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

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:

 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.

 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. 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. 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,

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 patrolling¹⁰ 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.

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 0 6 2017

KENTUCKY PUBLIC SERVICE COMMISSION

TTEST:

Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2017-00053 DATED FEB 0 6 2017

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION INTO COMPLIANCE OF)
CITY OF LIBERTY GAS COMPANY WITH) CASE NO.
KRS 278,495 and 49 CFR Part 192) 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:

 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"). 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

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ATTEST:

Executive Director

APPENDIX A

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 0 1 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 0 1 2016



Leonard K. Paters Secretary Energy and Environment Cabinet



Commonwealth of Kentucky Public Service Commission 211 Sower Bivd. P.O. Box 616 Frankfort. Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc ky.gav David L. Annatrong Chalmar

James W. Gardner Vice Chalmnan

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.

<u>Deficiencies</u>

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...

<u>Finding:</u>

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.)



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City of Liberty Gas System 2015 Natural Gas Standard Inspection August 18, 2015 Page 2

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.)

 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.)



City of Liberty Gas System 2015 Natural Gas Standard Inspection August 18, 2015 Page 3

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 complete.
 - 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. Easiem Transmission to venty 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



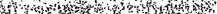


INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s) stevel samples	Report Number	Liberty Gas 07102015
Inspection Date(s) July 6-10, 2015	Report Date: 37	7/13/15
Inspection Types	☐ Integrity Management × Opera	tor Qualification
☐ Compliance Follow-up		2 3 3 10 9 3 3 4 4
OPERATO	OR INFORMATION	
Name of Operator St. City of Liberty Gas System	OP: ID: No. 2 (trino op to No., exp	i1472
Type of Eacility Municipal	Location of Facility	Liberty, KY.
Area of Operation Liberty , KY.		P. B. MANNER
Official Operator Contact and Address : (Contact	Unit Name and Address	
for Inspection Letters Steven Brown (Mayor)		
City of Liberty		
518 Middleburg St.		
Шьёнту, КУ, 42539		
Phone # and Email 606-787-9973 Ubertybb@w	/indstream.net	
Records Location Same as above		
Persons		
interviewed Title	Phone No.	
Bridget Blake Clerk		indstream.net
Greg Rodgers Superintendent		1 4.3 ₁₀ 1 1
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Number of Gas Employees 5		***
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Other 27 ··	50	
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Additional Operator Information		ADDED THE EXPENSE
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Summary

On July 6,7,8,9 and 10, 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 deliclencies. 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 partaining to leakage surveys and repairs, valve inspections, patrolling, corresion control, regulator inspections, pressure recordings, distribution integrity management, public awareness, and odorant verifications. The field portion of the inspection consisted of inspections own porder regulator stations, pipeline markers, mainline valve locations, and mater inspections. Also inspected the point of delivery from Texas Eastern Transmission and performed a protocol 9 field check on consisted test points to verify corresion protection for the City of Liberty.

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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 butside its business district. Last records were 2009 from Heath Contractors. The City of Liberty Operation and Maintenance Interval is every 3 years.
- (5) 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

Utility Regulatory and Safety Investigator IV

7/13/15



Procedures - Reporting

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4. Emergency Response equipment, tools, and materials a	(detail) Do	es the process inc ne scene of an eme	lude proced ergency? (E	lures for e P.ERG.RE	ensuring the a ADINESS.P) (d	vailability o letail)	f personne	:l,
192.615(a) (192.615(a)(4))	•		Sat+	Sat	Concern	Unsat	NĄ	NC
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5. Emergency Response oward protecting people first and	- Actions (I then property	(detail) Does th	e emergeni PRIORITY.I	cy plan in P) (detail)	clude procedu	res for taki	ng actions	directed :
192.615(a) (192.615(a)(5))			Sat+	Sat	Concern	'Unsat	ΝA	NC
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5. Emergency Response	(detail) Do	oes the emergency	plán includ	ie procedu	ires for the en	nergency s	hutdawn o	r pressure
5. Emergency Response eduction in any section of pipelin	(detail) Do	pes the emergency essary to minimize	plan includ hazards to	ie procedu life or pro	ires for the en	G.PRESSR	hutdown o EDUCESD.	r pressure P) (detail) NC
5. Emergency Response eduction in any section of pipelin	(detail) Do ne system nece	pes the emergency essary to minimize	hazards to	ie procedu life or pro	ires for the en operty? (EP.ER	G.PRESSR	EDUCESD.	P) (detail)
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6. Emergency Response eduction in any section of pipelin 192.615(a) (192.615(a)(6))	(detail) Do	pes the emergency essary to minimize	hazards to	le procedu life or pro Sat	ires for the en operty? (EP.ER	G.PRESSR	EDUCESD.	P) (detail)
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)2.615(a) (192.615(a)(9))	Sat+	Sat	Сопсегл	Unsat	., NA	NC.
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tes						
. Incident Investigation Actions (detail) Do	es the process	s include p	rocedures for	beginning .	action und	er ,
92.617, if applicable, as soon after the end of the emergency 2.615(a) (192.615(a)(10))	<i>y.as possible?</i> . Sat+	(EP.ERG.)	Concern	ONS.P) (di Unsat	etall) :	NC
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L. Emergency Response Training (detail) Doe	s the process	include tr	aining of the a	appropriate	operating	personi
assure they are knowledgeable of the emergency procedure tall)	s and verifyln	g that the	training is effe	ective? (EP	EAG.TRAI	NING P
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tes						3.0.4
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. Emergency Response Performance (detai vitles to determine whether the procedures were effectively) Does the p	rocess inc ach emerg	lude detailed : rency? (EP.ER	steps for re G.POSTEVI	vjewing er TREVIEW	nployee P) (det
lylties to determine whether the procedures were effectively	followed in e	ach emer Sat	lude detailed : jency? (EP.ER. Concern	G.POSTEVI	TREVIEW.	P) (det
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lvities to determine whether the procedures were effectively 2.615(b)(3)	followed in e	ach emer Sat	ency? (EP.ER	G.POSTEVI	TREVIEW.	P) (det
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L. Emergency Response Performance (detail vities to determine whether the procedures were effectively 2.615(b)(3) L. Liaison with Public Officials (detail) Does to propriate fire, police and other public officials and utility own 2.615(c) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 2.615(c)(4); ADB-05-03) Potes Public Education Program (detail) Has the convired? (PD.PA.PROGRAM.P) (detail) 2.616(a) (192.616(h))	Followed in e Sat+ To process inc ers? (EP.ERG Sat+ Program atinuing public	sat Sat LIAISON. Sat x ceducation	for establishing (detail) Concern	G.POSTEVI Unsat Unsat Program b	Intaining II	P) (detail N C



. Management Support of Public Awareness Pr emonstrate management support? (PD.PA.MGMTSUPPORT.P) (de		detail)	Does the ope	rator's prog	ram docur	mentation
92.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)	Sat+	Sat	Concern	Unsat	NA	NC
re, American State Company		×	** *** *			
Notes						
. Asset Identification (detail) Does the program clea						be
92.616(b) (API RP 1162 Section 2.7 Step 4)	Sat+	Sat	Concern		NA	NC
		×				
Notes			nder en	In the second	***************************************	
Audience Identification (detail) Does the program our affected stakeholder audience groups: (1) affected public, (2) is well as affected municipalities, school districts, businesses, and) emergenc	y officials	, (3) local pubi	lic officials,		
92.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; PI RP 1162 Section 3)	Sat+	Sat	Concern		NA	NC
		×				
5. Messages, Delivery Methods, and Frequencie nessages, delivery methods, and delivery frequencies to comprel	s (detai	l) Does t	he program de fected stakeho	fine the cor	nbination ces in all a	of areas
where gas is transported? (PD.PA.MESSAGES.P) (detail)	Sat+	Sat	Concern	Unsat	NA	NC
	300			· ·		
RP 1162 Section 5)			1	×	-	
P 1162 Section 5) Notes		s 2 times	per year accor		r plan.	
Notes The baseline public awareness message was not being sent to the baseline public awareness message was not being sent to the baseline public awareness program enhancements need for supplemental public awareness program enhancements	e customers	i) Were	relevant factor	ding to thei	d to deteri	
Notes The baseline public awareness message was not being sent to the baseline public awareness message was not being sent to the baseline public awareness program enhancements PD.PA.SUPPLEMENTAL.P) (detail)	e customers	i) Were	relevant factor	ding to thei	d to deteri	
Notes The baseline public awareness message was not being sent to the baseline public awareness message was not being sent to the baseline public awareness program enhancements PD.PA.SUPPLEMENTAL.P) (detail)	e customers ts (detai for each sta	i) Were i keholder	relevant factor audience, as o	ding to thei	d to detern API RP 11	62?
Notes The baseline public awareness message was not being sent to the baseline public awareness message was not being sent to the baseline public awareness program enhancements popel part of the public awareness program enhancements pd.PA.SUPPLEMENTAL.P) (detail) 192.616(c) (API RP 1162 Section 6.2)	e customers ts (detai for each sta	l) Were in keholder	relevant factor audience, as o	ding to thei	d to detern API RP 11	62?
Notes The baseline public awareness message was not being sent to the baseline public awareness message was not being sent to the baseline public awareness program enhancements polyphone program enhancements polyphone program enhancements polyphone program enhancements polyphone program (detail) Notes 7. Other Languages (detail) Does the program requires commonly understood by a significant number and concentration	ts (detai for each sta	1) Were in keholder Sat x	Concern	s considered fescribed in	d to deteri API RP 11 NA	NC NC
Notes Notes The baseline public awareness message was not being sent to the baseline public awareness message was not being sent to the baseline public awareness program enhancements (PD.PA.SUPPLEMENTAL.P) (detail) 192.616(c) (API RP 1162 Section 6.2) Notes 7. Other Languages (detail) Does the program require commonly understood by a significant number and concentration (PD.PA.LANGUAGE.P) (detail) 192.616(g) (API RP 1162 Section 2.3.1)	ts (detai for each sta	1) Were in keholder Sat x	Concern	s considered in Unsat	d to deteri API RP 11 NA	NC NC



192.616()) (192.616(c); APT RP 1162 Section 8; APT RP 1162 Appendix E)	Sat+	'Sat	Concern	Unsat	NA*	,p
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9. Master Meter and Petroleum Gas Systems (considering process meet the requirements of 192.616())? (PD.PA	.MSTRMETER	es <i>the ma:</i> CP) (detai	ster meter or ;)	petrojeniu i	gas systen	٠.
192.616(J) (192.616(h))	Sat+	Sat		Unsat	NA	N
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Procedures – Failure Investigation	maria. Nn		William Tolk		9 A 8 10	
						. 4
1. Incident Investigation (detail) Does the process	Înclude proc	edures for	analyzing acc	idents and	fallures, li	nclud
the selection of samples of the failed facility or equipment for lab determining the causes of the failure and minimizing the possibil	ioratory examity of recuire	nination, ! ≀nce? (EP.	where approp ERG.INCIDÈN	riatė, for th TANALYSIS	i <i>e purpose</i> i.P) (detall	ρF }
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Procedures - MAOP	١,٠٠٠				. 5.	•
1. Maximum Allowable Operating pressure Det	erminati	on (det	ail) page th			
determining the maximum allowable operating pressure for a pip	eline segme	nt in accor	rdance with 1	92.619?	ichane broc	,cuui
(MO.GOMAOP.MAOPDETERMINE,P) (detail)		*******	*****		<u> </u>	ं इस्टिंग्स
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	N
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Procedures - Pressure Test 💎 🚬	1. 4.0 A	$\mathcal{F}_{\mathcal{F}}}}}}}}}}$	A 14. 5	i e e d	۶	, , ·
1. Test Acceptance Criteria and Procedures (de	itaill w	··			- di	9-J
essure the basis for an acceptable pressure test? (AR,PTI.PRESS	TESTACCEP,	e cesc acce P) (detail)	plance criteria	a and proce	oures sun	icieni
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);	Sat+	Sat	Concern	Unsat	NA	N
192.507(b); 192.507(c))	ļ	·				
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Procedures - Odorization Of Gas

1. Odorization of Gas (detail) Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with \$192,6257 (MO.GOODOS.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
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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	2,627]		Sat+ Sat	Concern	-Unsat-	N A	N C
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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)

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192.627 (192.805(b))	(2) N.W. (1997) (1997) - 人位 展見集事 (4)	" nair" la finacia	Author 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	I .
"金龙"的"数","阿罗林","阿勒尔","阿罗尔","阿罗尔","阿罗尔","阿罗尔","阿罗尔","阿罗尔",		خالتها فالمسانة بسند البرقة بالمحمد المعادمات	وسلته انزناه بنيار والمساه فيديا واستاجته العزواني	—•
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Procedures - Pipeline Purging

1. Pipeline Purging (detail) Does the process include requirements for purging of pipelines in accordance with 192,6297 (MO.GOODOR:PURGE.P) (detail)

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

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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 Equilibrium reported? (PD.RW.PATROL.P) (detail) 192.705(a) (192.705(b); 192.705(c)) 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 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: Notes

Procedures - Line Marker

1. ROW	Markers Requ	uirements	(detail)	Does the	mess adequat	elu cover	the regula	emente for olere	ment of POW
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marker\$? (PD.RW.ROWMARK	ER.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)

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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))

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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)(11 (19	2.713(a)	i 192.7	13(b))`
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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))

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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))

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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)).

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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))

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Procedures - Protecting Cast-Iron Pipeline

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Procedures -	Weldin		Veld D	efect	Repa	ir/Rem	oval		
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. Miter joints (detail) Does the process prohibit the	e use of certain r	niter joint	s? (DC.WELDP	ROCEDURE	.MITERJOI	NT.P)
92.303 (192.233(a); 192.233(b); 192.233(c))	Sat+	Sat	Concern	Unsat	NA	NC
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 Preparation for Welding (detail) Does the p 192.2357 (DC.WELDPROCEDURE.WELDPREP.P) (detail) 	process require ce	rtain prep	parations for w	elding, in a	ccordance	with
192.303 (192.235)	Sat+	Sat	Concern	Unsat	NA	NC
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ualified inspectors? (DC.WELDINSP.WELDVISUALQUAL.P)	(detail)	guire visu Sat	Concern		be conduc	n C
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8. Inspection and Test of Welds (detail) Doe qualified inspectors? (DC.WELDINSP.WELDVISUALQUAL.P) (192.303 (192.241(a); 192.241(b); 192.241(c)) Notes 9. Repair or Removal of Weld Defects (detairemoved and/or repaired as specified by 192.245? (DC.WEL 192.303 (192.245(a); 192.245(b); 192.245(c)) Notes Procedures - Nondestructive T 1. Nondestructive Test and Interpretation and interpretation? (DC.WELDINSP.WELDNDT.P) (detail) 192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243	Sat+ ail) Does the procedures	Sat Ocess required AIR.P) (d	Concern x dire welds that letail) Concern x	unsat are unacce Unsat	NA ptable to t	N C



92.303 (1	ўС.СО.РLAST 92.273(b); 19	92.281(a); 1); 192.28	31(c);	Sat+	Sat	Concern	Unsat	NA	NC
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. Plasti be qualif	: pipe - Q	ualifying	Joinin	g Proc	edures ((detail)	Does the p	ricess require D.PLASTICIOI	plastic plp	e joining p	rocedu tail)
92.273(b)	(192,283(a);	; 192.283(b)	, 192.28	3(c); 192	.283(d))	Sat+	sat'	Concern	Unsat	NA T	NC
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s. Plasti pints in pia	c pipe - Q stic pipelines	ualifying are qualified	Joinin 17 (DC,C)	g Proc	edures . ĊiĢIŅTÕŪ	(detail) AL.P) (detai	(s'a proces }	s in place to	ensure that	personnel	makin
oints in pla	c pipe - Q stic pipelines (192.285(a)	are qualified	47 (DC.CC	O.PLASTI	ĊĨĢĬŃĹĠŊ	(detail) ALP) (detail Sati) Sat	Concern	$\mathcal{F}_{\mathcal{F}}}}}}}}}}$	personnel NA	
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oints in pla	stic pipelines	are qualified	47 (DC.CC	O.PLASTI	ĊĨĢĬŃĹĠŊ	ALP) (detal) Sat	jaroje (m. 1847)	$\mathcal{F}_{\mathcal{F}}}}}}}}}}$	<u>```##`.\$}``</u>	makin N C
oints in pla 92.285(d) Notes	stic pipelines (192.285(a)	are qualifies; 192.285(8)	d7 (DC.CC); 192:28	D.PLASTII 5(c); 192	2101NTQU .805)	ALP) (detal	Sat x	jaroje (m. 1847)	Unsat:	NA	N C
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be carried out by, or under the direction of, qualified personnel? (TQ.QU.CORROSION.P) (detail)	•	•
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	192.453 (1	192.80) 5(b)])	•			Sat+	Sat	Concern	Unsat	N _A	NC
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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
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adequate coating unless exempted by 192.455(b)? (TD.COAT.CO			1			
92.605(b)(2) (192.452(a); 192.455(a); 192.455(b); 92.461(a))	Sat+	Sat	Concern	Unsat	NA	NC
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Notes				-	(6)	
. Cathodic Protection post July 1971 (detail)	Does the pro	cess reau	ire that each b	uried or su	hmeraed i	ipeline
stalled after July 31, 1971, be protected against external corre	sion with a c	athodic p	rotection syste	m within 1	year after	200
ompletion of construction, conversion to service, or becoming j 92.605(b)(2) (192.455(a); 192.457(a); 192.452(a);	-	,	T			
92.452(b))	Sat+	Sat	Concern	Unsat	NA	NC
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 Use of Aluminum (detail) Does the process give actually pipeline? (TD.CP.ALUMINUM.P) (detail) 	requate guida	ance for ti	ne installation	or aluminun	n in a subi	mergea
92.605(b)(2) (192.455(e))	Sat+	Sat	Concern	Unsat	NA	NC
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	Does the	process re	equire that pin	elines Instal	lled hefore	Augus
5. Cathodic Protection pre August 1971 (detail 971 (except for cast and ductile iron lines) which are 1) bare of	r ineffectively	v coated t	ransmission lii	nes or 2) ba	re or coat	ed pipe
5. Cathodic Protection pre August 1971 (detail 1971 (except for cast and ductile iron lines) which are 1) bare on compressor, regulator or meter stations must be cathodically	r ineffectively	v coated t	ransmission lii	nes or 2) ba	re or coat	ed pipe
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3. Inspection and Test of Welds (detail) Do record welding are qualified by appropriate training and experience, as redetail)	ds indicate t equired by §	hat indivi §192.241(duals who perf (a)? (DC.WELD	orm visual INSP.WELL	inspection DVISUALQ	of JAL.R)
192.241(a) (192.241(b); 192.241(c); 192.807(a); 192.807(b))	Sat+	Sat	Concern	Unsat	N.A.	NC
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4. Qualification of Nondestructive Testing Personnels (TQ.QUOMCONST.NDT.R) (details)	onnel (de	etail) D	o records Indic	ate the qua	alification o	of ·
192.243(b)(2) (192.807(a); 192.807(b); 192.328(a); 192.328(b))	Sat+	Sat	Concern	Unsat	NA	NC
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5. Nondestructive Test and Interpretation Process adequate? (DC.WELDINSP.WELDNDT.R) (detail)	edures (detail)	Do records in	dicate that	NDT imple	menta
192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))	Sat+	Sat	Concern	Unsat	NA	NO
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6. Transmission Lines Record Keeping (detail) pipe/"other than pipe" repair, NDT required record, and (as requi	Do records	indicate ti	nat records are	maintaine	d of each	2
(MO.GM.RECORDS.R) (detail)	red by subp	arts L or	T patroi, surv	ey, inspect	on or test	, ,
192.605(b)(1) (192.243(f); 192.709(a); 192.709(b); 192.709(c))	Sat+	Sat	Concern	Unsat	NA	NO
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	(detail) (detail) Sat+	Have plas	Concern		NA.	N
7. Plastic pipe - Qualifying Joining Procedures accordance with 192.283? (DC.CO.PLASTICJOINTPROCEDURE.R)	(detail)					N
7. Plastic pipe - Qualifying Joining Procedures accordance with 192.283? (DC.CO.PLASTICJOINTPROCEDURE.R)	(detail)	Sat				N
7. Plastic pipe - Qualifying Joining Procedures accordance with 192.283? (DC.CO.PLASTICJOINTPROCEDURE.R) 192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d)) Notes	(detail)	Sat x	Concern s indicate pers	Unsat	NA	
7. Plastic pipe - Qualifying Joining Procedures accordance with 192.283? (DC.CO.PLASTICJOINTPROCEDURE.R) 192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d)) Notes 8. Plastic pipe - Qualifying Joining Procedures	(detail)	Sat x	Concern s indicate pers	Unsat	NA	



