provided an updated Emergency Contact List? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
Number of Customers:	639			
Number of Gas Employees:	2 plus 1 RussMar employee			
Gas Supplier:	Texas Gas			
Unaccounted for Gas:	14%			
7100 Submitted Date:	# of Leaks	# Excavation Tickets	# Excavation Damages	# EFV's installed
2/17/2021	28	502	5	3
Operating Pressure(s):	MAOP (within last year)		Actual Operating Pressure (at time of inspection)	
	Feeder:	175		
	Town:	125		
Other:				
Does the Operator have any transmission pipeline (above 20% SMYS):	n/a			
Additional Operator Information:				

Date of Last Inspection:	12/14/2020		
Number of Deficiencies:	1	Deficiencies not Cleared:	1

Summary of Areas Inspected

PHMSA Question Set

- | | | |
|---|--|---|
| <input type="checkbox"/> Emergency Plan | <input type="checkbox"/> Operations and Maintenance Plan | <input checked="" type="checkbox"/> Critical Valves Maintenance Inspections |
| <input checked="" type="checkbox"/> Cathodic Protection | <input type="checkbox"/> Accidents | <input checked="" type="checkbox"/> Leak Surveys |
| <input checked="" type="checkbox"/> Odorization | <input checked="" type="checkbox"/> Operator Qualification | <input checked="" type="checkbox"/> Damage Prevention |
| <input checked="" type="checkbox"/> Pipeline Markers | <input checked="" type="checkbox"/> Regulator Stations | <input type="checkbox"/> DIMP |
| <input checked="" type="checkbox"/> Field Inspection | <input type="checkbox"/> Other | |

Other: Records review only

State Question Set

- | | |
|--|--------------------------------|
| <input type="checkbox"/> Cybersecurity | <input type="checkbox"/> Other |
|--|--------------------------------|

Other:

Summary

The 2021 records only inspection for City of Drakesboro was conducted remotely. PHMSA Form 2 checklist was used for this inspection. Plans and records were picked up by inspector and returned to office for review. This inspection focused on the operational compliance records for YTD 2021. The standard inspection review for compliance was conducted in December 2020 by Melissa Holbrook and some of her 2020 inspection documentation is incorporated into this report without changes including the NTSB Supplemental Inspection Questions and the Drug and Alcohol checklist.

An opening conference was conducted at the City of Drakesboro offices with RussMar employees and Mayor Mike Jones to explain the scope and procedures for the inspection. All records relating to compliance were provided and the review was conducted in Frankfort.

The inspection consisted of a detailed review of 2021 records pertaining to leakage surveys and repairs, third party damage, valve inspections, patrolling, atmospheric corrosion, regulator inspections, cathodic protection, and odorant verifications. A field inspection and Protocol 9 were performed on 10/29/2021.

The closing conference was conducted with Mayor Jones and Jeff Roberts representing RussMar.

Violations

There were no violations noted during this records only review.

Submitted By:



Utility Regulatory and Safety Investigator

Assessment and Repair - Repair Methods and Practices

5. Test Reinstated Service Lines *From the review of records, did the operator properly test disconnected service lines?* (AR.RMP.TESTREINSTATE.R)
192.603(b) (192.725(a);192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders reviewed

Design and Construction - Construction

3. Plastic pipe - Qualifying Joining Procedures *Have plastic pipe joining procedures been qualified in accordance with 192.283?* (DC.CO.PLASTICJOINTPROCEDURE.R)
192.273(b) (192.283(a);192.283(b);192.283(c);192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

O&M Section 18 reviewed

5. Plastic pipe - Qualifying Personnel to Make Joints *Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?* (DC.CO.PLASTICJOINTQUAL.R)
192.285(d) (192.285(a);192.285(b);192.285(c);192.807(a);192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records and work orders reviewed indicating persons making joints were qualified

7. Qualification of Personnel Inspecting Joints in Plastic Pipelines *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?* (DC.CO.PLASTICJOINTINSP.R)
192.287 (192.807(a);192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders reviewed. Inspections made by qualified persons

Design and Construction - Construction Welding Procedures

2. Welding Procedures Do records indicate weld procedures are being qualified in accordance with 192.225?
(DC.WELDPROCEDURE.WELD.R)
192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes

Records were not checked and will be inspected during future construction inspections.

