COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

ORDER

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

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

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

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

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

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

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[1] *See* Appendix A.

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

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

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

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

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

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

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

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

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

[4] *Id.*, Appendix F.

[5] *Id.*, Appendix B.

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

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

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

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[6] *Id.*, Appendix C.

[7] *Id.*, Appendix D.

[8] *Id.*, Appendix E.

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

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

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

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

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[9] *Id.*, Appendix I.

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

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

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

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

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

By the Commission

ENTERED
FEB 06 2017
KENTUCKY PUBLIC
SERVICE COMMISSION

ATTEST:

Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2017-00053 DATED FEB 06 2017

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION INTO COMPLIANCE OF CITY OF LIBERTY GAS COMPANY WITH KRS 278.495 and 49 CFR Part 192	)))	CASE NO. 2016-00391

ORDER

The Commission, on its own motion, finds that a formal investigation should be conducted to examine the City of Liberty Gas Company's ("Liberty Gas") compliance with periodic leakage survey requirements in accordance with federal and state regulations. As a municipal gas distribution system, Liberty Gas falls under the Commission's jurisdiction over municipal gas facilities pursuant to KRS 278.040, KRS 278.495, and KRS 278.992.

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

Federal regulations set minimum requirements for periodic leakage control programs for gas distribution systems, such as Liberty Gas. For gas distribution systems located within a business district, 49 CFR, Section 192.723(b)(1), provides that a leakage survey in business districts be conducted at least once each calendar year, but at intervals not exceeding 15 months. For gas distribution systems located outside

a business district, 49 CFR, Section 192.723(b)(2), provides that a leakage survey be conducted "as frequently as necessary," but at least every five years at intervals not exceeding 63 months. However, 49 CFR, Section 192.605(a), states that a utility must prepare and follow written procedures for periodic leakage surveys in its operating and maintenance plan. When the operation and maintenance plan establishes a shorter interval for conducting a leakage survey than a regulation requires, the shorter interval controls.

On July 6–10, 2015, Commission investigator Steve Samples conducted a periodic regulatory compliance inspection of Liberty Gas. The inspection report issued July 13, 2015 ("2015 Inspection Report"), noted seven deficiencies of 49 CFR Part 192. Of the seven deficiencies, two were related to failure to comply with periodic leakage survey requirements, as follows:

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

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

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

The 2015 Inspection Report contained a finding that Liberty Gas's Operation and Maintenance Manual requires leakage surveys be conducted outside its business districts every three years, and that Liberty Gas had not conducted leakage surveys outside its business districts since 2009.

On August 18, 2015, a cover letter and copy of the 2015 Inspection Report were sent to Liberty Gas. Liberty Gas was requested to respond by September 18, 2015, outlining corrective actions for the cited deficiencies. A copy of the August 18, 2015 letter and 2015 Inspection Report are attached as Appendix B. Liberty Gas filed its response in a letter dated September 16, 2015, that was received by the Commission on September 21, 2015. A copy of Liberty Gas's September 16, 2015 response is attached as Appendix C. Liberty Gas stated that it had hired Heath Consultants ("Heath") to perform leakage surveys both inside and outside the business district before the end of 2015 to cure those two deficiencies. Liberty Gas further stated that it would schedule Heath to perform leakage surveys inside the business district on an annual basis and outside the business district every three years to ensure the leakage surveys were performed according to regulations and Liberty Gas's Operations and Maintenance Manual.

Mr. Samples conducted a follow-up inspection of Liberty Gas on June 23, 2016, to ascertain and verify compliance actions taken by Liberty Gas in order to correct the seven deficiencies noted in the 2015 Inspection Report. As noted in the follow-up inspection report ("2016 Inspection Report"), Liberty Gas had corrected five of the deficiencies cited in the 2015 Inspection Report, but had failed to correct the two deficiencies regarding conducting leakage surveys inside and outside Liberty's business district.

On September 6, 2016, a cover letter and copy of the 2016 Inspection Report were sent to Liberty Gas. Liberty Gas was requested to respond within 30 days with an explanation of why the deficiencies occurred and how the deficiencies would be remedied and prevented. A copy of the September 6, 2016 letter and 2016 Inspection

Report are attached as Appendix D. According to the September 6, 2016 letter and 2016 Inspection Report, the most recent leakage survey records were for a 2009 leakage survey conducted by Heath both inside and outside Liberty's business district. Liberty Gas filed its response on September 16, 2016, confirming that leakage surveys had not been conducted since 2009. A copy of Liberty Gas's September 16, 2016 response, with attachments, is attached as Appendix E. Liberty Gas stated that the failure to conduct the leakage surveys since 2009 was an oversight and that the task was overlooked after the death of the gas supervisor who scheduled leakage surveys. Liberty Gas further stated that Heath conducted leakage surveys inside and outside Liberty's business district on July 19–21, 2016, and attached a copy of the leakage survey report. Lastly, Liberty Gas stated that future scheduling of leakage surveys was set forth in its operations and maintenance plan, and on a calendar of gas-related tasks.

In reviewing the history of Liberty Gas's compliance with periodic leakage survey requirements as documented in periodic regulatory compliance inspections performed by Commission investigators, Liberty Gas was cited for failure to perform and document leak surveys in 2007 and 2009. A copy of the 2007 Inspection Report is attached as Appendix G, and a copy of the 2009 Inspection Report is attached as Appendix H. In the periodic regulatory compliance inspection conducted in 2012, the Commission investigator found there were no deficiencies and that Liberty Gas timely conducted periodic leakage surveys as required ("2012 Inspection Report").[1] A copy of the 2012 Inspection Report is attached as Appendix F.

[1] Utility Inspection Report, Liberty Gas (Ky. PSC Mar. 27, 2012), Report number 031212, at 10 of 26.

Due to the discrepancy between the 2012 Inspection Report, and both the 2015 and 2016 Inspection Reports regarding the performance of leakage surveys, the Commission Executive Director wrote to Liberty Gas on August 22, 2016, requesting a copy of all leakage surveys conducted both in and outside Liberty's business district since 2009. In response, Liberty Gas faxed a copy of the 2016 leak survey report conducted by Heath. After a second request was made to Liberty Gas to ensure that all leakage surveys had been forwarded to the Commission, Liberty Gas faxed leakage survey recaps for 2011, 2012, 2013, and 2014 ("Leakage Survey Recaps") that appear to have been conducted by Liberty Gas employees. A copy of the Leakage Survey Recaps is attached as Appendix I.

Based upon its review of 2012, 2015, and 2016 Inspection Reports, and being otherwise sufficiently advised, the Commission finds that a formal investigation should be conducted to examine and ascertain Liberty Gas's compliance with periodic leakage survey regulations in accordance with federal and state requirements.

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

1. This investigation is initiated to review Liberty Gas's compliance with the leakage survey requirements set forth in 49 CFR, Section 192.723(b)(1), and 49 CFR, Section 192.605(a).

2. a. Liberty Gas, pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the information requested in Appendix A to this Order. The information requested is due within 20 days of the date of this order.

b. Responses to requests for information shall be appropriately bound, tabbed and indexed, and shall include the name of the witness responsible for

responding to the questions related to the information provided, with a copy to all parties of record.

c. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

d. Any party shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect.

e. For any request to which a party fails or refuses to furnish all or part of the requested information, that party shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

f. Any party filing a paper containing personal information shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that the personal information cannot be read.

By the Commission

ENTERED

DEC 01 2016

KENTUCKY PUBLIC SERVICE COMMISSION

ATTEST:

Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

1. Refer to the Leakage Survey Recaps, which are attached to this Order as Appendix I. Provide copies of each gas leak detection survey report represented by the Leakage Survey Recaps.

2. Explain why the Leakage Survey Recaps were not provided to Commission Staff during the periodic regulatory compliance inspection of Liberty Gas conducted between July 6 and July 10, 2015.

3. Explain why the Leakage Survey Recaps were not provided to Commission Staff during the follow-up regulatory compliance inspection of Liberty Gas conducted June 23, 2016.

4. Refer to Liberty Gas's response to the 2015 Inspection Report, Finding 4 and 5, attached as Appendix C. Explain why the Leakage Survey Recaps were not referenced or provided in Liberty Gas's response.

5. Explain why leakage surveys were not conducted before the end of 2015, as Liberty Gas stated would occur in its response to the 2015 Inspection Report, Finding 4 and 5.

6. Refer to Liberty Gas's response to the 2016 Inspection Report, attached as Appendix E, in which Liberty Gas states that "[t]he failure to complete the above mentioned leakage surveys were an oversight....."

a. Explain why Liberty Gas confirmed that leakage surveys had not been performed either inside or outside Liberty's business district since 2009.

b. Explain why the Leakage Survey Recaps were not referenced or provided in Liberty Gas's response.

7. Refer to the Leakage Survey Recap dated June 6, 2011, which indicates a Grade 2 leak was detected. Provide documentation of the repair of the Grade 2 leak noted on the June 6, 2011 Leakage Survey Recap.

8. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014, identify which gas leak detection survey was conducted by Liberty Gas employees and which gas leak survey was conducted by a third-party leak detection company.

9. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014 by Liberty Gas employees:

a. Identify the employee who conducted the gas leak detection survey;

b. Identify the covered tasks the employee is qualified to perform;

c. State the dates of initial qualification and retraining;

d. Identify the qualification method(s); and

e. Provide records supporting the qualification of the employee to conduct a gas leak detection survey.

10. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014 by a third-party leak detection company:

a. Identify the third-party company who performed the gas leak detection survey;

b. Provide evidence of payment to the third-party leak detection company; and

c. Provide records supporting the qualification of the personnel who conducted the gas leak detection survey.

11. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014 by Liberty Gas employees, identify the survey method.

12. For each gas leak detection instrument utilized by Liberty Gas employees in conducting gas leak detection surveys, provide records for the past five years that document:

a. The frequency of gas leak detection instrument testing for accuracy;

b. The results of gas leak detection instrument testing for accuracy; and

c. The frequency of gas leak detection instrument calibration.

13. For each Liberty Gas employee who has conducted a gas leak detection survey since 2011, provide documentation of the employee's training on:

a. Gas leak detection instruments;

b. Gas leak detection procedures; and

c. Gas leak classification and action criteria.

14. Refer to the 2016 Leakage Control Survey performed by Heath between July 19 and July 21, 2016, contained in Appendix E.

a. Refer to unnumbered page 2, which notes that two Grade 2 leaks were detected during the leak survey. Provide documentation of the repairs of the two Grade 2 leaks.

b. State what percentage of the business district is included in the July 19–21, 2016 leak survey.

c. State what percentage of the area outside the business district is included in the July 19–21, 2016 leak survey.

15. Provide copies of each Operating and Maintenance Manual procedure pertaining to gas leak detection surveys in effect since 2011, including but not limited to survey schedule and survey processes.

16. Provide documentation that Liberty Gas has contracted with a qualified firm to provide future leakage surveys in Liberty's business district and in areas outside the business district.

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

Steven L. Beshear
Governor

Leonard K. Peters
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
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David L. Armstrong
Chairman

James W. Gardner
Vice Chairman

Daniel E. Logsdon Jr.
Commissioner

August 18, 2015

Mayor Steven Brown
City of Liberty, Kentucky
City of Liberty Gas System
PO Box 127
Liberty, KY 42539

RE: 2015 Natural Gas Standard Inspection – City of Liberty Gas System

Dear Mayor Brown,

Staff from the Kentucky Public Service Commission ("Staff") conducted a standard inspection of the natural gas facilities of the City of Liberty Gas System ("Liberty Gas") during the week of July 6-10, 2015. Liberty Gas serves approximately 650 customers in Liberty, Kentucky, and its surrounding area. The inspection included a records review, operator qualifications review, and a pipeline facilities review, as noted in the enclosed inspection report. *Seven deficiencies were documented during this inspection.* The previous inspection was conducted on March 12, 2012, and no deficiencies were documented during that inspection.

As noted, the following deficiencies were documented during this inspection.

Deficiencies

1. **49 CFR §192.465 (a) 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...
   Finding:
   The inspection found that Liberty Gas had not performed cathodic protection monitoring tests since 2013.
   (Refer to Question #3, Records – Corrosion Control Performance, on Page 38 of the Inspection Report.)

2. **49 CFR §192.739 (a) Pressure Limiting and Regulating Stations: Inspection and Testing**
   (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests...
   Finding:
   The inspection found that Liberty Gas had not inspected and tested its regulator stations since 2013.
   (Refer to Question #32, Records – Operations and Maintenance Performance, on Page 35 of the Inspection Report.)

3. **49 CFR §192.747 (a) Valve Maintenance: Distribution Systems**
   (a) *Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.*
   Finding:
   The inspection found that Liberty Gas had not performed inspections on its critical distribution system valves since 2013.
   (Refer to Question #38, Records – Operations and Maintenance Performance, on Page 36 of the Inspection Report.)

4. **49 CFR §192.723 (b)(1) Distribution Systems: Leakage Surveys**
   (b) *(1) A leakage survey with leak detector equipment must be conducted in business districts…at intervals not exceeding 15 months, but at least once each year.*
   Finding:
   The inspection found that Liberty Gas had not performed leakage surveys in its business districts since 2009.
   (Refer to Question #26, Records – Operations and Maintenance Performance, on Page 34 of the Inspection Report.)

5. **49 CFR §192.605 (a) Procedural Manual for Operations, Maintenance, and Emergency Operations**
   (a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities…*
   Finding:
   The inspection found that Liberty Gas' Operation and Maintenance Manual requires leakage surveys every 3 years outside its business districts and that Liberty Gas had not performed leakage surveys outside its business districts since 2009.
   (Refer to item #5, Probable Findings, on Page 3 and to Question #26, Records – Operations and Maintenance Performance, on Page 34 of the Inspection Report.)

6. **49 CFR §192.616 (c) Public Awareness**
   (c) *The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162…*
   Finding:
   The inspection found that Liberty Gas did not deliver its public awareness baseline message two (2) times per year as required in API RP 1162.
   (Refer to Question #5, Procedures – Public Awareness Program, on Page 10 and to Question #20, Records – Operations and Maintenance Performance, on Page 33 of the Inspection Report.)

7. **49 CFR §192.225 (b) Welding Procedures**

(b) *Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.*

Finding:

The inspection found that Liberty Gas did not have documented welding procedures. (Refer to Question #1, Procedures – Welding and Weld Defect Repair/Removal, on Page 17 of the Inspection Report.)

You are requested to respond to this report, outlining corrective actions for the cited deficiencies by September 18, 2015. Your response shall include:

1) the corrective actions Liberty Gas will complete to bring each deficiency into full compliance,
2) a detailed schedule for completing the corrective actions, and
3) the actions taken to prevent each deficiency from occurring again.

In addition, Staff has recommended that Liberty Gas review its point of delivery with Texas Eastern Transmission to verify the termination point of its pipeline system. **You are requested to review this recommendation and respond in writing by September 18, 2015.** Your response should include how this verification was established and how the location of the termination point of your pipeline system was modified, if necessary.

Should you have any questions or need additional information, please don't hesitate to contact me at (502) 782-2599. We appreciate your continued interest in the safe operation of your natural gas facilities.

Sincerely,

Jason M. Hurt, PE
Manager, Gas Pipeline Safety Branch
Division of Engineering

ec: Bridgett Blake

Attachment

INSPECTION REPORT

INSPECTION INFORMATION

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

OPERATOR INFORMATION

Name of Operator:	City of Liberty Gas System	OP ID No.: (If no OP ID No's explain if an application has been submitted.)	11472
Type of Facility:	Municipal	Location of Facility:	Liberty, KY.
Area of Operation:	Liberty , KY.		
Official Operator Contact and Address: (Contact for Inspection Letter)	Steven Brown (Mayor) City of Liberty 518 Middleburg St. Liberty, KY. 42539	Unit Name and Address:	
Phone # and Email:	606-787-9973 Libertybb@windstream.net		
Records Location:	Same as above		

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

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

Number of Customers:	650			
Number of Gas Employees:	5			
Gas Supplier:	Texas Eastern Transmission			
Unaccounted for Gas:	4%			
Services:	Residential: 650	Commercial:	Industrial:	Other:

Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)
Feeder:	250 psig	240 PSIG
Town:	150 psig	100 psig
Other:	27	50

Does the Operator have any transmission pipeline (above 20% SMYS): No

Additional Operator Information:

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

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

Summary of Areas Inspected

PHMSA Question Set

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

Other:

State Question Set

☒ Cybersecurity	☐ Other

Other:

Summary

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

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

Probable Findings

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

Recommendations and Comments

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

Submitted By:

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

Procedures - Reporting

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

191.5(b) (191.7)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

191.22

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

192.605(d)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Customer and EFV Installation Notification

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Normal Operating And Maintenance

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

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Change In Class Location

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Continuing Surveillance

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Damage Prevention Program

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

192.614(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Emergency

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

192.615(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.615(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.615(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Public Awareness Program

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

192.616(a) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
			x		

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

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

192.616(c) (API RP 1162 Section 6.2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(j) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Failure Investigationn

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

192.617

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - MAOP

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pressure Test

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Odorization Of Gas

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Tapping Pipelines Under Pressure

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

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pipeline Purging

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Distribution System Patrolling & Leakage Survey

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Line Marker

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Transmission Record Keeping

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Transmission Field Repair

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Test Requirements For Reinstating Service Lines

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Abandonment Or Deactivation Of Facilities

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pressure Limiting And Regulating Station

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Valve And Vault Maintenance

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes:

Procedures - Vault Inspection

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes:

Procedures - Prevention Of Accidental Ignition

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes:

Procedures - Caulked Bell And Spigot Joints

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

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes:

Procedures - Protecting Cast-Iron Pipeline

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

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Welding And Weld Defect Repair/Removal

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

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No welding procedures

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

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

Sat+	Sat	Concern	Unsat	NA	NC
		x			

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

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

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

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

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

192.303 (192.231)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

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

192.303 (192.235)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

Procedures - Nondestructive Testing

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

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

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

Procedures - Joining Of Pipeline Materials

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.287 (192.805(h))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Corrosion Control

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

192.453 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.605(b)(2) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Field Review - Pipeline Inspection (Field)

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

192.463(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.465(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.605(b)(8)	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.719(a) (192.719(b))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.741(a) (192.741(b); 192.741(c))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.745(a) (192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Regulatory Reporting Performance

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

191.5(a) (191.7(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

191.17(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.727(g)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Construction Performance

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

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
No welding procedures

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Operations And Maintenance Performance

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.614(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.605(a) (192.617)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(d) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.709 (192.619; 192.621; 192.623)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(e) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

21. Baseline Message Delivery Frequency (detail) *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2-3?* (PD.PA.MESSAGEFREQUENCY.R) (detail)

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

Sat+	Sat	Concern	Unsat	NA	NC
			x		

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

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(c) (API RP 1162 Section 4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
			x		

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

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

192.603(b) (192.725(a); 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(c) (API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
			x		

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

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

192.616(c) (API RP 1162 Section 8.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(c) (API RP 1162 Section 8.4.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

192.616(c) (API RP 1162 Section 8.4.2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.603(b) (192.747)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No records of valves being checked since 2013.