92.287 (192.807(a); 192.807(b))	÷	Sat+	Saty	Concern	Unsat	NA /	NC
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O. Underground Clearance (detail) Do reconnum (if plastic) Installed as to prevent heat damage to the p					s in accord	lance with.	192.325
92.325(a) (192.325(b); 192.325(c))		Sat+		Concern	Unsat	NA .	NC
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1. Depth of Cover - Onshore (detail) Is ons	inore pipi	ing minim :	ium cover	as specifica il	1 192.32//	(DCCO.CC	JVEK.K
92.327(a) (192.327(b); 192.327(c), 192.327(d); 192.327	7(e))	Sat+	Sat	Concern	Unsat	NA	NC
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2. EFV Installation (detail) Do records indicate erformance? (MO.GO.EFVINSTALL.R) (detail)		program	satisfies ti	he requiremen	nts for insta	allation and	
2. EFV Installation (detail) Do records Indicate erformance? (MO.GO.EFVINSTALL.R) (detail) 92.383(b) (192.381(a); 192.381(b); 192.381(c); 192.38	16434	program Sat+	satisfies ti	ne requireme Concern	nts for insta Unsat	allation and	NC
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5. Normal Ma	intenance and	Operations (detail)	Has the o	serator con	ducted annu	al reviews o	f the writt	en
procedures in the	manual as required?	(MO:GO.OMANNI	JALREVIE	W.R) (deta	ii) 🦠 🔆 🐫	SEA LIGHT COMMON TO SEA		1.62 2.64	
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Abnormal Operations (Review) (detail) Do	o records indicat	e periodic	review of wor	k done by	operator p	ersonne
determine the effectiveness of the abnormal operation pro O GOABNORMALABNORMALREVIEW.R) (detail)	cedures and cor	rective ac	tion taken wh	ere deficiel	icles are fo	nuq5
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Damage Prevention Program (detail) Does	4 3 3 3 3	M . 1 - 1	Welster State		<u></u>	<u> </u>
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29. Acceptable Methods for Program Implementation Audits (detail) was one or more of the three a care paying the complete the annument acceptable methods (i.e., internal assessment, and party contractor review, or regulatory inspections) used to complete the annument
audit of review of program implementation? (PD:RA AUDITMETHODS:R) (detail)
192'616(c) (192'616(l) APERP1162'Section 6:3) Sat+ Sat+ Concern Unsat+ NA NG
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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
192.727(e); 192.727(f); 192.727(g)) Satt. Satt. Concern Unsat NA NC
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i. Evalua	ting Progi	am Eff	ectiver	iess (d	letail) <i>H</i>	lave effectiv	eness éva	luation(s) of i	the program	n been për	formed
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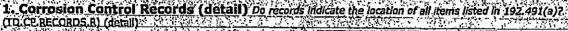
PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)	-					
92.616(c) (API RP 1162 Section 8.4.2)	Sat+	Sat	Concern	Unsat	NA	NC
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18. Valve Maintenance Distribution Lines (deta ach distribution system valve that might be required in an emer- alendar year, and prompt remedial action to correct any valve for	gency at into	ervals not	exceeding 15	months, bu	it at least	once eac
92.603(b) (192.747)	Sat+	Sat	Concern		NA	NC
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Notes to records of valves being checked since 2013.		i	* 18 g	ter terioris en en en estado en estado en estado en estado en entre en estado en estado en estado en estado en		ALTONIO NA SANTANIA MATERIA
89. Vault Inspection (detail) Do records document ins internal content of 200 cubic feet (5.66 cubic meters) or more the FS.FG.VAULTINSPECTFAC.R) (detail)						lumetric
.92.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))	Sat+	Sat	Concern	Unsat	NA	NC
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0. Measure Desired Stakeholder Behavior (de						on made
of whether appropriate preventive, response, and mitigative beha PD.PA.MEASUREBEHAVIOR.R) (detail)	aviors were	unaerstoc	od and likely to	o de exhibite	ea.e	
192.616(c) (API RP 1162 Section 8.4.3)	Sat+	Sat	Concern	Unsat	NA	NC
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A1. Prevention of Accidental Ignition (detail) Details the danger of accidental ignition where the presence of gas constituted (192.751(a); 192.751(b); 192.751(c))				(MO.GM.IC		
41. Prevention of Accidental Ignition (detail) Detail the danger of accidental ignition where the presence of gas constitution.	tituted a haz	ard of fire	e or explosioni	(MO.GM.IC	NITION.P	(detail)
41. Prevention of Accidental Ignition (detail) Dethe danger of accidental ignition where the presence of gas constitution (192.709 (192.751(a); 192.751(b); 192.751(c)) Notes 42. Measure Bottom-Line Results (detail) Were	Sat+	sat x	Concern Concern	Unsat	NA NA v tracking	(detail) NC
41. Prevention of Accidental Ignition (detail) Detail the danger of accidental ignition where the presence of gas constituted (192.751(a); 192.751(b); 192.751(c)) Notes 42. Measure Bottom-Line Results (detail) Were the party incidents and consequences including: (1) near misses, (2) damages that do not result in pipeline failures? (PD.PA.MEASURE	Sat+ bottom-line excavation BOTTOM.R)	Sat X x results of damages (detail)	Concern Concern the program is resulting in po	Unsat Unsat	NA V tracking es, (3) ex	N C
41. Prevention of Accidental Ignition (detail) Dethe danger of accidental ignition where the presence of gas constitution (192.751(a); 192.751(b); 192.751(c)) Notes	Sat+ bottom-line excavation	sat x results of damages	Concern Concern	Unsat Unsat	NA NA v tracking	(detail) NC



Program Changes (detail) Were needed changes d on the results and findings of the program effectiveness et 616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 ion 8.5) Master Meter and Petroleum Gas Systems em operator has met the requirements of 192.616(j)? (PD.P 616(f) (192.616(h); API RP 1162 Section 2.7 (Step 12); API	valuations? (Sat+ (detail) E	fications to	MCFS P) (de	Identified a	x and docum	nented NC
Program Changes (detail) Were needed changes of on the results and findings of the program effectiveness et 616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 ton 8.5) Les Master Meter and Petroleum Gas Systems em operator has met the requirements of 192.616()? (PD.P	valuations? (Sat+ (detail) E	PD.PA.CH	MCFS P) (de	tali)	<u> </u>	
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cords - Operator Qualification						- 2. Y.
Qualification Records for Personnel Perform	ing Cove	red Tas	ks (detail) Do record	s documei	ir the
uation and qualifications of individuals performing covered to s be verified? (TQ.OQ.RECORDS.R) (detail)	asks, and cal	n the quali	fication of ind	ividuais pen	formin g co	vered
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Contractor and Other Entity Qualification (d	etail) Are	adequate .	records maint	alned for co	ntractor p	ersonn
ifications that contain the required elements? (TQ.OQ.OQCC	Sat+	(detail)	Concern		NA	N C
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Records - Corrosion Control Performance





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

192.491(c) (192.459)

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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))

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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.CURRENTTESTR) (detail)

192.491(c) (192.465(b))

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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))

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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.	. N C^.\.
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13. Internal Corrosion Control: Design and Con	struction	r (192.4	76) (deta	iil) Dó réc	ords demoi	nstrate - 3
tre transmission line project has leatures incorporated into its de required of 197.4767 (DC.DPC.INT.CORRODE R) (decail)	sign and.co	istructions	d redace the	risicotinte	imal Corros	lon, as
192.476(d) (192.476(b); 192.476(c); .476(d))	satt.	sat	Concern	Unsat	NA:	NC"
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14. Internal Corrosion Corrosive Gas Actions (d	e ca ll) <i>Do</i>) (detall):	records d	coment the a	actions tak	an when co	rrosive
192.491(c) (192.477)	Satt	Sat	Concern	Unsat	NA	NC
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15-Atmospheric Corrosion Monitoring (detail) atmospheric comosion? (TD:ATM:ATM:CORRODEINSP.R)?(detail);;	Do records	focument)	nspection of	abovegroui	nd pipe for	
192.491(c) (192.481(a); 192.481(b); 192.481(c)),	Sati	Sat	Concern	Unsat	NA:	NC
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16: New Burled Pipe Coating (detail) Do records do 31: 1971, has been protected against external corrosion with an						arter July?
(TO,COAT,NEWPIPE,R) (detail).		13.7	1851/2019		\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	200
192,491(c) (192,455(a)(1); 192,461(a)); 192,461(b); 192,483(a));	Sat+	Sat	Concern	Unsat	NA	NC
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	an and				k. 44873	
17. Repair of Internally Corroded Pipe (detail):	Do records	document	Mary In the State of		ar of pice t	han handi
been internally corroded to an extent that there is not sufficient r	emaining st	rength in t	he pipe wall?	(TD.ICP.R	EPAIR.R) (d	ietali)
192.485(a) (192.485(b))	Satt	Sat	Concern	Unsat	NA.	NC
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Notes				Y Kashi		18.00
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18. Evaluation of Internally Corroded Pipe (det	all) Do re	cords docu	ment adequa	te evaluati	on of Intern	ially
corroded pipe? (TD.ICP.EVALUATE.R) (detail)	MACH L	A KAS	极温度		75 8 117	restant.
192.491(c) (192.485(c))	Sat+	Sat	Concern	Unsat	NA"	NC.
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Page 40 of 67

Procedures (Distribution Compressor Station) - Compressor > Station

92.605(b)(6)	sát+	Sat	Concern	Unsat	NA	**************************************
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	<u> </u>		. A	4 3 1 3 3 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1	<u> </u>	<u> </u>
Compressor Station Design/Construction - int-up and shut down have sufficient detail to ensure start-up	Start-Up a	and Shu	it-Down (i	ietail) D lo a mandé	oes the pro	cess lo
eration within the MAOP limits prescribed by this part, plus th	e bulld-up al	lowed for (peration of p	ressure-lin	iting and c	ontrol .
vices 7 (FS.CS.CMPSUSD.P) (detail)	Alle Address o	19 m - 1	Childry action.	Vid. 13.35		. 3: 12: N : 12: N
2.605(b)(5) (192.605(b)(7))	Sat+	Sat	Concern	Unsat		NC
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otes		z . z		45.33		
Compressor Station Design/Construction -	Pressure	Relief (detail) Dö	s the proc	ess provide	adequa
táll for inspection and testing of compressor slation pressure S.CSSYSPROT.CMPRELIEF.P) (detail)	relief devices			ipture disk		TO T
Z.605(b)(1) (192.731(a); 192.731(b); 192.731(c))	Sat+	Sat	Concern		NA.	NC
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Compressor stations - Storage of Combusti the storage of flammable/combustible materials and specify	ble Materi	als (de	tail) Does ti r äasoline stoi	e process age tanks	include req belog losta	uiremen iled at
impressor stations be protected in accordance with NFPA No.	30, as require	d of §192	. <i>735(b)?</i> (DC.	COCMP.CM	PCOMBUS	TIBLE.P)
etall)	Sat+	Sat	Concern	Unsat	NA	NC
	Satt	Sat	concern	Unsac	I NA	NE
2.303 (192./35(a); 192./35(b))	i ,		<u> </u>			ļ <u>.</u>
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otes Compressor Station Design/Construction -	Permanei	nt Gas I	etection			
otes Compressor Station Design/Construction – equately detail regularments of permanent gas detectors and	Permanei l alarms at co	nt Gas I	etection			
Compressor Station Design/Construction - equately detail requirements of permanent gas detectors and S.CSSYSPROT.CMPGASDETREQ.P) (detail)	Permanei Jalarms at co	nt Gas I mpressor	etection (buildings?	(detail)	Does the p	rocess
Compressor Station Design/Construction - equately detail requirements of permanent gas detectors and s.CSSYSPROT.CMPGASDETREQ.P) (detail)	Permanei l alarms at co	nt Gas I	etection		Does the p	
2.303 (192.735(a); 192.735(b)) otes Compressor Station Design/Construction - lequately detail requirements of permanent gas detectors and S.CSSYSPROT.CMPGASDETREQ.P) (detail) 2.605(b) (192.736(b))	Permanei Jalarms at co	nt Gas I mpressor	etection (buildings?	(detail)	Does the p	rocess



Field Review (Distribution Compressor Station) - Compressor

Stations Inspection (Field)



1. Compressor Station	Design/Construction	- Exits (detail) Does	eách main compressor	bullding operating \
floor have at least two separates	d. easily accessed and unobs	tructed exits to a place of a	alery, main compresso	r building exits that
have door latches that can be re				
(FS.CS.BLDGEXITS.O) (detail)		THE MALE WAS COUNTY OF	阿斯拉尔斯 阿利尔	

192.163(c).

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Notes:

2. Compressor Station Design/Construction - Fence Gates (detail) bo 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)

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3. Compressor Station Design/Construction - NFPA/ZO (detail) Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station? (FS.CS.CMPNFPA70.0) (detail)

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4: Compressor stations Liquid Removal (detail) are compressors protected from liquids and as applicable liquid separators for compressors installed in accordance with 192, 1657 (DC DPCCMP, CMPLIOPROT O) (detail)

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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 ploing at a location. Where the gas will not create a hazard? (FS.CSSYSPROT.ESDGASDISCH.O) (detail)

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6. Compres: an emergency si required for field	hutdöwn syste	m that is ca	pable of blo	ckina aas o	ut of the sta	ation and h	low dawn the	station blo	ina? NOT	É Nai
192.167(a)(1)	ikan sa Salatan sa Kata	W. W. W. W.			Sat+	·Sat	Concern		NA	N
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7. Compress shutdown system compressor built	ń that is capal	le of shuttli	ng down ga	s:compressi	SD (deta ng equipme	ii) Does nt and gas	each compres fires in the v	sor station icinity of ga	have an e is headen	merg and
192.167(a)(3)					Sat+	Şàt	Concern	Unsat	NA	. N
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8. Compress an emergency's	hutdown syste	m that is ca	pable of shi	utung down	electrical fa	icilities (ex	cept emerger	ncy and êgu	ressor sta Ilpment pi	don hi rotecu
<i>circuits) near ga</i> 192.167(a)(3)(i)		CC 330 FC	oressor buil	aingsr, (rs.)	Sat+	Sat	Concern	<u> </u>	NA	N
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(he station, 2) N 153 meters) fro	hutdown syste lear the exit ga	m that is ca ites, if the s	pable of be tation is fer	ing operated need, or need	l from at le r emergenc	ast two loc y exits, if	ations which not fenced, 3,	are: 1) Out And not m	side the g nore than	as are 500 fe
an emergency s the station, 2) N 1153 meters) fro	hutdown syste lear the exit ga	m that is ca ites, if the s	pable of be tation is fer	ing operated need, or need	i from at lear r emergence LOCATION.	ast two loc y exits, if i O) (detail)	ations which not fenced, 3	are: 1) Out And not m	side the g nore than	as are 500 fe
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4. Compressor Stati	on Design/Cons te in the event of inac	struction - dequate heating	Lubricat or lubricat	ion (de	etail) Do com	pressor uni	ts have sh .0) (detail	utdowr)
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5. Compressor Stati as engines that operate with utomatically shut off and th	h pressure gas injection	on equipped so	that stoppa vented? (FS	ge of the S.CSSYSP	engine will res ROT.CMPGASE	nGSD.O) (c	uel being letail)	-
5. Compressor Stati as engines that operate with utomatically shut off and th	h pressure gas injection	on equipped so	that stoppa	ge of the	engine will res	nGSD.O) (c	letail)	or statio
5. Compressor Stati as engines that operate with utomatically shut off and th 92.171(d)	h pressure gas injection	on equipped so manifold being	that stoppa vented? (FS	ge of the S.CSSYSP	engine will res ROT.CMPGASE	nGSD.O) (c	uel being letail)	-
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19. Atmospheric Corrosion Monitoring (detail)	Iș pipe țha	t is expose	d to atmosph			:d7 :
(TD.ATM.ATMCORRODEINSP.O) (detail)	-			 	in the installation	
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20. Start-Stop Procedures (détail) During startup o	r shut-in, is	it assured	that the pres	sure (Imital	ions on the	pipe
192,605(b)(5)	Sat+	Sat	Concern	2 2 2 2 2 2	NA	. N
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21. Normal Operations and Maintenance Proce and operating history available to appropriate operating personne	gures - r el7 (MÖ.GO.	IISTORY (OMHISTOR	geçalı) Arı (Y.O) (detail)	e.constructi	ou técoros	map
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22. Compressor Station - Emergency Response	Plan (de	etail) 4e	ememanav i	กละกกกร้อ	ane for seli	erted
compressor stations kept on site? (FS.CS.CMPERP.O) (detail)	7			S 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		y . i
192.605(a) (192.615(b))	Sat+	(Sat	Çoncern	Unsat	NA.	N
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23. MAOP Recording (detail) Do pressure recording of	harts or SCA 97 (MO.GOM	<i>WA PECONG</i> MANPIMANI	RECORDING	.O) (detail)		
pressure limits have been maintained in accordance with 192.61	97 (MO.GOM	AOP.MAOF	RECORDING			N
23. MAOP Recording (detail) Do pressure recording cl pressure limits have been maintained in accordance with 192.61 192.605(b)(1) (192.619(a); 192.619(c))	harts or SCA 97 (MO.GON Sat+	AOP.MAOF	RECORDING. Concern	O) (detail) Unsat	NA X	N



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6. Comp	rèssor Statio: e a compressor sta	n Design/Const ation designed, install	ruction ;- ed; and inspe	Pressure	Relief	(detaii) SSYSPROT.CM	e pressure PRELIEF:0	relief/limii) (detail)	ting '	•
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7. Comp	red as required an	ns - Storage of (gasoline stor	age tanks li	nstalled at	compressor s		combustible		
.7. Comp naterials sto with NFPA No	red as required an o. 30, as required i		gasoline stor	ombustible	estalled at E.O) (deta	compressor s all)	tations pro	combustible itected in a	ccordance	,
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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.
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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	, NÀ	NC
			x	
Notes				



PHMSA Form 14 Question Set (IA Equivalent) PHMSA (OQ) INSPECTION FORM

Instructions

- Use in conjunction with Unit inspections
 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	A STATE OF THE STA		121
Inspection Location City & State	Liberty, KY.		1 2 2	
Operator Employee Interviewed	Bridgett Blake		Phone #	
Position/Title	Operations	, XV -		
Operator Designated Employer Represe (a.k.a. Substance Abuse Program Mana		Premier Drug Testi	ng	#14.7 A
DER Phone # 606-787-9973		1 1 7 ± t=17	2	" Jan Pag

§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)	 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)	 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				