Design and Construction - Design of Pipe Components

1. Flanges and Flange Accessories Do records indicate flanges and flange accessories meet the requirements of 192.147? (DC.DPC.FLANGE.R)
192.147(a) (192.147(b);192.147(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Flanges observed meet the requirements.

Design and Construction - Pressure Testing

1. Test Requirements for Plastic Pipe Do records indicate that pressure testing is conducted in accordance with 192.513? (DC.PT.PRESSTESTPLASTIC.R)
192.517(b) (192.513(a);192.513(b);192.513(c);192.513(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders reviewed indicating proper pressure testing.

2. Test Requirements for Service Lines Do records indicate that pressure testing is conducted in accordance with 192.511? (DC.PT.SERVICELINE.R)
 192.517(b) (192.511(a);192.511(b);192.511(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders reviewed indicating proper pressure testing.

Design and Construction - Pressure Testing - Low Pressure

1. Strength Test Duration Requirements for SMYS < 30% Do records indicate that pressure testing is conducted in accordance with 192.507? (DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R)
 192.517(a) (192.507(a);192.507(b);192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders reviewed.

2. Strength Test Requirements for Operations < 100 psig Do records indicate that pressure testing is conducted in accordance with 192.509(a) (except for service lines and plastic pipelines)? (DC.PTLOWPRESS.PRESSTEST100PSIG.R)
 192.517(b) (192.509(a);192.509(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders reviewed tested 90lbs air for one hour.

Emergency Preparedness and Response - Emergency Response

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

192.605(a) (192.617)

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes
None to report

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

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

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes
Did not review. Previous inspection reported completed on 6/8/2020 by Jeff Roberts RussMar

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Work orders reviewed of leak repairs

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

192.605(a) (192.615(c)(1);192.615(c)(2);192.615(c)(3);192.615(c)(4);192.616(c);ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes
Did not review. 2020 inspection noted the meeting held on 12/14/2020.

Facilities and Storage - Facilities General

3. Vault Inspection Do records document the adequacy of inspections of all vaults having an internal volume ≥ 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment? (FS.FG.VAULTINSPECT.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No vaults

Gas Distribution Integrity Management - GDIM Implementation

34. Mechanical Fitting Failures - Information Collection (Data) Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks? (GDIM.RR.MECHANICALFITTINGDATAIMPL.R)

192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

None noted to report. Process in place to record.

Maintenance and Operations - Gas Pipeline Abnormal Operations

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work order records reviewed. No issues noted.

Maintenance and Operations - Gas Pipeline Class Location

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Does not apply to this operator

Maintenance and Operations - Gas Pipeline MAOP

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records reviewed from 1988 indicating 125 psig and 40 psig

Maintenance and Operations - Gas Pipeline Maintenance

2. Abandonment or Deactivation of Pipeline and Facilities Do records indicate pipelines and facilities were abandoned or deactivated in accordance with requirements? (MO.GM.ABANDONPIPE.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records reviewed of services closed in and capped

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
No issues noted of not following procedures

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No Transmission

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

192.603(b) (192.747(a);192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Critical valves were exercised at 9 locations on 10/6/2021

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
None on system

16. Maintenance of Equipment Used in Joining Plastic Pipe Do records indicate equipment used in joining plastic pipe was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints? (MO.GM.EQUIPPLASTICJOINT.R)
 192.603(b) (192.756)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Records indicate equipment maintained per manufacturer's specifications

Maintenance and Operations - Gas Pipeline Odorization

2. Odorization of Gas Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements? (MO.GOODOR.ODORIZE.R)
 192.709(c) (192.625(a);192.625(b);192.625(c);192.625(d);192.625(e);192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Records indicate weekly sniff tests conducted at 4 locations on the system and injection system at the take station.