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

192.616(c) (API RP 1162 Section 8.4.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.616(c) (API RP 1162 Section 8.4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Operator Qualification

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

192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Corrosion Control Performance

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

192.491(a)	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.491(c) (192.459)	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.491(c) (192.465(a))	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not checked since 2013.

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

192.491(c) (192.465(b))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes
Checking every month.

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

192.491(c) (192.465(c))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

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

192.491(c) (192.465(d))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

7. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?* (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Interference Currents (detail) *Do records document that the operator has minimized the detrimental effects of stray currents when found?* (TD.CPMONITOR.INTFRCURRENT.R) (detail)

192.491(c) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Internal Corrosion (detail) *Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion?* (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Internal Corrosion Control: Design and Construction (192.476) (detail) *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?* (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. New Buried Pipe Coating (detail) *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)?* (TD.COAT.NEWPIPE.R) (detail)

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service?* (FS.CS.CMPMAINT.P) (detail)

192.605(b)(6)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?* (FS.CS.CMPSUSD.P) (detail)

192.605(b)(5) (192.605(b)(7))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks?* (FS.CSSYSPROT.CMPRELIEF.P) (detail)

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)?* (DC.COCMP.CMPCOMBUSTIBLE.P) (detail)

192.303 (192.735(a); 192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - Permanent Gas Detection (detail) *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings?* (FS.CSSYSPROT.CMPGASDETREQ.P) (detail)

192.605(b) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?* (FS.CS.BLDGEXITS.O) (detail)

192.163(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Fence Gates (detail) *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?* (FS.CS.FENCEGATES.O) (detail)

192.163(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - NFPA 70 (detail) *Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station?* (FS.CS.CMPNFPA70.O) (detail)

192.163(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations Liquid Removal (detail) *Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165?* (DC.DPCCMP.CMPLIQPROT.O) (detail)

192.141 (192.165(a); 192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?* (FS.CSSYSPROT.ESDGASDISCH.O) (detail)

192.167(a)(2)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Compressor Station Design/Construction - ESD Gas Block (detail) *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less.* (FS.CSSYSPROT.ESDGASBLK.O) (detail)

192.167(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Compressor Station Design/Construction - ESD (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings?* (FS.CSSYSPROT.ESDGASSD.O) (detail)

192.167(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Compressor Station Design/Construction - ESD Electrical (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings?* (FS.CSSYSPROT.ESDELECSD.O) (detail)

192.167(a)(3)(i) (192.167(a)(3)(ii))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Compressor Station Design/Construction - ESD Locations (detail) *Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station?* (FS.CSSYSPROT.ESDLOCATION.O) (detail)

192.167(a)(4)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) *Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages?* (FS.CSSYSPROT.ESDDISTSD.O) (detail)

192.167(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Compressor Station Design/Construction - Unattended Platform ESD (detail) *Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform.* (FS.CSSYSPROT.UNATTPLATCMPSD.O) (detail)

192.167(c)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Compressor Station Design/Construction - Fire Protection (detail) *Do compressor stations have adequate fire protection facilities?* (FS.CSSYSPROT.CMPFP.O) (detail)

192.171(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Compressor Station Design/Construction - Over-Speed Protection (detail) *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven?* (FS.CSSYSPROT.CMPOVSPD.O) (detail)

192.171(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Compressor Station Design/Construction - Lubrication (detail) *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication?* (FS.CSSYSPROT.CMPLUBPROT.O) (detail)

192.171(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented?* (FS.CSSYSPROT.CMPGASENGSD.O) (detail)

192.171(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler?* (FS.CSSYSPROT.CMPGASENGMFL.O) (detail)

192.171(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

17. Compressor Station Design/Construction - Ventilation (detail) *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas?* (FS.CS.CMPBLDGVENT.O) (detail)

192.173

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

18. Cathodic Protection of Underground Piping (detail) *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?* (TD.CP.PRE1971.O) (detail)

192.457(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?* (DC.MO.MAOPLIMIT.O) (detail)

192.605(b)(5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

192.605(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site?* (FS.CS.CMPERP.O) (detail)

192.605(a) (192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619?* (MO.GOMAOP.MAOPRECORDING.O) (detail)

192.605(b)(1) (192.619(a); 192.619(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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

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

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly?* (FS.CSSYSPROT.CMPRELIEF.O) (detail)

192.199 (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?* (DC.COCMP.CMPCOMBUSTIBLE.O) (detail)

192.735(a) (192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?* (FS.CSSYSPROT.CMPGASDET.O) (detail)

192.736(a) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval?* (FS.CSSYSPROT.CMPRELIEF.R) (detail)

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required?* (FS.CSSYSPROT.CMPGASDETOM.R) (detail)

192.709(c) (192.736(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Instructions

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

Name of Operator	City of Liberty	**Op ID #**	11472
Inspector	Steve Samples	**Unit #**	
Date of Inspection	7/8/15		
Inspection Location City & State	Liberty, KY.		
Operator Employee Interviewed	**Bridgett Blake**	**Phone #**	
Position/Title	**Operations**		
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)	**Premier Drug Testing**		
DER Phone #	606-787-9973		

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	**1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?**	x		
Comments				
.3 .105(c) .225(b)	**2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.**	x		
Comments				
.3 .105(b)	**3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.**	x		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	**4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?**	x		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	**5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.**	x		
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* (TQ.OQ.OQPLAN.P) (detail)

192.805(a) (192.801(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task?* (TQ.OQ.REEVALINTERVAL.P) (detail)

192.805(g)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Contractors Adhering to OQ Plan (detail) *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan?* (TQ.OQ.OQPLANCONTRACTOR.P) (detail)

192.805(b) (192.805(f); 192.805(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified?* (TQ.OQ.OQCONTRACTOR.P) (detail)

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Management of Other Entities Performing Covered Tasks (detail) *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task?* (TQ.OQ.OTHERENTITY.R) (detail)

192.805(b) (192.805(c); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Evaluation Methods (detail) *Are evaluation methods established and documented appropriate to each covered task?* (TQ.OQ.EVALMETHOD.P) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Evaluation Methods (detail) *Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records?* (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Abnormal Operating Conditions (detail) *Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals?* (TQ.OQ.ABNORMAL.P) (detail)

192.803

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Abnormal Operating Conditions (detail) *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?* (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.807

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition?* (TQ.OQ.MERGERACQ.P) (detail)

192.805(b) (192.803)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?* (TQ.OQ.TRAINING.P) (detail)

192.805(h)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. Covered Task Performed by Non-Qualified Individual (detail) *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?* (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Personnel Performance Monitoring (detail) *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

19. Program Performance and Improvement (detail) *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

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

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

21. Management of Changes (detail) *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

22. Notification of Significant Plan Changes (detail) *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Training and Qualification - OQ Protocol 9

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

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Darren Atwood and Greg Rodgers. O.k.

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

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
I-1 Monitor Corrossion task: Last qualified 2/13/13. Due every 3 years. O.k.

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

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Checked test points on high pressure line. Readings well above -.85 criteria (-1.06) (on rectifier) New personnel in charge not checking since 2013. See report deficiencies.

Distribution Integrity Management Program

Implementation Inspection Form

This inspection form is for the evaluation of an operator's implementation of its gas distribution integrity management program (DIMP) through a review of its records and actions performed on pipeline facilities. This inspection form is applicable to operators, other than Master Meter and Small LPG operators, that have developed and implemented a DIMP under §192.1005. The form asks inspectors to review records and perform field observations regarding the implementation of the DIMP required elements. Following a review of the operator's DIMP plan, inspectors will observe actions taken by the operator to ensure that procedures have been followed. There are instances when actions by an operator could be deemed satisfactory by an inspector for an implementation question while still not meeting the procedural requirements in the DIMP plan resulting in an unsatisfactory rating for a corresponding procedural question.

Questions with code references beside them are enforceable. "S/Y" stands for "satisfactory" or "yes"; "U/N" stands for "unsatisfactory" or "no"; "N/A" stands for "not applicable"; and "N/C" stands for "not checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section. Due to the unique characteristics of some operator's system, there are instances where an operator is not required to perform an action, and some of the questions requesting a review of documents may not apply and would be rated as "N/A" (rather than rating "U/N"). For instance, in Question #8, if the operator has NOT acquired any new information relevant to threat identification, rate as "N/A". Correspondingly, if the operator had acquired new information that needed to be included in the threat identification and had not, then the rating would be "U/N".

This inspection form includes two types of activities – records review and field observation activities:

- The Records Review questions are to be performed on records used by an operator for implementing its DIMP plan. Not all parts of this form may be applicable to a specific Records Review inspection, and only those applicable portions of this form need to be completed.
- The Field Observation questions are to be used on field activities being performed by an operator in support of its DIMP plan. Field Observation inspection activities may also include review of data, environmental conditions, and assumptions being used by an operator in support of its DIMP plan. Not all parts of this form may be applicable to a specific Field Observation inspection, and only those applicable portions of this form need to be completed.

A review of applicable Operations and Maintenance (O&M) and DIMP processes and procedures applicable to the field activity being inspected should be considered by the inspector to ensure the operator is implementing its O&M Manuals and DIMP in a consistent manner.

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):	City of Liberty
PHMSA Operator ID:	11472
Type of Operator:	☐ Investor Owned ☒ Municipal ☐ Private ☐ LPG ☐ Other (Identify - e.g., cooperative)
State(s) included in this inspection	Kentucky
Headquarters Address:	518 Middleburg St.
Company Contact:	Greg Rodgers
Phone Number:	
Email:	
Date(s) of Inspection	7/8,9/15
Date of this Report	7/13/15
Date of Current DIMP Plan/Revision	

Persons Interviewed:

Persons Interviewed *(list primary contact first)*	Title	Phone Number	Email
Greg Rodgers	Operations		
Darren Atwood	Operations		

State/Federal Representatives:

Inspector Name and Agency	Phone Number	Email
Steve Samples	502-330-5985	Stevend.samples@ky.gov

System Description Narrative:

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1005	Issues Identified in previous Integrity Management Inspection(s)				
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	x	☐	☐	☐
Inspector Comments						
	192.1007(a)	Knowledge of the system				
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	x	☐	☐	☐
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	x	☐	☐	☐
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	x	☐	☐	☐
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	x	☐	☐	☐
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	x	☐	☐	☐
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats, Evaluate and Rank Risk				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	x	☐	☐	☐
Inspector Comments						
10	.1007 (b)	Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following: • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below)	x	☐	☐	☐
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	x	☐	☐	☐
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats, Evaluate and Rank Risk				
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	x	☐	☐	☐
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	x	☐	☐	☐
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	x	☐	☐	☐
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	x	☐	☐	☐
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(d)	Identify and implement measures to address risks				
18	.1007 (d)	Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan?	x	☐	☐	☐
19	.1007 (d)	Has the operator completed any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat? (e.g., pipe replacement program completed, etc.)	x	☐	☐	☐
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	x	☐	☐	☐
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	x	☐	☐	☐
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: Locate the leaks in the distribution system; Evaluate the actual or potential hazards associated with these leaks; Act appropriately to mitigate these hazards; Keep records; and Self-assess to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(e)	Measure performance, monitor results, and evaluate effectiveness				
23	.1007 (e)	Is the operator collecting data for the required performance measures in §192.1007(e)? i) Number of hazardous leaks either eliminated or repaired, categorized by cause? ii) Number of excavation damages? iii) Number of excavation tickets? iv) Total number of leaks either eliminated or repaired, categorized by cause? v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1)	x x x x x	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	x	☐	☐	☐
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	x	☐	☐	☐
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	Periodic Evaluation and Improvement				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	x	☐	☐	☐
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary?	x x x x x x x x	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	x	☐	☐	☐
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
31	.1007 (f)	Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures? If not, were performance measures modified, deleted or added? (describe in Inspector comments)	x	☐	☐	☐
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	x	☐	☐	☐
Inspector Comments						
	192.1007 (g)	Report results				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	x	☐	☐	☐
Inspector Comments						
	192.1009	What must an operator report when mechanical fittings fail?				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
35	1009	Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year? Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?	x x	☐ ☐	☐ ☐	☐ ☐
Inspector Comments						
36	1009	Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following: • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1011	What records must an operator keep?				
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	x	☐	☐	☐
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	x	☐	☐	☐
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	x	☐	☐	☐
Inspector Comments						
	192.1013	When may an operator deviate from required periodic inspections under this part?				
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory	x	☐	☐	☐
		Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")				
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	x	☐	☐	☐
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	x	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	x	☐	☐	☐
Inspector Comments						
44	1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	x	☐	☐	☐
Inspector Comments						

Additional Inspector Comments:

SUPPLEMENTAL INSPECTION QUESTIONS

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked (U, N/A, or N/C must include an explanation if checked)

SUPPLEMENTAL INSPECTION QUESTIONS	S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS				
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.			x	
If necessary, was remedial action taken?			x	
Review operator procedures for surveillance of cast iron pipelines			x	
Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)			x	
Review operator emergency response procedures for leaks caused by excavation damage near buildings.	x			
Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)	x			
Review operator records of previous accidents and failures (including reported third party damage and leak response) to ensure appropriate operator response as required by 192.617.	x			
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS				
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?	x			
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?	x			
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?	x			
If no, encourage and promote the adoption of CGA Best Practices document.	x			
Review operators records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617.	x			
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS				
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?			x	
If yes, what is operator doing to mitigate the safety concerns?				
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?			x	
Comments:				

CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. *Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?*

Yes	No	NA	NC
	x		

Notes
No control pressure gas computer systems in place at this time.

2. *Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.*

Yes	No	NA	NC
	x		

Notes

3. *Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.*

Yes	No	NA	NC
	x		

Notes

4. *Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?*

Yes	No	NA	NC
	x		

Notes

5. *Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.*

Yes	No	NA	NC
	x		

Notes

6. *Identify personnel with specific responsibilities for cybersecurity within your organization?*

Yes	No	NA	NC
		x	

Notes

APPENDIX C

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

City of Liberty

P.O. Box 127 • Liberty, KY 42539

RECEIVED
SEP 21 2015
PUBLIC SERVICE COMMISSION

September 16, 2015

Jason Hurt, PE
Manager, Gas Pipeline Safety Branch
Kentucky Public Service Commission
211 Sower Blvd.
PO Box 615
Frankfort, KY 40602

RE: 2015 Natural Gas Standard Inspection – City of Liberty Gas System

Dear Mr. Hurt,

Thank you for your recent standard inspection of the City of Liberty's Gas System. During the inspection, our gas system received seven (7) deficiencies. The following response will explain the corrective actions we are taking, and how the City of Liberty will bring each deficiency into compliance.

Deficiencies

1. Finding – The inspection found that Liberty Gas had not performed cathodic protection monitoring tests since 2013.

   Corrective Action – The City of Liberty had failed to perform cathodic protection monitoring. In August 2015, the majority of our system's meters have been painted and inspected. The few remaining will be completed by the end of this month (September). We are currently working on a schedule which will outline all required monitoring and when it needs to be completed. We are confident this schedule will keep us from failing to perform the cathodic protection monitoring in the future.

2. Finding – The inspection found that Liberty Gas had not inspected and tested its regulator stations since 2013.

   Corrective Action – The City of Liberty's regulator stations were inspected and tested by Cox Meter Service on August 25 and 26, 2015. A copy of each regulator inspection is enclosed. We have arranged for this company to perform the regulator inspections and testing each year in the future.

3. Finding – The inspection found that Liberty Gas had not performed inspections on its critical distribution system valves since 2013.

   Corrective Action – The City of Liberty Gas System's operators inspected its critical distribution system valves on July 14, 2015. The valve located on Button Knob was dug out and fixed so it's

easily accessible. The operators will be working off a set schedule for inspections of the critical distribution system in the future so this will not be missed again.

4. Finding – The inspection found that Liberty Gas had not performed leakage surveys in its business districts since 2009.

   Corrective Action – Liberty Gas has contacted Heath Consultants, whom will be performing the leakage survey inside our business districts. We are currently trying to schedule a time for them to come before the end of the year 2015. This will be scheduled with them annually to ensure the leakage survey is performed according to regulations.

5. Finding – The inspection found that Liberty Gas' Operation and Maintenance Manual requires leakage surveys every 3 years outside its business districts and that Liberty Gas had not performed leakage surveys outside its business districts since 2009.

   Corrective Action – As stated above in Corrective Action #4, the City of Liberty gas system has contacted Heath Consultants. They will be performing our leakage survey for outside business districts before the end of the year 2015. This will be scheduled with them every 3 years to ensure the leakage survey is performed according to our Operation and Maintenance Manual.

6. Finding – The inspection found that Liberty Gas did not deliver its public awareness baseline message two (2) times per year as required in API RP 1162.

   Corrective Action – The City of Liberty's Gas public awareness baseline message was delivered to all residential and commercial gas customers, as well as contractors, on August 6, 2015. I mistakenly thought what we were previously doing was sufficient. We will now make sure this message gets delivered twice a year. A copy of what was delivered is enclosed.

7. Finding – The inspection found that Liberty Gas did not have documented welding procedures.

   Corrective Action – The City of Liberty Gas System is currently working on a welding procedures manual. We will have it officially on file by the end of this month (September).

It was also recommended that Liberty Gas review its point of delivery with Texas Eastern Transmission to verify the termination point of its pipeline system. The Liberty Gas system operators are in the process of contacting Texas Eastern Transmission and setting up a meeting to verify the termination point. This should be taken care of within thirty (30) days.

Please feel free to contact me at (606) 787-9973 or libertybb@windstream.net, if you have any questions or concerns.

Sincerely,

Bridgett Blake

Bridgett Blake
City of Liberty

CALL BEFORE YOU DIG!

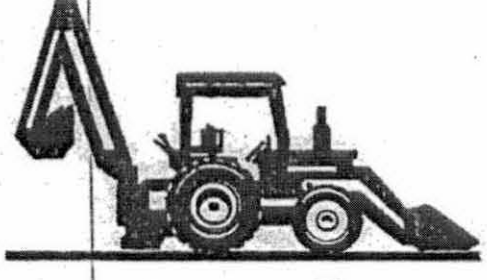
WHAT YOU DON'T SEE COULD HURT YOU

Digging without a call to Kentucky Underground Protection, or 811 could result in:

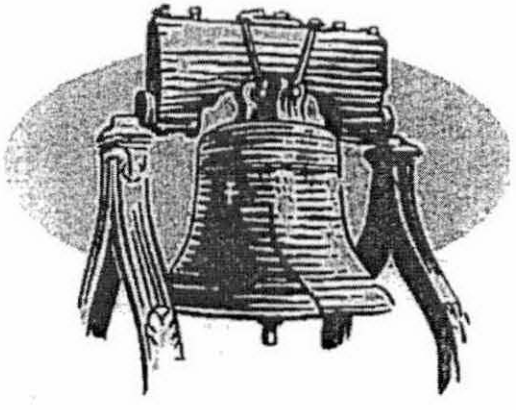
- Accidents or Injuries
- Legal Problems
- Damage to the Environment
- Interruption of Utilities or Services
- Job/Project Delays

Residents, contractors and others planning to dig in Kentucky

CALL 811 TWO BUSINESS DAYS BEFORE YOU DIG



CITY OF LIBERTY



A Guide to Safe Digging in Kentucky for Residents and Contractors

Cox Meter Service Inc.
103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

RELIEF VALVE INSPECTION REPORT

Station Number: Bitton Knob
Station Name: Reg. Station

District: ____ Town: Liberty

Relief Valve Make: Fisher Type: H-205-25 Size: 1" Body Rating: ____

Mfg. Serial No.: None Date: ____

Type of Loading: Spring: X Pilot Type: ____ Other: ____

Range of Loading: N/A

Location of Control Line: ____

Location of Relief Valve: Downstream of Regulators

Relief Valve Set To Relieve At: 28# Set With Gauge? Yes

Is there a valve under the Relief Valve: Yes ☐ No ☐ Type: Mueller Stop (Outlet Valve of Reg.) Size: 1"

Is there a 1/4" tap between valve and relief: Yes ☐ No ☒

Size of vent stack: None

Type cap on vent stack: Weather Cap: None Can: ____ Other: ____

If can is used is top 3" of vent stack painted red: Yes ☐ No ☐

CONDITION OF RELIEF VALVE

Seat	Orifice	Diaphragm	Vent	Boot

Size of valve orifice size: ____

Capacity ____ at ____ Lbs.