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 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(a) Sat+ Sat |Concern | Unsat NC 14 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' v Notes 4. Contractor and Other Entity Qualification (detail) Does the process regulre 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); Sat+ Sat Concern NC 192.805(1) 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 Notes 7. Management of Other Entitles Performing Covered Tasks (detail) Do records document evaluation of the other entity (les) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OQ.OTHERENTTTY.R) (detail) 192.805(b) (192.805(c); 192.803) Sat+ Sat Concern Unsat NA NC x

Notes

	PHMSA Form 14 Question Set (IA Equivalent) PHMSA (OQ) INSPECTION FORM
8. Evaluation Methods (detail) Are evaluation met	hods established and documented appropriate to each covered
task7 (TQ:QQ:EVALMETHOD.P) (detail) -192.805(b) (192.803-192.809(d); 192.809(e))	Sat+ Sat Concern Unsat NA NC
	Satt Satt Concern Under NA NC.
Notes	Mary Alleria to James I from the property of the Control Nove May
9. Evaluation Methods (detail) Do records Indicate	evaluation methods are documented for covered tasks and
consistent with personnel qualification records? (TQ.OQ.EVALM	/ETHOD R) (detail)
192.805(b) (192.803, 192.809(d), 192.809(e))	Sat Sat Concorn Unsat NA NC
Notes	
10. Abnormal Operating Conditions (detail) of tasks be qualified to recognize and react to abnormal operating	g conditions (AOCs), 2) evaluation and qualification of
anticipate and appropriately react to during the performance o	3) AOCs identified as those that the individual may reasonably Cthe covered task, and 4) established provisions for
communicating AOCs for the purpose of qualifying individuals? 192.803	(TO OQ ABNORMALP) (detail) Sat + Sat Concern Unsat NA NC
Notes	
11: Abnormal Operating Conditions (detail)	o records document evaluation of qualified individuals for
recognition and reaction to AOCs? (TO OQ ABNORMALR) (det	an)
192.807(a) (192.807(b); 192.803)	Satt Sats Concern Unsat NA NC
Notes	
12. Qualification Records for Personnel Perfo	orming Covered Tasks (detail) Pagerons
document the evaluation and qualifications of individuals performing covered tasks be verified? (TO.OQ.RECORDS.R) (d	orming covered tasks, and can the qualification of individuals
192.807	Sat - Sat Concern Unsat NA NC
Notes	
13. Planning for Mergers and Acquisitions (D	
Individuals) (detail) Does the process adequately ma "during program integration following a merger or acquisition?"	nage qualifications of individuals performing covered tasks (TQ.QQ.MERGERACQ.P) (detail)
192.805(b) (192.803)	Sat+ Sat Concern Unsat NA NC
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.6. Covered Task Performed by Non-Qualific valified individuals to perform covered tasks while being directions and limitations placed on such activities? (TQ.OQ.	ected and ol	bserved b	y a qualified l	there provi Individual,	sions for i and are th	ion-
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lotes						
7. Personnel Performance Monitoring (deta dividual if there is reason to believe the Individual is no long informance by an Individual contributed to an Incident or ac sks? (TQ.OQ.PERFMONITOR.P) (detail)	er qualified cident; other	to perfo r factors	rm a covered affecting the	task based performani	on: cover ce of cove	red ta. red
2.805(d) (192.805(e))	Sat+	Sat	Concern	Unsat	NA.	⁸ N c
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otes)				
9. Program Performance and Improvement og am and implementation of improvements to enhance the etail)	t (detail) e effectiven	Poes the	program? (T	uire evalua Q.OQ.PRO	GRAMEVA	L.P)
02.605(a) (192.605(b)(8))	Sat+	Sat	Concern		NA	N C
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lotes			<u> </u>			
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1. Management of Changes (detail) Does the andards and other elements used by individuals in performiculating contractor individuals, and how these changes are in	ing covered	tasks are	communicate	ed to the in	ndividuals,	• 1
1. Management of Changes (detail) Does the andards and other elements used by Individuals in performic cluding contractor individuals, and how these changes are inetail)	ing covered	tasks are	communicate valuation met	ed to the in	ndividuals,	C.P)
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1. Management of Changes (detail) Does the andards and other elements used by individuals in performic duding contractor individuals, and how these changes are interest. 22.805(f)	Sat+ (detail)	tasks are d in the e Sat x	Concern	ed to the li hod(s)? (T Unsat	ndividuals, Q.OQ.MQ(N.A	N C



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.PROTE TASK PERFORMANCE O) (detail)

192.801(a) (192.809(a))

13 10	Sat+	Sat	Concern	Unsat	NA	NC
			138 5 2			2003

STANT WAS IN THE

Darren Atwood and Greg Rodgers. O.k.

2. Qualification Status (detail) Venty the individuals performing the observed covered tasks are currently qualified to perform the covered tasks are currently.

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132.QU.	4L0] L	T35'GA	2(4))
		1. DIN	

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

3: Abnormal Operating Condition Recognition and Reaction (detail) Venty the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed. (TO PROT9 ACCRECOG.O) (detail)

192.801(a) (192.809(a))

					Concern		
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Notes



4- Verification of Qualification (detail) Verify the qualification records are current, and ensure the personal - the detail of the personal o

192.801(a) (192.809(a))

		Concern			
restriction.	# *		24.5	an Make	NOTE:

Notes

5. Program Inspection Deficiencies (detail) Have potential issues identified by the fleadquarters inspection process been corrected at the operational levels (TO PROTE CORRECTION O) (detail)

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Notes

Checked test points on high pressure line. Readings well above 3.85 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.

n	nera	tor	In	forme	tion.
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Operator Injorm	ation:	4		
Name of Operator (leg	gal entity).	City of Liberty		
PHMSA Operator ID:	de abuga serbeasia	11472	a Min a	×
Type of Operator:	1	wned xl Municipal Postify - e.g., cooperative)	rivateLPG	
State(s) included in th	is inspection	Kentucky		
Headquarters Address		518 Middleburg St.	- 1	
Company Contact:	ARAN MARKET	Greg Rodgers	:8:	-
Phone Number:	eran ne se	i i	× 3	
Email:		X	***	
Date(s) of Inspection	A STATE OF THE STA	7/8,9/15		
Date of this Descrip	chiyatin, lakir	7/13/15	4 4 5 N	
Date of Current DIMP	2000			

Persons Interviewed	新生产工业 医阴阳炎	Phone	BACK CHARLES CHAP Y
(list primary contact first)	Title	Number	Email
Greg Rodgers	Operations		
Darren Atwood	Operations	1	7

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

System Description Narrative:



PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Rule §	Description	S/Y	U/N	N/A	N/C
192.1005	Issues Identified in previous Integrity Manage	ment	nspection	on(s)	
*- If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	x			
mments	and the second of the second	2.5			
192.1007(a)	Knowledge of the system	1			1
.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			
mments		у.			
.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	x			
.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	1		
mments	29				
.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shutoffs, 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			
	*- If not satisfactory, insert appropriate code section(s) mments 192.1007 (a)(3) mments .1007 (a)(3)	*- If not satisfactory, insert appropriate code section(s) **- If not satisfactory, inspections been satisfactorily addressed? Provide comments below. **- If not satisfactory, inspections been satisfactorily addressed? Provide comments below. **- If not satisfactory, inspections been satisfactorily addressed? Provide comments below. **- If not satisfactory, inspection section(s) **- If not satisfactorily addressed? Provide comments below. **- If not satisfactorily addressed? Provide comments missing or inspection and data not needed to fill knowledge gaps to assess existing and potential threats? **- If not satisfactorily addressed? Provide comments inspection and data needed to fill knowledge gaps to assess existing and potential threats? **- If not satisfactorily addressed? 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Provide comments inspection and data needed to fill knowledge gaps to assess existing and potential threats? **- If not satisfactorily addressed? **- If not satisfactor	*-If not satisfactory, insert appropriate code section(s) mments 192.1007 (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? mments 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? mments 1007 (a)(3) Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan? mments 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? mments 1007(a)(5) Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shutoffs, 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	* If not satisfactory, insert appropriate code section(s) * If not satisfactory, insert appropriate code section(s) * Imments 192:1007 (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? * Incomplete system information and data using the procedures prescribed in its DIMP plan? * Incomplete system information and data using the procedures prescribed in its DIMP plan? * Incomplete system information and data using the procedures prescribed in its DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities? * Incomplete system information identified or acquired during normal operations, maintenance, and inspection activities? * Incomplete system information identified or acquired during normal operations, maintenance, and inspection activities? * Incomplete system information identified or acquired during normal operations, maintenance, and inspection activities? * Incomplete system information and data using the procedures prescribed in its DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities? * Incomplete system information and data using the procedures prescribed in its DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities? * Incomplete system information and data needed to fill knowledge gaps to assess existing or incomplete system. * Incomplete system information and data needed to fill knowledge gaps to assess existing or incomplete system. * Incomplete system information and data needed to fill knowledge gaps to assess existing or incomplete system. * Incomplete system information and data needed to fill knowledge gaps to assess existing or incomplete system information and data needed to fill knowledge gaps to assess existing or incomplete system information and data n	*- If not satisfactory, insert appropriate code section(s) *- If not satisfactory, insert appropriate code section(s) *- If not satisfactory, insert appropriate code section(s) *- If not satisfactory, insert appropriate code *- If not section(s) *- If not satisfactory, insert appropriate code *- If not section(s) *- If not satisfactory, insert appropriate code *- If not section(s) *- If not satisfactory, insert appropriate code *- If not section(s) *- If not satisfactory, insert appropriate code *- If not satisfactory, appropriate code *- If not satisfactory, appropriate code *- If not satisfactority addressed? *- If not satisfactority addressed? *- If not satisfactority addressed? *- If not satisfactory appropriate code

	Question	Rule §	Descri	ation	S/Y	U/N	N/A	N/C	
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			conjunction with the op-	erator's DIMP plan	新 場為	第 第章			
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			of field conditions to Inf reviewed records	rormation in the		10.00	877 V	3.75	PARTIES NO.
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192:1007 (b) and (c) .1007(b) ments .1007 (b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification? Have any changes occurred that require reevaluation of threats and risks? Examples include, but are not limited to, the following:	x			
.1007(b)	information relevant to system knowledge that may affect its threat identification? Have any changes occurred that require reevaluation of threats and risks? Examples include, but are not limited to, the				
	evaluation of threats and risks? Examples include, but are not limited to, the	x			
.1007 (b)	evaluation of threats and risks? Examples include, but are not limited to, the	x			
	 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) 			J	
ments					
.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 reevaluation of threats and risks?	×			
omments					
.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?	х			
	.1007 (b)	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) The street of the first of the street o	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) The street operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require reevaluation of threats and risks? The street operator identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	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) That 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 reevaluation of threats and risks? That the operator identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	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) That 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 reevaluation of threats and risks? The state of 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?

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192,1007	Identify Threats: Evaluate and Rank Risk				A DES
	(b) and (c)	CONTRACTOR OF THE RESIDENCE OF THE RESID				
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 Cor	nments					
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?	×			
Inspector	Comments		(4)			
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?	×			
Inspector Co	mments		-			
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-	- 🗆 -	-0-	- 0
Inspector Co	mments				7.5	
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?	×			





PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev θ

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?	×			
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 Co						
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 Co	mments					
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	×			
Inspector Co	mments					-
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			

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)?	2000			
<u>s</u>		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	x			
		ii) Number of excavation damages? iii) Number of excavation tickets? iv) Total number of leaks either eliminated	x x x			
		or repaired, categorized by cause? v) Number of hazardous leaks either eliminated or repaired, categorized by	×			
x x x x x x x x x x		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	x			
Incompany Co.		7100.1-1)				
Inspector Co 24	.1007 (e)	Based on field observations and/or record	×	<u> </u>		
24		reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?				
Inspector Co	mments			<u></u>		50.0
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	x			
Inspector Co	mments		-		-	
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 Co	mments		L		L	



PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev θ

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	2192.1007(f)	Periodic Evaluation and Improvement		S. March		
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 Cor	mments					
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			
Inspector Co	mments					
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 Co	mments					-
30	.1007 (f)	If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?	×			
Inspector Co	mments					L

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
31	.1007 (f)	Did the periodic evaluation indicate that the selected <u>performance measures</u> are assessing the effectiveness of risk reduction measures? If not, were performance measures	X			
ar a		modified, deleted or added? (describe in Inspector comments)			To the second	
Inspector Co	mments		i.		. 15.5	
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	X			
Inspector Co	mments					
	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	X			
		the last inspection?	- ,			5:
Inspector Co	mments					# 1
34	192,1009	What must an operator report when mechan Has the operator maintained accurate	ical fitt	ings fail		
34	.1005	records documenting mechanical fitting failures resulting in hazardous leaks?	4			
	1	1	1	1	1	



PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014; - ..., Rev 0

Question Rule 9 Description S/Y U/N N/A N/N Number Did the operator report all mechanical fitting x 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
Did the operator report all mechanical fitting x 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
State authorities, as appropriate, by March 15 th of the next calendar year? Did the reports contain the information required by Department of Transportation
15 th of the next calendar year? Did the reports contain the information required by Department of Transportation
required by Department of Transportation
Form PHMSA F-7100.1-2?
Inspector Comments
36 1009 Did the operator follow its procedure(s) for x
submitting PHMSA Form F-7100:1-2? Methods to verify include, but are not
Ilmited to, the following: Field observation of the excavation of a
falled mechanical fitting Examination of falled fittings or
photographs that have been retained by the operator
Interview with field personnel responsible for collecting information
Tesponsible for concerning mornitation

Rule §	Description	S/Y	U/N	N/A	N/C
192.1011	What records must an operator keep?				
.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)?	pr keep? cords			
nments	Late Att.				
.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	rator retaining the records ating compliance with Subpart P, and in its DIMP plan, for 10 years (or 12/2011)? Decrator retain for 10 years (or since			
nments	AND THE REAL PROPERTY AND A SECOND	:		1.57%	
.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	x			
nments		5 20 80			
192 1013	When may an operator deviate from required	netio	dic inso	ctions	inder
.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	×			
nments					
.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	×			
nments .				-	
.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	x			
	192.1011 .1011 .mments .1011 .1013 .1013 (c)	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)? Inments Initial Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans? Initial Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below. Inments Initial Did the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A") Initial Did the operator conducted the periodic inspections at the specified alternate intervals? Initial Did the operator complied with all conditions that were required as part of the alternate inspection interval approval?	192.1011 What records must an operator keep? 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)? Inments 1011 Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans? Inments 1011 Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below. Inments 192.1013 When may an operator deviate from required perioditis part? 1013 (c) Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A") Inments 1013 (c) Has the operator conducted the periodic inspections at the specified alternate intervals? Inments 1013 (d) Has the operator complied with all conditions that were required as part of the alternate inspection interval approval?	192.1011 What records must an operator keep?	.1011 What records must an operator keep? .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)? .1011 Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans? .1011 Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below. .1013 (c) When may an operator deviate from required periodic inspections at this part? .1013 (c) Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A") .1013 (c) Has the operator conducted the periodic inspections at the specified alternate intervals? .1013 (c) Has the operator complied with all conditions that were required as part of the alternate inspection interval approval?

			075 (0.00 (0.				
	Question .	Rule §	Description	S	U/N	N/A	N/C
	43 🦥	;1013 (c)	Do performance measure records indicate	都是否	***	\$ 18 A	9800
			that an equal or greater overall level of	7 X 1	, 🔲 ,		
			safety has been achieved since the alternate.			7440344# 4 10 10 10	13
1		500 to 100 to 1	Inspection frequency was implemented?	1,1000	 	[(\$45 <u>8</u>]}]	1 1 1 1 1 1 1
-	Inspector Con	<u>)</u>		ese si est	<u> </u>	<u> </u>	
1	mabactor cou	ımen <u>ıs </u>	The state of the s			· · · · · · · · · · · · · · · · · · ·	4 1
I	`44	1013 (c)	If that an equal or greater overall level of	X			
.	أدفي المنا	1, 1,	safety has not been achieved, is the	4.6	1 2		1.91
ļ	1 1		operator taking corrective action?				
İ		/:	Provide comments below regarding	ائندنان دالاف		Sext of	
Į			corrective actions taken or lack thereof.		**	7 T 45	(* 1954) 1 - 1 - 1 - 1
[Inspector Com	iments	"我们的生物的"是《我们的是一个人的	州(森)		ge, com	強化。

Additional inspector Comments



SUPPLEMENTAL INSPECTION QUESTIONS
U-Unsatisfactory N/A-Not Applicable N/C-Not Cheeked (U, N/A, or N/C must include an explanation if cheeked.

	SUPPLEMENTAL INSPECTION QUESTIONS	S	U	N/A	N/
	NTSB SUPPLEMENTAL INSPECTION QUESTIONS			7	
	w operator procedures for determining if exposed cast iron pipe was examined for evidence phitization.	7		x	
	If necessary, was remedial action taken?	10	2	x	
Revie	w 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)		7)	x	
Revie buildi	w operator emergency response procedures for leaks caused by excavation damage near- ings.	х	ev vv	1-2	
*	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			
	ew operator records of previous accidents and failures (including reported third party damage eak response) to ensure appropriate operator response as required by 192.617.	x			
7	THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QU	JEST	IONS		
Revie to pro	w directional drilling/boring procedures of operator or its contractor – do they include actions of their facilities from the dangers posed by drilling and other trenchless technologies?	x	s a		
	erator following its written procedures pertaining to notification of excavation, marking, ive response, and the availability and use of the one-call system?	x			
	operator adopted the CGA Best Practices document as a means of reducing damages to all reground facilities?	x			
	If no, encourage and promote the adoption of CGA Best Practices document.	x			
Revie failur	ew operators records of accidents and failures due to excavation damage to ensure causes of the are addressed to minimize the possibility of recurrence as required by 192.617.	х			
	PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QU	JEST	ONS		_
	operator identified any plastic pipe and /or components that have shown a record of cts/leaks?			x	
defec	If yes, what is operator doing to mitigate the safety concerns?				
	nsmission, has operator submitted information into National Pipeline Mapping System				1

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.

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concerns?				• •					•	. "	
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lo control pressure gas computer syste	ms in place at this time.		4,		F 14	Α.
			grand (g	. :	- 1	•
2. Has the operator developed and Imp	lemented a cybersecurity	v written pla	n that incli	ides asse	ssina and	
nitigating vulnerabilities for critical infra	structure and essential	business sys	tems? De	cribe.	**}.,	8.3
			Yes	No	NA:	NC
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Notes					1 4	
aucus.	11.				6.7.	•
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. Has the operator utilized any interna	l or external recourses a	ind/or nervo	onel accion	ad recei	Tärlle vilti	•
ccessing and/or analyzing cybersecurity	y threats and vulnerabili	ties? Desch	iniei ossigii lbe.	en abeni	ceny wie	•
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• Has the operator experienced any cy	ber-attacks related to its	s business o	r operation	al system	is? Descr	ibe.
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			Yes	No	NA	NC



APPENDIX C

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 0 1 2016

SEP 2 1 2015

PUBLIC SERVICE COMMISSION

September 16, 2015

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

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

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 falling to perform the cathodic protection monitoring in the future.

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 values on July 14, 2015. The valve located on Button Knob was dug out and fixed so it's



City Hall (606) 787-9973

Litilities (606) 787-6691

Fax (806) 787-7992

TDD # 1-800-247-2510



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.

 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.

 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.

 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 <u>libertybb@windstream.net</u>, if you have any questions or concerns.

Sincerely.

Bridgett Blake City of Liberty

Sudgett Blake

CALL BEFORE YOU DIG!