Maintenance and Operations - Gas Pipeline Operations

5. Normal Maintenance and Operations Have annual reviews of the written procedures or processes in the manual been conducted as required? (MO.GO.OMANNUALREVIEW.R)
 192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Annual reviews noted

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 No issues noted. At this time the City of Drakesboro has 2 employees with limited qualifications working under the 1-to-1 supervision with a qualified RussMar employee

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 All employees and contractor have proper access to all information

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Notifications reviewed

Maintenance and Operations - Gas Pipeline Overpressure Protection

2. Pressure Limiting and Regulating Stations Capacity of Relief Devices Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required? (MO.GMOPP.PRESSREGCAP.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Records reviewed. Testing conducted as required.

4. Pressure Limiting and Regulating Stations Inspection and Testing *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations? (MO.GMOPP.PRESSREGTEST.R)*

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Records reviewed. Testing conducted as required.

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No transmission

Maintenance and Operations - ROW Markers, Patrols, Leakage Survey and Monitoring

2. Transmission Patrolling Requirements *Do records indicate that transmission line ROW surface conditions have been patrolled as required? (MO.RW.TRANSPATROL.R)*

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No transmission

4. Transmission Leakage Surveys *Do records indicate transmission leakage surveys conducted as required? (MO.RW.TRANSLEAKAGE.R)*

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No transmission

6. Distribution Patrolling Do records indicate distribution patrolling was conducted as required? (MO.RW.DISTPATROL.R)
192.603(b) (192.721(a);192.721(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Patrolling records reviewed

8. Distribution Leakage Surveys Do records indicate distribution leakage surveys were conducted as required?
(MO.RW.DISTPATROLLEAKAGE.R)
192.603(b) (192.723(a);192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Leak survey completed in July 2021. 2 Grade 1 leaks found and repaired. Leak orders 0555-1554 and 0556-48 reviewed. Note: All leak orders and repairs are reported monthly in Operator’s monthly reporting to the Commission.

Maintenance and Operations - Uprating

1. Maximum Allowable Operating Pressure Increase Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553? (MO.GOUPRATE.MAOPINCREASE.R)
192.553(a) (192.553(b);192.553(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No increase to MAOP

2. Maximum Allowable Operating Pressure Increase Limit Do records indicate that increases in MAOP are limited in accordance with 192.619 and 192.621? (MO.GOUPRATE.MAOPINCREASELIMIT.R)
192.553(b) (192.553(c);192.553(d);192.557(a))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No increase to MAOP

3. Maximum Allowable Operating Pressure Increase Preparation *Do records indicate that increases in MAOP were preceded by the actions specified in 192.557? (MO.GOUPRATE.MAOPINCREASEPREP.R)*

192.553(b) (192.553(c);192.553(a);192.557(b);192.557(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No increase to MAOP

4. Maximum Allowable Operating Pressure Increase - Cast or Ductile Iron *Do records indicate that requirements were followed for increasing the MAOP for cast iron or-ductile iron pipe where records are inadequate for evaluating the level of safety of the pipeline when operating at the proposed increased pressure? (MO.GOUPRATE.MAOPINCREASECASTDUCTILE.R)*

192.553(b) (192.553(c);192.557(d))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No cast or Ductile Iron

Public Awareness and Damage Prevention - Damage Prevention

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

192.614(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Plan reviewed.

Public Awareness and Damage Prevention - Public Awareness

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

192.605(a) (192.615(c)(1);192.615(c)(2);192.615(c)(3);192.615(c)(4);192.616(c);ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Meeting conducted per procedures. Records reviewed

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

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Materials reviewed. English only.

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

192.616(c) (API RP 1162 Section 8.4)

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes

Refer to previous PAPE inspection

25. Master Meter and Petroleum Gas Systems Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192? (PD.PA.MSTRMETER.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No Master Meter systems served.