COMMENTS: Blew Relief Found set at 28#

8-26-15 Inspector: Wellington ? Cox

Cox Meter Service Inc.
103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

RELIEF VALVE
INSPECTION REPORT

Station Number Wooleam Ridge
Station Name Reg. Station

Town Liberty

...lief Valve Make American Type Axial-Flow Size 2" Body Rating 300#

...Serial No. 81409 Date

...e of Loading: Spring Pilot Type ZSC-150 Other

...ge of Loading 10-75#

...ation of Control Line Outside of Relief

...tion of Relief Valve Downstream outlet valves of Regulator.

...f Valve Set To Relieve At: 28# Set With Gauge? yes

...re a valve under the Relief Valve: Yes [X] No [ ] Type Nordstrom Size 2"

...re a ¼" tap between valve and relief Yes [X] No [ ]

... of vent stack: 2"

...ap on vent stack: Weather Cap X Can Other

...is used is top 3" of vent stack painted red: Yes [ ] No [ ]

CONDITION OF RELIEF VALVE

Seat	Orifice	Diaphragm	Vent	Boot

...valve orifice size

...V ... at ... Lbs.

...NTS: Blew Relief Found set at 28#

...26-15 Inspector Wethington & Cox

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

REGULATOR

INSPECTION REPORT Bottom Run

Station Number Bottom Kiosk
Station Name Reg. Station

Town Liberty

Reg. Make Fisher Type 627-R Size 1" Body Rating 1000#

Mfg. Serial No. None Date Regulator Installed

PRESSURE INFORMATION

	INLET	OUTLET
Present	240	20
Maximum Pressure (winter)		
Minimum Pressure (summer)		

PRESSURE CONDITIONS CHANGE

	From	To
Inlet		
Outlet		

PRESSURE RECORDER

UPSTREAM: Type None Range S.N. CHART CHANGED: Daily Wkly
DOWNSTREAM: Type None Range S.N. CHART CHANGED: Daily Wkly

CONDITION OF REGULATOR

Valve Seat Ok Diaphragm Ok Packing Vent Open Stroke Dirt

INNER VALVE AND SEAT INFORMATION

Double Port Comp. Disc. Steel Disc Type Travel
Single Port O-Ring Size 3/8 Orifice Tek-Bottom Guide Skirt G.

LOADING AND CONTROL

Type of Loading: Spring X Pilot Type Instrument
Range of Loading 15-40 Serial No.
Type Auxiliary Reg. None Condition Seat: Diaph:
Location of Control Line
Location of Supply Line
Drying Agent for Supply Gas None Date Changed

ADDITIONAL INFORMATION ABOUT REGULATOR

Diaphragm Size STD Pressure Opens Valve Closes Valve
Is this Valve in Series with other valve In Parallel
Is Heater None Type
Does Regulator Have 100% Shut-Off: Yes [X] No [ ] Est. Leakage

COMMENTS OR REPAIRS MADE: Checked Orifice, Seat & Shut OFF - Ok

GENERAL CONDITION AND APPEARANCE OF INSTALLATION: Good [ ] Fair [X] Poor [ ]
MAINTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail)

8-26-15 Inspector W. Hughes & Co

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

REGULATOR

INSPECTION REPORT Top Run

Station Number Button Coal
Station Name Reg Station

District _____ Town _____

Reg. Make Fisher Type 627-R Size 1" Body Rating 1000#

Mfg. Serial No. None Date Regulator Installed _____

PRESSURE INFORMATION

	INLET	OUTLET
Present	240	21#
Maximum Pressure (winter)		
Minimum Pressure (summer)		

PRESSURE CONDITIONS CHANGI

	From	To
Inlet		
Outlet		

PRESSURE RECORDER

UPSTREAM: Type None Range _____ S.N. _____ CHART CHANGED: Daily ___ Wkly ___

DOWNSTREAM: Type None Range _____ S.N. _____ CHART CHANGED: Daily ___ Wkly ___

CONDITION OF REGULATOR

Valve _____ Seat Ok Diaphragm _____ Packing _____ Vent Open Stroke _____ Oil _____

INNER VALVE AND SEAT INFORMATION

Double Port _____ Comp. Disc. _____ Steel Disc _____ Type _____ Travel _____

Single Port _____ O-Ring _____ Size 3/8" ORIFICE Top-Bottom Guide _____ Skirt G. _____

LOADING AND CONTROL

Type of Loading: Spring X Pilot Type _____ Instrument _____

Range of Loading 15-40# Serial No. _____

Type Auxiliary Reg. — Condition _____ Seats _____ Diaphs _____

Location of Control Line —

Location of Supply Line _____

Drying Agent for Supply Gas None Date Changed _____

ADDITIONAL INFORMATION ABOUT REGULATOR

Diaphragm Size STD Pressure Opens Valve _____ Closes Valve _____

Is this Valve in Series with other valve _____ In Parallel _____

Gas Heater None Type _____

Did Regulator Have 100% Shut-Off: Yes [X] No [ ] Est. Leakage _____

COMMENTS OR REPAIRS MADE: Check Seat, Orifice & Shut off - Ok

GENERAL CONDITION AND APPEARANCE OF INSTALLATION: Good [ ] Fair [X] Poor [ ]

MAINTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail) _____

8-26-15 Inspector Cox Matthews

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

REGULATOR

INSPECTION REPORT

Station Number Wood Reem
Station Name Ridge Dep. Station

District _____ Town Liberty

Reg. Make Fisher Type 99 Size 2" Body Rating 300#

Mfg. Serial No. 6607679 Date Regulator Installed _____

PRESSURE INFORMATION

	INLET #	OUTLET #
Present	108	26
Maximum Pressure (winter)		
Minimum Pressure (summer)		

PRESSURE CONDITIONS CHANGE

	From	To
Inlet		
Outlet		

PRESSURE RECORDER

UPSTREAM: Type Spring Gauge Range _____ S.N. _____ CHART CHANGED: Daily ____ Wkly ____

DOWNSTREAM: Type Spring Gauge Range _____ S.N. _____ CHART CHANGED: Daily ____ Wkly ____

CONDITION OF REGULATOR

Valve _____ Seat ok Diaphragm _____ Packing _____ Vent Open Stroke _____ Oil _____

INNER VALVE AND SEAT INFORMATION

Double Port _____ Comp. Disc. _____ Steel Disc _____ Type _____ Travel _____

Single Port X O-Ring _____ Size 1/8" orifice Top-Bottom Guide _____ Skirt G. _____

LOADING AND CONTROL

Type of Loading: Spring _____ Pilot Type 61-H Instrument _____

Range of Loading 10-15# Serial No. _____

Type Auxiliary Regs None Condition _____ Seats _____ Diaphs _____

Location of Control Line 3' Downstream of Regulator

Location of Supply Line Beef

Drying Agent for Supply Gas None Date Changed _____

ADDITIONAL INFORMATION ABOUT REGULATOR

Diaphragm Size SID Pressure Opens Valve _____ Closes Valve _____

This Valve In Series with other valve _____ In Parallel _____

Heater None Type _____

Regulator Have 100% Shut-Off: Yes [X] No [ ] Est. Leakage _____

COMMENTS OR REPAIRS MADE: Checked seat, Orifice & Shut off - Ok

GENERAL CONDITION AND APPEARANCE OF INSTALLATION: Good [ ] Fair [X] Poor [ ]

MAINTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail) _____

3-26-15

Inspector Cox & Washington

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

REGULATOR

INSPECTION REPORT

Front Regulator
Stand By Run

Station Number Woodburn
Station Name Ridge T.B.

Town Liberty

Reg. Make American Type Axia-Flow Size 2" Body Rating 300#

Mfg. Serial No. 93164 Date Regulator Installed

PRESSURE INFORMATION

	INLET	OUTLET
Present	240	105
Maximum Pressure (winter)		
Minimum Pressure (summer)		

PRESSURE CONDITIONS CHANGE

	From	To
Inlet		
Outlet		

PRESSURE RECORDER

UPSTREAM: Type Spring Range 0-300# S.N. CHART CHANGED: Daily Wkly

DOWNSTREAM: Type Differential Range 6-250# S.N. CHART CHANGED: Daily Wkly X

CONDITION OF REGULATOR

Valve Seat Diaphragm Packing Vent Stroke Oil

INNER VALVE AND SEAT INFORMATION

Double Port Comp. Disc. Steel Disc Type Travel

Single Port O-Ring Size 50 70 D Top-Bottom Guide Skirt O.

LOADING AND CONTROL

Type of Loading: Spring Pilot Type 252-100 Instrument

Range of Loading 25-150# Serial No.

Type Auxiliary Reg.s None. Condition Seals Diaph:

Location of Control Line 3' Down stream of Reg.

Location of Supply Line Body

Drying Agent for Supply Gas None Date Changed

ADDITIONAL INFORMATION ABOUT REGULATOR

Diaphragm Size 5in Pressure Opens Valve Closes Valve

Is this Valve in Series with other valve In Parallel

Is Heater None Type

Does Regulator Have 100% Shut-Off: Yes ☒ No ☐ Est. Leakage

COMMENTS OR REPAIRS MADE: Replaced Pilot Diaphragm & Seat Ck Shut off, Bleed Strainer Set Press at 105#

GENERAL CONDITION AND APPEARANCE OF INSTALLATION: Good ☐ Fair ☐ Poor ☐

MAINTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail)

8-26-15 Inspector Cox & Worthington

Cox Meter Service Inc.
103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

REGULATOR

INSPECTION REPORT

Bottom Run
Stand By Run

Station Number Whip Ave.
Station Name Reg. Station

Town

Reg. Make Mooney Type Flow Grid Size 2x1 Body Rating

Mfg. Serial No. 139639 Date Regulator Installed

PRESSURE INFORMATION

	INLET	OUTLET
Present	105#	25#
Maximum Pressure (winter)		
Minimum Pressure (summer)		

PRESSURE CONDITIONS CHANGE

	From	To
Inlet		
Outlet		

PRESSURE RECORDER

UPSTREAM: Type American Range 0-250# S.N. 172966 CHART CHANGED: Daily Wkly X

DOWNSTREAM: Type " Range 0-50# S.N. " CHART CHANGED: Daily Wkly X

CONDITION OF REGULATOR

Valve Seat Ok Diaphragm Ok Packing Vent Open Stroke Oil

INNER VALVE AND SEAT INFORMATION

Double Port Comp. Disc. Steel Disc. Type Travel

Single Port X O-Ring Size 100% Top-Bottom Guide Skirt G.

LOADING AND CONTROL

Type of Loading: Spring Pilot Type Mooney Instrument

Range of Loading 10-40# Serial No.

Type Auxiliary Reg.s None Condition Seats Diaph:

Location of Control Line 1' Downstream of Regulator

Location of Supply Line Body

Drying Agent for Supply Gas None Date Changed

ADDITIONAL INFORMATION ABOUT REGULATOR

Diaphragm Size STD Pressure Opens Valve Closes Valve

Is this Valve in Series with other valve In Parallel

Gas Heater None Type

Did Regulator Have 100% Shut-Off: Yes ☒ No ☐ Est. Leakage

COMMENTS OR REPAIRS MADE: Found Metal Shavings in Boot - Installed New Boot
Check Shut OFF - ok - Set press at 25#

GENERAL CONDITION AND APPERANCE OF INSTALLATION: Good ☒ Fair ☐ Poor ☐

MAINTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail)

8-25-15 Inspector [signature]

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

REGULATOR

INSPECTION REPORT

Top Run - Worker

Station Number Whip Ave
Station Name Reg. Station

Division _____ Town Liberty

Reg. Make Mooney Type Flow GRID Size 2x1 Body Rating 150#

Reg. Serial No. 169637 Date Regulator Installed _____

PRESSURE INFORMATION

	INLET	OUTLET
Present	105#	27"
Maximum Pressure (winter)		
Minimum Pressure (summer)		

PRESSURE CONDITIONS CHANGE

	From	To
Inlet		
Outlet		

PRESSURE RECORDER

UPSTREAM: Type Dynamics Range 0-250# S.N. 172966 CHART CHANGED: Daily ___ Weekly ___

DOWNSTREAM: Type Dynamics Range 0-50" S.N. " CHART CHANGED: Daily ___ Weekly X

CONDITION OF REGULATOR

Valve _____ Seat OK Diaphragm OK Packing _____ Vent Open Stroke _____ Oil _____

INNER VALVE AND SEAT INFORMATION

Double Port _____ Comp. Disc. _____ Steel Disc. _____ Type _____ Travel _____

Single Port X O-Ring _____ Size 100% Top-Bottom Guide _____ Skirt G. _____

LOADING AND CONTROL

Type of Loading: Spring _____ Pilot Type Mooney Instrument _____

Range of Loading 10-40" Serial No. _____

Type Auxiliary Reg. None Condition _____ Seats _____ Diaphr. _____

Location of Control Line 1" Downstream Reg.

Location of Supply Line Body

Drying Agent for Supply Gas NONE Date Changed _____

ADDITIONAL INFORMATION ABOUT REGULATOR

Diaphragm Size STD Pressure Opens Valve _____ Closes Valve _____

Is this Valve in Series with other valve _____ In Parallel _____

Gas Heater None Type _____

Did Regulator Have 100% Shut-Off: Yes [X] No [ ] Est. Leakage _____

COMMENTS OR REPAIRS MADE: Found Metal Shavings in Boot - Replaced Check Shut OFF - OK Set Press at 27"

GENERAL CONDITION AND APPEARANCE OF INSTALLATION: Good [X] Fair [ ] Poor [ ]

MAINTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail) _____

8-25-15 Inspector W. Hughes & Cox

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

REGULATOR

INSPECTION REPORT Back Regulator Worker

Station Number Woodlawn
Station Name Ridge T.B

District _____ Town Liberty

Reg. Make American Type Axial Flow Size 2" Body Rating 300#

Mfg. Serial No: N/A Date Regulator Installed _____

PRESSURE INFORMATION

	INLET	OUTLET
Present	190#	110#
Maximum Pressure (winter)		
Minimum Pressure (summer)		

PRESSURE CONDITIONS CHANGE

	From	To
Inlet		
Outlet		

PRESSURE RECORDER

UPSTREAM: Type Spring Gauge Range 0-300# S.N. _____ CHART CHANGED: Daily ___ Wkly ___

DOWNSTREAM: Type American Range 0-250# S.N. _____ CHART CHANGED: Daily ___ Wkly X

CONDITION OF REGULATOR

Valve _____ Seat New Diaphragm New Packing _____ Vent Open Stroke _____ Oil _____

INNER VALVE AND SEAT INFORMATION

Double Port _____ Comp. Disc _____ Steel Disc _____ Type _____ Travel _____

Single Port X O-Ring _____ Size 50% R Top-Bottom Guide _____ Skirt G. _____

LOADING AND CONTROL

Type of Loading: Spring _____ Pilot Type ZSC-100 Instrument _____

Range of Loading 25-150# Serial No. _____

Type Auxiliary Reg.s NONE Condition _____ Seat: _____ Diaph: _____

Location of Control Line 4' Downstream OF Regulator

Location of Supply Line Block

Odorizing Agent for Supply Gas NONE Date Changed _____

ADDITIONAL INFORMATION ABOUT REGULATOR

Diaphragm Size X Pressure Opens Valve _____ Closes Valve _____

This Valve in Series with other valve _____ In Parallel _____

Heater NONE Type _____

Regulator Have 100% Shut-Off: Yes [X] No [ ] Est. Leakage _____

COMMENTS OR REPAIRS MADE: Cleaned Dirt From Cages OF Regulator - Blew Strainers. Replaced Pilot Seat & Diaphragm. Installed New #1 Boot. Check Shutoff - ok - Set press AT 110#

GENERAL CONDITION AND APPEARANCE OF INSTALLATION: Good [ ] Fair [X] Poor [ ]

MAINTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail) _____

5-25-15 Inspector Wethington & Cox

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

RELIEF VALVE INSPECTION REPORT

Station Number Woodcrest Ridge
Station Name Voc School Reg Stn

District _____ Town Liberty

Relief Valve Make Annex Type Axial-Flow Size 3" Body Rating 300#

Mfg. Serial No. 53331 Date _____

Type of Loading: Spring _____ Pilot Type ZSC-150 Other _____

Range of Loading Taged 100-225

Location of Control Line Inletside of Relief

Location of Relief Valve On 4" Riser outside of Bldg

Relief Valve Set To Relieve At: 31# Set With Gauge? Yes

Is there a valve under the Relief Valve: Yes [X] No [ ] Type Fig. 143 Size 3"

Is there a ¼" tap between valve and relief: Yes [X] No [ ]

What is size of vent stack: 3"

Is cap on vent stack: Weather Cap X Can _____ Other _____

Paint is used is top 3" of vent stack painted red: Yes [ ] No [ ]

CONDITION OF RELIEF VALVE

Seat	Orifice	Diaphragm	Vent	Boot

Size of valve orifice size 1

Capacity _____ at _____ lbs.

COMMENTS: Blew Relief Valve Forced Set AT 31#

8-25-15 Inspector Washington & Cox

Cox Meter Service Inc.

103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

RELIEF VALVE INSPECTION REPORT

Station Number Woodcrest Ridge
Station Name T.B. Station

District _____ Town Liberty

Relief Valve Make American Type Axial Flow Size 3" Body Rating 300#

Mfg. Serial No. 29338 Date _____

Type of Loading: Spring _____ Pilot Type ZSC-150 Other: _____

Range of Loading 100-225

Location of Control Line Inlet side of Relief

Location of Relief Valve Downstream outlet Valves of Regulators

Relief Valve Set To Relieve At: 158# Set With Gauge? Yes

Is there a valve under the Relief Valve: Yes ☒ No ☐ Type Nordstrom Size 3"

Is there a ¼" tap between valve and relief Yes ☒ No ☐

Size of vent stack: 3"

Rain cap on vent stack: Weather Cap X Can _____ Other _____

Paint used is top 3" of vent stack painted red: Yes ☐ No ☐

CONDITION OF RELIEF VALVE

Seat	Orifice	Diaphragm	Vent	Boot

Size of valve orifice size 1

Capacity _____ at _____ Lbs.