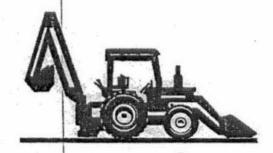
WHAT YOU DON'T SEE COULD HURT YOU

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

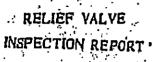


CITY OF LIBERTY



A Guide to Safe Digging in Kentucky for Residents and Contractors

Cox Meter Service Inc. 103 Larkspur Lane Campbelisville, Ry. 42718 502-465-3037



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	Inspector			

COX Meter Service Inc. 103 Larkipur Lane Campbelliville, Ky. 42718 502-465-3037

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COX Meter Service Inc. 103 Larkspur Lane Campbellwille, Ry. 42718 502-455-3037

REGULATOR

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5-06-15	Inspector	Witherten	نهو	

Cox Mêter Service Inc. 103 Larkspur Cahe: Campbellsville, Ky. 42718 502-465-3037

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

REGULATOR
INSPECTION REPORT

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3-96-15	·	Inspector BX &	Wethington	, ; ,

Cox Meter Service Inc.
103 Larkspur Lane
Campbellsville, Ky. 42718
502-165-3037

INSPECTION REPORT

	FRONT Regulative	
	Stand By Run	Station Number Wooh Prem
(a) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	Town Li Reply	
A constant	Type AXIA-Flued	Station Name Lage, 7.8
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Mg. Serial No. 43164	Date Regulator Inst	alled
	PRESSURE INFORMATION	
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	PRESSURE RECORDER	33.48
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UPSTREAM: Type DEMA	Range 6 200 S.N.	CHART CHANGED DAILY WHILE CHART CHANGED DAILY TRIY
	CONDITION OF REGULATOR	Sir Charles Control of the Control o
Mada.		
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O'Alina San Carlos San	·斯特特 化多氯酚 化二溴磺基酚 化氯	servician daide
	TOWDUNG WAN COLLEKTE	
Type of Loading: Soring	Pilot Type ZSC -100	fastinaeat
Type Auxillary Rog.s 10000.	Gadition Sc	· · · · · · · · · · · · · · · · · · ·
position of Control Line 3 Down Stre	me of Keg.	
ocation of Supply Line Body. Tring Agent for Supply Gas None		No Chapred
_	iditional information about regul	
aphragm Size Sip this Yalva in Series with other raise	Pressure Opens Valve In Parallel	Closes Valve
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i Regulator Have 190% Shut-Olf. Yes X	No The Leakner	
MHENTE OR REPAIRS MADE: PEPLE		at Cle Shut OF Blew
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TERAL CONDITION AND APPERANCE OF		٠٠ .
NTENANCE AND/OR CHANGES NEEDED	/ first abcentered has in details	
		
8-21-15	Inspecie (DX+V	Dill :
8-26-15	Inspector COXEU	Defleratain

Cox Meter Service Inc. 103 Exikspurtane Campbelliville, Ky. 42718 502-455-3037

	Station Mumber Char Ase
Town	Station Name Lego States
Reg. Maked Machaey Type Flow Ges	Size At Body Racing
Sug. Serial No. 139639 Date Regulator Installe	: d
PRESSURE INFORMATION	A State of
INLET DUTLET	PRESSURE CONDITIONS CHANGE
Maximum Pressure (winter)	From To
Minimum Pressure (summer)	
PRESSURE RECORDER	, ale
UPSTREAM: Typo HURUKAN Range O- 250 S.N. 172966	CHART CHANGED: Daily Mick
DOWNSTREAM: Type Range O- CO! S.N.	CHART CHANGED: Dally Wily &
CONDITION OF REGULATOR	
Valve Seat Ok Diaphragm Ok Packing Vent	Strake Oil
INNER VALVE AND SEAT INFORMATION	
Double Port Comp. Disc "Steel Disc "Top-I	Type Travel
Je Port X O-Ring Size 100% Top-	Battom Guide Skirt G
LOADING AND CONTROL	
Type of Loading: Sgring Pilot Type Meous	Instrument
tange of Loading 10-405 Senial No. Senial No. Senial No. Senial No. Senial No. Senial No.	
Oracion of Control Line 1 Downstorm of Feducian	Olaph:
ocation of Supply Line Bedy.	
rying Agent for Supply Cas Norte	Changed
ADDITIONAL INFORMATION ABOUT REGULAT	ทัก
aphragm Size SID Pressure Opens Valve	Closes Valve
this Valve in Series with other valve In Parallel S Heater Type Type	
	1. · · · · ·
	77111.57
WHENTS OR REPAIRS MADE: Forest Metal Shawings IN BOOT	- THEHAM NEW BOOK
Check Shut OFF-OK- ST PAGES AT 25th	
CRECK DAY OFF-DE- SEL DAES HI 23	
The second secon	
IERAL CONDITION AND APPERANCE OF INSTALLATION: Good K Fair Poor	3
NTENANCE AND/OR CHANGES NEEDED. (list specifically and in detail)	
	
6	
	66
B-25-15 Inspecies Without	uilf

Cox Meter Service Inc.
103 Larksportage
Campbellsville, Ry. 42718
502-465-3037

INSPECTION REPORT

		Town Li Bent		Station N	umber Whip	lve
Reg. Make Mooney		Flora	GRID	Station N		9100.00
	1637	_Туро/ 1043_		5lze_ 6 }		120
ong, Serial No 169	001	.j	Date Regulator Ins	talled		- ; - ; -
		PRESSURE I	INFORMATION	45		
	INLET	OUTLET		PRES	SURE CONDITION	CHYNGI
, Present Maximum Pressure (winter)			- 10 to 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	n/el	Sema	i Je
Minimum Prassure (summer)	4999			luilei	-	
		PRESSURE	RECORDER			
UPSTREAM: Type	entice Bang	- A-252ª	SN. 17296	CHARTE	HANGED-Daily	VEI W
DOWNSTREAM: Type M					HANGED: Daily	
		CONDITION O	F REGULATOR		Sale.	
Valve Scat	OC Diaphragn	<u>OlC.</u> Pa	king	Vent Quesa 5	Irake	D)1
	INN	ER VALVE AND	SEAT INFORMAT	ION	ing the second	
Dauble Pact	Comp. Disc	Size		Type	Trayel -	
ale Port	O-Ring	Size	100%	Cop-Bation Guide	Skirş G.	
		LOADING AN	D CONTROL			
Type of Loading: Spring	Stepe	Pilot Typo	1.Copei	instrument		, e .
Range of Loading 10-40	13.5		Serial No.			·
Type Auxillary Reg. s NOS Location of Control Line	Durastrani	Condition		cut:	Diaph:	
Location of Supply Line	CB-4		//			
Hying Agent for Supply Gas	<u>wone</u>		<u> </u>	late Changed		•
	•	NAL INFORMATI	ON ABOUT REGU	LATOR :		
Nephragm Size <u>STD</u>		essure Opens Valve	<u></u>	Closes Valve		
s this Valve in Series, with oth	ieryzlyc		in Parallel			
ias Heater <u>Non C.</u> Hd Regulator Have 100% Shut-	Off: Yes DO No.	Est. Leakage				
OMMENTS OR REPAIRS MAD	· — .		4	Perhood		
A			_	7265		
Check Shut OFF	-olc 541	Dreck by	27"			
						
MERAL CONDITION AND A	PPERANCE OF INSTA	ALLATION: Good	X Fair Po	ot∏ .		
INTENANCE AND/OR CHAI	NGES NEEDED. (list :	specifically and in d	letzīD			·
						
		 				
	·	<u> </u>	 _	·		
<u> </u>	<u> </u>	<u></u>	· · ·	1-27		<u></u> .
8.92-12			upeciar WHL	oh 4 loop	· 	

Cox Meler Service Inc. 103 Licksportage Campbellyille, Ky. 12718 502-165-3037

		Station Numb Workliem
Done and a series	Town Liberty True Axipt Flow	Station Name Range 7.8
Reg. Hake AMPRICAL	i like hijiya ka	Size O Body Rating BOO'S
Nig. Serial No. MA	Date Regulator installed	4
	PRESSURE INFORMATION	
IN) The	OUTLET	PRESSURE CONDITIONS CHANGI
Present	Justin	From
Minimum Pressure (summer)	, Outlet	Was a series
	PRESSURE RECORDER	A CONTRACTOR OF THE STATE OF TH
UPSTREAM: Type Spery Copuge	マード こうしょう はんのきょうれん しょうじょう カケール しんしょしょく	
UPSTREAM: Type Amelican	Range O-250" SN.	CHART CHANGED: Daily Willy
A STATE OF THE STA	CONDITION OF REGULATOR	THE COUNTY OF TH
N.A.		Ohan
		Open Stroko 011
	INNER VALVE AND SEAT INFORMATION	
lauble Part Comp. Disc.	Steel Oise Top-8	TypeTrayel
Insta Port O-Ring	Size 50 % 5. Top-8	allen GuideSkirt G
	LOADING AND CONTROL	
of Loading: Sgring	Pilot Type ZSC-100	lastnimant
	Serial No.	
pe Autiliary Reg.s AONE cation of Control Line 4 Down 51: cation of Supply Line Block	Condition Scale	Diaphs
cation of Control Line Block		
ring Agent for Supply Cas MONE	Date C	Nangod
	DITIONAL INFORMATION ABOUT REGULAT	nr.
phragm Sizehis Valve in Series with other valve	Prossure Opens Valve In Parallel	_ Closes Valve
Heater None Type.		
Regulator Have 100% Shut-Off: Yes X	No Est Leskage	
MENTS OF REPAIRS MADE: COMP	& DIET From Cages of Kee	rulator - BRED STRAINERS:
		<u> </u>
ephood 1/10/ Seal ? Little	LAGUM. Lustatled New A- 1	130e1.
Check ShuTOFF- Ot-	SET PICES AT 110.	
TRAL CONDITION AND APPERANCE OF	INSTALLATION: Good Fair Paor	· ·
Tenance and/or changes needed.	(list specifically and in detail)	
		
8-92-12	inspector Wetherest	& Cal
0/2-1/2	inspector the latest	
本ツ	•	* I

Cox Meter Service Inc. 103 Larispur Lane Campbelleville, Ky. 42718 502–465–3037

INSPECTION REPORT

District	Town LiBerty		Voc School Range
Roller Valve Make AUNELL	Type Akipl - Flow	Size O	Body Rating Boo
Mrg. Senat No. 53331		An addition do	Soul Walling
Type of Loadings Spring	Pilot Type ZSC-150	Others	
Range of Loading Jaged 100-22	5		
The state of the s			
Cocasion of Control Line Buet Side	OF Kellet		
na digish yakan katalan dikaran di Araba katalan dikaran di Araba katalan di Araba katalan di Araba katalan di Tangkaran di Araba katalan			
ocation of Railet Valve Ond Re	en outside OF 1810g.	***	र की कर्मकार स्थाप के अपने हैं की हैं। इ.स.च्या १९७४
3/#		46.00	
olief Valya Sot To Relieve At:	Set With G	andes 442	Dr.
there a valve under the Rellef Valve: Yes	Service State of the Service S	Size _	
there a Ke tap between valve and sellef . Yo	of the up (1) : 3/4		
mag of Yeat stack: Weather Cap X	Can Other		
Mi la used is top 3" of yent stack painted of			
	CONDITION OF RELIEF VALVE		
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the second second second			
of Yalva office size		• .	
cityat			
HENTS: BLEW KEHPF L	value Found Set	AT 31"	
			
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•			
8.92-12	Inspector Wethington	b Con	
0 00 10	Inspector CUETHINGTON	· CEN	
200	•		-

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

INSPECTION REPORT

		Station Numb	WOOken Kidge
Disaster	Town LIBCETS	Station Name.	T. B. Station
Relief Valve Make HMELICAN	Type AXIN Flows	ire 3"	_ Body Railing Boo
Mrg. Serial No. 39338	Daja	ng ng ganggang ng kalabina.	
Type of Landing: Spring	Pilot Type ZSC-15D	Other:	
Range of Loading 100-335	The state of the s	<u> </u>	Wall brook
A STATE OF THE STA			I But I water
Execution of Control Line Tilet Side	OF COURT		
		192 Taylor	and the second
ocation of Relief Valve	in outlet values OF	Legislaturs	
The second secon	was the addition of the	THE STREET	
clief Valva Set To Relieve At: 1587	Set With Ga	ISE? LIES	
there a valve under the Relief Valve: Yes		Size	<i>ට</i> *
there a K" top between valve and telief Y			
izo of vent stack: 3"			
pa cap on yent stacks Weather Cap	Can Other	4* 12.	
is used is top 3" of yent stack painted t			
	CONDITION OF RELIEF VALVE		
Scal Orifice		Yent	Hant
5		.* 1 .	5001
of valve critice size		· ·	i.
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olty	₹ - - 103.	~Ð#	•
WENTS: 18 MENTS: KELLEE	- Found SOTAT 15	28 th	`
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8-25-15	Inspactor Wething tou	<u> </u>	
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	• •		•

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

RELIEF VALVE INSPECTION REPORT

er en en en en en en en en en en en en en				·. ,·	Station Number	whip the	
FATTER		LIBERTY	4.		Station Name.	Kegyhan &	SKL
Hor Valve Make Fish	4	Type	308	Size_	0	Body Railing	100
3. Serial No. Roop	148779		Date				•
pe of Loadings Spring		Pilot Type	6358 B	· · · · ·	ther:		
	40.	· · · · · · · · · · · · · · · · · · ·				1.44.33	
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cation of Control Line	Body	1 1 1 1 1 1		1			
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ailon of Reflet Valve	Down strem	OcoHeT U	Alves-A-F	- Reas	3 p 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	· \$1 · · · · · · · · · · · · · · · · · ·	
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ere a valve under the R	ellet Valve: Yes X	No 🔲 Туро _	5760		Size) ti = 0)
ste a M., tob petweed A	· · · · · · · · · · · · · · · · · · ·			· · · · ·	., 4		
size of vent stacks	ð						
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la used is top 3" of		Yes No	7		·	**************************************	
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00-19		laspector	WE Migh	<u>ت بر بد</u>	7	·	 -
a .			•				

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. Nedelk M.S. President

APPENDIX D

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 0 1 2016



Charles G. Snavely Secretary Energy and Environment Cabinet



Commonwealth of Kentucky Public Service Commission 211 Sower Blvd. P.O. Box 813 Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3840 Fair (502) 564-3460 Michael J. Schmitt Chairman

> Robert Cleero Vice Charman

Daniel E. Logadon 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.





Periodic Water Inspection City of Liberty Gas Company Gas System September 6, 2016 Page 2 of 2

Please review the enclosed inspection report in its entirety as you will find further information noted in regard to the inspection, of you have any questions regarding this inspection; feel free to contact Bill. Altken at 502-782-2597 or via email at Bill. Altken@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

	THOPECITO	MINIONMATION		
KY PSC Inspector(s): Steve Sa	mples	Report Number	ri de la la la la la la la la la la la la la	Liberty Gas 06232016
Inspection Date(s): 6/23/16		[Report Date:	HENNING BUT	6/27/16
	Comprehensive pliance Follow-up	☐ Integrity Management ☐ Construction	nt Operator	Qualification
	OPERATO	R INFORMATION)o o
Name of Operator: City of Libert	y Gas system	OP ID No.4 (If no of an application has it		
Type of Facility: Municipal		(Location of Facility		Liberty, KY.
Area of Operation: Liberty , KY.				Astronomic State of the Company of t
Official Operator Contact and Add	dress: (Contact	Unit Name and Ac	dress	MATERIAL STATE
or Inspection Letter)		Unit Name and Ac		
Steven Brown (Mayor) City of Liberty				
518 Middleburg St.				
Jberty, KY. 42539				1
hone # and Email: 606-787-99 Records Location: Same as ab	73 Libertybb@win	dstream.net		
ersons Title		Phone No.	lamail.	
nterviewed	对外国际	Service Control of the Child		
ridget Blake Clerk		606-787-9973	ndstream.net	
reg Rodgers Superintendent			-	
/			 	
las the Operator provided an up	dated Emergen	cy (Contact) List?	* Yeś	□ No
lumber of Customers:	650			
lumber of Gas Employees:	5			
as Suppliers	Texas Eastern Tr	ransmission		
Inaccounted for Gas;	4%		1/1	
Services:	Residential	(Commercial	Industrial	Other
Services:	650			
perating Pressure(s):	MAOP (within last year)		ting Pressure (at time of inspection)
Feeders	250 psig		240 PSIG	
Town:	150 pslg		100 psig	
Others	27		50	
oes the Operator have any tran	smission pipelin	e (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.



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 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 0 1 2016

City of Liberty

P.O. Box 127 • Liberty, KY 42539

September 13, 2016

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

RECEIVED

SEP 16 2016

Public Service Commission

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 <u>libertybb@windstream.net</u>.

Sincerely.

Steven Brown

Mayor

City of Liberty

City Hall (606) 787-9973 Utilities (606) 787-6691

Fax (606) 787-7992

TDD # 1-800-247-2510



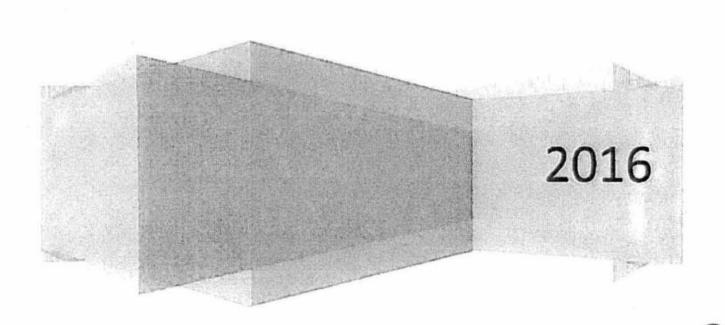
Leak Survey Report

CITY OF LIBERTY GAS DEPARTMENT

LIBERTY, KY.

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



SUMMARY OF

Gas Leak Survey

LEAKAGE CONTROL SURVEY

Liberty G	as Department		Liberty,	KY.	- E	40		
	Client		City and	State		District or Divisi		
Conduct	ed by our Consu	ultant(s)		Na	than Miller			
Date Start	7/19/2016	_	Date Complete	d 7/2	1/2016	_Total Day _	3	
Number of Da	ys		3					
Miles of Main	Surveyed		27.6					
Number of Lea	ak Indications							
	Under Groun	d Classifi	cation*	Above	Ground Cla	ssification*		
	GR-1	GR-2	GR-3	GR-1	GR-2	GR-3		
	0	2	0	0	0	0		
	Key Map Symbols			Leak Indica	tion Classifica	tion*		
	x Indicates Leak I	ndication		Grade 1-	Schedule fo	r Immediate Repa	air	
	IIII Estimated Area	a Affected		Grade 2-	Schedule fo	r Repair after Gra	de 1	
	Δ Catch Basin				Indications a	are completed. Re	check	
	* Tree				mandatory i	fleak cannot be r	epaired	
	[] House & Buildin	g			within six m	onths or before fr	ost.	
	Indicates the A	Aain		Grade 3-	Repair as w	ork scheduled pe	mit if	
	Represents of	ourbe line or	edge of road		Indications	cannot be repaired	d within	
	unless designated	as property	line.		one year, in	dication should be		
					chanlend			

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 old 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 service line feak 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 1	iberty									WE	EK END	ING:		07/23/1	6
LOCATION:	Liberty	, KY		.'						DA	vs to c	OMPLE	TE SURV	EV:		3
		A martine state of the	A PROPERTY OF	UN	DERGR	OUND	LEAKS			ABO	VE GR	OUND I	EAKS			BILLABLE HOURS
Date	Town	Miles	Services	1 or C	2 or B	3 or A	Reports	Buildings	Negative	Positive	larC	2 or B	3 or A	Lesks	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																
1)	TOTAL FOR WEEK	27.6	0	0	2	0	2	0	0	0	0	0	0		0 0	24
	TOTAL THRU LAST WEEK	o	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	DPER	Passed Test?	RAILD PPAI-AI	RMLD	Passed Test?	OMP	OMD	Passed Test?	Calibratio	a Verified:	(delete one	Yes or No)		SIN
Sunday							1	1			1	DPIR	101			
Monday											1	OMD				
Tuesday		134		Y]	1		0	-CVI	00
Wednesday		138		Y							1	1				~~~
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Leakage Control Report Fleid Survey



9030 Monroe Rd Houston, TX 77061

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Leakage Control Report Field Survey

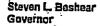


9030 Monros Rd Houston, TX 77051

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APPENDIX F

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 0 1 2016



Leonard K. Peters Secretary Energy and Environment Cabinet



Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40502-0615
Telephone: (502) 564-3940
Fax: (502) 564-3480
psc.ky.gov

David L. Annstrong
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 Weşley





COMMONWEALTH OF KENTUCKY PUBLIC SERVICE COMMISSION

UTILITY INSPECTION REPORT

Report Date: 3/27/2012

Report Number: City of Liberty Gas Company 031212

Inspector:

Joel Grugin

Inspection Date:

3/12/2012

Type of Inspection:

Periodic Regulatory Compliance Inspection

Type of Facility:

Name of Utility:

City of Liberty Gas Company

Location of Facility:

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:

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 Eastem

Distribution Description: Steel and plastic distribution gas system operating at 240 PSIG to 20

Workforce Summary:

6 Operator qualified employees

Utility Reps in Insp:

Ronnie Wesley

Date of Last Inspection:

5/27/2009

DTR from Last Insp:

DTRs not Cleared:

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 BIMP 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

ر ن Joel Grugin

Utility Regulatory and Safety Investigator III

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, corseries of inspections, and is to be filed as part of the Standard Inspection Report.