Public Awareness and Damage Prevention - ROW Markers, Patrols, Leakage Survey and Monitoring

2. Transmission Patrolling Requirements Do records indicate that transmission line ROW surface conditions have been patrolled as required? (MO.RW.TRANSPATROL.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No transmission

4. Transmission Leakage Surveys Do records indicate transmission leakage surveys conducted as required? (MO.RW.TRANSLEAKAGE.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No transmission

6. Distribution Patrolling Do records indicate distribution patrolling was conducted as required? (MO.RW.DISTPATROL.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Patrolling records reviewed

8. Distribution Leakage Surveys Do records indicate distribution leakage surveys were conducted as required? (MO.RW.DISTPATROLLEAKAGE.R)

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Leakage surveys reviewed

Reporting - Regulatory Reporting (Traditional)

1. Annual Report Records *Have complete and accurate Annual Reports been submitted?* (RPT.RR.ANNUALREPORT.R)
191.11(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
2021 annual report reviewed

3. Immediate Reporting: Incidents *Do records indicate immediate notifications of incidents were made in accordance with 191.5?* (RPT.RR.IMMEDREPORT.R)
191.5(a) (191.7(a);191.7(d))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No incidents

5. Mechanical Fitting Failures - Information Collection (Data) *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?* (GDIM.RR.MECHANICALFITTINGDATAIMPL.R)
192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
None found

7. Incident Reports *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.1 within the required time frame?* (RPT.RR.INCIDENTREPORT.R)
191.9(a)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
None reported

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

191.9(b)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
None reported

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
None reported

Time-Dependent Threats - Atmospheric Corrosion

3. Atmospheric Corrosion Monitoring Do records document inspection of aboveground pipe for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.R)

192.491(c) (192.481(a);192.481(b);192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Records of AC monitoring reviewed

Time-Dependent Threats - External Corrosion - CP Monitoring

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

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records reviewed

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

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

CP monitoring records reviewed

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

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

None indicated

10. Correction of Corrosion Control Deficiencies Do records adequately document actions taken to correct any identified deficiencies in corrosion control? (TD.CPMONITOR.DEFICIENCY.R)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

New rectifier installed in 9/2021 and all shorts have been addressed. Readings reviewed now show all areas of system are compliant and under protection.

12. Test Stations Do records identify the location of test stations and show a sufficient number of test stations?
 (TD.CPMONITOR.TESTSTATION.R)

192.469

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Sufficient number of test locations noted

15. Test Leads Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (TD.CPMONITOR.TESTLEAD.R)

192.491(c) (192.471(a);192.471(b);192.471(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records of previous construction indicate test leads installed in accordance with requirements

18. Interference Currents Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized? (TD.CPMONITOR.INTFRCURRENT.R)

192.491(c) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

None noted

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

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

All items noted in records

Time-Dependent Threats - External Corrosion - Cathodic Protection

6. Unprotected Buried Pipelines (typically bare pipelines) Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating? (TD.CP.UNPROTECT.R)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No bare steel

8. Isolation from Other Metallic Structures Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.R)

192.491(c) (192.467(a);192.467(b);192.467(c);192.467(d);192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Does not apply to Operator's system

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

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

All items noted

Time-Dependent Threats - External Corrosion - Coatings

2. New Buried Pipe Coating Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material? (TD.COAT.NEWPIPE.R)

192.491(c) (192.455(a);192.461(a);192.461(b);192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

All pipe installed has been coated

Time-Dependent Threats - External Corrosion - Exposed Pipe

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

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders document examination

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

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

All items listed were noted.

Time-Dependent Threats - Internal Corrosion - Preventive Measures

2. Internal Corrosion *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?* (TD.ICP.CORRGAS.R)

192.491(c) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Operator receives pipeline quality gas from Texas Gas. No issues with gas quality.

5. Internal Corrosion Corrosive Gas Actions Do records document the actions taken when corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.R)

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Operator receives pipeline quality gas from Texas Gas. No issues with gas quality.

8. Internal Corrosion in Cutout Pipe Do records document examination of removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.R)

192.491(c) (192.475(a);192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders indicate that cutout pipe is inspected.

9. Evaluation of Internally Corroded Pipe Do records document adequate evaluation of internally corroded pipe? (TD.ICP.EVALUATE.R)

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Operator receives pipeline quality gas from Texas Gas. No issues with gas quality.

10. Repair of Internally Corroded Pipe Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall? (TD.ICP.REPAIR.R)

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Operator receives pipeline quality gas from Texas Gas. No issues with gas quality.