COMMENTS: Blew Relief - Found set AT 158#

8-25-15 Inspector Wethington & Cox

Cox Meter Service Inc.
103 Larkspur Lane
Campbellsville, Ky. 42718
502-465-3037

RELIEF VALVE
INSPECTION REPORT

Station Number Lebanon Ave
Station Name Regulator Station

Street ________ Town Liberty

Relief Valve Make Fisher Type 1808 Size 2" Body Rating 150#

Mfg. Serial No. R00014877 9 Date ________

Type of Loading: Spring ________ Pilot Type 6358 B Other ________

Range of Loading 15-40#

Location of Control Line Body

Location of Relief Valve Downstream outlet valves of Regs

Relief Valve Set To Relieve At: 30# Set With Gauge? yes

Is there a valve under the Relief Valve: Yes [X] No [ ] Type STOP Size 2"

Is there a ¼" tap between valve and relief, Yes [X] No [ ]

Size of vent stack: 2"

Type on vent stack: Weather Cap ________ Can ________ Other ________

If can is used is top 3" of vent stack painted red: Yes [ ] No [ ]

CONDITION OF RELIEF VALVE

Seat	Orifice	Diaphragm	Vent	Boot

Relief valve orifice size ________

Capacity ________ at ________ Lbs.

COMMENTS: Blew Relief Found set at 30#

Date: -28-15 Inspector Wethington & Cox

ARC RANDOLPH & ASSOCIATES, LLC

This is to confirm that

Larry G. Cox

of "Cox Meter Service"
has the knowledge to perform Operator Qualification task:

M-4: "Inspect/Test Pressure Limiting Stations & Devices"

Dated the 26th day of February in 2015

D.J. Nedolk M.S., President

APPENDIX D

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

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

Michael J. Schmitt
Chairman

Robert Cicero
Vice Chairman

Daniel E. Logsdon Jr.
Commissioner

September 6, 2016

Mr. Steve Sweeney
Mayor
City of Liberty Gas Company
Courthouse Square
P. O. Box 127
Liberty, KY 42539

Re: Periodic Gas Inspection
City of Liberty Gas Company Gas System
Casey County, KY

Dear Steve Sweeny:

Public Service Commission staff performed a periodic inspection of the City of Liberty Gas Company gas system on June 23, 2016, reviewing utility operations and management practices pursuant to Commission regulations. The report of this inspection is enclosed with this letter.

Based on the inspector's observations, the following deficiencies were identified:

(1) 192.723(b)(1) – The City of Liberty has not conducted leakage surveys on its business district each year. Last records were 2009 from Heath Contractors.

(2) 192.723(b)(2) – The City of Liberty has not conducted leakage surveys outside its business district. Last records were 2009 from Heath Contractors. The City of Liberty Operation and Maintenance Interval is every 3 years.

For the two deficiencies listed above, an explanation of why these deficiencies occurred and how these deficiencies will be remedied and prevented in the future needs to be provided. A letter addressing the organization's actions regarding the deficiencies needs to be submitted within 30 days from the date of this letter.

Seven deficiencies were noted on the previous inspection on July 7, 2015. The two above deficiencies are continual deficiencies from the prior inspection.

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 Bill Aitken at 502-782-2597 or via email at Bill.Aitken@ky.gov.

Sincerely,

Bill Aitken
Utility Regulatory Safety Investigator
Public Service Commission

Enclosure(s)

Copy: Mr. Gerald G Wilson, Public Works Superintendent, City of Liberty Gas Company, Courthouse Square, P. O. Box 127, Liberty, KY 42539

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Steve Samples	Report Number:	Liberty Gas 06232016
Inspection Date(s):	6/23/16	Report Date:	6/27/16
Inspection Type:	Standard Comprehensive ☐ Integrity Management ☐ Operator Qualification x☐ Compliance Follow-up ☐ Construction		

OPERATOR INFORMATION

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

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

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

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

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

Number of Customers:	650			
Number of Gas Employees:	5			
Gas Supplier:	Texas Eastern Transmission			
Unaccounted for Gas:	4%			
Services:	Residential	Commercial	Industrial	Other
	650			

Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)
Feeder:	250 psig	240 PSIG
Town:	150 psig	100 psig
Other:	27	50

Does the Operator have any transmission pipeline (above 20% SMYS):	No

Additional Operator Information:

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

Summary

This inspection was to check the progress of the previous 7 deficiencies found in 2015.

Probable Findings

City of Liberty should perform the leakage surveys required as soon as possible.

Submitted By:

Steve Samples 9/6/16

Steve Samples 6/27/16

Utility Regulatory and Safety Investigator IV

APPENDIX E

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

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

September 13, 2016

RECEIVED
SEP 16 2016
Public Service Commission

Bill Aitken
Utility Regulatory Safety Investigator
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602-0615

Re: Periodic Gas Inspection
City of Liberty Gas System

Dear Mr. Aitken:

This is in response to a letter from your office dated September 6, 2016 regarding a periodic inspection of the City of Liberty's gas system. During that inspection on June 23, 2016, the inspector observed the following deficiencies:

- The City of Liberty has not conducted leakage surveys on its business district each year. Last records were from 2009 from Heath Consultants.
- The City of Liberty has not conducted leakage surveys outside its business district. Last records were 2009 from Heath Consultants. The City of Liberty Operation and Maintenance interval is every 3 years.

The failure to complete the above mentioned leakage surveys were an oversight on the City of Liberty's part due to the death of our gas supervisor, Ronnie Wesley. Mr. Wesley's job duties included scheduling these surveys, and that duty had been overlooked after his death.

On the date of the inspection the City of Liberty had previously entered into an agreement with Heath Consultants to complete leakage surveys on its business district and outside its business district. Both of those leakage surveys were performed by Heath Consultants from July 19-21, 2016. A copy of the survey is enclosed with this letter.

The City of Liberty now has a calendar with all gas duties listed for our employees. We will be diligent in the future with scheduling and performing all surveys and inspections noted in our Operations and Maintenance Plan.

If you have any questions regarding this letter, please call myself or Bridgett Blake at 606-787-9973 or via email at libertybb@windstream.net.

Sincerely,

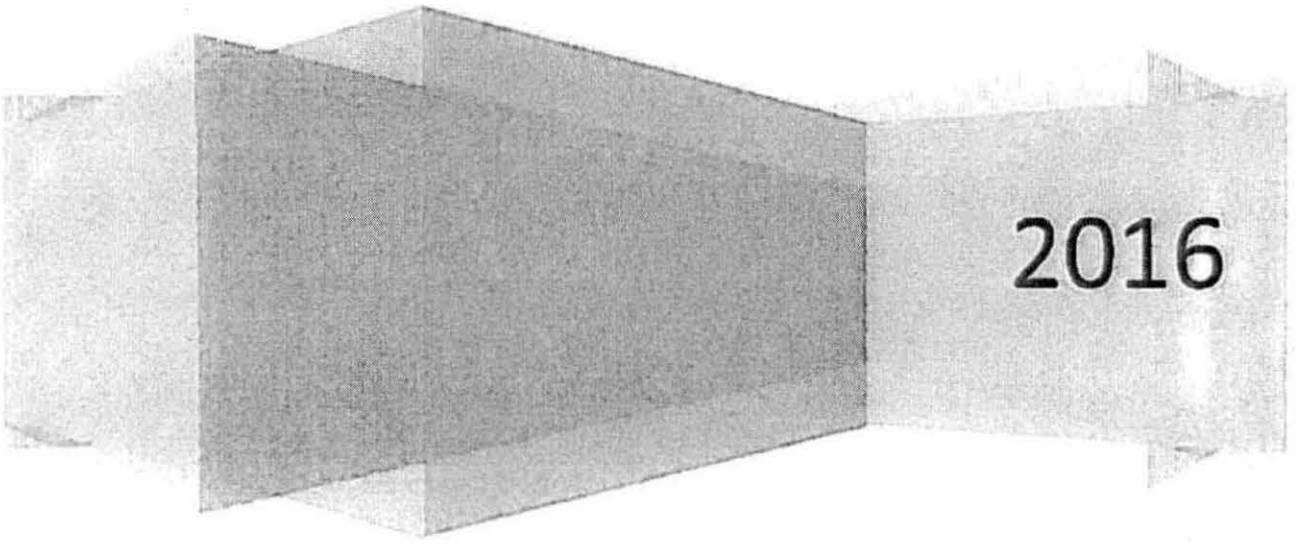
Steven Brown
Mayor
City of Liberty

Leak Survey Report

CITY OF LIBERTY GAS DEPARTMENT

LIBERTY, KY.

Heath Consultants



HEATH CONSULTANTS

Heath Consultants, Incorporated

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

8-5-16

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

Ms. Blake,

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

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

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

Sincerely,

William Luttrell

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

HEATH CONSULTANTS

SUMMARY OF **Gas Leak Survey**

LEAKAGE CONTROL SURVEY

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

Conducted by our Consultant(s) Nathan Miller

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

Number of Days 3

Miles of Main Surveyed 27.6

Number of Leak Indications 2

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

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

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

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

Special Cases

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

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

CONSULTANT'S WEEKLY RESUME

ORDER NO.: _____

CLIENT: City of Liberty

WEEK ENDING: 07/23/16

LOCATION: Liberty, KY

DAYS TO COMPLETE SURVEY: 3

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

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

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

RMLD _____

DPIR _____

OMD _____

_____

Consultant

Leakage Control Report

Field Survey

HEATH CONSULTANTS

9030 Monroe Rd

Houston, TX 77061

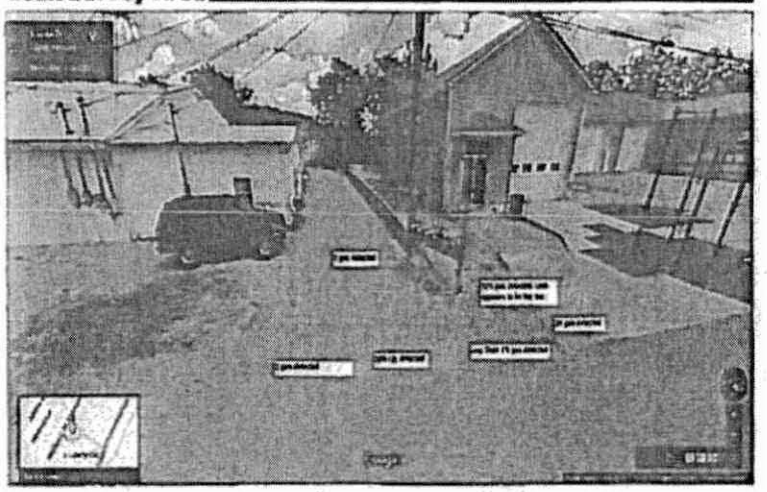
Address 49 Scanlon Dr

City/County Liberty State KY

Leak Survey Area Business

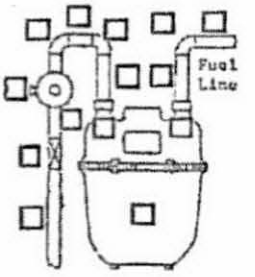
Page Number

Field Case Number 2016-001



GRADE OF CASE

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



LEAK DATA

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

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

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

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

to be completed by qualified field personnel

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

Remarks

Asset # _____

TECHNICIAN _____ **DATE** _____

Leakage Control Report

Field Survey

HEATH CONSULTANTS

9030 Monroe Rd

Houston, TX 77061

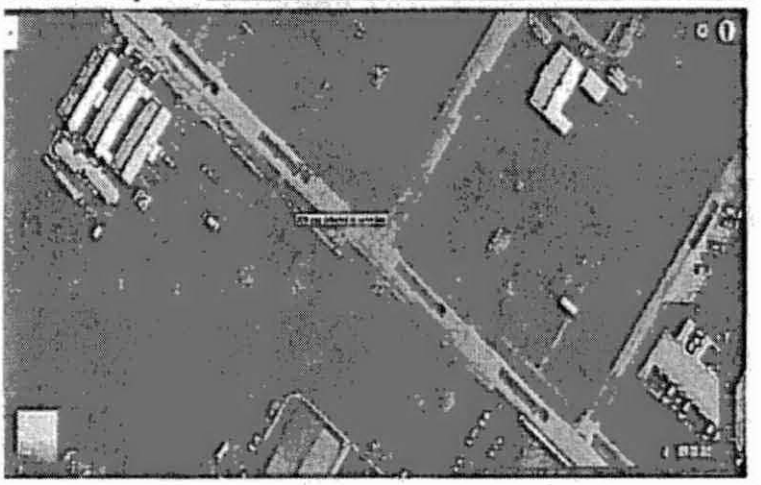
Address Montgomery St @ Whipp Ave

City/County Liberty State KY

Leak Survey Area Residential

Page Number

Field Case Number 2018-002

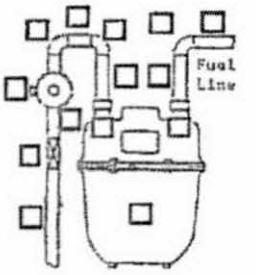


GRADE OF CASE

GRADE 1 ☐

GRADE 2 ☒

GRADE 3 ☐



LEAK DATA

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

Remarks: 20% gas detected in valve box

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

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

to be completed by qualified field personnel

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

Remarks

Asset #_____

TECHNICIAN _____ DATE _____

APPENDIX F

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

Steven L. Beshear
Governor

Leonard K. Peters
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

David L. Armstrong
Chairman

James W. Gardner
Vice Chairman

March 27, 2012

Steve Sweeney
Mayor
City of Liberty
518 Middleburg Street
Liberty, KY 42539

PERIODIC REGULATORY COMPLIANCE INSPECTION

On March 12, 2012, Joel Grugin conducted a periodic regulatory compliance inspection of the natural gas facilities of the City of Liberty Gas Company serving approximately 547 customers in Liberty, Kentucky. A copy of the inspection report is attached for your review. No deficiencies were documented during this inspection. The previous inspection was conducted on May 27, 2009. Nine deficiencies were documented during that inspection and all were corrected in a timely manner.

If you have any questions or need additional information, you are welcome to contact me at (502) 564-3940. We appreciate your continued interest in the safe operation of your gas facilities.

JASON R. BRANGERS, P.E., MANAGER, GAS BRANCH, DIVISION OF ENGINEERING

Attachment: City of Liberty Gas Company 031212 Inspection Report

C. Ronnie Wesley

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/27/2012

Report Number: City of Liberty Gas Company 031212

BRIEF

Inspector:	Joel Grugin
Inspection Date:	3/12/2012
Type of Inspection:	Periodic Regulatory Compliance Inspection
Type of Facility:	Municipal
Name of Utility:	City of Liberty Gas Company
Location of Facility:	Liberty, KY
Purpose of Inspection:	Periodic inspection of a municipal operator's facilities and management practices to verify compliance with federal pipeline safety regulations.
Applicable Regulations	49 CFR Part 191, 192, and 199.

INSPECTION

Description of Utility:	Municipal operator serving the City of Liberty and surrounding area.
Number of Customers:	547
Area of Operation:	Liberty and some rural accounts in Casey County along the HP feeder line from Texas Eastern's delivery point.
Supply Source:	Texas Eastern
Distribution Description:	Steel and plastic distribution gas system operating at 240 PSIG to 20 PSIG.
Workforce Summary:	6 Operator qualified employees
Utility Reps in Insp:	Ronnie Wesley
Date of Last Inspection:	5/27/2009
DTR from Last Insp:	9
DTRs not Cleared:	0

Summary of Items and facilities Inspected:

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Public Awareness, DIMP and Drug and Alcohol Plans were reviewed during the office visit. Also inspected were records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, and odorant verification tests. The field portion of the inspection consisted of inspecting regulator settings, pipeline markers, mainline valve locations, meter installations, and the point of delivery at Texas Eastern facility.

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/27/2012

Report Number: City of Liberty Gas Company 031212

FINDINGS

RECOMMENDATIONS

ADDITIONAL INSPECTOR COMMENTS

Ronnie Wesley has done an excellent job in correcting all of the deficiencies from the previous inspection and in maintaining Liberty's natural gas system. The new DIMP regulations which went into effect last year will require more accurate record keeping in the future and I encourage the City of Liberty Gas Company to learn those requirements and to follow the implementation of their plan. No deficiencies were found during this inspection.

Submitted by

Joel Grugin

Utility Regulatory and Safety Investigator III

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

A completed **Standard Inspection Report** is to be submitted to the Director within 60 days from completion of the inspection. A **Post Inspection Memorandum (PIM)** is to be completed and submitted to the Director within 30 days from the completion of the inspection, or series of inspections, and is to be filed as part of the **Standard Inspection Report.**

Inspection Report		Post Inspection Memorandum	
Inspector/Submit Date:		Inspector/Submit Date:	
		Peer Review/Date:	
		Director Approval/Date:	

POST INSPECTION MEMORANDUM (PIM)

Name of Operator:	Liberty Natural GAS	OPID #:	11472
Name of Unit(s):		Unit #(s):	
Records Location:	518 Middleburg ST Liberty 42539	Activity #	
Unit Type & Commodity:			
Inspection Type:	Standard Periodic	Inspection Date(s):	3-12,13,14-2012
PHMSA Representative(s):	Joel Grugin	AFO Days:	

Company System Maps (copies for Region Files):	
Validate SMART Data (components, miles, etc): ☐	Acquisition(s), Sale or New Construction (submit SMART update): ☐
Validate Additional Requirements Resulting From Waiver(s) or Special Permit(s):	

Summary:

Findings:

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

Name of Operator:			
OP ID No.: [1]		Unit ID No.: [1]	
HQ Address:		System/Unit Name & Address: [1]	
Co. Official:	Ronnie Wesley	Activity Record ID No.:	
Phone No.:		Phone No.:	
Fax No.:	606-787-7992	Fax No.:	
Emergency Phone No.:	911	Emergency Phone No.:	

Persons Interviewed	Title	Phone No.
Ronnie Wesley	Supervisor Public Works	606-303-1327

PHMSA Representative(s): [1]		Inspection Date(s): [1]	
Company System Maps (Copies for Region Files):			

Unit Description

Portion of Unit Inspected: [1]

For gas transmission and distribution pipeline inspections, the attached evaluation form should be used in conjunction with 19CFR Parts 191 and 192.

[1] Information not required if included on page 1.

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

GAS SYSTEM OPERATIONS

Supplier	Texas Eastern	Date:				
Unaccounted for gas:	7%?	Services:	*Residential*	*Commercial*	*Industrial*	*Other*
			410	136	1	

	Operating Pressure(s):	MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	240	250	
Town:	110		
Other:	925		

Does the operator have any transmission pipelines?	
For compressor station inspections, use Attachment 4.	