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Unless otherwise noted, all code references are to 49CFR Part 192. S-Satisfactory 1: - 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.

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Unless otherwise noted, all code references are to 49CFR Part 192. S-Satisfactory U-Unsatisfactory N/A-Not Applicable
If an item is marked U. N/A, or N/C, an explanation must be included in this report.

.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)		<u> </u>		
	.605(b)(3)	Making construction records, maps, and operating history available to appropriate operating personnel	1			
	.605(b)(5)	Start up and shut down of the pipeline to assure operation within MAOP plus allowable buildup		<u> </u>	1	
	.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	1			-
	.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 hamess and line	7			
	.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.	1			
	.605(b)(12)	Implementing the applicable control room management procedures required by 192.631.	۲			$\overline{\cdot}$

<u> </u>	.605(b)(12)	Implementing t	he applicable co	ontrol room mana	igement proced	ures required by	192.631.	<u> </u>			-l ÷
Comme	nts:								Jr. et	•	
~~~~~			er de ligit de			r ;	राज्याः		• •	,	
.605(a)			CHANGE in	CLASS LOC	ATION PRO	CEDURES	•		s	ប	N/A N/C
•	.609	Class location	study				•	· ,	v	,	

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Comm	ents:

513	{	CONTINUING SURVEILLANCE PROCEDURES	S	ซ	N/AN/C
	.613(a)	Procedures for surveillance and required actions relating to change in class location, failures (including cast from circumferential cracking), leakage history, corrosion, substantial changes in CP requirements, and unusual operating and maintenance conditions (NTSB B.8)	V		
	.613(b)	Procedures requiring MAOP to be reduced, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition	1		

omments:

S(a)	•	DAMAGE PREVENTION PROGRAM PROCEDURES	S	U	N/A N	υd
	.614(c)	Participation in a qualified one-call program, or if available, a company program that complies with the following:			,	

Confirmation or revision of MAOP

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR
Unless otherwise noted, all code references are to 49CFR Part 192. S-Satisfactory U-Unsatisfactory NA-Not Applicable N/C-Not Ch
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

.605(a)	DAMAGE PREVENTION PROGRAM PROCEDURES		s	U	N/A!	V/C
	(i) Identify persons who engage in excavating	· · · · · · ·	7		1.0	
	(2) Provide notification to the public in the One Call area		1	•		·
) (3) Pròvide means for receiving and recording notifications of pending excavations		1			_
	(4) Provide notification of pending excavations to the members	. 7 .**	1			
1 [(5) Provide means of temporary marking for the pipeline in the vicinity of the excavation	ns	1			<u> </u>
	(6) Provides for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged		V		*;	
1 [(i) Inspection must be done to verify integrity of the pipeline	; , ; .	V			
1.	(ii) After blasting, a leak survey must be conducted as part of the inspection by the	he operator .	1			7

Come	nents:
	110.1024

.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	V			
	.615(a)(2) "	Establish and maintain communication with appropriate public officials regarding possible emergency	V			
	.615(a)(3)	Prompt response to each of the following emergencies:		<i>.</i>		
-		(i) Gas detected inside a building	ス		1	Γ
		(ii) Fire located near or directly involving a pipeline	1	_	_	
		(iii) Explosion near or directly involving a pipeline	7	1.		
		(iv) Natural disaster	7			
	.615(a)(4)	Availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency	/			Į.
	.615(a)(5)	Actions directed towards protecting people first, then property.	~		<u>.</u> .	<u> </u>
	.615(a)(6)	Emergency shutdown or pressure reduction to minimize hazards to life or property	1	Γ-	Γ	
	.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)	1			
•	.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	_	乚	<u> </u>	_
	.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.			<u> </u>	_
	.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(e)	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	/			



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 Che N/C - Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Comments					·	
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			<u> </u>			
	٠.	PUBLIC AWARENESS PROGRAM PROCEDURES	S	Tr	N/A	NIC
.605(a)	.616	(Also in accordance with API RP 1162) Public Awareness Program also in accordance with API RP 1162 (Amdt 192-99 pub. 5/19/05 eff.	 			1,4,5
		06/20/05 and Amdt 192-not numbered pub 12/13/07 eff. 12/13/07).	<u> </u>			
. •	.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;	1	F	T .	
		(2) Possible hazards associated with unintended releases from a gas pipeline facility:	V		1	
		(3) Physical indications of a possible release:	7	ſ	7	
r of the	. "	(4) Steps to be taken for public safety in the event of a gas pipeline release; and	1	<u>-</u>	1	
		(5) Procedures to report such an event (to the operator).	7	Γ	7	
	.616(e)	The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of procline facility locations.	1	F	Ŧ	
	.616(1)	The operator's program and the media used must be comprehensive enough to reach all areas in which	1	 	†	-
· 1	.616(g)	the operator transports gas. 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. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010.	1	Ì		
	.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:			Ţ.	
	}	(I) A description of the purpose and reliability of the pipeline: (2) An overview of the hazards of the pipeline and prevention measures used:			1	
•	,	(3) Information about damage prevention;	1	{	1	
		(4) How to recognize and respond to a leak; and (5) How to get additional information.]		
	ł. ,	(See this subpart for requirements for master meter or petroleum gas system operators not located on property controlled by the operator.)	}		}	
				_		
Comments	1					
•						
A				$\overline{}$		
.617		FAILURE INVESTIGATION PROCEDURES	\dashv	S	UN	/AN/C
}	.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence	_	나	_	
				_		
Comments	•					

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR
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1)	MAOP PROCEDURES	S	U	N/A	NC
Í	.619 Establishing MAOP so that it is commensurate with the class location	1			
•	MAOP cannot exceed the lowest of the following:	 	·	7	•
1	(a)(1) Design pressure of the weakest element	i/	٠.		Ī
-	(a)(2) Test pressure divided by applicable factor	十フ	_		1.
.	(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.				-
į	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. Solution of the part before March 15, 2006, or applicable date in second.	/			<u> </u>
	becomes column. subject to this part, whichever			}	
1	All other pipelines. is later. All other pipelines. July 1, 1970. July 1, 1965.	}	٠,:	· ·	<u> </u>
٠ ا	(A) 100 (A) (A) (A) (A) (A) (A) (A) (A) (A) (A)				Ļ
٠, {	(a)(4) Maximum safe pressure determined by operator.	7/		,	
• • • •	(b) Overpressure protective devices must be installed if:619(a)(4) is applicable	1		<u> </u>	
	(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	/		 -	
	 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) Max./Min: Allowable Operating Pressure - Low Pressure Distribution Systems 	/			
				<u> </u>	
nents		·.*			
	PRESSURE TEST PROCEDURES	S	Ū	N/A	N/C
)	.503 Pressure testing	1			-
<u></u>	- 		<u></u>		
nents					
	ODODIZATION -CCAS PROCEDURES	10	77	N/A	NI
)	625(a) Distribution lines must contain odorized gas. – must be readily detectable by person with normal sense of smell at 1's of the LEL	S	٢	LV/A	44.0
Ì	.625(b) Odorized gas in Class 3 or 4 locations (if applicable).	7	_		{
1		1		Т	Γ^{-}
<u>, </u>	.625(f) Periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.	10	}		}

Unless otherwise noted, all code references are to 49CFR Part 192. S-Satisfactory U-Unsatisfactory N/A-Not Applicable
If an item is marked U, N/A, or N/C, an explanation must be included in this report. N/C - Not Checked

Comment	3:				
				:	•
	_			•	•
					<u> </u>
.605(a)		"TAPPING PIPELINES UNDER PRESSURE PROCEDURES	S	U	N/AN/C
	.627	Hot taps must be made by a qualified crew			
	<u> </u>	NDT testing is suggested prior to tapping the pipe. Reference API RP 2201 for Best Practices.			1 1
Ž					
Comment	S:		·	. •	
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		the control of the co		,"	· • • • •
			:		
.605(a)		PIPELINE PURGING PROCEDURES	S	Ū	N/AN/C
	.629	Purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline	<u>نــــا</u>	.	,
	 	(a) Lines containing air must be properly purged.		_	
		(b) Lines containing gas must be properly purged	_	<u> </u>	
Comment	š				 -
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•					•
<u> </u>		A CONTRACT OF THE PARTY OF THE			٠.
Personal Property of the Personal Property of		CONTROL DOOM MANAGEMENT PROCEDURES			
	• • •	CONTROL ROOM MANAGEMENT PROCEDURES (Applies to Operator with greater than 250,000 services)	s	U	N/AN/
.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.	<u></u>	\mathbb{L}_{-}	
•	}.	(2) Controller's role when an abnormal operating condition is detected.	Γ	Γ	$\Pi\Pi$
•		(3) Controller's role during an emergency			
	. .	(4) A method of recording shift change responsibilities between controllers.	\vdash	-	H
	.631(e)	The operator's program must provide its controllers with the information, tools, processes and procedures	 	<u> </u>	┸╂╼╌
		necessary to perform each of the following:	<u> </u>		
	ŀ	(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.	1	}	111
		(2) Conduct point-to-point verification between SCADA displays and related equipment when changes	 	 	+++-
	}	that affect pipeline safety are made.	↓_	<u> </u>	111
	· ·	(3) Test and verify any internal communications plan – at least once a year NTE 15 months.	<u> </u>	L	
	Ì	(4) Test any backup SCADA system at least once each year but NTE 15 months.	1	[
	1	(5) Establish and implement procedures for when a different controller assumes responsibility.	{		\prod
	.631(d)	Each operator must implement and follow methods to reduce the risk associated with controller fatigue,	1		44
		including:	├	т —	, , , -
	1	(I) Establishing shift lengths and schedule rotations that provide time sufficient to achieve eight hours of	i i	ì	111
		continuous sleep.		}	111

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.

		CONTROL ROOM MANAGEMENT PROCEDURES (Applies to Operator with greater than 250,000 services)	s	U	VA	N/C
		(3) Training of controllers and supervisors to recognize the effects of fatigue.			1	
· .	1 . :	(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	(1) Reviewing alarms using a process that ensures that they are accurate and support safe operations.		_	ΙŤ	
	<u>.</u>	(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.		•	П	
•	} ·	(4) Reviewing the alarm management plan at least once every calendar year NTE 15 months.		_	П	
	}	(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.				
•	.63I(Ú	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.			l	S.
	 -	(2) Requiring field personnel to contact the control room when emergency conditions exist and When held changes could affect control room operations.	•	-		
	-	(3) Seeking control room or management participation in planning prior to implementation of significant pipeline changes.			1	
	.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.			Ī	
		(2) Including lessons learned from the operator's training program required by this section.	·		П	
	.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:	<i>2</i> 5 .			
• •	{	(1) Responding to abnormal operating conditions (AOCs).				
•	}	(2) Using a computerized simulator or other method for training controllers to recognize AOCs] _		П	
•		(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.			П	
<u> </u>		(5) Providing an opportunity for controllers to review relevant procedures for infrequently used operating setups.			1	

Comments:	-							
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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	/		_	
en en						_

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7 .		.		<u></u>	
TRA	NSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES	S	ט	N/Á	N/(
	Patrolling ROW conditions	-	 →	F	
	Maximum interval between patrols of lines:	تــا	<u></u>	╌	ب
V =7			_	rt	广
	Class Location At Highway and Railroad Crossings At All Other Places		ļ	1	
	[1 and 2 2/yr (7½ months) 1/yr (15 months)	. !	1	1	
ſ	3 4/yr (4½ months) 2/yr (7½ months)		١.		<i>'</i>
٠ . أ	4/yr (4½ months) 4/yr (4½ months)	, i		11	ľ
	CONTRACTOR OF THE PROPERTY OF	٠,٠	[·
06	Leakage surveys - 1 year/15 months	_		\Box	Γ
,8' .	Leak detector equipment survey requirements for lines transporting un-odorized gas	: :-			Γ
	(a) Class 3 locations - 71/2 months but at least twice each calendar year	·			
	(b) Glass 4 locations - 41/2 months but at least 4 times each calendar year	,		\sqcap	Γ
Dic	TRIPITION CVCTPM DATION I INC. 9. I EAVAGE CHINEV PROCEDURES		71	DY/A	
		7	u	11/21	"
	failure or leakage (i.e., consider cast fron, weather conditions, known slip areas, etc.)		<u>L</u> _	<u> </u>	
/21(b)	failure or leakage must be patrolled				
(b)(1)	and	/			
	The take a contract to the contract of the con	ļ <u></u>		┶	↓
(b)(2)	Outside business districts at intervals not exceeding 71/2 months, but at least twice each calendar year	Z			
(b)(2) 723(a) & (b)	Outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year. Periodic leak surveys determined by the nature of the operations and conditions.	7			
		7			
	DIS 21(a)	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) 6 Leakage surveys - I year/15 months Leak detector equipment survey requirements for lines transporting un-odorized gas (a) Class 3 locations - 1½ months but at least twice each calendar year (b) Class 4 locations - 4½ months put at least 4 times each calendar year (c) Class 4 locations - 4½ months put at least 4 times each calendar year 21(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.) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage roust be patrolled.	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) 6 Leakage surveys — I year/15 months Leak detector equipment survey requirements for lines transporting un-adortized gas (a) Class 3 locations — 7½ months but at least twice each calendar year (b) Class 4 locations — 4½ months put at least 4 times each calendar year 21(a) Frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage (i.e., consider cast from, weather conditions, known slip areas, etc.) Mains in places, or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled.	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/yr (4½ months) 4/yr (4½ months) 4/yr (4½ months) 4/yr (4½ 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 put at least 4 times each calendar year (b) Class 4 locations - 4½ months put at least 4 times each calendar year 21(a) Frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage (i.e. consider cast fron, weather conditions, known slip areas, etc.) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled	Class Location At Highway and Railroad Crossings At All Other Places 1 and 2 2/yr (7/2 months) 1/yr (15 months) 3 4/yr (4/2 months) 2/yr (7/2 months) 4/yr (4/2 months) 4/yr (4/2 months) Leak getector equipment survey requirements for lines transporting un-odorized gas (a) Class 3 Jocations 4/2 months but at least twice each calendar year (b) Class 4 locations 4/2 months put at least 4 times each calendar year 21(a) Frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage (i.e. consider cast from, weather conditions, known slip areas, etc.) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage (nust be patrolled

· ·	If an item is marked U, N/A, or N/C, an explanation must be included in this report.		•	_
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.60 5 (b)	TRANSMISSION RECORD KEEPING PROCEDURES	S	U	N/AN/
	.709 Records must be maintained	†		1
	(a) Repairs to the pipe – life of system	T	\top	
	(b) Repairs to "other than pipe" - 5 years	\top	\top	. 1
	(c) Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests -5 years or until next one	1	\top	7
State of the	 In the control of the c			
Comment				a _n
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·	The second of th	<u> </u>	_	, , , ,
i05(b)	FRANSMISSION FIELD REPAIR PROCEDURES	` S	្ឋប	N/A N/
•	Imperfections and Damages	Ţ·		
	.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 3 design strength	1_		1
197 B	(2) Use of a reliable engineering method		Г	\Box
	.713(b) Reduce operating pressure to a safe level during the repair	1		ПТ
	Permanent Field Repair of Welds	Ţ-		
	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:	 	<u> </u>	
•	Cracks longer than 8% of the weld length (except offshore) must be removed	 	ــــ	-
•	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	┷	↓_	111
•	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:		 	\coprod
	(1) The weld is not leaking			11.
	(2) The pressure is reduced to produce a stress that is 20% of SMYS or less		L	
	(3) Grinding is limited so that 1/2 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	1	T:	



.717

(a)

Permanent Field Repairs of Leaks

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

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 1/2D of the pipe size

Field repairs of leaks must be made as follows:

Unless otherwise noted, all code references are to 49CFR Part 192. S-Satisfactory U-Unsatisfactory N/A-Not Applicable

If an item is marked U. N/A. or N/C. an explanation must be included in this report. N/C-Not Checked

	TRANSMISSION FIELD REPAIR PROCEDURES	S	U	N/A	W
	(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		-	1	1
	(b)(5) Apply reliable engineering method			П	1
	Testing of Repairs				
]		•	
(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 \$192,2410			Ī	T
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	in the configuration of the state of the sta	<i>7</i> . '			٠.
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		1)	↓_	╀
(0)	as a new service line before reconnect. See code for exception to this.	0		<u> </u>	1
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;		•		•	•
			-	. 	<u> </u>
:	ABANDONMENT OF DEACTIVATION OF FACILITIES PROCEDURES	S	ш	N//	TN
.727(b)		-	H	-	7
	deactivation where the pipeline is not being maintained. Offshore abandoned pipelines must be filled			ļ	1
(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.	7			T
. (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	1	·	\lceil	T
<u>_</u>	(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	1			
	(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	1			
(c)	(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	111111111111111111111111111111111111111			
		mechanically applied full encirclement split sleeve of appropriate design (b)(3) Apply reliable engineering method Testing of Repairs 7.19(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 mure of SMVS, the repair must be nondestructively tested in accordance with \$192.2410 TEST REQUIREMENTS FOR REINSTATING SERVICE LINES 7.25(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. ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES 7.27(b) Operator must disconnect both ends, puge, 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 lineative pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end. 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ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES 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 scaled (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. 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STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR Inless otherwise noted, all code references are to 49CFR Part 192. S-Satisfactory U-Unsatisfactory N/A-Not Applicable N/C-Not CI If an Item is marked U. N/A, or N/C, an explanation must be included in this report. NC-Not Checked

			_		
b)	PRESSURE LIMITING and REGULATING STATION PROCEDURES	S	บ	J. N	/A N/
	(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	/	•		
··L	(3) Set to control or relieve at correct pressures consistent with 201(a), except for .739(b).	1		\neg	· .
<u>,</u>	(4) Properly installed and protected from dirt, liquids, and other conditions that may prevent proper			brack	
· [_	739(b) For steel lines if MAOP is determined per .619(c) and the MAOP is 60 psi (414 kPa) gage or more	•		<u> </u>	
4	If MAOP produces hoop stress that Then the pressure limit is:	1			-
1	Is greater than 72 percent of SMYS -MAOP plus 4 percent	1			.] .
.	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	<u> </u>	-		 -
Г	(a) In place to indicate gas pressure in the district that is supplied by more than one regulating station	1	Г	\top	1.5
丁	(b) Determine the need in a distribution system supplied by only one district station.	1	Π	+	-
	(c) Inspect equipment and take corrective measures when indications of abnormally high or low pressure	I.			:
Ŀ	743 Testing of Relief Devices	•		. :.	Ţ.
Ŀ	743 (a) Capacity must be consistent with 201(a) except for .739(b), and be determined 1 per yr/15 mo.				1
	(b) If calculated, capacities must be compared; annual review and documentation are	7	ľ	7	7
	required.	7	-		
<u></u>	(c) If insufficient capacity, new or additional devices must be installed to provide required capacity.			ار .	- 1
:nts:		· v.	*		·
ents:		. 0	20		
	VALVE AND VAULT MAINTENANCE PROCEDURES	s			/AN
		s		U N	/AN
	VALVE AND VAULT MAINTENANCE PROCEDURES	s			/AN
	VALVE AND VAULT MAINTENANCE PROCEDURES Transmission Valves .745 (a) Inspect and partially operate each transmission valve that might be required during an	S		UN	/AN
	VALVE AND VAULT MAINTENANCE PROCEDURES 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	S		UN	/AN
	VALVE AND VAULT MAINTENANCE PROCEDURES 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)	S		UN	//AN
	VALVE AND VAULT MAINTENANCE PROCEDURES 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.	S		UN	I/ANI
	VALVE AND VAULT MAINTENANCE PROCEDURES 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.	1			
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ents	VALVE AND VAULT MAINTENANCE PROCEDURES 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.	1			
	VALVE AND VAULT MAINTENANCE PROCEDURES 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. VAULT INSPECTION PROCEDURES 749 Inspection of vaults greater than 200 cubic feet and housing pressure regulating or limiting devices (1 per yr NTE 15 months).	1			
	VALVE AND VAULT MAINTENANCE PROCEDURES 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. VAULT INSPECTION PROCEDURES 749 Inspection of vaults greater than 200 cubic feet and housing pressure regulating or limiting devices (1 per yr NTE 15 months).	1			
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(a) Removal of ignition sources in presence of gas and providing for a fire extinguisher

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.605(b)	P	REVENTION of ACCIDENTAL IGNITION PROCEDURES	S	11	N/A	NIC
57		vent welding or cutting on a pipeline containing a combustible mixture	 	 	- 47 474	<u> </u>
		t warning signs	-			-
·,	(c) Pos	warring signs	<u>_</u>	<u>L_</u>	<u> </u>	
Comment	Si				 -	
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	••	A HOLD CONTROL OF THE PARTY OF	:			
·. ·						
	•				. •	.,
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.605(b)		CAULKED BELL AND SPIGOT JOINTS PROCEDURES	S	Ü	N/A	NC
•	} 	caulked bell and spiget joint repair:	-	L		Ļ
•		realised bell and spigot joint repair. nen subject to more than 25 psig, sealed with mechanical clamp, or scaled with material/device	<u> </u>			
	wh	ich does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in	•		()	-
(re-		92.753(a)(2)(iii)	1		1	
.ا.		nen subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means	֓֟֟֓֟֓֓֓֓֓֓֓֟֓֓֓֓֟֓֓֓֓֓֓֟֟ <u>֟</u>			
-	l om	er than caulking	<u> </u>	ļ.,	لببإ	 _
605(b)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	PROTECTING CAST-IRON PIPELINE PROCEDURES	s	177	N/A	NIC
	755 Onerator		-	<u> </u>	AV.A	
**************************************		has knowledge that the support for a segment of a buried east-iron pipeline is disturbed must rotection.	1	• •		
-		brations from heavy construction equipment, trains, trucks, buses or blasting?			1	
		pact forces by vehicles?	 	_	 	
		rth movement?	 	-	-1-	
	}	her foreseeable outside forces which might subject the segment of pipeline to a bending stress		-	┼┼╴	
		ovide permanent protection for the disturbed section as soon as feasible	-	+	┼┼╴	\vdash
437	<u> </u>	ovide permanent projection for the distanced section as soon as leastone	<u> </u>		نيبا	-3-1
3(c)		ING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	s	Tr	N/A	N/C
-7-7		iding procedures must be qualified under Section 5 of API 1104.	-	 -	1	~~~
	or Se	ction IX of ASME Boller and Pressure Code by destructive test.	1	Ш		
	(b) Ret	tention of welding procedure – details and test	/	\coprod	<u>l </u>	
	.227 (a) W	elders must be qualified by Section 6 of API 1104 (19th Ed., 1999, including errata		П	1	
		tober31, 2001; and 20th edition 2007, including errata 2008) or Section IX of ASME lifer and Pressure Code (2004 ed. Including addenda through July 1, 2005) See exception in		11	ĺ	
		27(b).		11	}	(•)
:	(b) We	elders may be qualified under section I of Appendix C to weld on lines that operate at < 20%	1.	Π	1	
		/S.	1	11	↓	
		weld on compressor station piping and components, a welder must successfully complete a tructive test	/	11	1	} '
		lder must have used welding process within the preceding 6 months	17	十十	 	
		selder qualified under .227(a)—	 	┰	ـــــــــــــــــــــــــــــــــــ	<u></u>
	.229(c) (1)	May not weld on pipe that operates at ≥ 20% SMYS unless within the preceding 6	┼-	r	7	T -
	(1)	calendar months the welder has had one weld tested and found acceptable under the	/		ļ	ļ ·
	}	sections 6 or 9 of API Standard 1104; may maintain an ongoing qualification status by	}	11	ł	١.
•	1	performing welds tested and found acceptable at least twice per year, not exceeding 7½ months; may not requalify under an earlier referenced edition.	l	Ħ	1	l
	(2)	May not yield on pipe that operates at < 20% SMYS unless is tested in accordance with	 -	╫	┼──	
	} · ' ²	.229(c)(1) or requalifies under .229(d)(1) or (d)(2).	Ľ	Ш		<u> </u>
	(d) We	iders qualified under .227(b) may not weld unless:		\int		
	(1)	Requalified within 1 year/15 months, or	1	\prod		
. 75	(2)		7	\sqcap	1	
		operation must be protected from weather	フ		\top	
-	, , ; 17 \d\ E'	mRuterrate trimes an historian seast is annexes	•			

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR
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13(e) .	WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	S.	Ù	N/A	N/C
	233 Miter joints (consider pipe alignment)	/	1		13
	.235 Welding preparation and joint alignment		T	7	Γ
,	.241 (a) Visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure:	1	T		Γ
	(1) Compliance with the welding procedure	7:	1		Π
	(2) Weld is acceptable in accordance with Section 9 of API 1104		П		Г
•	(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:	<i>i</i>			
	(1) The nominal pipe diameter is less than 6 inches, or	7			
•	(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	1			$\lceil \rceil$
	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.		ŀ		
	Repair and Removal of Weld Defects		T		•
	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				
<u> </u>	(b) Each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated it conditions exist which would adversely affect the quality of the weld repair. After repair, the weld must be inspected and found acceptable.	N		-	
	(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	1	1		
,	Note: Sleeve Repairs - use low hydrogen rod (Best Practices -ref. API 1104 App. B, In Service Welding)			, ,	. 2

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.13(c)	NONDESTRUCTIVE TESTING PROCEDURES	S	U	N/A	N/C
	. (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	1			
	(b) Nondestructive testing of welds must be performed:	<u> </u>			
	(1) In accordance with a written procedure, and	17	· _	\prod	
	(2) By persons trained and qualified in the established procedures and with the test equipment used	1			
	(c) Procedures established for proper interpretation of each nondestructive test of a weld to ensure acceptability of the weld under 192.241©	1			,
	(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%	1		1	}
	(2) In Class 2 locations at least 15%	77			
	(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.	1			
	(4) At pipeline tie-ins, 100%	1/	<u> </u>	<u> </u>	

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.13(e)	NONDESTRUCTIVE TESTING PROCEDURES	s	U	NAN	νd
	(e) Except for a welder whose work is isolated from the principal welding activity, a sample of each welder is work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b)				
3.4	(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.				
		<u>. </u>	<u> </u>		 -
Comments					
					ią.
273(b)	JOINING of PIPELINE MATERIALS	S	U	N/A N	1/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	190
1:	(1) The mating surfaces of the joint must be clean, dry, and free of material which might be detrimental to the joint.	<u>/</u>			二
	(2) The solvent cement must conform to ASTM Designation: D 2513.	1		- 	ᅥ
	(3) The joint may not be heated to accelerate the setting of the cement.	1			\dashv
	(c) Each heat-fusion joint on plastic pipe must comply with the following:	لسنتا	÷c		
	(1) A but 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.	1			$\overline{}$
	(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.	<i>!</i> .	•		
	(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.			₹	\neg
	(d) Each adhesive joint on plastic pipe must comply with the following:	·		 -,	
	(1) The adhesive must conform to ASTM Designation: D 2517.	7			\Box
	(2) The materials and adhesive must be compatible with each other.	1			
	(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.	7			
	(2) A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling.	7		:	
•	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-	<u>L</u>	<u>.</u>]
•	(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	1			
	(ii) Thermosetting plastic pipe: paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517: or	1			
	(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.	1			·

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.273(b)		JOINING of PIPELINE MATERIALS	S	Ü	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 πο less than 25 percent or failure initiates outside the joint area, the procedure qualifies for use.	1			
	(Б)	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).	1			
••		(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.	/			
l		(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	4		├	
		elongation of no less than 25 percent or failure initiates outside the joint area.	7 ;		<u> </u>	
		(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.		<u> </u>		<u> -</u>
		(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	1	 -:-	·	-
	(c)	a lesser wall thickness. A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints.	1	, ·		
	(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.	7	·	·	
•.	.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	/	Ŀ		
` ;		(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.	1	<u> </u>	<u> </u>	
	(p)	The specimen joint must be:	<u> </u>	,		
		(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	/	<u> </u>	<u> </u>	<u> · </u>
		(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;	\ <u>'</u> .	<u> </u>	igspace	<u> </u>
			1	<u></u>	Щ	
	<u> </u>	(ii) Examined by ultrasonic inspection and found not to contain flaws that may cause failure: or	 -	т		_
	·	 (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 	Ļ	ļ ·	ــ	
		area.	1	<u>1</u> _	L	<u>L</u> _
	(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	Ļ	↓	↓	↓_
		(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.	<u>Ľ</u>	<u>_</u>	<u> </u>	<u> </u>
	(d)	Each operator shall establish a method to determine that each person making joints in plastic given in the operator's system is qualified in accordance with this section.			-	1

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.

.273(b)		JOINING of PIPELINE MATERIALS	s	U.	N/AN/	ď
	.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		•		7
¥2.4	<u> </u>	the acceptability of plastic pipe joints made under the applicable joining procedure.				- [

	.287	192.285(b)	unless that	person has be	en qualified b	y appropriate t	required by §§192. raining or experien joining procedure.	ce in evaluating	7	,		
			3 71		h h			7 - 7 - 7 - 7 - 7	1.			
Comments	:				15.00				•		···	

.605(b)	CORROSION CONTROL PROCEDURES	S	U	NAN	V/C
	.453 Are corrosion procedures established and carried out by or under the direction of a qualified person for:	1	لـــــــــــــــــــــــــــــــــــــ		
	Design	1		Ť	_
• • •	• Operations	7			
	• Installation	7			_
	Maintenance (1994) Maintenance (1994) Maintenance (1994) Maintenance (1994) Maintenance (1994) Maintenance (1994) Maintenance (199	ノ			_
	ASS (a) For pipelines installed after July 31, 1971, buried segments must be externally coated and	1	F	一	=
-	(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	 - 	ات		_
	with a natural pH in excess of 8 (see exceptions in code)	1/	ام		
	.457 (a) All effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected	1			
	(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 east iron or ductile iron) bare or coated distribution lines.	/			;
	.459 Examination of burjed pipeline when exposed: if corrosion is found, further investigation is required (Note: To include graphitization on east from or ductile from pipe. NTSB B.7)	1			
	.461 Procedures must address the protective coating requirements of the regulations. External coating on the steel pipe must meet the requirements of this part.	/		,	3
· ·	.463 Cathodic protection level according to Appendix D criteria	1			
•	.465 (a) Pipe-to-soil monitoring (1 per yr/15 months) or short sections (10% per year, all in 10 years)	1			, _
•	(b) Rectifier monitoring (6 per yr/2½ months)	1			
٠,	(c) Interference bond monitoring (as required)	1			_
	(d) Prompt remedial action to correct any deficiencies indicated by the monitoring	1	<u> </u>		
	.465 (e) Electrical surveys (closely spaced pipe to soil) on bare/unprotected lines, cathodically protect active corrosion areas (1 per 3 years/39 months)	7		-	
	.467 Electrical isolation (include casings)	1			
,	.469 Sufficient test stations to determine CP adequacy	7			
	.471 Test lead maintenance	1			
•	.473 Interference currents	1	<u> </u>		٠
	.475 (a) Proper procedures for transporting corrosive gas?	1	_		
	(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	1			
	(b) Exceptions - offshore pipeline and systems replaced before 5/23/07	1			
	(c) Evaluate impact of configuration changes to existing systems	1			
	.477 Internal corresion control coupon (or other suit. Means) monitoring (2 per yr/7 1/2 months)	1			
	.479 (a) Each exposed pipe must be cleaned and coated (see exceptions under .479(c))	1.1	{ _	([

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.605(b)	, , ,	CORROSION CONTROL PROCEDURES	S	ָ ש	N/A	NV
25		Offshore splash zones and soil-to-air interfaces must be coated	\			Г
		(b) Coating material must be suitable	7			Γ
		Coating is not required where operator has proven that corrosion will:			. •	•
		(c) (1) Only be a light surface oxide, or	1			·
		(2) Not affect safe operation before next scheduled inspection	7			l
•	.481	(a) Atmospheric corrosion control monitoring (1 per 3 yrs/39 months onshore: 1 per yr/15 months offshore)	1			
	.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)	1			
	483	Replacement and required pipe must be coated and cathodically protected (see code for exceptions)				۲.
•	.485	(a) Procedures to replace pipe or reduce the MAOP if general corrosion has reduced the wall thickness?	1			
		(b) Procedures to replace/repair pipe or reduce MAOP if localized corrosion has reduced wall thickness (unless reliable engineering repair method exists)?	1			1
		(c) Procedures to use Rstreng or B-31G to determine remaining wall strength?	1		Ŀ	
	.487	Remedial measures (distribution lines other than cast iron or duetile iron)	J			
	.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.	1			
		 (b) Each segment of cast from or ductile iron pipe where localized graphitization is found it must be assessed and remediated according to this subpart. 	V,			
	.491	Corrosion control maps and record retention (pipeline service life or 5 yrs)	7	· ·		-

Co	•	
~ "		



.801- .809	Subpart N — Qualification of Pipeline Personnel Procedures	S	יט ו	VAN/C
	Refer to Operator Qualification Inspection Forms and Protocols (OPS web site)			•
.901-	Subpart O — Pipeline Integrity Management	S	ַ ט	VÁN/C
,931,	This form does not cover Gas Pipeline Integrity Management Programs			
				
Subparts	PART 199 – DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES	s	\ U	N/A N/C
1-0	Drug & Alcohol Testing & Alcohol Misuse Prevention Program - Use PHMSA Form # 13, PHMSA 2008 Drug and Alcohol Program Check.			

omments: Drug testing is I and they have Ge	Per Sumed Quarte	rly - At leasterne compoleess	is Tested	at that Time
and they have le		• •		



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	PIPELINE INSPECTION (Field)	S	ט ו	VÂN/C
.179	Valve Protection from Tampering or Damage 5 valves	0		17.
£463	Cathodic Protection			***
.465	Rectifiers	-	77.	1
:.476	Systems designed to reduce internal corresion	1	•	
479	.Pipeline Components Exposed to the Atmosphere	7	-	\top
.603	Knowledge of Operating Personnel	1		7
.707	ROW Markers, Road and Railroad Crossings	7		
.719	Pre-pressure Tested Pipe (Markings and Inventory)	1		
.741	Telemetering. Recording gauges	-3.		•
.739/.743	Pressure Limiting and Regulating Devices (spot-check field installed equipment vs. inspection records) 3 status			7
.745	Valve Maintenance	7		
.751	Warning Signs	7	7	7
.801809	Operator Qualification - Use PHMSA Form 15 Operator Qualification Field Inspection Protocol Form		1	

	the second of th	
Comments: Hellis Musphy Colo	ile GIF ST.W. Ave) T. S	tation, Price Limber
ppeto Soil readings thank Th		

191.5	REGULATORY REPORTING PERFORMANCE AND RECORDS	S	U	N/AN/C
191.5	Telephonic reports to NRC	1	$oxed{\Box}$	
191,15	Written incident reports; supplemental incident reports (Form F 7100.2)	V	一	
191	Annual Reports (Forms 7100.1-1, 7100.2-1)	17	\Box	
191.23	Safety related condition reports		-	-
192.16	Customer Notification (Verification - 90 days - and Elements)	7/	П	
192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports	12	Π	

CONSTRUCTION PERFORMANCE AND RECORDS					N/A	N/C
.225	Test Results to Qualify Welding Procedures					
.227	Welder Qualification				١.	
.241 (a)	Visual Weld Inspector Training/Experience	•	_			
.243 (b)(2)	Nondestructive Technician Qualification				Γ	
(c)	NDT procedures					
(1)	Total Number of Girth Welds					
(1)	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				\prod_{\cdot}	L.
285	Personnel Joining Qualifications					
287	Joining Inspection Qualifications					
325	Construction Specifications					
.325	Underground Clearance	$-\Box$		L.	<u> </u>	<u> </u>

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	CONSTRUCTION PERFORMAN	NCE AND RECORDS	S	U	N/A	N/
	Amount, Location, Cover of each Size of Pipe Installed	. 8.		7.		Τ
2763(e)	EFV customer notification			, ·		✝
,455	Cathodic Protection	The first of the second second	1			T
, .		A STATE OF THE STA	•			
	OPERATIONS and MAINTENANCE PER	FORMANCE AND RECORDS	S	U	N/A	N/
.517 (a)	Pressure Testing (operates at or above 100		[]			
.517 (b)	Pressure Testing (operates below 100 psig.	service lines, plastic lines) – 5 years	<u></u>	_	<u> </u>	L
.603(b)	.605(a) Procedural Manual Review - Operations as	nd Maintenance (1 per yr/15 months) .	\		ļ	l _
.	.605(b)(3) Availability of construction records, maps,	operating history to operating personnel				Г
-	.605(b)(8) Periodic review of personnel work - effect	iveness of normal O&M procedures	~			Π
•	.605(c)(4) Periodic review of personnel work - effect	iveness of abnormal operation procedures				Т
.709	.614 Damage Prevention (Miscellaneous)		1		Γ.	T
	.609 Class Location Study (If Applicable)	The state of the s	12	\vdash		\vdash
.603(b)	.615(b)(1) Location Specific Emergency Plan		V	\vdash	 	\vdash
	.615(b)(2) Emergency Procedure training, verify effective	ctiveness of training	17		Г	T
-	.615(b)(3) Employee Emergency activity review, dete	ermine if procedures were followed.	7			
	-615(c) Liaison Program with Public Officials	The second secon	7	Γ		
· . · · · · · · · · · · · · · · · · · ·	.616 Public Awareness Program		Τ	_	-	
	emergency responder, public officials, sel below:	eceipts, audience contact documentation, etc. for hool superintendents, program evaluations, etc.). See table	_	L		
		ommended Message Deliveries	İ			
,	Stakeholder Audience (Natural Gas Transmission Line Operators)	Baseline Message Frequency (starting effective date of Plan)	1		•	
	Residents Along Right-of-Way and Places of	2 years	ľ			
	Congregation	A a sual	1			
	Emergency Officials Public Officials	Annual 3 years	1			
	Excavator and Contractors	Annual	'			
	One-Call Centers					
	Stakeholder Audience (Gathering Line	As required of One-Call Center)			
	' Oppostation	Baseline Message Frequency				
•	Operators) Residents and Places of Congregation					
·	Residents and Places of Congregation Emergency Officials	Baseline Message Frequency (starting from effective date of Plan) Annual Annual				
	Residents and Places of Congregation Emergency Officials Public Officials	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years				•
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual				
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center	}			
•	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs)	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan)			•	