Training and Qualification - Qualification of Personnel - Specific Requirements

2. Corrosion Control Personnel Qualification Do records indicate qualification of personnel implementing pipeline corrosion control methods? (TQ.QU.CORROSION.R)
192.453 (192.807(a);192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
RussMar employees and contractor Corrosion Solutions responsible for CP have proper OQ

Training and Qualification - Qualification of Personnel - Specific Requirements (O and M Construction)

3. Qualification of Welders Do records indicate adequate qualification of welders? (TQ.QUOMCONST.WELDER.R)
192.227(a) (192.227(b);192.229(a);192.229(b);192.229(c);192.229(d);192.328(a);192.328(b);192.807(a);192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes
Welding records not reviewed. Will review during pending construction inspections

4. Qualification of Nondestructive Testing Personnel Do records indicate the qualification of nondestructive testing personnel? (TQ.QUOMCONST.NDT.R)
192.243(b)(2) (192.807(a);192.807(b);192.328(a);192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC

Notes
Welding records not reviewed. Will review during pending construction inspections

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	City of Drakesboro	Op ID #	3538
Inspector	Melissa Holbrook	Unit #	
Date of Inspection	11/25/2020		
Inspection Location City & State	Virtual Inspection		
Operator Employee Interviewed	Drakesboro/RussMar submitted information via email	Phone #	270-543-6425
Position/Title	n/a		
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)		Mike Jones, Mayor	
DER Phone #	270-543-6425		

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?	X		
Comments	Refer to D&A plan			
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.	X		
Comments	Need to add 50 % for phmsa in plan 2020 drug tests submitted			
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.	X		
Comments	Supervisor Mayor will ensure employee test after incident/accident			

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.113(c) .117(a)(4) .227(b)(2) .241	4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?	X		
Comments	Pg 6 completed by KLC 11-11-2020			
.3 .113(b) .117(a)(4) .239(b)(11)	5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.	X		
Comments	D&A plan includes EAP not in office to see numbers			

NTSB SUPPLEMENTAL INSPECTION QUESTIONS				
SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator have procedures for determining if exposed cast iron pipe was examined for evidence of graphitization?			X	
If necessary, was remedial action taken?			X	
Comments: Operator has no cast iron				
Does the operator have procedures for surveillance of cast iron pipelines?			X	
Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)			X	
Comments: Operator has no cast iron				
Does the operator have emergency response procedures for leaks caused by excavation damage near buildings?	X			
Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)	X			
Comments: EP-pg 24				
Does the operator's records of previous accidents and failures (including reported third party damage and leak response) ensure appropriate operator response as required by 192.617.	X			
Comments: Records reviewed				

THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator or its contractors have directional drilling/ boring procedures?	X			
Do the procedures include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?	X			
Comments: Russmar has written procedures when needed				
Is operator following written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?	X			
Comments:				
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities? If no, encourage and promote the adoption of CGA Best Practices document.		X		
Comments: PSC recommends operator to adopt CGA best practices. PSC has sent a copy of practices to City of Drakesboro.				
Do the operator's records of accidents and failures due to excavation damage ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?	X			
Comments: work orders reviewed				

PLASTIC PIPE DEFECTS/LEAKS

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks? If yes, what is operator doing to mitigate the safety concerns?			X	
Comments: no issues with plastic pipe				

PERMALOCK MECHANICAL TAPPING TEE ASSEMBLIES

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator use PermaLock Mechanical Tapping Tee Assemblies? If yes, are they experience any issues with these type of installations?	X			
Comments: Operator are using perma lock tapping tees but not honey well brand No issues indicated, Operator was emailed NTSB report to review with employees.				
Are they using best practices recommended by the manufacturer in their O&M Manual and/or distribution integrity management programs?	X			
Comments: Russmar- Jeff Roberts has reviewed perma lock with Dee Sims. Perma lock is in O&M Sec 23				
Are they using the specified tools and methods to correctly install these Assemblies?	X			

Comments: O&M Sec 23

Operator is using directions included in packet provided by manufacture per Jeff Roberts.