49CFR PART 191

	REPORTING PROCEDURES	S	U	N/A	N/C
.605(b)(4)	Procedures for gathering data for incident reporting				
	191.5 Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at http://www.nrc.uscg.mil/nrchp.html. *(191.3 - A release of gas from a pipeline, that results in a death or personal injury necessitating in-patient hospitalization, estimated property damage of $50,000 or more, including loss to the operator and others, or both, but excluding cost of gas lost, unintentional estimated gas loss of three million cubic feet or more, or an event that is significant in the judgment of the operator.)*	✓			
	191.7 Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	✓			
	191.15(a) 30-day follow-up written report (Form 7100-2) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov	✓			
	191.15(c) Supplemental report (to 30-day follow-up)	✓			
605(a)	191.17 Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. *(NOTE: June 15, 2011 (may change to August 15) for the year 2010).*	✓			
	191.22 Each operator must obtain an OPID; validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov	✓			
	191.23 Reporting safety-related condition (SRCR)	✓			
	191.25 Filing the SRCR within 5 days of determination, but not later than 10 days after discovery	✓			
	191.27 Offshore pipeline condition reports – filed within 60 days after the Inspections	✓			
605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions	✓			

Comments:

49CFR PART 192

		CUSTOMER AND EFV INSTALLATION NOTIFICATION PROCEDURES	S	U	N/A	N/C
3(c)	.16	Procedures for notifying new customers, within 90 days, of their responsibility for those selections of service lines not maintained by the operator.	✓			
	.381	If EFVs are installed, they must meet the performance requirements of §192.381	✓			
	.383	If the operator has a voluntary installation program for excess flow valves, the program must meet the requirements outlined in §192.383.	✓			
	.383	If the operator does not have a voluntary program for EFV installations, customers must be notified in accordance with §192.383.	✓			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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.605(a)	NORMAL OPERATING and MAINTENANCE PROCEDURES		S	U	N/A	N/C
	.605(a)	O&M Plan review and update procedure (1 per year/15 months)	✓			
	.605(b)(3)	Making construction records, maps, and operating history available to appropriate operating personnel	✓			
	.605(b)(5)	Start up and shut down of the pipeline to assure operation within MAOP plus allowable buildup	✓			
	.605(b)(8)	Periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found	✓			
	.605(b)(9)	Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line	✓			
	.605(b)(10)	Routine inspection and testing of pipe-type or bottle-type holders	✓			
	.605(b)(11)	Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency proced. under §192.615(a)(3) specifically apply to these reports.	✓			
	.605(b)(12)	Implementing the applicable control room management procedures required by 192.631.	✓			

Comments:

.605(a)	CHANGE in CLASS LOCATION PROCEDURES		S	U	N/A	N/C
	.609	Class location study	✓			
	.611	Confirmation or revision of MAOP	✓			

Comments:

513	CONTINUING SURVEILLANCE PROCEDURES		S	U	N/A	N/C
	.613(a)	Procedures for surveillance and required actions relating to change in class location, failures (including cast iron circumferential cracking), leakage history, corrosion, substantial changes in CP requirements, and unusual operating and maintenance conditions (NTSB B.8)	✓			
	.613(b)	Procedures requiring MAOP to be reduced, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition	✓			

omments:

5(a)	DAMAGE PREVENTION PROGRAM PROCEDURES		S	U	N/A	N/C
	.614(c)	Participation in a qualified one-call program, or if available, a company program that complies with the following:				

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.605(a)	DAMAGE PREVENTION PROGRAM PROCEDURES	S	U	N/A	N/C
	(1) Identify persons who engage in excavating	✓			
	(2) Provide notification to the public in the One Call area	✓			
	(3) Provide means for receiving and recording notifications of pending excavations	✓			
	(4) Provide notification of pending excavations to the members	✓			
	(5) Provide means of temporary marking for the pipeline in the vicinity of the excavations	✓			
	(6) Provides for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged	✓			
	(i) Inspection must be done to verify integrity of the pipeline	✓			
	(ii) After blasting, a leak survey must be conducted as part of the inspection by the operator	✓			

Comments:

.615	EMERGENCY PROCEDURES	S	U	N/A	N/C
.615(a)(1)	Receiving, identifying, and classifying notices of events which require immediate response by the operator	✓			
.615(a)(2)	Establish and maintain communication with appropriate public officials regarding possible emergency	✓			
.615(a)(3)	Prompt response to each of the following emergencies:				
	(i) Gas detected inside a building	✓			
	(ii) Fire located near or directly involving a pipeline	✓			
	(iii) Explosion near or directly involving a pipeline	✓			
	(iv) Natural disaster	✓			
.615(a)(4)	Availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency	✓			
.615(a)(5)	Actions directed towards protecting people first, then property.	✓			
.615(a)(6)	Emergency shutdown or pressure reduction to minimize hazards to life or property	✓			
.615(a)(7)	Making safe any actual or potential hazard to life or property. Response should consider the possibility of leaks in multiple locations caused by excavation damage and underground migration of gas into nearby buildings. (NTSB B.9)	✓			
.615(a)(8)	Notifying appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials	✓			
.615(a)(9)	Instructions for restoring service outages after the emergency has been rendered safe	✓			
.615(a)(10)	Investigating accidents and failures as soon as possible after the emergency	✓			
.615(a)(11)	Actions required to be taken by a controller during an emergency in accordance with 192.631.	✓			
.615(b)(1)	Furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action	✓			
.615(b)(2)	Training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training	✓			
.615(b)(3)	Reviewing activities following emergencies to determine if the procedures were effective	✓			
.615(c)	Establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies	✓			

Comments:

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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Comments:

		PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)			S	U	N/A	N/C
.605(a)	.616	Public Awareness Program also in accordance with API RP 1162 (Amdt.192-99 pub. 5/19/05 eff. 06/20/05 and Amdt 192-not numbered pub 12/13/07 eff. 12/13/07).						
	.616(d)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:						
		(1)	Use of a one-call notification system prior to excavation and other damage prevention activities;		✓			
		(2)	Possible hazards associated with unintended releases from a gas pipeline facility;		✓			
		(3)	Physical indications of a possible release;		✓			
		(4)	Steps to be taken for public safety in the event of a gas pipeline release; and		✓			
		(5)	Procedures to report such an event (to the operator).		✓			
	.616(e)	The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.			✓			
	.616(f)	The operator's program and the media used must be comprehensive enough to reach all areas in which the operator transports gas.			✓			
	.616(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area?			✓			
	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010.			✓			
	.616(j)	Operators of a master meter or petroleum gas system (unless the operator transports gas as a primary activity) must develop/implement a written procedure to provide its customers public awareness messages twice annually that includes: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. (See this subpart for requirements for master meter or petroleum gas system operators not located on property controlled by the operator.)					✓	

Comments:

.617	FAILURE INVESTIGATION PROCEDURES		S	U	N/A	N/C
	.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence	✓			

Comments:

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.605(a)	MAOP PROCEDURES	S	U	N/A	N/C
.619	Establishing MAOP so that it is commensurate with the class location	✓			
	MAOP cannot exceed the lowest of the following:				
	(a)(1) Design pressure of the weakest element	✓			
	(a)(2) Test pressure divided by applicable factor	✓			
	(a)(3) The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in second column, unless the segment was tested according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K.	✓			

Pipeline segment	Pressure date	Test date
- Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.
All other pipelines.	July 1, 1970.	July 1, 1965.

	(a)(4) Maximum safe pressure determined by operator	✓			
	(b) Overpressure protective devices must be installed if .619(a)(4) is applicable	✓			
	(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with § 192.611	✓			
.621	MAOP - High Pressure Distribution Systems Note: D F =0.32, or = 0.40 for PA-11 pipe produced after January 23, 2009 with a nominal pipe size (IPS or CTS) 4-inch or less, and a SDR of 11 or greater (i.e. thicker pipe wall). PA-11 design criteria in 192.121 & .123. (Final Rule Pub. 24 December, 2008)	✓			
.623	Max./Min: Allowable Operating Pressure - Low Pressure Distribution Systems				

Comments:

13(c)	PRESSURE TEST PROCEDURES	S	U	N/A	N/C
.503	Pressure testing	✓			

Comments:

05(a)	ODORIZATION of GAS PROCEDURES	S	U	N/A	N/C
.625(a)	Distribution lines must contain odorized gas. – must be readily detectable by person with normal sense of smell at 1/5 of the LEL	✓			
.625(b)	Odorized gas in Class 3 or 4 locations (if applicable).	✓			
.625(f)	Periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.	✓			

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Comments:

.605(a)		TAPPING PIPELINES UNDER PRESSURE PROCEDURES	S	U	N/A	N/C
	.627	Hot taps must be made by a qualified crew NDT testing is suggested prior to tapping the pipe. Reference API RP 2201 for Best Practices.	✓			

Comments:

.605(a)		PIPELINE PURGING PROCEDURES	S	U	N/A	N/C
	.629	Purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline				
		(a) Lines containing air must be properly purged.	✓			
		(b) Lines containing gas must be properly purged	✓			

Comments:

		CONTROL ROOM MANAGEMENT PROCEDURES (Applies to Operator with greater than 250,000 services)	S	U	N/A	N/C
.605(a)	.631(a)	605(b)(12) Each operator must have and follow written control room management procedures. NOTE: *An operator must develop the procedures no later than August 1, 2011 and implement the procedures no later than February 1, 2013.*				
	.631(b)	The operator's program must define the roles and responsibilities of a controller during normal, abnormal and emergency conditions including a definition of:				
		(1) Controller's authority and responsibility.				
		(2) Controller's role when an abnormal operating condition is detected.				
		(3) Controller's role during an emergency				
		(4) A method of recording shift change responsibilities between controllers.				
	.631(c)	The operator's program must provide its controllers with the information, tools, processes and procedures necessary to perform each of the following:				
		(1) Implement sections 1, 4, 8,9,11.2, and 11.3 of API RP 1165 whenever a SCADA System is added, expanded or replaced.				
		(2) Conduct point-to-point verification between SCADA displays and related equipment when changes that affect pipeline safety are made.				
		(3) Test and verify any internal communications plan – at least once a year NTE 15 months.				
		(4) Test any backup SCADA system at least once each year but NTE 15 months.				
		(5) Establish and implement procedures for when a different controller assumes responsibility.				
	.631(d)	Each operator must implement and follow methods to reduce the risk associated with controller fatigue, including:				
		(1) Establishing shift lengths and schedule rotations that provide time sufficient to achieve eight hours of continuous sleep.				
		(2) Educating controllers and supervisors in fatigue mitigation strategies.				

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		CONTROL ROOM MANAGEMENT PROCEDURES (Applies to Operator with greater than 250,000 services)	S	U	N/A	N/C
		(3) Training of controllers and supervisors to recognize the effects of fatigue.				
		(4) Establishing a maximum limit on controller hours-of-service.				
	.631(e)	Each operator must have a written alarm management plan including these provisions:				
		(1) Reviewing alarms using a process that ensures that they are accurate and support safe operations.				
		(2) Identifying at least once a year, points that have been taken off SCADA scan or have had alarms inhibited, generated false alarms, or have had forced or manual values for periods of time exceeding that required for maintenance activities.				
		(3) Verifying the alarm set-point values and alarm descriptions once each year NTE 15 months.				
		(4) Reviewing the alarm management plan at least once every calendar year NTE 15 months.				
		(5) Monitoring the content and volume of activity being directed to and required of each controller once each year NTE 15 months.				
		(6) Addressing deficiencies identified through implementation of 1-5 of this section.				
	.631(f)	Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing the following:				
		(1) Establishing communications between controllers, management and field personnel when implementing physical changes to the pipeline.				
		(2) Requiring field personnel to contact the control room when emergency conditions exist and when field changes could affect control room operations.				
		(3) Seeking control room or management participation in planning prior to implementation of significant pipeline changes.				
	.631(g)	Each operator must assure that lessons learned from its experience are incorporated in to its procedures by performing the following:				
		(1) Reviewing reportable incidents to determine if control room actions contributed to the event and correcting any deficiencies.				
		(2) Including lessons learned from the operator's training program required by this section.				
	.631(h)	Each operator must establish a controller training program and review its contents once a year NTE 15 months which includes the following elements:				
		(1) Responding to abnormal operating conditions (AOCs).				
		(2) Using a computerized simulator or other method for training controllers to recognize AOCs				
		(3) Training controllers on their responsibilities for communication under the operator's emergency response procedures.				
		(4) Training that provides a working knowledge of the pipeline system, especially during AOCs.				
		(5) Providing an opportunity for controllers to review relevant procedures for infrequently used operating setups.				

Comments:

605(a)		MAINTENANCE PROCEDURES	S	U	N/A	N/C
	.703(b)	Each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service	✓			
	(c)	Hazardous leaks must be repaired promptly	✓			

ents:

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Comments:

.605(b)	TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES	S	U	N/A	N/C
.705(a)	Patrolling ROW conditions				
(b)	Maximum interval between patrols of lines:				

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	2/yr (7½ months)	1/yr (15 months)
3	4/yr (4½ months)	2/yr (7½ months)
4	4/yr (4½ months)	4/yr (4½ months)

.706	Leakage surveys – 1 year/15 months				
	Leak detector equipment survey requirements for lines transporting un-odorized gas				
	(a) Class 3 locations - 7½ months but at least twice each calendar year				
	(b) Class 4 locations - 4½ months but at least 4 times each calendar year				

Comments:

.605(b)	DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES	S	U	N/A	N/C
.721(a)	Frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage (i.e., consider cast iron, weather conditions, known slip areas, etc.)	✓			
.721(b)	Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled . . .				
(b)(1)	In business districts at intervals not exceeding 4½ months, but at least four times each calendar year; and	✓			
(b)(2)	Outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year	✓			
.723(a) & (b)	Periodic leak surveys determined by the nature of the operations and conditions.	✓			
(b)(1)	In business districts as specified, 1/yr (15 months)	✓			
(b)(2)	Outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	✓			

Comments:

.605(b)	LINE MARKER PROCEDURES	S	U	N/A	N/C
.707	Line markers installed and labeled as required	✓			

Comments:

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Comments:

605(b)	TRANSMISSION RECORD KEEPING PROCEDURES	S	U	N/A	N/C
	.709 Records must be maintained...				
	(a) Repairs to the pipe – life of system				
	(b) Repairs to "other than pipe" – 5 years				
	(c) Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests – 5 years or until next one				

Comments:

605(b)	TRANSMISSION FIELD REPAIR PROCEDURES	S	U	N/A	N/C
	Imperfections and Damages				
	.713(a) Repairs of imperfections and damages on pipelines operating above 40% SMYS				
	(1) Cut out a cylindrical piece of pipe and replace with pipe of ∃ design strength				
	(2) Use of a reliable engineering method				
	.713(b) Reduce operating pressure to a safe level during the repair				
	Permanent Field Repair of Welds				
	.715 Welds found to be unacceptable under §192.241(c) must be repaired by:				
	(a) Taking the line out of service and repairing in accordance with §192.245:				
	▪ Cracks longer than 8% of the weld length (except offshore) must be removed				
	▪ For each weld that is repaired, the defect must be removed down to clean metal and the pipe preheated if conditions demand it				
	▪ Repairs must be inspected to ensure acceptability				
	▪ Crack repairs or defect repairs in previously repaired areas must be done in accordance with qualified written welding procedures				
	(b) If the line remains in service, the weld may be repaired in accordance with §192.245 if:				
	(1) The weld is not leaking				
	(2) The pressure is reduced to produce a stress that is 20% of SMYS or less				
	(3) Grinding is limited so that ⅛ inch of pipe weld remains				
	(c) If the weld cannot be repaired in accordance with (a) or (b) above, a full encirclement welded split sleeve must be installed				
	Permanent Field Repairs of Leaks				
	.717 Field repairs of leaks must be made as follows:				
	(a) Replace by cutting out a cylinder and replace with pipe similar or of greater design				
	(b)(1) Install a full encirclement welded split sleeve of an appropriate design unless the pipe is joined by mechanical couplings and operates at less than 40% SMYS				
	(b)(2) A leak due to a corrosion pit may be repaired by installing a bolt on leak clamp				
	(b)(3) For a corrosion pit leak, if a pipe is not more than 40,000 psi SMYS, the pits may be repaired by fillet welding a steel plate. The plate must have rounded corners and the same thickness or greater than the pipe, and not more than ½D of the pipe size				

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.605(b)	TRANSMISSION FIELD REPAIR PROCEDURES	S	U	N/A	N/C
	(b)(4) Submerged offshore pipe or pipe in inland navigable waterways may be repaired with a mechanically applied full encirclement split sleeve of appropriate design				
	(b)(5) Apply reliable engineering method				
	Testing of Repairs				
.719(a)	Replacement pipe must be pressure tested to meet the requirements of a new pipeline				
(b)	For lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241©				

Comments:

.605(b)	TEST REQUIREMENTS FOR REINSTATING SERVICE LINES	S	U	N/A	N/C
.725(a)	Except for .725(b), disconnected service lines must be tested the same as a new service line.	✓			
(b)	Service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect. See code for exception to this.	✓			

Comments:

.605(b)	ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES	S	U	N/A	N/C
.727(b)	Operator must disconnect both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained. Offshore abandoned pipelines must be filled with water or an inert material, with the ends sealed	✓			
(c)	Except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end.	✓			
(d)	Whenever service to a customer is discontinued, do the procedures indicate one of the following:				
	(1) The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator	✓			
	(2) A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly	✓			
	(3) The customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed	✓			
(e)	If air is used for purging, the operator shall ensure that a combustible mixture is not present after purging	✓			
.727(g)	Operator must file reports upon abandoning underwater facilities crossing navigable waterways, including offshore facilities.	✓			

Comments:

.605(b)	PRESSURE LIMITING and REGULATING STATION PROCEDURES	S	U	N/A	N/C
.739(a)	Inspection and testing procedures for pressure limiting stations, relief devices, pressure regulating stations and equipment (1 per yr/15 months)	✓			
	(1) In good mechanical condition	✓			

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.605(b)	PRESSURE LIMITING and REGULATING STATION PROCEDURES	S	U	N/A	N/C
	(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	✓			
	(3) Set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	✓			
	(4) Properly installed and protected from dirt, liquids, and other conditions that may prevent proper oper.	✓			
.739(b)	For steel lines if MAOP is determined per .619(c) and the MAOP is 60 psi (414 kPa) gage or more . . .				
	If MAOP produces hoop stress that / Then the pressure limit is:	✓			
	Is greater than 72 percent of SMYS / MAOP plus 4 percent				
	Is unknown as a percent of SMYS / A pressure that will prevent unsafe operation of the pipeline considering its operating and maintenance history and MAOP				
.741	Telemetering or Recording Gauges				
	(a) In place to indicate gas pressure in the district that is supplied by more than one regulating station	✓			
	(b) Determine the need in a distribution system supplied by only one district station.	✓			
	(c) Inspect equipment and take corrective measures when indications of abnormally high or low pressure	✓			
.743	Testing of Relief Devices				
.743	(a) Capacity must be consistent with .201(a) except for .739(b), and be determined 1 per yr/15 mo.	✓			
	(b) If calculated, capacities must be compared; annual review and documentation are required.	✓			
	(c) If insufficient capacity, new or additional devices must be installed to provide required capacity.	✓			

omments:

05(b)	VALVE AND VAULT MAINTENANCE PROCEDURES	S	U	N/A	N/C
	Transmission Valves				
.745	(a) Inspect and partially operate each transmission valve that might be required during an emergency (1 per yr/15 months)			✓	
.745	(b) Prompt remedial action required, or designate alternative valve.			✓	
	Distribution Valves				
.747	(a) Check and service each valve that may be necessary for the safe operation of a distribution system (1 per yr/15 months)	✓			
	(b) Prompt remedial action required, or designate alternative valve.	✓			

5(b)	VAULT INSPECTION PROCEDURES	S	U	N/A	N/C
.749	Inspection of vaults greater than 200 cubic feet and housing pressure regulating or limiting devices (1 per yr NTE 15 months). NO VAULTS			✓	

mments:

3(b)	PREVENTION of ACCIDENTAL IGNITION PROCEDURES	S	U	N/A	N/C
.751	Reduce the hazard of fire or explosion by:				
	(a) Removal of ignition sources in presence of gas and providing for a fire extinguisher	✓			

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.605(b)		PREVENTION of ACCIDENTAL IGNITION PROCEDURES	S	U	N/A	N/C
	(b)	Prevent welding or cutting on a pipeline containing a combustible mixture	✓			
	(c)	Post warning signs	✓			

Comments:

.605(b)		CAULKED BELL AND SPIGOT JOINTS PROCEDURES	S	U	N/A	N/C
.753		Cast-iron caulked bell and spigot joint repair:				
	(a)	When subject to more than 25 psig, sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)			✓	
	(b)	When subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking			✓	

605(b)		PROTECTING CAST-IRON PIPELINE PROCEDURES	S	U	N/A	N/C
.755		Operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection.				
	(a)	Vibrations from heavy construction equipment, trains, trucks, buses or blasting?				
	(b)	Impact forces by vehicles?				
	(c)	Earth movement?				
	(d)	Other foreseeable outside forces which might subject the segment of pipeline to a bending stress				
	(e)	Provide permanent protection for the disturbed section as soon as feasible				

3(c)			WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	S	U	N/A	N/C
.225	(a)		Welding procedures must be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test.	✓			
	(b)		Retention of welding procedure – details and test	✓			
.227	(a)		Welders must be qualified by Section 6 of API 1104 (19th Ed., 1999, including errata October31, 2001; and 20th edition 2007, including errata 2008) or Section IX of ASME Boiler and Pressure Code (2004 ed. Including addenda through July 1, 2005) See exception in .227(b).	✓			
	(b)		Welders may be qualified under section I of Appendix C to weld on lines that operate at < 20% SMYS.	✓			
.229	(a)		To weld on compressor station piping and components, a welder must successfully complete a destructive test	✓			
	(b)		Welder must have used welding process within the preceding 6 months	✓			
	(c)		A welder qualified under .227(a)–				
.229(c)		(1)	May not weld on pipe that operates at ≥ 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104; may maintain an ongoing qualification status by performing welds tested and found acceptable at least twice per year, not exceeding 7½ months; may not requalify under an earlier referenced edition.	✓			
		(2)	May not weld on pipe that operates at < 20% SMYS unless is tested in accordance with .229(c)(1) or requalifies under .229(d)(1) or (d)(2).	✓			
	(d)		Welders qualified under .227(b) may not weld unless:				
		(1)	Requalified within 1 year/15 months, or	✓			
		(2)	Within 7½ months but at least twice per year had a production weld pass a qualifying test	✓			
.231			Welding operation must be protected from weather	✓			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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.13(c)		WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	S	U	N/A	N/C
	.233	Miter joints (consider pipe alignment)	/			
	.235	Welding preparation and joint alignment	/			
	.241	(a) Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure:	/			
		(1) Compliance with the welding procedure	/			
		(2) Weld is acceptable in accordance with Section 9 of API 1104	/			
		(b) Welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243 except welds that are visually inspected and approved by a qualified welding inspector if:	/			
		(1) The nominal pipe diameter is less than 6 inches, or	/			
		(2) The pipeline is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical	/			
	.241	(c) Acceptability based on visual inspection or NDT is determined according to Section 9 of API 1104. If a girth weld is unacceptable under Section 9 for a reason other than a crack, and if Appendix A to API 1104 applies to the weld, the acceptability of the weld may be further determined under that appendix.	/			
		Repair and Removal of Weld Defects				
	.245	(a) Each weld that is unacceptable must be removed or repaired. Except for offshore pipelines, a weld must be removed if it has a crack that is more than 8% of the weld length	/			
		(b) Each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair. After repair, the weld must be inspected and found acceptable.	/			
		(c) Repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure, qualified under §192.225	/			
		Note: Sleeve Repairs – use low hydrogen rod (Best Practices –ref. API 1104 App. B, In Service Welding)				

ments:

.13(c)		NONDESTRUCTIVE TESTING PROCEDURES	S	U	N/A	N/C
	.243	(a) Nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld	/			
		(b) Nondestructive testing of welds must be performed:				
		(1) In accordance with a written procedure, and	/			
		(2) By persons trained and qualified in the established procedures and with the test equipment used	/			
		(c) Procedures established for proper interpretation of each nondestructive test of a weld to ensure acceptability of the weld under 192.241©	/			
		(d) When nondestructive testing is required under §192.241(b), the following percentage of each day's field butt welds, selected at random by the operator, must be nondestructively tested over the entire circumference				
		(1) In Class 1 locations at least 10%	/			
		(2) In Class 2 locations at least 15%	/			
		(3) In Class 3 and 4 locations, at crossings of a major navigable river, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impractical, then 90%. Nondestructive testing must be impractical for each girth weld not tested.	/			
		(4) At pipeline tie-ins, 100%	/			

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.13(c)	NONDESTRUCTIVE TESTING PROCEDURES	S	U	N/A	N/C
	(e) Except for a welder whose work is isolated from the principal welding activity, a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b).	/			
	(f) Nondestructive testing – the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds.	/			

Comments:

.273(b)	JOINING of PIPELINE MATERIALS	S	U	N/A	N/C
.281	(a) A plastic pipe joint that is joined by solvent cement, adhesive, or heat fusion may not be disturbed until it has properly set. Plastic pipe may not be joined by a threaded joint or miter joint.	/			
	(b) Each solvent cement joint on plastic pipe must comply with the following:				
	(1) The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint.	/			
	(2) The solvent cement must conform to ASTM Designation: D 2513.	/			
	(3) The joint may not be heated to accelerate the setting of the cement.	/			
	(c) Each heat-fusion joint on plastic pipe must comply with the following:				
	(1) A butt heat-fusion joint must be joined by a device that holds the heater element square to the ends of the piping, compresses the heated ends together, and holds the pipe in proper alignment while the plastic hardens.	/			
	(2) A socket heat-fusion joint must be joined by a device that heats the mating surfaces of the joint uniformly and simultaneously to essentially the same temperature.	/			
	(3) An electrofusion joint must be joined utilizing the equipment and techniques of the fittings manufacturer or equipment and techniques shown, by testing joints to the requirements of §192.283(a)(1)(iii), to be at least equivalent to those of the fittings manufacturer.	/			
	(4) Heat may not be applied with a torch or other open flame.	/			
	(d) Each adhesive joint on plastic pipe must comply with the following:				
	(1) The adhesive must conform to ASTM Designation: D 2517.	/			
	(2) The materials and adhesive must be compatible with each other.	/			
	(e) Each compression type mechanical joint on plastic pipe must comply with the following:				
	(1) The gasket material in the coupling must be compatible with the plastic.	/			
	(2) A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling.	/			
.283	(a) Before any written procedure established under §192.273(b) is used for making plastic pipe joints by a heat fusion, solvent cement, or adhesive method, the procedure must be qualified by subjecting specimen joints made according to the procedure to the following tests:				
	(1) The burst test requirements of–				
	(i) Thermoplastic pipe: paragraph 6.6 (sustained pressure test) or paragraph 6.7 (Minimum Hydrostatic Burst Test) or paragraph 8.9 (Sustained Static pressure Test) of ASTM D2513	/			
	(ii) Thermosetting plastic pipe: paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517; or	/			
	(iii) Electrofusion fittings for polyethylene pipe and tubing: paragraph 9.1 (Minimum Hydraulic Burst Pressure Test), paragraph 9.2 (Sustained Pressure Test), paragraph 9.3 (Tensile Strength Test), or paragraph 9.4 (Joint Integrity Tests) of ASTM Designation F1055.	/			

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.273(b)	JOINING of PIPELINE MATERIALS	S	U	N/A	N/C
	(2) For procedures intended for lateral pipe connections, subject a specimen joint made from pipe sections joined at right angles according to the procedure to a force on the lateral pipe until failure occurs in the specimen. If failure initiates outside the joint area, the procedure qualifies for use; and.	✓			
	(3) For procedures intended for non-lateral pipe connections, follow the tensile test requirements of ASTM D638, except that the test may be conducted at ambient temperature and humidity If the specimen elongates no less than 25 percent or failure initiates outside the joint area, the procedure qualifies for use.	✓			
	(b) Before any written procedure established under §192.273(b) is used for making mechanical plastic pipe joints that are designed to withstand tensile forces, the procedure must be qualified by subjecting five specimen joints made according to the procedure to the following tensile test:				
	(1) Use an apparatus for the test as specified in ASTM D 638 (except for conditioning).	✓			
	(2) The specimen must be of such length that the distance between the grips of the apparatus and the end of the stiffener does not affect the joint strength.	✓			
	(3) The speed of testing is 0.20 in. (5.0 mm) per minute, plus or minus 25 percent.	✓			
	(4) Pipe specimens less than 4 inches (102 mm) in diameter are qualified if the pipe yields to an elongation of no less than 25 percent or failure initiates outside the joint area.	✓			
	(5) Pipe specimens 4 inches (102 mm) and larger in diameter shall be pulled until the pipe is subjected to a tensile stress equal to or greater than the maximum thermal stress that would be produced by a temperature change of 100° F (38° C) or until the pipe is pulled from the fitting. If the pipe pulls from the fitting, the lowest value of the five test results or the manufacturer's rating, whichever is lower must be used in the design calculations for stress.	✓			
	(6) Each specimen that fails at the grips must be retested using new pipe.	✓			
	(7) Results pertain only to the specific outside diameter, and material of the pipe tested, except that testing of a heavier wall pipe may be used to qualify pipe of the same material but with a lesser wall thickness.	✓			
	(c) A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints.	✓			
	(d) Pipe or fittings manufactured before July 1, 1980, may be used in accordance with procedures that the manufacturer certifies will produce a joint as strong as the pipe.	✓			
.285	(a) No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by:				
	(1) Appropriate training or experience in the use of the procedure; and	✓			
	(2) Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section.	✓			
	(b) The specimen joint must be:				
	(1) Visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure; and	✓			
	(2) In the case of a heat fusion, solvent cement, or adhesive joint:	✓			
	(i) Tested under any one of the test methods listed under §192.283(a) applicable to the type of joint and material being tested;	✓			
		✓			
	(ii) Examined by ultrasonic inspection and found not to contain flaws that may cause failure; or				
	(A) Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and	✓			
	(B) Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area.	✓			
	(c) A person must be requalified under an applicable procedure, if during any 12-month period that person:				
	(1) Does not make any joints under that procedure; or	✓			
	(2) Has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under §192.513.	✓			
	(d) Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section.	✓			

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.273(b)	JOINING of PIPELINE MATERIALS		S	U	N/A	N/C
	.287	No person may carry out the inspection of joints in plastic pipes required by §§192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure.	✓			

Comments:

.605(b)	CORROSION CONTROL PROCEDURES		S	U	N/A	N/C
	.453	Are corrosion procedures established and carried out by or under the direction of a qualified person for:				
		• Design	✓			
		• Operations	✓			
		• Installation	✓			
		• Maintenance	✓			
	.455	(a) For pipelines installed after July 31, 1971, buried segments must be externally coated and	✓			
		(b) cathodically protected within one year after construction (see exceptions in code)	✓			
		(c) Aluminum may not be installed in a buried or submerged pipeline if exposed to an environment with a natural pH in excess of 8 (see exceptions in code)	✓			
	.457	(a) All effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected	✓			
		(b) If installed before August 1, 1971, cathodic protection must be provided in areas of active corrosion for: bare or ineffectively coated transmission lines, and bare or coated c/s, regulator sta., meter sta. piping, and (except for cast iron or ductile iron) bare or coated distribution lines.	✓			
	.459	Examination of buried pipeline when exposed: if corrosion is found, further investigation is required (Note: To include graphitization on cast iron or ductile iron pipe. NTSB B.7)	✓			
	.461	Procedures must address the protective coating requirements of the regulations. External coating on the steel pipe must meet the requirements of this part.	✓			
	.463	Cathodic protection level according to Appendix D criteria	✓			
	.465	(a) Pipe-to-soil monitoring (1 per yr/15 months) or short sections (10% per year, all in 10 years)	✓			
		(b) Rectifier monitoring (6 per yr/2½ months)	✓			
		(c) Interference bond monitoring (as required)	✓			
		(d) Prompt remedial action to correct any deficiencies indicated by the monitoring	✓			
	.465	(e) Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas (1 per 3 years/39 months)	✓			
	.467	Electrical isolation (include casings)	✓			
	.469	Sufficient test stations to determine CP adequacy	✓			
	.471	Test lead maintenance	✓			
	.473	Interference currents	✓			
	.475	(a) Proper procedures for transporting corrosive gas?	✓			
		(b) Removed pipe must be inspected for internal corrosion. If found, the adjacent pipe must be inspected to determine extent. Certain pipe must be replaced. Steps must be taken to minimize internal corrosion.	✓			
	.476	Systems designed to reduce internal corrosion Amdt 192-(no number) Pub. 4/23/07, eff. 5/23/07 (a) New construction	✓			
		(b) Exceptions – offshore pipeline and systems replaced before 5/23/07	✓			
		(c) Evaluate impact of configuration changes to existing systems	✓			
	.477	Internal corrosion control coupon (or other suit. Means) monitoring (2 per yr/7½ months)	✓			
	.479	(a) Each exposed pipe must be cleaned and coated (see exceptions under .479(c))	✓			

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.605(b)		CORRECTION CONTROL PROCEDURES	S	U	N/A	N/C
		Offshore splash zones and soil-to-air interfaces must be coated	✓			
	(b)	Coating material must be suitable	✓			
		Coating is not required where operator has proven that corrosion will:				
	(c)	(1) Only be a light surface oxide, or	✓			
		(2) Not affect safe operation before next scheduled inspection	✓			
.481	(a)	Atmospheric corrosion control monitoring (1 per 3 yrs/39 months onshore; 1 per yr/15 months offshore)	✓			
.481	(b)	Special attention required at soil/air interfaces, thermal insulation, under disbonded coating, pipe supports, splash zones, deck penetrations, spans over water	✓			
.481	(c)	Protection must be provided if atmospheric corrosion is found (per §192.479)	✓			
.483		Replacement and required pipe must be coated and cathodically protected (see code for exceptions)	✓			
.485	(a)	Procedures to replace pipe or reduce the MAOP if general corrosion has reduced the wall thickness?	✓			
	(b)	Procedures to replace/repair pipe or reduce MAOP if localized corrosion has reduced wall thickness (unless reliable engineering repair method exists)?	✓			
	(c)	Procedures to use Rstreng or B-31G to determine remaining wall strength?	✓			
.487		Remedial measures (distribution lines other than cast iron or ductile iron)	✓			
.489	(a)	Each segment of cast iron or ductile iron pipe on which general graphitization is found to a degree where a fracture or any leakage might result, must be replaced.	✓			
	(b)	Each segment of cast iron or ductile iron pipe where localized graphitization is found it must be assessed and remediated according to this subpart.	✓			
.491		Corrosion control maps and record retention (pipeline service life or 5 yrs)	✓			

Comments:

.801-.809	Subpart N — Qualification of Pipeline Personnel Procedures	S	U	N/A	N/C
	Refer to Operator Qualification Inspection Forms and Protocols (OPS web site)				

.901-.951	Subpart O — Pipeline Integrity Management	S	U	N/A	N/C
	This form does not cover Gas Pipeline Integrity Management Programs				

Subparts A - C	PART 199 – DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES	S	U	N/A	N/C
	Drug & Alcohol Testing & Alcohol Misuse Prevention Program – Use PHMSA Form # 13, PHMSA 2008 Drug and Alcohol Program Check.				

Comments: Drug testing is performed Quarterly - At least one is tested at that time and they have (e OQ trained employees

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	PIPELINE INSPECTION (Field)	S	U	N/A	N/C
.179	Valve Protection from Tampering or Damage 5 valves.	✓			
.463	Cathodic Protection	✓			
.465	Rectifiers	✓			
.476	Systems designed to reduce internal corrosion	✓			
.479	Pipeline Components Exposed to the Atmosphere	✓			
.605	Knowledge of Operating Personnel	✓			
.707	ROW Markers, Road and Railroad Crossings	✓			
.719	Pre-pressure Tested Pipe (Markings and Inventory)	✓			
.741	Telemetering, Recording gauges				
.739/.743	Pressure Limiting and Regulating Devices (spot-check field installed equipment vs. inspection records) 3 stations	✓			
.745	Valve Maintenance	✓			
.751	Warning Signs	✓			
.801 - .809	Operator Qualification - Use PHMSA Form 15 Operator Qualification Field Inspection Protocol Form				

Comments: Hollis Murphy, Columbia Gulf, ST.W. Quel T. Station, Price Lumber
Pipe to Soil readings Check these

	REGULATORY REPORTING PERFORMANCE AND RECORDS	S	U	N/A	N/C
191.5	Telephonic reports to NRC	✓			
191.15	Written incident reports; supplemental incident reports (Form F 7100.2)	✓			
191	Annual Reports (Forms 7100.1-1, 7100.2-1)	✓			
191.23	Safety related condition reports	✓			
192.16	Customer Notification (Verification – 90 days – and Elements)	✓			
192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports	✓			

	CONSTRUCTION PERFORMANCE AND RECORDS	S	U	N/A	N/C
.225	Test Results to Qualify Welding Procedures				
.227	Welder Qualification				
.241 (a)	Visual Weld Inspector Training/Experience				
.243 (b)(2)	Nondestructive Technician Qualification				
(c)	NDT procedures				
(f)	Total Number of Girth Welds				
(f)	Number of Welds Inspected by NDT				
(f)	Number of Welds Rejected				
(f)	Disposition of each Weld Rejected				
273/.283	Qualified Joining Procedures Including Test Results				
285	Personnel Joining Qualifications				
287	Joining Inspection Qualifications				
	Construction Specifications				
.325	Underground Clearance				

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	CONSTRUCTION PERFORMANCE AND RECORDS	S	U	N/A	N/C
	Amount, Location, Cover of each Size of Pipe Installed	✓			
.383(e)	EFV customer notification	✓			
.455	Cathodic Protection	✓			

		OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS	S	U	N/A	N/C
.517 (a)		Pressure Testing (operates at or above 100 psig) – useful life of pipeline	✓			
.517 (b)		Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	✓			
.603(b)	.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months)	✓			
	.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	✓			
	.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures	✓			
	.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures	✓			
.709	.614	Damage Prevention (Miscellaneous)	✓			
	.609	Class Location Study (If Applicable)	✓			
.603(b)	.615(b)(1)	Location Specific Emergency Plan	✓			
	.615(b)(2)	Emergency Procedure training, verify effectiveness of training	✓			
	.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	✓			
	.615(c)	Liaison Program with Public Officials	✓			
	.616	Public Awareness Program				
	.616(e & f)	Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:				

API RP 1162 Baseline* Recommended Message Deliveries	
Stakeholder Audience (Natural Gas Transmission Line Operators)	**Baseline Message Frequency (starting effective date of Plan)**
Residents Along Right-of-Way and Places of Congregation	2 years
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual
One-Call Centers	As required of One-Call Center
Stakeholder Audience (Gathering Line Operators)	**Baseline Message Frequency (starting from effective date of Plan)**
Residents and Places of Congregation	Annual
Emergency Officials	Annual
Public Officials	3 years
Excavators and Contractors	Annual
One-Call Centers	As required of One-Call Center
Stakeholder Audience (LDCs)	**Baseline Message Frequency (starting from effective date of Plan)**
Residents Along Local Distribution System	Annual
LDC Customers	Twice annually
Emergency Officials	Annual
Public Officials	3 years
Excavator and Contractors	Annual
One-Call Centers	As required of One-Call Center
* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.	