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs) Residents Along Local Distribution System	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan) Annual				
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs) Residents Along Local Distribution System LDC Customers	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan)				
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs) Residents Along Local Distribution System LDC Customers Emergency Officials Public Officials	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan) Annual Twice annually Annual 3 years				
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs) Residents Along Local Distribution System LDC Customers Emergency Officials Public Officials Excavator and Contractors	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan) Annual Twice annually Annual 3 years Annual				
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs) Residents Along Local Distribution System LDC Customers Emergency Officials Public Officials Excavator and Contractors One-Call Centers	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan) Annual Twice annually Annual 3 years Annual As required of One-Call Center				
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs) Residents Along Local Distribution System LDC Customers Emergency Officials Public Officials Excavator and Contractors One-Call Centers * Refer to API RP 1162 for additional requirements supplemental requirements, recordkeeping, program	Baseline Message Frequency (starting from effective date of Plan) Annual Annual 3 years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan) Annual Twice annually Annual 3 years Annual As required of One-Call Center i, including general program recommendations, a evaluation, etc.				
	Residents and Places of Congregation Emergency Officials Public Officials Excavators and Contractors One-Call Centers Stakeholder Audience (LDCs) Residents Along Local Distribution System LDC Customers Emergency Officials Public Officials Excavator and Contractors One-Call Centers * Refer to API RP 1162 for additional requirements supplemental requirements, recordkeeping, program	Baseline Message Frequency (starting from effective date of Plan) Annual Annual As years Annual As required of One-Call Center Baseline Message Frequency (starting from effective date of Plan) Annual Twice annually Annual 3 years Annual As required of One-Call Center i, including general program recommendations, a evaluation, etc. and any other languages commonly understood by a				

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	OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS	Ś	U	N/A	N
	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:			V	1
	(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			<u> </u>	H
.709	.619 .621 .623 Maximum Allowable Operating Pressure (MAOP) Note: New PA-I1 design criteria is incorporated into 192.121 & .123. (Final Rule Pub. 24 December, 2008)	V	_		┢
	.625. Odorization of Gas	V	-	 -	┝
	.705 Patrolling (Refer to Table Below)	1	 	├	├
		لبا		<u> </u>	<u> </u>
	Class Location At Highway and Railroad Crossings At All Other Places	, ,,	• !	, .·	,
	1 and 2 2/yr (7½ months) 1/yr (15 months)		٠.		٠, .
:	3 4/yr (4½ months) 2/yr (7½ months)		-		!
· 6	4. 4/yr (4½ months) . 4/yr (4½ months)			: !.·	. "
.709	.706 Leak Surveys (Refer to Table Helow)	·	<u> </u>	=	_
.707	1700 LEAN SHIVE TO TABLE DELON)	<u>.</u>	Ļ		
	Class Location . Required . Not Exceed	l			
	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.	l			٠
602/L)		ī	<u>.</u>	· · · ·	,
(a)cva.	.721(b)(1) Patrolling Business District (4 per yr/4½ months)	2	<u> </u>		<u> </u> -
· · ·	.721(b)(2) Patrolling Outside Business District (2 per yr/7½ months)	1	<u> </u>	<u> </u>	上
·.	.723(b)(1) Leakage Survey - business District (1 per yr/15 months)	12	<u> </u>		L
,	.723(b)(2) Leakage Survey	 	<u></u>		
	Outside Business District (5 years)	1.	[.	L
	Cathodically unprotected distribution lines (3 years)	.1 / 1			ı
					╚
.•	.725 Tests for reinstating service lines	1			
603b/.727g	.725 Tests for reinstating service lines .727 Abandoned Pipelines: Underwater Facility Reports	ンマン			
603b/.727g 709		ノンソン			
	.727 Abandoned Pipelines: Underwater Facility Reports	ノンレン			-
	.727 Abandoned Pipelines: Underwater Facility Reports .739 Pressure Limiting and Regulating Stations (1 per yr/15 months)	17771			
	.727 Abandoned Pipelines: Underwater Facility Reports .739 Pressure Limiting and Regulating Stations (1 per yr/15 months) .743 Pressure Limiting and Regulator Stations - Capacity (1 per yr/15 months)	27777			
709	.727 Abandoned Pipelines: Underwater Facility Reports .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)	7		· · · · · · · · · · · · · · · · · · ·	
709 503(b)	.727 Abandoned Pipelines: Underwater Facility Reports .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) .747 Valve Maintenance Distribution Lines (1 per yr/15 months)	7			
709 503(b) 709	.727 Abandoned Pipelines: Underwater Facility Reports .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) .747 Valve Maintenance Distribution Lines (1 per yr/15 months) .749 Vault Maintenance (3200 cubic feet)(1 per yr/15 months)	7			
709 503(b) 709	.727 Abandoned Pipelines: Underwater Facility Reports .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) .747 Valve Maintenance Distribution Lines (1 per yr/15 months) .749 Vault Maintenance (3200 cubic feet)(1 per yr/15 months) .751 Prevention of Accidental Ignition (hot work permits)	7		・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	
709 503(b) 709	.727 Abandoned Pipelines: Underwater Facility Reports .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) .747 Valve Maintenance Distribution Lines (1 per yr/15 months) .749 Vault Maintenance (3260 cubic feet)(1 per yr/15 months) .751 Prevention of Accidental Ignition (hot work permits) .755 Caulked Bell and Spigot Joint Repair .225(b) Welding - Procedure	7			
709 503(b) 709	Abandoned Pipelines: Underwater Facility Reports 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) 747 Valve Maintenance Distribution Lines (1 per yr/15 months) 749 Vault Maintenance (3200 cubic feet) (1 per yr/15 months) 751 Prevention of Accidental Ignition (hot work permits) 755 Caulked Bell and Spigot Joint Repair 725(b) Welding - Procedure 727/229 Welding - Welder Qualification	7	レンン	ン ン ン	
709 503(b) 709	.727 Abandoned Pipelines: Underwater Facility Reports .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) .747 Valve Maintenance Distribution Lines (1 per yr/15 months) .749 Vault Maintenance (3260 cubic feet)(1 per yr/15 months) .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		ンソン	Ø	
709 503(b) 709	Abandoned Pipelines: Underwater Facility Reports 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) 747 Valve Maintenance Distribution Lines (1 per yr/15 months) 749 Vault Maintenance (3200 cubic feet) (1 per yr/15 months) 751 Prevention of Accidental Ignition (hot work permits) 755 Caulked Bell and Spigot Joint Repair 725(b) Welding - Procedure 727/229 Welding - Welder Qualification	7		Ø	

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 Ch N/C - Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

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	OPERATIONS and MAINTENANCE PERFORMANCE AND RECORDS				s	UN	AN/C
	.243(f) NDT Records (Pipeline Life)		,		<i>i</i>		_
	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	: -	,	;1	•	3.5	1

٠.			<u> </u>	<u>, ', </u>	<u></u>			
1	Comments:			ر مید		*	`	 • • •
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3,		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)			. ,	٠.
491	.465(b)	Rectifier Monitoring (6 per yr/21/2 months)		·		
.491	.465(c)	Interference Bond Monitoring - Critical (6-per-yr/2//-months)			77-,	1.1
.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)	·			<i>i</i> .
491	.467	Electrical Isolation (Including Casings)				
491	469	Test Stations - Sufficient Number			·	
430	. 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/7% months)	<u> </u>	_		<u> </u>
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	1	[1	l

Comments:			•			•	
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Distribution Operator Compressor Station Inspection
Unless otherwise noted, all code references are to 49CFR Part 192. S-Satisfactory U-Unsatisfactory N/A-Not Applicable
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/AN/C
Polici.	.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
•	100	(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:	1,12	电热电路 医二氏性		to the second second second
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. Fig.	:	COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	s	ָּט	N/Å	NÇ
163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits		-		
	, .	Door latch must open from inside without a key		1,		
		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	Ī	·		
	7.	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?				Γ
		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?			1	
67	(a)	ESD system must:				
	· ·	- Discharge blowdown gas to a safe location	$oxed{ }$			
		- Block and blowdown the gas in the station	Γ.			
		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers				
<u>. </u>		Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage	<u> </u>			
		ESD system must be operable from at least two locations, each of which is:	<u> </u>			
	•	- Outside the gas area of the station	<u> </u>			
		- Not more than 500 feet from the limits of the station	<u></u>	<u></u>		
7		- ESD switches near emergency exits?				<u> </u>
	_(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?				
400	(c)	Are ESDs on platforms designed to actuate automatically by				
)	- For unattended compressor stations, when:	1.			

Distribution Operator Compressor Station Inspection
Unless otherwise noted, all code references are to 19CFR Part 192, S-Satisfactory U-Unsattsfactory N/A-Not Applicable
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		COMPRESSOR STATIONS INSPECTION (FleId) (Note: Facilities may be "Grandfathered")	s	บ	N/A	N/C
		The gas pressure equals MAOP plus 15%?				
	•	An uncontrolled fire occurs on the platform?			1	
±		- For compressor station in a building, when	•			ľ
		An uncontrolled fire occurs in the building?				
		Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?		,		£
.171	(8)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.				
1 7 .	(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)?				Α,
·	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?	; -, -y		• :-	
	. (e)	Are the mutilers equipped with vents to vent any trapped gas?				
.173		Is each compressor station building adequately ventilated?				
.457	٠4`	Is all buried piping cathodically protected?				
.481 -		Atmospheric corrosion of aboveground facilities			7,7	प्रदेश
.603 ·		Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?				:
-4	• •	Are facility maps current/up-to-date?			. ,	
615	•	Emergency Plan for the station on site?		Γ.	<u> </u>	
619 .		Review pressure recording charts and/or SCADA		1.	Ī.,	
702		Markers		:		
		Overpressure protection - reliefs or shutdowns		7	Γ.	
735	÷,	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?		2		
;	•	Are aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?		· ·		
136		Gas detection - location	<u> </u>	· ·		

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	COMPRESSOR STATION O&M PERFORMANCE AND RECORDS	s	U	N/AN/C
09	.731(a) Compressor Station Relief Devices (1 per yr/15 months)		1	
	.731(e) Compressor Station Emergency Shutdown (1 per yr/15 months)			
	.736(c) Compressor Stations - Detection and Alarms (Performance Test)			

omments:			 •	
	•			
		•		



Leave this list with the operator.



All PHMSA Advisory Bulletins (Last 2 years)

Number	<u>Date</u>	<u>Subject</u>
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 Hazardons Liquid Systems
VDB-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
-11-02	February 9, 2011	. Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems
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or more PHMSA Advisory Bulletins, go to http://phmsa



APPENDIX G

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 8 1 2016

Emle 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.kv.gov

April 2, 2007

Mark David Goss Chairman

> John W. Clay Commissioner

The Honorable Steve Sweeney Mayor of Liberty
P.O. Box 127
Liberty, KY 42539

RE: Natural Gas Facilities Inspection of the City of Liberty Gas Company

Dear Mayor Sweeney:

On March 21, 2007. Joel Grugin conducted a periodic regulatory compliance inspection of the natural gas facilities of the City of Liberty Gas Company in Liberty, Kentucky. A copy of the inspection report is attached for your review. Six deficiencies were documented during this comprehensive inspection. The previous inspection of this facility was conducted on April 21, 2004. During that comprehensive inspection, two deficiencies were documented, and one was not corrected in a timely manner.

Please review the attached report. As noted, six deficiencies were documented during the inspection. You are requested to respond to this report, outlining corrective actions for the cited deficiencies by May 1, 2007. Please provide your responses on the copies of the Deficiency Tracking Reports sent with this letter by completing the three sections under the Response heading for the cited deficiency.

If you have any questions or need additional information, you are welcome to contact me at (502) 564-3940. We appreciate your continued interest in the safe operation of your gas facilities.

Sincerely,

Jason R. Brangers, P.E.

Manager

Gas Branch

Division of Engineering

JRB:SS:mae

Attachment: City of Liberty 032107 Inspection Report





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 4

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:

~

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

Utility Regulatory and Safety Investigator III



' Report Number: City of Liberty 032107
DTR Number: 1

Deficiency Tracking Report

Deliciency Detail		
Utility	Date of Investigation	Investigator
City of Liberty Gas Company	- 3/21/2007	Joel Grugin
Regulation		
49 CFR Part 192.723 Distribution system		perator of a distribution system
shall conduct periodic leakage surveys		
·	<u> </u>	
Deficiency:		
City of Liberty had not performed a leaka	ige survey since 2003. (This i	s a repeat deficiency.)
	If Repeat Deficiency,	Date of Last DTR: 4/21/200
Response (attach additional pa	des as necessary)	
1) Explain why the deficiency occurred. Include In		inlance and why it was not detected
by the utility. (Attach extra pages as necessary)	HOUSTON Spoot Mist canasa lite del	ciercy and why it was not detected
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<u> </u>		
2) Explain actions taken to correct the deficiency, done. (Attach extra pages as necessary)	including utility's responsible person,	actions taken, and when it was (or will be)
	·	
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 page	s as necessary)	
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Response Provided By:	R	esponse Date:
Signature:	•	
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Report Number: DTR Number:

Deficiency Tracking Report

Deficiency Detail		
Utility	Date of Investigation	Investigator.
City of Liberty Gas Company	3/21/2007	Joel Grugin
Regulation		the first the second
49 CFR Part 192.605(a) Procedural manual operatora manual of written procedures for perfectly response		
Deficiency:		
City of Liberty did not review and update op-	eration, maintenance, and	emergency plan as required .
	If Repeat Deficiency	Date of Last DTR:
Response (attach additional page	s as necessary)	
Explain why the deficiency occurred. Include inform by the utility. (Attach extra pages as necessary)		ficiency and why it was not detected
Explain actions taken to correct the deficiency, including. (Attach extra pages as necessary).	iding utility's responsible person	, actions taken, and when it was (or will be)
 Explain actions taken to prevent the deficiency from when it was (or will be) done. (Attach extra pages as 	n occuming again, including utilit necessary)	s responsible person, actions taken, and
Response Provided By:	F	Response Date:
Signature:		



Report Number: City of Liberty 032107
DTR Number: 3

Deficiency Tracking Report

Utility	Date of Investigation	Investigator
City of Liberty Gas Company	3/21/2007	Joel Grugin
na light and sign and the contract of	<u> </u>	
Regulation		
9 CFR Part 192.725 (b) Each service line he point of disconnection to the service line	e temporarily disconnected ne valve in the same mant	l from the main must be lested from her as a new service line, hefore
econnecting		ioi de dinario en ties inicipatata
	· · · · · · · · · · · · · · · · · · ·	
Peficiency:		247 A Bubble 45-44
City of Liberty improperly tested a broken nstead of a pressure test.	service line on Highway 18	147. A bubble test was performed

Broke Bugger and the Commence of	If Repeat Deficien	cy, Date of Last DTR:
<u>Response (attäch additional pag</u>	<u>les as necessary)</u>	
) Explain why the deficiency occurred. Include Info	ormation about what caused the o	deficiency and why it was not detected
y the utility. (Attach extra pages as necessary)		A STATE OF THE STA
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	<u> </u>	
) Explain actions taken to correct the deficiency, in	icluding utility's responsible persi	on, actions taken, and when it was (or will be
) Explain actions taken to correct the deficiency, in one. (Attach extra pages as necessary)	icluding utility's responsible persi	on, actions taken, and when it was (or will be
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Signature:

Deficiency Tracking Report

<u>Deficiency Detail</u>		
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 combustible gases to assure the proper co	(f) Each operator shall connected in accommodate and accommodate accommodate and accommodate and accommodate and accommodate and accommodate and accommoda	nduct periodic sampling of ordance with this section
Deficiency:		
City of Liberty did not perform periodic ado		
	If Repeat Deficiency, D	ate of Last DTR:
Response lattach additional page	es as necessary)	
Explain why the deficiency occurred: Include information by the utility. (Attach extra pages as necessary)	mation about what caused the defic	ency and why it was not detected
Explain actions taken to correct the deficiency, incidence. (Altach extra pages as necessary)	ciuding utility's responsible person, a	ctions taken, and when it was (or will be)
Explain actions taken to prevent the deficiency frowhen it was (or will be) done. (Attach extra pages a		responsible person, actions taken, and
	· .	
Response Provided By:	Res	ponse Date:



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TR Number: 5			•
Defici	iency Tracking R	eport	· · ·
Deficiency Detail			
Utility	Date of Investigation	n Investigat	or
City of Liberty Gas Company	3/21/2007	Joel Grug	in '
Regulation	1		
9 CFR Part 192.747			
)eficiency:			
City of Liberty had not identified or docu	mented critical valve inspe	ctions	
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	If Repeat Delicie	ency, Date of Last DTR:	ing state of the
Response (attach additional pa	iges as necessary)		· 5.34
) Explain why the deficiency occurred. Include i		a deficiency and why it was not	detected
y the utility. (Attach extra pages as necessary)		A CONTRACTOR OF THE	
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) Explain actions taken to correct the deficiency,	, including utility's responsible per	son, actions taken, and when I	t was (or will b
one. (Attach extra pages as necessary)			
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hen it was (or will be) done. (Attach extra page	es as necessary) .	<u>'</u>	
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Response Provided By:		Response Date:	



Response Date:

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	Delicien	cy macking Kep	Ort
<u>Deficiency Detail</u>			
Utility	γν. ⁵	Date of Investigation	Investigator
City of Liberty Gas Con	прапу	3/21/2007	Joel Grugin
Regulation			
49 CFR Part 192.465 Extern protection must be tested at			pipeline that is under cathodic
Deficiency:			
City of Liberty did not perform	n corrosion test	s for 2006.	
·		if Repeat Deficiency,	Date of Last DTR
Response (attach add			3,000
1) Explain why the deficiency occur by the utility. (Attach extra pages as	rred. Include inform s necessary)	ation about what caused the defi	ciency and why it was not detected
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Explain actions taken to correct done. (Attach extra pages as necessary)	the deficiency, inclu	ding utility's responsible person,	actions taken, and when it was (or will