OPERATOR PROCEDURES FOR CONSIDERING LOW PRESSURE SYSTEMS IN THREAT ANALYSIS

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator include low pressure systems in DIMP Plan?			X	
Comments: Operator does not have low pressure system				
Does the operator have procedures for considering low pressure distribution systems in threat analysis?			X	
Comments: Operator does not have low pressure system				

DISTRIBUTION- INDOOR METER SETS WITH REGULATORS

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator have any meters /and or service regulators inside buildings? If so, do they have an action plan to relocate the equipment outside of the building? Recommend installing methane detectors inside buildings. NTSB (Silver Spring, MD Incident)			X	
Comments: Operator has no meters or regulators inside				

TRANSMISSION ONLY

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?			X	
Comments: not required in transmission				
Does operator have any reversal flows, product changes, conversion of service? (ADB-2014-0040)			X	
Comments: does not apply to operator				

Assessment and Repair - Repair Criteria (O and M)

2. Field Inspection - Remedial Actions (OM) *Is anomaly remediation and documentation of remediation adequate for all segments?* (AR.RCOM.REMEDIATIONOM.O)
 192.487(a) (192.487(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Reviewed records of leak repairs

Assessment and Repair - Repair Methods and Practices

2. Prevention of Accidental Ignition *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.* (AR.RMP.IGNITION.O)
 192.751(a) (192.751(b);192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Field inspection of a weekly sniff test observed. No issues

Design and Construction - Design of Pipe Components

2. Flanges and Flange Accessories *Do flanges and flange accessories meet the requirements of 192.147?* (DC.DPC.FLANGE.O)
 192.141 (192.147(a);192.147(b);192.147(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Accessories observed with proper markings

3. Distribution Valve Placement Are distribution line valves being installed as required of 192.181?
 (DC.DPC.GDVALVEPLACEMENT.O)
 192.141 (192.181(a);192.181(b);192.181(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Valves observed. No issues

Design and Construction - Materials

1. Marking of Materials Are pipe, valves, and fittings properly marked for identification in accordance with the requirements of 192.63? (DC.MA.MARKING.O)
 192.63(a) (192.63(b);192.63(c);192.63(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 All pipe and fittings observed were marked

Design and Construction - Meters, Service Regulators, and Service Lines

1. Customer Meters and Regulator Location Are meters and service regulators being located consistent with the requirements of 192.353? (DC.METERREGSVC.CUSTOMETERREGLOC.O)
 192.351 (192.353(a);192.353(b);192.353(c);192.353(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Meters and service regulators observed in the field

2. Customer Meters and Regulator Protection Are meters and service regulators being protected from damage consistent with the requirements of 192.355? (DC.METERREGSVC.CUSTOMETERREGPROT.O)
 192.351 (192.355(a);192.355(b);192.355(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Meters and regulators observed were protected.

3. Customer Meters and Regulator Installation *Are meters and service regulators being installed consistent with the requirements of 192.357? (DC.METERREGSVC.CUSTMETERREGINSTALL.O)*
 192.351 (192.357(a);192.357(b);192.357(c);192.357(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Meters and regulators observed in the field. Construction standards provide procedures for installation.

4. Customer Meter Operating Pressure *Are customer meter operating pressures consistent with the requirements of 192.359? (DC.METERREGSVC.CUSTMETEROPPRESS.O)*
 192.351 (192.359(a);192.359(b);192.359(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 New meters installed meet the requirements.

5. Service Line Installation *Are customer service lines being installed consistent with the requirements of 192.361? (DC.METERREGSVC.SVCLINEINSTALL.O)*
 192.351 (192.361(a);192.361(b);192.361(c);192.361(d);192.361(e);192.361(f);192.361(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Customer service lines installed to meet this requirement.

6. Service Line Valve and Location Requirements *Are customer service line valves being installed meeting the valve and locations requirements of 192.363 and 192.365? (DC.METERREGSVC.SVCLINEVLVLOCATEREQT.O)*
 192.351 (192.363(a);192.363(b);192.363(c);192.365(a);192.365(b);192.365(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Service line valves observed

7. Service Line Connection Requirements Are customer service lines being installed with connections meeting the requirements of 192.367 and 192.369? (DC.METERREGSVC.SVCLINECONNECT.O)

192.351 (192.367(a);192.367(b);192.369(a);192.369(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Customer services observed.