	.616(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.				
	.616(h)	Effectiveness Review of operator's program.				

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		OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS	S	U	N/A	N/C
	.616(j)	Operators of a master meter or petroleum gas systems - public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information.			✓	
	.617	Failure Investigation Reports (Note: Also include reported third party damage and leak response records. NTSB B.10)			✓	
.517		Pressure Testing				
.709		.619 .621 .623 Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123. (Final Rule Pub. 24 December, 2008)	✓			
	.625	Odorization of Gas	✓			
	.705	Patrolling (Refer to Table Below)	✓			

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	2/yr (7½ months)	1/yr (15 months)
3	4/yr (4½ months)	2/yr (7½ months)
4	4/yr (4½ months)	4/yr (4½ months)

.709	.706	Leak Surveys (Refer to Table Below)				

Class Location	Required	Not Exceed
1 and 2	1/yr	15 months
3	2/yr*	7½ months
4	4/yr*	4½ months

* Leak detector equipment survey required for lines transporting un-odorized gas.

.603(b)	.721(b)(1)	Patrolling Business District (4 per yr/4½ months)	✓			
	.721(b)(2)	Patrolling Outside Business District (2 per yr/7½ months)	✓			
	.723(b)(1)	Leakage Survey – business District (1 per yr/15 months)	✓			
	.723(b)(2)	Leakage Survey				
		• Outside Business District (5 years)	✓			
		• Cathodically unprotected distribution lines (3 years)	✓			
	.725	Tests for reinstating service lines	✓			
603b/.727g	.727	Abandoned Pipelines: Underwater Facility Reports	✓			
709	.739	Pressure Limiting and Regulating Stations (1 per yr/15 months)	✓			
	.743	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months)	✓			
	.745	Valve Maintenance Transmission Lines (1 per yr/15 months)			✓	
503(b)	.747	Valve Maintenance Distribution Lines (1 per yr/15 months)	✓			
709	.749	Vault Maintenance (3200 cubic feet)(1 per yr/15 months)			✓	
503(b)	.751	Prevention of Accidental Ignition (hot work permits)	✓			
	.755	Caulked Bell and Spigot Joint Repair			✓	
	.225(b)	Welding – Procedure		✓		
	.227/.229	Welding – Welder Qualification		✓	✓	
	.243(b)(2)	NDT – NDT Personnel Qualification			✓	
	.283	Joining - Procedures	✓			
	.285	Joining - Personnel Qualifications	✓			
	.287	Joining - Inspector Qualifications	✓			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

	OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS	S	U	N/A	N/C
	.243(f) NDT Records (Pipeline Life)	✓			
	Repair: pipe (Pipeline Life): Other than pipe (5 years)				
.807(b)	Refer to PHMSA Form # 15 to document review of operator's employee covered task records				

Comments:

		CORROSION CONTROL PERFORMANCE AND RECORDS	S	U	N/A	N/C
.491	.491(a)	Maps or Records				
.491	.459	Examination of Buried Pipe when Exposed				
.491	.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)				
.491	.465(b)	Rectifier Monitoring (6 per yr/2½ months)				
.491	.465(c)	Interference Bond Monitoring – Critical (6 per yr/2½ months)				
.491	.465(c)	Interference Bond Monitoring – Non-critical (1 per yr/15 months)				
.491	.465(d)	Prompt Remedial Actions				
.491	.465(e)	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months)				
.491	.467	Electrical Isolation (Including Casings)				
.491	.469	Test Stations – Sufficient Number				
	.471	Test Lead Maintenance				
.491	.473	Interference Currents				
.491	.475(a)	Internal Corrosion: Corrosive Gas Investigation				
.491	.475(b)	Internal Corrosion; Internal Surface Inspection: Pipe Replacement				
.491	.476 (d)	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems				
.491	.477	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months)				
.491	.481	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore)				
.491	.483/.485	Remedial: Replaced or Repaired Pipe: coated and protected: corrosion evaluation and actions				

Comments:

Attachment 1
Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

(b)		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
	.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service				
	.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units				
	.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement				
	.735	(a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings				
		(b) Tank must be protected according to NFPA #30				
	.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:				
		▪ 50% of the upright side areas are permanently open, or				
		▪ It is an unattended field compressor station of 1000 hp or less				

Comments:

		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits				
		Door latch must open from inside without a key				
		Doors must swing outward				
	(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit				
		Each gate located within 200 ft of any compressor plant building must open outward				
		When occupied, the door must be opened from the inside without a key				
	(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?				
165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?				
	(b)	Do the liquid separators have a manual means of removing liquids?				
		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?				
167	(a)	ESD system must:				
		- Discharge blowdown gas to a safe location				
		- Block and blowdown the gas in the station				
		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers				
		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage				
		ESD system must be operable from at least two locations, each of which is:				
		- Outside the gas area of the station				
		- Not more than 500 feet from the limits of the station				
		- ESD switches near emergency exits?				
	(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?				
	(c)	Are ESDs on platforms designed to actuate automatically by...				
		- For unattended compressor stations, when:				

Attachment 1
Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	U	N/A	N/C
		• The gas pressure equals MAOP plus 15%?				
		• An uncontrolled fire occurs on the platform?				
		- For compressor station in a building, when				
		• An uncontrolled fire occurs in the building?				
		• Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class I, Group D is not a source of ignition)?				
.171	(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.				
	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?				
	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?				
	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?				
	(e)	Are the mufflers equipped with vents to vent any trapped gas?				
.173		Is each compressor station building adequately ventilated?				
.457		Is all buried piping cathodically protected?				
.481		Atmospheric corrosion of aboveground facilities				
.603		Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?				
		Are facility maps current/up-to-date?				
615		Emergency Plan for the station on site?				
619		Review pressure recording charts and/or SCADA				
707		Markers				
		Overpressure protection – reliefs or shutdowns				
735		Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?				
		Are aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?				
736		Gas detection – location				

Comments:

		COMPRESSOR STATION O&M PERFORMANCE AND RECORDS	S	U	N/A	N/C
09	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)				
	.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)				
	.736(c)	Compressor Stations – Detection and Alarms (Performance Test)				

Comments:

Recent PHMSA Advisory Bulletins (Last 2 years)

Leave this list with the operator.

All PHMSA Advisory Bulletins (Last 2 years)

Number	Date	Subject
ADB-09-01	May 21, 2009	Pipeline Safety: Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	September 30, 2009	Pipeline Safety: Weldable Compression Coupling Installation
ADB-09-03	December 7, 2009	Pipeline Safety: Operator Qualification (OQ) Program Modifications
ADB-09-04	January 19, 2010	Pipeline Safety: Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	February 3, 2010	Pipeline Safety - Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Pipeline Safety: Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe
ADB-10-04	April 29, 2010	Pipeline Safety: Implementation of Electronic Filing for Recently Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-06	August 3, 2010	Pipeline Safety: Personal Electronic Device Related Distractions
ADB-10-08	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

For more PHMSA Advisory Bulletins, go to http://phmsa.dot.gov/pipeline/regs/advisory-bulletin

APPENDIX G

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

Ernie Fletcher
Governor

Teresa J. Hill, Secretary
Environmental and Public
Protection Cabinet

Timothy J. LeDonne
Commissioner
Department of Public Protection

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Mark David Goss
Chairman

John W. Clay
Commissioner

April 2, 2007

The Honorable Steve Sweeney
Mayor of Liberty
P.O. Box 127
Liberty, KY 42539

RE: Natural Gas Facilities Inspection of the City of Liberty Gas Company

Dear Mayor Sweeney:

On March 21, 2007, Joel Grugin conducted a periodic regulatory compliance inspection of the natural gas facilities of the City of Liberty Gas Company in Liberty, Kentucky. A copy of the inspection report is attached for your review. Six deficiencies were documented during this comprehensive inspection. The previous inspection of this facility was conducted on April 21, 2004. During that comprehensive inspection, two deficiencies were documented, and one was not corrected in a timely manner.

Please review the attached report. As noted, six deficiencies were documented during the inspection. You are requested to respond to this report, outlining corrective actions for the cited deficiencies by May 1, 2007. Please provide your responses on the copies of the Deficiency Tracking Reports sent with this letter by completing the three sections under the Response heading for the cited deficiency.

If you have any questions or need additional information, you are welcome to contact me at (502) 564-3940. We appreciate your continued interest in the safe operation of your gas facilities.

Sincerely,

Jason R. Grangers, P.E.
Manager
Gas Branch
Division of Engineering

JRB:SS:mae
Attachment: City of Liberty 032107 Inspection Report

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/26/2007

Report Number: City of Liberty 032107

BRIEF

Inspector: Joel Grugin

Inspection Date: 3/21/2007

Type of Inspection: Periodic Regulatory Compliance Inspection

Type of Facility: Municipal

Name of Utility: City of Liberty Gas Company

Location of Facility: Liberty, KY

Purpose of Inspection: Periodic inspection of a municipal's facilities and management practices to verify compliance with federal pipeline safety regulations.

Applicable Regulations 49 CFR Part 192

INSPECTION

Description of Utility: City distribution system serving 614 customers in the city of Liberty and areas along distribution pipeline from Texas Eastern.

Number of Customers: 614

Area of Operation: Liberty, KY

Supply Source: Texas Eastern Transmission Corp.

Distribution Description: Distribution gas system operating in Liberty, KY operating at pressures from 240 psig to 20 psig supplied through steel and plastic pipelines.

Workforce Summary: Ronnie Wesley, Supervisor; Bridget Blake, Office Personnel; Greg Rodgers and Jeff Wethington, Maintenance.

Utility Reps in Insp: Ronnie Wesley, Bridget Blake, and Jeff Wethington

Date of Last Inspection: 4/21/2004

DTR from Last Insp: 2

DTRs not Cleared: 1

Summary of items and facilities Inspected:

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Drug and Alcohol, and Public Awareness Plans were reviewed during the office visit. Also inspected were records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, and odorant verification tests. The field portion of the inspection consisted of inspecting corrosion pipeline readings, regulator settings, pipeline markers, mainline valve locations, and meter installations.

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/26/2007

Report Number: City of Liberty 032107

FINDINGS

1 City of Liberty had not performed a leakage survey since 2003. (This is a repeat deficiency.)

2 City of Liberty did not review and update operation, maintenance, and emergency plan as required .

3 City of Liberty improperly tested a broken service line on Highway 1547. A bubble test was performed instead of a pressure test .

4 City of Liberty did not perform periodic odorant tests.

5 City of Liberty had not identified or documented critical valve inspections.

6 City of Liberty did not perform corrosion tests for 2006.

RECOMMENDATIONS

To correct the findings noted in this report it is necessary for the City of Liberty Gas Company to take the following actions: (1) Perform and document leak surveys as required in 192.723. (2) Review, update, and document their operations, maintenance, and emergency plans annually. (3) Test all disconnected service lines as new. (4) Perform and document periodic odor tests. (5) Identify, inspect, and document critical valve inspections annually. (6) Perform and document corrosion readings annually.

ADDITIONAL INSPECTOR COMMENTS

One previous deficiency had not been corrected. We have scheduled a reinspection to verify compliance with the noted deficiencies for 7/20/2007.

Submitted by

Joel Grugin WH

Joel Grugin
Utility Regulatory and Safety Investigator III

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 1

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.723 Distribution systems: Leakage surveys... Each operator of a distribution system shall conduct periodic leakage surveys...

Deficiency:

City of Liberty had not performed a leakage survey since 2003. (This is a repeat deficiency.)

If Repeat Deficiency, Date of Last DTR: 4/21/2004

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 2

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grigin

Regulation

49 CFR Part 192.605(a) Procedural manual for operations, maintenance, and emergencies...Each operator...a manual of written procedures for conducting operations and maintenance activities and for emergency response...

Deficiency:

City of Liberty did not review and update operation, maintenance, and emergency plan as required .

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary).

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 3

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.725 (b) Each service line temporarily disconnected from the main must be tested from the point of disconnection to the service line valve in the same manner as a new service line, before reconnecting...

Deficiency:

City of Liberty improperly tested a broken service line on Highway 1547. A bubble test was performed instead of a pressure test .

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 4

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.625(f) Odorization of gas. ...(f) Each operator shall conduct periodic sampling of combustible gases to assure the proper concentration of odorant in accordance with this section,..

Deficiency:

City of Liberty did not perform periodic odorant tests.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred: Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 5

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.747

Deficiency:

City of Liberty had not identified or documented critical valve inspections.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: City of Liberty 032107 Due Date: 5/1/2007
DTR Number: 6

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin

Regulation

49 CFR Part 192.465 External corrosion control: Monitoring...(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year...

Deficiency:

City of Liberty did not perform corrosion tests for 2006.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

APPENDIX H

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

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

June 12, 2009

Honorable Steve Sweeney
Mayor of Liberty
Courthouse Square
P.O. Box 127
Liberty, KY 42539

PERIODIC REGULATORY COMPLIANCE INSPECTION OF LIBERTY NATURAL GAS

On May 27, 2009, Steve Samples conducted a periodic regulatory compliance inspection of the natural gas facilities of Liberty Natural Gas in Liberty, Kentucky. A copy of the inspection report is attached for your review. Nine deficiencies were documented during this periodic inspection. The previous inspection of this utility was conducted on March 21, 2007. Six deficiencies were documented during that periodic inspection and were corrected in a timely manner.

As noted, nine deficiencies were documented during the inspection. You are requested to respond to this report, outlining corrective actions for the nine cited deficiencies by July 17, 2009. Please provide your responses on the copies of the Deficiency Tracking Reports sent with this letter by completing the three separate sections under the Response heading for the cited deficiency.

If you have any questions or need additional information, you are welcome to contact me at (502) 564-3940. We appreciate your continued interest in the safe operation of your gas facilities.

JASON R. BRANGERS, P.E., MANAGER, GAS BRANCH, DIVISION OF ENGINEERING

Attachment: LibertyNaturalGas 052709 Inspection Report

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 5/29/2009

Report Number: Liberty Natural Gas 052709

BRIEF

Inspector:	Steve Samples
Inspection Date:	5/27/2009
Type of Inspection:	Periodic Regulatory Compliance Inspection
Type of Facility:	Municipal
Name of Utility:	City of Liberty Gas Company
Location of Facility:	Liberty, KY
Purpose of Inspection:	Periodic inspection of a municipal operator's facilities and management practices to verify compliance with federal pipeline safety regulations.
Applicable Regulations:	49 CFR Part 191,192, and 199.

INSPECTION

Description of Utility:	Municipal operator serving city of Liberty and surrounding area.
Number of Customers:	556
Area of Operation:	Liberty, KY
Supply Source:	Texas Eastern Transmission
Distribution Description:	Steel and plastic distribution gas system in Casey County operating at 240 PSIG to 20 PSIG.
Workforce Summary:	4 Gas Operator Qualified Employees and office personnel.
Utility Reps in Insp:	Ronnie Wesley, Supervisor, and Charlene Rodgers (City Clerk)
Date of Last Inspection:	3/21/2007
DTR from Last Insp:	6
DTRs not Cleared:	0

Summary of items and facilities Inspected:

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Public Awareness and Drug and Alcohol Plans were reviewed during the office visit. Also inspected were records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, and odorant verification tests. The field portion of the inspection consisted of inspecting regulator settings, pipeline markers, mainline valve locations, meter installations, and the point of delivery at Texas Eastern facility.

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 5/29/2009

Report Number: Liberty Natural Gas 052709

FINDINGS

1 Liberty Natural Gas was not a member of Kentucky one-call system.

2 Liberty Natural Gas was not taking adequate precautions when working in hazardous situations.

3 Liberty Natural Gas system did not have a Public Awareness Plan or records to indicate following a plan.

4 Liberty Natural Gas was not conducting leakage surveys in their business district each year.

5 Liberty Natural Gas did not have records to indicate their critical valves have been inspected each year.

6 Liberty Natural Gas did not take corrosion readings in 2008.

7 Rectifier readings were taken by Mike White. He did not have corrosion operator qualifications.

8 Liberty Natural Gas did not have records to show they had tested their new segments of main after a dig in.

9 Liberty Natural Gas did not review and update their manuals annually.

RECOMMENDATIONS

City of Liberty should correct the stated deficiencies in a timely manner.

ADDITIONAL INSPECTOR COMMENTS

Ronnie Wesley was advised of the plastic squeeze off box at the Woodrum Ridge Regulator Station were they are squeezing off plastic in the same place periodically. It is standard practice in the gas industry, and normally a pipe manufacturer recommmendation, not to squeeze off pipe more than once in the same location. This should be replaced with a plastic valve. A follow up inspection will be scheduled.

Submitted by

Steve Samples

Steve Samples
Utility Regulatory and Safety Investigator III

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 1

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.614 Damage prevention program...each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities...

Deficiency:

Liberty Natural Gas was not a member of Kentucky one-call system.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 2

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.605(b)(9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathin

Deficiency:

Liberty Natural Gas was not taking adequate precautions when working in hazardous situations.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 3

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.616 Public awareness. Each operator shall establish a continuing educational program to enable customers, the public, appropriate government organizations, and persons engaged in excavation...

Deficiency:

Liberty Natural Gas system did not have a Public Awareness Plan or records to indicate following a plan.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 4

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.723 (b)(1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at

Deficiency:

Liberty Natural Gas was not conducting leakage surveys in their business district each year.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 5

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.747 Each valve...must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

Deficiency:

Liberty Natural Gas did not have records to indicate their critical valves have been inspected each year.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 8

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.465 External corrosion control: Monitoring... (a) Each pipeline that is under cathodic protection must be tested at least once each calendar year...