8. Service Line Connection Requirements Are customer service lines being installed constructed appropriately for the types of materials used? (DC.METERREGSVC.SVCLINEMATERIAL.O)

192.351 (192.371;192.373(a);192.373(b);192.373(c);192.375(a);192.375(b);192.377)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Customer services observed.

9. Service Line Connection Requirements Are new customer service lines not in use configured in accordance with the requirements of 192.379? (DC.METERREGSVC.NEWSVCLINENOTUSED.O)

192.351 (192.379;192.379(a);192.379(b);192.379(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

None observed but covered in procedures.

10. Service Line Connection Requirements Are service line excess flow valves located and identified in accordance with the requirements of 192.381? (DC.METERREGSVC.EXCSFLOWVLVLOCATE.O)

192.351 (192.381(c);192.381(d);192.381(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

EFVs observed

Facilities and Storage - Facilities General

4. Vault Inspection Are inspections of selected vaults with internal volume ≥ 200 cubic feet (5.66 cubic meters) housing pressure regulating/limiting equipment adequate? (FS.FG.VAULTINSPECT.O)
 192.749(a) (192.749(b);192.749(c);192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
 No vaults

Maintenance and Operations - Gas Pipeline Maintenance

8. Valve Maintenance Distribution Lines Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable? (MO.GM.DISTVALVEINSPECT.O)
 192.747(a) (192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Operator's 9 Critical Valve inspection records were reviewed.

11. Bell and Spigot Joints Do records indicate that caulked bell and spigot joints were correctly sealed? (MO.GM.BELLSPIGOTJOINT.O)
 192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
 None on system

13. Protecting Cast-Iron Pipeline Is adequate protection in place for segments of a buried cast-iron pipeline for which support has been disturbed? (MO.GM.CASTIRONPROTECT.O)
 192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
 None on system

17. Maintenance of Equipment Used in Joining Plastic Pipe *Is proper maintenance being performed on equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?* (MO.GM.EQUIPPLASTICJOINT.O)
192.756

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Operator uses manufacturer's recommended practices for maintenance.

Maintenance and Operations - Gas Pipeline Odorization

3. Odorization of Gas *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?* (MO.GOODOR.ODORIZE.O)
192.625(a) (192.625(c);192.625(d);192.625(e);192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Weekly testing records with an instrument were reviewed.

Maintenance and Operations - Gas Pipeline Operations

3. Pipeline Purging *Are lines being purged in accordance with 192.629?* (MO.GO.PURGE.O)
192.629(a) (192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Work orders reviewed

Maintenance and Operations - Gas Pipeline Overpressure Protection

5. Pressure Limiting and Regulating Stations Inspection and Testing *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?* (MO.GMOPP.PRESSREGTEST.O)
 192.739(a) (192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Noted adequate inspections/testing records

7. Pressure Telemetry or Recording Gauges *Are telemetry or recording gauges properly utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.O)
 192.741(a) (192.741(b);192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 Gauges observed at take station

Maintenance and Operations - ROW Markers, Patrols, Leakage Survey and Monitoring

10. Placement of ROW Markers *Are line markers placed and maintained as required?* (MO.RW.ROWMARKER.O)
 192.707(a) (192.707(b);192.707(d);CGA Best Practices, v4.0, Practice 2-5;CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 ROW markers observed in field with proper information

11. Placement of ROW Markers *Are line markers placed and maintained as required for above ground pipelines?* (MO.RW.ROWMARKERABOVE.O)
 192.707(c) (CGA Best Practices, v4.0, Practice 2-5;CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
 ROW markers observed in field with proper information

Public Awareness and Damage Prevention - Damage Prevention

6. Participation in Qualified One Call Systems *Observe operator process a "One Call" ticket. (PD.DP.ONECALL.O)*
192.614(c)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

One call procedure reviewed

Public Awareness and Damage Prevention - ROW Markers, Patrols, Leakage Survey and Monitoring

10. Placement of ROW Markers *Are line markers placed and maintained as required? (MO.RW.ROWMARKER.O)*
192.707(a) (192.707(b);192.707(d);CGA Best Practices, v4.0, Practice 2-5;CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

ROW markers observed in field with proper information

11. Placement of ROW Markers *Are line markers placed and maintained as required for above ground pipelines? (MO.RW.ROWMARKERABOVE.O)*
192.707(c) (CGA Best Practices, v4.0, Practice 2-5;CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

ROW markers observed in field with proper information

Time-Dependent Threats - Atmospheric Corrosion

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
No AC noted in field

Time-Dependent Threats - External Corrosion - CP Monitoring

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

192.465(a) (192.463(b);192.463(c);192.463(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
CP reading methodology reviewed

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

192.465(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Records reviewed of installation of new rectifier installed September 2021

13. Test Stations *Do cathodically protected pipelines have a sufficient number of test stations?* (TD.CPMONITOR.TESTSTATION.O)

192.469

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Sufficient test stations observed

16. Test Leads Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (TD.CPMONITOR.TESTLEAD.O)

192.471(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Construction specifications reviewed

19. Interference Currents Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized? (TD.CPMONITOR.INTFRCURRENT.O)

192.473(a)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No interference currents reported

Time-Dependent Threats - External Corrosion - Cathodic Protection

9. Isolation from Other Metallic Structures Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.O)

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

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Any isolation issues found relating to casings are being addressed

10. Impressed Current or Galvanic Anode Systems Are impressed current type cathodic protection systems and galvanic anode systems installed so as to minimize any adverse effect on existing adjacent underground metallic structures? (TD.CP.ADJACENTMETAL.O)

192.473(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

No issues noted

12. Graphitization of Cast Iron and Ductile Iron *Has there been adequate remediation for the graphitization of cast iron or ductile iron pipe?* (TD.CP.GRAPHITIZE.O)

192.489(a) (192.489(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No cast or ductile iron on system

Time-Dependent Threats - External Corrosion - Coatings

3. New Buried Pipe Coating Installation *Is external protective coating being protected from damage that could result from adverse ditch conditions or supporting blocks?* (TD.COAT.NEWPIPEINSTALL.O)

192.461(d)

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes

No construction at time of inspection

Time-Dependent Threats - Internal Corrosion - Preventive Measures

3. Internal Corrosion Corrosive Gas Prevention *If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented?* (TD.ICP.CORRGASPRVNT.O)

192.475(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Exposed/removed sections are examined

6. Internal Corrosion Corrosive Gas Actions *Are adequate actions taken when corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.O)

192.477

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No issues noted to inspect

11. Bottle Type and Pipe Type Holders *Is gas containing more than 0.25 grain of hydrogen sulfide per 100 standard cubic feet (5.8 milligrams/m3) at standard conditions (4 parts per million) being stored in pipe-type or bottle-type holders?*
 (TD.ICP.PIPEBOTTLE.O)

192.475(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

None on system

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

Training and Qualification – OQ Protocol 9 (OQ Field Inspection)

1. Covered Task Performance (detail) Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures. (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
	X					

Notes

Brian Allard performed odorant check with instrument under 1-to-1 supervision from Michael Bottoms (RussMar). Brian Allard was not OQ to perform task. Michael Bottom OQ was current and confirmed.

2. Qualification Status (detail) Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks. (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
	X					

Notes

Brian Allard was not OQ to perform task. Michael Bottom OQ was current and confirmed.

3. Abnormal Operating Condition Recognition and Reaction (detail) Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed. (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
	X					

Notes

AOCs were discussed during performance of task.

4. Verification of Qualification (detail) Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance. (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
	X					

Notes

Brian Allard was not OQ to perform task. Michael Bottom OQ was current and confirmed. Operator confirms individuals are current prior to work being performed.

5. Program Inspection Deficiencies (detail) Have potential issues identified by the headquarters inspection process been corrected at the operational level? (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
	X					

Notes

None identified.