Deficiency:

Liberty Natural Gas did not take corrosion readings in 2008.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 7

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.805(b) Qualification program... (b) Ensure through evaluation that individuals performing covered tasks are qualified;

Deficiency:

Rectifier readings were taken by Mike White. He did not have corrosion operator qualifications.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 8

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.503(a)(1) No person may operate a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until - It has been tested in accordance with this subpart and Sections 192.619 to substantiate

Deficiency:

Liberty Natural Gas did not have records to show they had tested their new segments of main after a dig in:

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occuring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

Report Number: Liberty Natural Gas 052709 Due Date: 7/17/2009
DTR Number: 9

Deficiency Tracking Report

Deficiency Detail

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples

Regulation

49 CFR Part 192.605(a) Procedural manual for operations, maintenance, and emergencies...

Deficiency:

Liberty Natural Gas did not review and update their manuals annually.

If Repeat Deficiency, Date of Last DTR:

Response (attach additional pages as necessary)

1) Explain why the deficiency occurred. Include information about what caused the deficiency and why it was not detected by the utility. (Attach extra pages as necessary)

2) Explain actions taken to correct the deficiency, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

3) Explain actions taken to prevent the deficiency from occurring again, including utility's responsible person, actions taken, and when it was (or will be) done. (Attach extra pages as necessary)

Response Provided By: _____ Response Date: _____

Signature: _____

APPENDIX I

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 01 2016

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	30
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 8/27/14 Employees: Greg Rodgers

1. Plus Business District and Schools.
2. Book: 1.

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	100
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 8/27/14 Employees: Darrin Wesley

1. Plus Business District and Schools.
2. Book: 2

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected 1
b. Percent of system inspected 20%
c. Number of services inspected 90
d. Percent of total services

2. RESULTS

a. Number of leaks detected 0
b. Number of pipeline leaks 0
c. Number of services leaks 0
d. Number grade "1" leaks 0
e. Number grade "2" leaks 0
f. Number grade "3" leaks 0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 6/27/14 Employees: Jeff Wethington

1. Plus Business District and Schools.
2. Book: 3.

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	45
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 8/27/14 Employees: Darren Atwood

1. Plus Business District and Schools.
2. Book: 4.

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	4
b. Percent of system inspected	20%
c. Number of services inspected	100
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 8/27/14 Employees: Chris Dial

1. Plus Business District and Schools.
2. Book: 5

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	30
d. Percent of total services	6

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 7/25/13 Employees: Greg Rodgers

1. Plus Business District and Schools.
2. Book: 1.

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	80%
c. Number of services inspected	45
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 7/25/13 Employees: Darren Atwood

1. Plus Business District and Schools.
2. Book: 4

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	30
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 7/8/13 Employees: Greg Rodgers

1. Plus Business District and Schools.
2. Book: 1

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	45
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 7/8/12 Employees: Darren Atwood

1. Plus Business District and Schools.
2. Book: 4

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

   a. Miles of pipeline inspected 1
   b. Percent of system inspected 20%
   c. Number of services inspected 30
   d. Percent of total services

2. RESULTS

   a. Number of leaks detected 1
   b. Number of pipeline leaks 0
   c. Number of services leaks 1
   d. Number grade "1" leaks 0
   e. Number grade "2" leaks 1
   f. Number grade "3" leaks 0

CLASSIFICATION METHOD

   a. Class "1" leaks 75% to 100% CGI Meter
   b. Class "2" leaks 15% to 75% CGI Meter
   c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 6/6/2011 Employees: Jeff Washington
Greg Rodgers

1. Plus Business District and Schools.
2. Book: 1.

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	100
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 6/7/2011 Employees: Jeff Wethington
Greg Rodgers

1. Plus Business District and Schools.
2. Book: 2

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

a. Miles of pipeline inspected	1
b. Percent of system inspected	20%
c. Number of services inspected	75
d. Percent of total services	

2. RESULTS

a. Number of leaks detected	0
b. Number of pipeline leaks	0
c. Number of services leaks	0
d. Number grade "1" leaks	0
e. Number grade "2" leaks	0
f. Number grade "3" leaks	0

CLASSIFICATION METHOD

a. Class "1" leaks 75% to 100% CGI Meter
b. Class "2" leaks 15% to 75% CGI Meter
c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 6/8/2011 Employees: Jeff Wethington
Greg Rodgers

1. Plus Business District and Schools.
2. Book: 3+4

City of Liberty

LEAKAGE SURVEY RECAP

1. SCOPE

   a. Miles of pipeline inspected 4
   b. Percent of system inspected 20%
   c. Number of services inspected 100
   d. Percent of total services

2. RESULTS

   a. Number of leaks detected 0
   b. Number of pipeline leaks 0
   c. Number of services leaks 0
   d. Number grade "1" leaks 0
   e. Number grade "2" leaks 0
   f. Number grade "3" leaks 0

CLASSIFICATION METHOD

   a. Class "1" leaks 75% to 100% CGI Meter
   b. Class "2" leaks 15% to 75% CGI Meter
   c. Class "3" leaks 0% to 15% CGI Meter

Name of Company: City of Liberty
P.O. BOX 127
Liberty, KY 42539

The City of Liberty has been divided into five (5) parts because we have five meter books.

Date of Survey: 6/9/2011 Employees: Jeff Washington
Grey Rodgers

1. Plus Business District and Schools.
2. Book: 5.

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

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

APPENDIX B

APPENDIX A TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2017-00053 DATED

APPENDIX B

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2017-00053 DATED

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

December 15, 2016

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Case No. 2016-00391
Investigation into Compliance of City of Liberty Gas Company with KRS 278.495 and 49 CFR Part 192

To Whom It May Concern:

This letter serves as response from the City of Liberty concerning Case No. 2016-00391 regarding the investigation into compliance of City of Liberty Gas Company. Based on Appendix A of the Order the City of Liberty received, below will state each number represented in Appendix A and the response from the City of Liberty Gas Company:

1. Refer to the Leakage Survey Recaps, which are attached to this Order as Appendix 1. Provide copies of each gas leak detection survey report represented by the Leakage Survey Recaps.

*Explanation – The information provided on the Leakage Survey Recaps were not proper Leakage Surveys, therefore there are no leak detection survey reports to provide. One of our employees incorrectly filled the leakage survey recaps out based on patrolling that the city employees had completed thinking that was the correct form to fill out.

2. Explain why the Leakage Survey Recaps were not provided to Commission Staff during the periodic regulatory compliance inspection of Liberty Gas conducted between July 6 and July 10, 2015.

*Explanation – During the inspection conducted between July 6 and July 10, 2015, Liberty Gas employees learned that the patrolling we were doing was not actually a proper Leakage Survey. The Recaps were not provided to Commission Staff because we didn't think that's what he was asking for. Once we learned what a leakage survey actually entails, we realized that we were not in compliance with those guidelines so we didn't have the correct paperwork to provide to the Inspector. The last Leakage Survey Report performed for the City of Liberty Gas Company was in 2009 by Heath Consultants.

3. Explain why the Leakage Survey Recaps were not provided to Commission Staff during the follow-up regulatory compliance inspection of Liberty Gas conducted June 23, 2016.

*Explanation – As stated above, the Leakage Survey Recaps were filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly. Liberty Gas employees learned of their errors during the inspection conducted July 6 through July 10, 2015 and because they had not been done correctly, we did not turn in the Recaps to Commission Staff. The last Leakage Survey Report performed for the City of Liberty Gas Company was in 2009 by Heath Consultants.

4. Refer to Liberty Gas's response to the 2015 Inspection Report, Finding 4 and 5 attached as Appendix C. Explain why the Leakage Survey Recaps were not referenced of provided in Liberty Gas's response.

*Explanation - As stated above, the Leakage Survey Recaps were filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly. Liberty Gas employees learned of their errors during the inspection conducted July 6 through July 10, 2015 and because they had not been done correctly, we did not provide the Leakage Survey Recaps in our response to the 2015 Inspection Report. The last Leakage Survey Report performed for the City of Liberty Gas Company was in 2009 by Heath Consultants.

5. Explain why leakage surveys were not conducted before the end of 2015, as Liberty Gas stated would occur in its response to the 2015 Inspection Report, Funding 4 and 5.

*Explanation – This was a miscommunication among employees regarding who was contacting Heath Consultants to schedule the leakage survey. Since then, we are working on making sure everyone knows and understands their job duties.

6. Refer to Liberty Gas's response to the 2016 Inspection Report, attached as Appendix E, in which Liberty Gas states that "[t]he failure to complete the above mentioned leakage surveys were an oversight...."
   a. Explain why Liberty Gas confirmed that leakage surveys had not been performed either inside or outside Liberty's business districts since 2009.
   b. Explain why the Leakage Survey Recaps were not referenced or provided in Liberty Gas's response.

*Explanation - As stated above, the Leakage Survey Recaps were filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly. Liberty Gas employees learned of their errors during the inspection conducted July 6 through July 10, 2015 and because they had not been done correctly, we did not provide the Leakage Survey Recaps in our response to the 2016 Inspection Report. The last Leakage Survey Report performed for the City of Liberty Gas Company was in 2009 by Heath Consultants.

7. Refer to the Leakage Survey Recap dated June 6, 2011, which indicates a Grade 2 leak was detected. Provide documentation of the repair of the Grade 2 leak noted on the June 6, 2011 Leakage Survey Recap.

*Explanation – We are unable to find any documentation regarding the repair of the Grade 2 leak noted on the June 6, 2011 Leakage Survey Recap.

8. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014, identify which gas leak detection survey was conducted by Liberty Gas employees and which gas leak survey was conducted by a third-party leak detection company.

*Explanation - As stated above, the Leakage Survey Recaps were filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly. Liberty Gas employees learned of their errors during the inspection conducted July 6 through July 10, 2015. None of those were performed by a third-party leak detection company. The last Leakage Survey Report performed for the City of Liberty Gas Company was in 2009 by Heath Consultants.

9. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014 by Liberty Gas employees:
   a. Identify the employee who conducted the gas leak detection survey;
   b. Identify the covered tasks the employee is qualified and retraining;
   c. State the dates of initial qualification and retraining;
   d. Identify the qualification method(s); and
   e. Provide records supporting the qualification of the employee to conduct a gas leak detection survey.

*Explanation - As stated above, the Leakage Survey Recaps were incorrectly filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly. Liberty Gas employees learned of their errors during the inspection conducted July 6 through July 10, 2015. Therefore, none of the city employees conducted a gas leak detection survey.

10. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014 by a third-party leak detection company:

a. Identify the third-party company who performed the gas leak detection survey;
b. Provide evidence of payment to the third-party leak detection company; and
c. Provide records supporting the qualification of the personnel who conducted the gas leak detection survey.

*Explanation – Liberty Gas Company did not have any third-party companies perform a gas leak detection survey since 2009.

11. For each gas leak detection survey conducted in 2011, 2012, 2013, and 2014 by Liberty Gas employees, identify the survey method.

*Explanation - As stated above, the Leakage Survey Recaps were incorrectly filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly. Therefore, none of the city employees conducted a gas leak detection survey.

12. For each gas leak detection instrument utilized by Liberty Gas employees in conducting gas leak detection surveys, provide records for the past five years that document:

a. The frequency of gas leak detection instrument testing for accuracy;
b. The results of gas leak detection instrument testing for accuracy; and
c. The frequency of gas leak detection instrument calibration.

*Explanation - As stated above, the Leakage Survey Recaps were incorrectly filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly. Therefore, none of the city employees conducted a gas leak detection survey. No instruments were used during their patrolling.

13. For each Liberty Gas employee who has conducted a gas leak detection survey since 2011, provide documentation of the employee's training on:

a. Gas leak detection instruments;
b. Gas leak detection procedures; and
c. Gas leak classification and action criteria.

*Explanation - As stated above, the Leakage Survey Recaps were incorrectly filled out based on patrolling done by city employees, and were not actual Leakage Surveys that had been performed correctly with instruments. Therefore, none of the city employees conducted a gas leak detection survey.

14. Refer to the 2016 Leakage Control Survey performed by Heath between July 19 and July 21, 2016, contained in Appendix E.

a. Refer to unnumbered page 2, which notes that two Grade 2 leaks were detected during the leak survey. Provide documentation of the repairs of the two Grade 2 leaks.
b. State what percentage of the business district is included in the July 19-21, 2016 leak survey.
c. State what percentage of the area outside the business district is included in the July 19-21, 2016 leak survey.

*Explanation –

a. The two Grade 2 leaks are scheduled to be repaired on the next weather permitting day. The 6 month deadline for those repairs will be January 21, 2017. We will provide documentation to the Public Service Commission as soon as those repairs are completed.

b. During the leak survey conducted on July 19-21, 100% of the business district area was completed.

c. During the leak survey conducted on July 19-21, 100% of the area outside the business district was completed.

15. Provide copies of each Operating and Maintenance Manual procedure pertaining to gas leak detection surveys in effect since 2011, including but not limited to survey schedule and survey processes.

*Explanation – Copies of the O&M Manual procedures regarding leak detection surveys are enclosed.

16. Provide documentation that Liberty Gas has contracted with a qualified firm to provide future leakage surveys in Liberty's business district and in areas outside the business district.

*Explanation – Enclosed is a copy of the contract with Heath Consultants which expires at the end of 2016. The City of Liberty has been in contact with Heath regarding a contract for future leakage surveys. We are waiting on their contract department to send us a renewed contract for the next year.

In conclusion, the leakage survey recaps should never have been filled out or sent in as a leakage survey. This was an error on our employee's part. We are continuing to put forth effort to ensure we are completing the proper work, as well as the correct paperwork. The City of Liberty apologizes for the confusion we have caused, and will strive to follow all guidelines set in our O&M Manual in the future. For any questions or concerns, please call me or Mayor Brown at (606)787-9973 or email me at libertybb@windstream.net.

Sincerely,

Bridgett Blake

Bridgett Blake
City of Liberty

SERVICES AGREEMENT (INDEPENDENT CONTRACTOR)

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

SECTION ONE-SCOPE OF WORK:

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

SECTION TWO-PRICE/PAYMENT:

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

SECTION THREE-RELATIONSHIP OF PARTIES:

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

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

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

SECTION FIVE-INSURANCE TO BE SECURED:

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

SECTION SIX-INDEMNIFICATION

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

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

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

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

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

SECTION SEVEN-COMPLIANCE WITH LAW AND SAFETY REQUIREMENTS:

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

SECTION EIGHT-DURATION/RENEWAL/CANCELLATION:

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

SECTION NINE-CONFIDENTIALITY:

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

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

SECTION TEN-MISCELLANEOUS:

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

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

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

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

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

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

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

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

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

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

SECTION ELEVEN-FORCE MAJEURE

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

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

SECTION TWELVE--NOTICES

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

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

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

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

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

HEATH CONSULTANTS INCORPORATED

WITNESS: _____

By: _____

Name: Gary Lape (Print)

Title: VP Operations (Print)
Thereunto duly authorized

Date: 6-22-16

LIBERTY GAS COMPANY

WITNESS: Bridgett Blake

By: _____

Name: Steven Brown (Print)

Title: Mayor (Print)
Thereunto duly authorized

Date: 06/13/16

PLEASE RETURN EXECUTED CONTRACT TO: contractsadmin@heathus.com

-OR-

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

Option to Renew

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

HEATH CONSULTANTS INCORPORATED

BY:

WITNESS:_____ _____

_____
Signature

Name: _____(Print)

Title: _____(Print)
Thereunto duly authorized

Date: _____

LIBERTY GAS COMPANY

BY:

WITNESS: Barbara Blake _____

_____
Signature

Name: Steven Brown (Print)

Title: Mayor (Print)
Thereunto duly authorized

Date: 06/13/16

PLEASE RETURN EXECUTED CONTRACT TO: [illegible]

-OR-

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

EXHIBIT A

SCOPE OF WORK

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

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

EXHIBIT B

PRICE SCHEDULE

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

See attached Proposal Letter

EXHIBIT C

INSURANCE REQUIREMENTS

PLEASE SEE ATTACHED HEATH STANDARD CERTIFICATES.

Heath Consultants Incorporated

June 3, 2016

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

Ms. Blake,

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

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

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

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

Sincerely,

Todd Kelley
Field Services Manager

Cc: Jessie Spires
William Luttrell
Nashville Office File

ACORD®

CERTIFICATE OF LIABILITY INSURANCE

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

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

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

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

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A: Liberty Mutual Fire Ins. Co.	23035
INSURER B: Steadfast Insurance Company	26387
INSURER C:	
INSURER D:	
INSURER E:	
INSURER F:	

INSURED
Heath Consultants Inc. 9030 Monroe Rd. Houston TX 77061

COVERAGES CERTIFICATE NUMBER: CL1572271989 REVISION NUMBER:

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

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY CLAIMS-MADE [X] OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: POLICY [X] PRO-JECT [ ] LOC OTHER:			TB2291452436035	7/30/2015	7/30/2016	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG Employee Benefits	$ 2,000,000 $ 1,000,000 $ 10,000 $ 2,000,000 $ 2,000,000 $ 2,000,000 $
A	AUTOMOBILE LIABILITY X ANY AUTO ALL OWNED AUTOS [ ] SCHEDULED AUTOS X HIRED AUTOS [X] NON-OWNED AUTOS			AS2291452436025	7/30/2015	7/30/2016	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)	$ 1,000,000 $ $ $
A	X UMBRELLA LIAB [X] OCCUR EXCESS LIAB [ ] CLAIMS-MADE DED X RETENTION $ 10,000			TH7291452436065	7/30/2015	7/30/2016	EACH OCCURRENCE AGGREGATE	$ 10,000,000 $ 10,000,000
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y/N [ ] N/A If yes, describe under DESCRIPTION OF OPERATIONS below						PER STATUTE [ ] OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	$ $ $
B	Professional Liability			EOC5932316	7/30/2015	7/30/2016	Aggregate Each Limit	$10,000,000 $10,000,000

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

CERTIFICATE HOLDER

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

CANCELLATION

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

AUTHORIZED REPRESENTATIVE

Henry Hochman/JR02

SOI7913

ACORD® CERTIFICATE OF LIABILITY INSURANCE

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

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

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

PRODUCER	CONTACT NAME:	
Commercial Lines Wells Fargo Insurance Services USA, Inc. 6100 Fairview Road Charlotte, NC 28210	PHONE (A/C, No, Ext): 888-672-2412	FAX (A/C, No):
	E-MAIL ADDRESS: certs@trinet.com	
	INSURER(S) AFFORDING COVERAGE	NAIC #
	INSURER A: Indemnity Insurance Company of North America	43575
INSURED Strategic Outsourcing, Inc PO Box 241448 Charlotte, NC 28224 RE: Heath Consultants Incorporated	INSURER B:	
	INSURER C:	
	INSURER D:	
	INSURER E:	
	INSURER F:	

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

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

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

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

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

CERTIFICATE HOLDER

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

CANCELLATION

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

AUTHORIZED REPRESENTATIVE

Purging

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

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

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

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

Leakage Survey

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

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

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

(2) Method of Performance of Leakage Survey.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Abandonment or Inactivation of Facilities

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

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

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

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

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

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

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

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

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