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Explain actions taken to correct done. (Attach extra pages as necessary)	the deficiency, inclu	ding utility's responsible person,	actions taken, and when it was (or will
done. (Attach extra pages as nec	the deficiency, incluessary)	occuming again, including utility	actions taken, and when it was (or will
done. (Attach extra pages as nece	the deficiency, incluessary)	occuming again, including utility	



Response Provided By:

Signature:

APPENDIX H

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 0 1 2016

Steven L. Beshear Governor

Leonard K. Peters Secretary Energy and Environment Cabinet



Commonwealth of Kentucky Public Service Commission 211 Sower Bivd. P.O. Box 815 Frankfort, Kentucky 40502-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov David L. Armstrong Chairman

> James Gardner Vice-Chalman

John W. Clay Commissioner

June 12, 2009

Honorable Steve Sweeney
Mayor of Liberty
Courthouse Square
P.O. Box 127
Liberty, KY 42539

PERIODIC REGULATORY COMPLIANCE INSPECTION OF LIBERTY NATURAL GAS

On May 27, 2009, Steve Samples conducted a periodic regulatory compliance inspection of the natural gas facilities of Liberty Natural Gas in Liberty, Kentucky. A copy of the inspection report is attached for your review. Nine deficiencies were documented during this periodic inspection. The previous inspection of this utility was conducted on March 21, 2007. Six deficiencies were documented during that periodic inspection and were corrected in a timely manner.

As noted, nine deficiencies were documented during the inspection. You are requested to respond to this report, outlining corrective actions for the nine cited deficiencies by July 17, 2009. Please provide your responses on the copies of the Deficiency Tracking Reports sent with this letter by completing the three separate sections under the Response heading for the cited deficiency.

If you have any questions or need additional information, you are welcome to contact me at (502) 564-3940. We appreciate your continued interest in the safe operation of your gas facilities.

JASON R. BRANGERS, P.E., MANAGER, GAS BRANCH, DIVISION OF ENGINEERING

Attachment: LibertyNaturalGas 052709 Inspection Report





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

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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:

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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.
- 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 recommendation, not to squeeze off pipe more than once in the same location. This should be replaced with a plastic valve. A follow up inspection will be scheduled.

Submitted by

Steve Samples

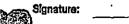
Utility Regulatory and Safety Investigator III



Deficiency Tracking Report

Deficiency Detail		
Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples
Regulation		No.
49 CFR Part 192.614 Damage prevention p accordance with this section, a written progr activities	rogrameach operator of ram to prevent damage to	a buried pipeline must carry out, in that pipeline from excavation
Deficiency:		ris de la companya de la companya de la companya de la companya de la companya de la companya de la companya d
Liberty Natural Gas was not a member of K	entucky one-call system.	
	If Repeat Deficiency	Date of Last DTR:
Response (attach additional page	s as necessary)	
Explain why the deficiency occurred, include inform by the utility. (Attach extra pages as necessary)	are a ration of	iclency and why it was not detected
 Explain actions taken to correct the deficiency, includence. (Attach extra pages as necessary) 	iding utility's responsible person,	actions taken, and when it was (or will be)
 Explain actions taken to prevent the deficiency from when it was (or will be) done. (Attach extra pages as 	occurring again, including utility necessary)	's responsible person, actions taken, and

Response Date:



Response Provided By:

Deficiency Tracking Report



<u>Deficiency Detail</u>		
Uthity	Date of investigation	Investigator
City of Liberty Gas Company	5/27/2009	Stevė Samples
Regulation		
49 CFR Part 192.605(b)(9) Taking adequate the hazards of unsafe accumulations of vap excavation, emergency rescue equipment, is	or or gas, and making avail	
Deficiency:	reflect to be a city	
Liberty Natural Gas was not taking adequate	precautions when working	
Response (attach additional page	e as nocoseani	
1) Explain why the deficiency occurred. Include inform by the utility. (Attach extra pages as necessary)		lancy and why it was not detected
Explain actions taken to correct the deficiency, includence. (Attach extra pages as necessary)	ding utility's responsible person, a	ctions taken, and when it was (or will be)
3) Explain actions taken to prevent the deficiency from when it was (or will be) done. (Attach extra pages as		responsible person, actions taken, and
Response Provided By:	Res	ponse Date:



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Utility	Date of investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples
Regulation		Marile 1, 10
49 CFR Part 192.616 Public awareness. Eac to enable customers, the public, appropriate excavation	h operator shall establisi government organization	n a continuing educational program is, and persons engaged in
Deficiency:	Sample of the same	
Liberty Natural Gas system did not have a Pu	iblic Awareness Plan or	records to indicate following a plan.
	1 - 31 - 321	, Date of Last DTR:
Response (attach additional pages	as necessary)	
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Explain actions taken to correct the deficiency, includ done. (Attach extra pages as necessary)	ing utility's responsible person	, actions taken, and when it was (or will be)
3) Explain actions taken to prevent the deficiency from o when it was (or will be) done. (Attach extra pages as n	occuning again, including utilit acessary)	's responsible person, actions taken, and
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7/17/2009

	Deficienc	y Tracking F	Report	
Deficiency Detail			Gas and	
Utility	· · · · · · · · · · · · · · · · · · ·	Date of Investigati	on In	restigator.
City of Liberty Gas Comp		5/27/2009		ve Samples
Regulation			All Maria	
49 CFR Part 192.723 (b)(1) A business districts, including to manholes, at cracks in paver	sts of the atmos	phere in gas, electr	quipment must be lc, telephone, sew	conducted in er, and water sys
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Response Provided By:			Response Date:	



Deficiency Tracking Report

utility	Date of Investigation	investigator
City of Liberty Gas Company	5/27/2009	Steve Samples
Regulation		
49 CFR Part 192.747 Each valvemust be o	hecked and serviced at	intervals not exceeding 15 mo
but at least once each calendar year.	, , , , , , , , , , , , , , , , , , ,	
Deficiency:		The second second
Liberty Natural Gas did not have records to li	ndicate their critical valve	es have been inspected each y
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Response (attach additional pages	3 4	
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<u>Deficiency Detail</u>		
Utility.	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples
Regulation		
49 CFR Part 192.465 External corrosion cor	trol: Monitoring(a) Eac	h pipeline that is under cathodic
protection must be tested at least once each	calendar year	
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Deficiency:		
Liberty Natural Gas did not take corrosion re	adings in 2008.	
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Report Number: Liberty Natural Gas 052709

OTR Number: 7

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7/17/2009

Deficiency Tracking Report

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Utility	Date of Investigation	Investigator
City of Liberty Gas Company	5/27/2009	Steve Samples
Regulation		
9 CFR Part 192.805(b) Qualification progra	m (b) Ensure through (evaluation that individuals
performing covered tasks are qualified;		
Deficiency:	programme to the second	
Rectifier readings were taken by Mike White	. He did not have comosi	on operator qualifications.
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Deficiency Tracking Report

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Uulity	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 o segment of pipeline that has been relocated subpart and Sections 192.619 to substantiate	or replaced, until - It has	f pipeline, or return to service a been tested in accordance with this
Deffclency:	The state of the s	Annah Maria
Liberty Natural Gas did not have records to s	how they had tested the	ir new segments of main after a dig
n:		
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Response Date:





Response Provided By:

Due Date:

7/17/2009

Deficiency Tracking Report

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Utility	•	Date of Investigation	Investigator	
City of Liberty Gas Company	•.	5/27/2009	Steve Samples	, ·
Regulation	•	A PROPERTY OF		
49 CFR Part 192.605(a) Procedural manu	uali	for operations, maintenance,	and emergencies	,,,
		215 The Control of th		

Deficiency:

Liberty Natural Gas did not review and update their manuals annually.

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If Repeat Deficiency, Date of Last DTR:

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APPENDIX I

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2016-00391 DATED DEC 0 1 2016

City of Liberty



<u>LBAKAGB SURVEY RECAP</u>

1.	SCOPE		
	a. Miles of pipeline inspecte		
• • •	b. Percent of system inspect		
1 V	o. Number of services inspe-	zied	
•	d. Percent of total services		and the second
	Dalary ma		
	-RESULTS	A STATE OF THE STA	
	A Manufacture of the state of t		
	a. Number of leaks detected		
	b. Number of pipeline leaks	<u>0</u>	
	c. Number of services leaks		•
. , ,	d. Number grade "1" leaks		• • •
· ·	e. Number grade "2" leaks	<u> </u>	•
:	f. Number grade "3" leaks		
CLASSIF	TCATION METHOD a. Class "1" leaks 75% to 10	10% CGI Meter	
• •	b. Class "2" leaks 15% to 75	% CGI Meter	
•	o. Class "3" leaks 0% to 159	6 CGI Meter	
Name of (Company: City of Liberty P.O. BOX 127 Liberty, KY 4253		
The City of books.	of Liberty has been divided into	five (5) parts because we ha	ave five meter
Date of S	urvey: <u>8 27 14</u> En	mployees: Greg Rudgers	
	us Business District and School	S	









LBAKAGE SURVEY RECAP

	1.	SC	OPE		•
•.		a.	Miles of pipeline inspected	1	
•		. b .	Percent of system inspected	20 70	
	9		Number of services inspected	100	
			Percent of total services		
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		8.	Number of leaks detected	ų.	
•		h	Number of pipeline leaks		•
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			Number grade '2" leaks		
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		٠,		in mem.	
	Name of	Comp	any: City of Liberty		
		•	P.O. BOX 127		
•			Liberty, KY 42539		
	The City books.	of Lib	erty has been divided into five	(5) parts becaus	e we have five meter
•	Date of S	urvey	: <u>\$/37/14</u> Emplo	yees: <u>Darrin</u>	Westey
•		lus Bu ook;	siness District and Schools.		
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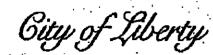
City of Liberty



LEAKAGE SURVEY RECAP

1.	SCOPE		•	•
			• • •	
•	a. Miles of pipeline inspected	$\mathcal{L}_{\mathcal{A}}$		
	b. Percent of system inspected	20.00	- . :	
	c. Number of services inspected		-	
	d. Percent of total services		- ,	
	CL Accept of total solvices		- , , ,	
2	RESULTS			
	- ALBOUTIS			•
	a. Number of leaks detected	^		
			-	
•.	b. Number of pipeline leaks		-	
	c. Number of services leaks	<u> </u>	4.	
	d. Number grade "1" leaks		-	
•	e. Number grade "2" leaks	<u> </u>	- -	
•	f. Number grade "3" leaks	0		
	TCATION METHOD a. Class "1" leaks 75% to 100% b. Class "2" leaks 15% to 75% Co. Class "3" leaks 0% to 15% Co	GI Meter		
Name of	City of Liberty P.O. BOX 127 Liberty, KY 42539			
The City books.	of Liberty has been divided into five	(5) parts becau	se we have five meter	
	urvey: <u>8/27/14</u> Employ	rees: Jeff	Wethington	
Date of S				



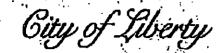




LEAKAGE SURVEY RECAP

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		Miles of pipeline inspected		•	•
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	d,	Percent of total services		•	
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		Number of leaks detected	<u>u</u>	•	
		Number of pipeline leaks		<u> </u>	
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		Number grade "2" leaks	<u></u>	-	
. •		Number grade "3" leaks		-	
•	4.	Mumber Brade '2' teska		•	
CLASSI	FIÇA	. COHTEM MOIT			
		•			
_	a.	Class "1" leaks 75% to 100%		•	
•	þ.			•	
	C.	Class "3" leaks 0% to 15% C	GI Meter		
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Name of	Con	7. 3	_	•	
		P.O. BOX 127	<u>.</u>		-
		Liberty, KY 42539	_	•	
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The City books.	of L	lberty has been divided into five	e (5) parts becaus	so we have five meter	
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Date of S	urve	y: <u>8/27/14 </u>	yees: <u>Vairen</u>	Atmod	
		usiness District and Schools.	·		
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LEAKAGE SURVEY RECAP

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	d.	Percent of total services	3 12.55	-	•
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		Number of pipeline leaks		<u> </u>	
		Number of services leaks		· →	
	d.	Number grade "1" leaks	0	· ·	
		Number grade "2" leaks		•	
•	f.	Number grade "3" leaks	. 0	· .	
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•	b.				•
•	0,	Class "3" leaks 0% to 15% CG	I Meter		• •
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Date of St	nvej	y: <u>8/27/14</u> Employ	ees: <u>Chris</u>	Dial	 .
	ıs Bi	usiness District and Schools.			<u> </u>
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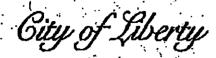




	1.:	SCOPE
		a. Miles of pipeline inspected
		b. Percent of system inspected 20%
	•	c. Number of services inspected 20
:		d. Percent of total services
		the the transfer t
	⁹ 2	RESULTS 8
		
		a. Number of leaks detected 6
		b. Number of pipeline leaks
		c. Number of services leaks 6
<u>~</u> .		d. Number grade "1" leaks
	•	e. Number grade "2" leaks O
		f. Number grade "3" leaks
	CLASSII	ICATION METHOD
		a. Class "1" leaks 75% to 100% CGI Meter
	•	b. Class "2" leaks 15% to 75% COI 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 books.	of Liberty has been divided into five (5) parts because we have five meter
	Date of S	urvey: <u>1/25/13</u> Employees; Areg Rodgers
		us Business District and Schools.
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LEAKAGE SURVEY RECAP

	1.	SCOPE			
	·	a. Miles of pipeline inspected	1	. 4	
	1	b. Percent of system inspected	80%		•
٠:		c. Number of services inspected	45		1
		d. Percent of total services			
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		a. Number of leaks detected	<u></u>		· :
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		d. Number grade "1" leaks	0	•	•
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_	. f	f. Number grade "3" leaks			•
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	a b o	Class "2" leaks 15% to 75%	CGI Meter	a de la companya de l	
	Name of Co	mpany: City of Liberty P.O. BOX 127 Liberty, KY 42539	- - -		•
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	Date of Surv	vey: 7/35/13 Emplo	oyees: <u>Duren</u>	Awood	
	1. Plus 2. Book	Business District and Schools.			





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	. 1. SO	COPE			
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	a,	Miles of pipeline inspected			
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•	c.	Number of services inspected	30		:
•	ď,	Percent of total services	<u> </u>	•	
	2RI	ESULTS			•
,		Number of leaks detected			
	b.	Number of pipeline leaks			
•		Number of services leaks	0	,	
8	•	Number grade "1" leaks		•	
	. 6-	Number grade "2" leaks			
•	£	Number grade "3" leaks		• • •	
•	CLASSIFICA	ATION METHOD			· ··
	a,	Class "1" leaks 75% to 100%			
	b.	Class "2" leaks 15% to 75%.		•	•
	C.	Class "3" leaks 0% to 15% C	GI Meter		, •
	Name of Con	pany: <u>City of Liberty</u> P.O. BOX 127 Liberty, KY 42539			
	The City of L. books.	iberty has been divided into fiv	e (5) parts becaus	e we have five meter	
	Date of Surve	y:Emplo	oyees: <u>Lug R</u>	Bagus	
	1. Plus B 2. Book:	business District and Schools.			







<u>LBAKAGE SURVEY RECAP</u>

	1. SCOPE		
	a. Miles of pipeline inspected		
	b. Percent of system inspected	20%	
•	c. Number of services inspected		
	d. Percent of total services		
	2. RESULTS		
	a. Number of leaks detected		
	b. Number of pipeline leaks	0	
•	c. Number of services leaks		
٠.	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% b. Class "2" leaks 15% to 75% C c. Class "3" leaks 0% to 15% CC	GI Meter	
•	Name of Company: City of Liberty P.O. BOX 127 Liberty, KY 42539		
	The City of Liberty has been divided into five books,	(5) parts becaus	so we have five meter
	Date of Survey: 2/8/12 Employ	rees: <u>10ahra</u>)	atwood
	 Plus Business District and Schools. Book: <u>4</u> 	-	
à	•	•	٠.







			1.47.6	4.				
•		a	Miles of pipeli	helmanuri en	• • • • • • • • • • • • • • • • • • • •			٠.
		h.	Percent of syst		2010	 '		
	•		Number of ser	ajues piesestoj em mishecten	30	-		
	•		Percent of tota					
•		140	T CACCOUL OT TOTAL	I SCLAIGES	**	_		٠. ١
	· `		SULTS -		<u> </u>	<u> </u>		
		4. IXI	antia				" en / g = 03	i i
			**************************************					,
	,-	. il	Number of leal	ra detected	——————————————————————————————————————	- :	2	
	•	, D.	Number of pipe	ainė leaks	<u>. 0</u>		•	
	:		Number of seri			<u></u>		
			Number grade			<u> </u>		
		e,	Number grade	'2" leaks			. N. 1	• .
		, t	Number grade	"3" leaks			15. 14	
						_		
		CLASSIFICA	TION METHO	D .		i	١.	
					• • • •	•.		
			Class "1" leaks					
	•	b.	Class "2" leaks	15% to 75% C	GI Meter	,	٠.	
		·C.	Class "3" leaks	0% to 15% CC	II Meter	111	. 5.	
					•	• •	•	
	æ.	Name of Com	pany: City of	Liberty		*		
	7.	· ·	P.O. BO	X 127		*.		
	•		Liberty.	KY 42539			•	
				· , · · · · ·				
	:	The City of Li	berty has been d	ivided into five	(5) narta hecar	ree we hove	five meter	
		books.		MIO MIO	(-) have cons	NOC THE THEY'S	TAS MOIST	
		•	1.1		41 4			
		Date of Survey	v: _ 6/6/2.n	II Employ	rees: ()off]	Wathinator	~-	
		•	1-1			V 7		
		1. Plus Br	usiness District a	nd Schools	(Tran	Rodaus		
		2. Book;		T- NAWARI	- SILVII	1000003		
	•			•				







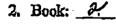
1,	SCOPE	
i de V.	a. Miles of pipeline inspected	
	b. Percent of system inspected	2070
* * * * *	c. Number of services inspected	100
	d. Percent of total services	
2	Prom ro	
e o e de proposition. La		
	a. Number of leaks detected	
. *	b. Number of pipeline leaks	0
• • •	c. Number of services leaks	0
	d. Number grade "1" leaks	0
	e. Number grade "2" leaks	
	f. Number grade "3" leaks	0
YLASSTR	ΙζΑΤΙΟΝ ΜΕΤΉΟΣ	**

- Class "1" leaks 75% to 100% CGI Meter
- 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: Employees: I. Plus Business District and Schools.









Gity of Liberty



LEAKAGE SURVEY RECAP

1.	SCOPE		•
	a. Miles of pipeline inspected	7	٠.
	b. Percent of system inspected	20%	
/33	c. Number of services inspected	75 *	: -
•••	d. Percent of total services		
			· ·

_RESULTS

a. Number of leaks detected
b. Number of pipeline leaks
c. Number of services leaks
d. Number grade "1" leaks
o. Number grade "2" leaks
f. Number grade "3" leaks

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: Off Mothington

1. Plus Business District and Schools.
2. Book: 3+4





Miles of pipeline inspected

1. Plus Business District and Schools.

2. Book: 5.

City of Liberty



<u>LEAKAGE SURVEY RECAP</u>

	. · b.	· Percent of system inspected	201/0		٠.
٠.	O.	Number of services inspected	(N)		•
*	ď,	Percent of total services	3.4		
		SULTS	A. Mark		
	151	23 (15 to 15			•
		Number of leaks detected	'n		
	b .	Number of pipeline leaks	Ö	<u>-</u>	•
•.		Number of services leaks	0	-	
A .	"d.		0	-	
*	, ė,	Number grade "2" leaks	0	***	
•	. f.	Number grade "3" leaks	D		
•	CLASSIFICA	TION METHOD			
	a. b. c.	Class "1" leaks 75% to 100% Class "2" leaks 15% to 75% C Class "3" leaks 0% to 15% CC	GI Meter		٠.
	Name of Com	P.O. BOX 127	•		
		Liberty, KY 42539		•	
	The City of Libooks.	iberty has been divided into five	(5) parts becau	se we have five meter	
•	Data of Susya	· 6/9/7011 12-11-	c loca i	latta i antona	



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

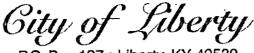
*City of Liberty Gas Company City of Liberty Gas Company Courthouse Square P. O. Box 127 Liberty, KY 42539

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



P.O. Box 127 • Liberty, KY 42539

RECEIVED

DEC 21 2016

Public Service Commission

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.



City Hall (606) 787-9973

Utilities (606) 787-6691

Fax (606) 787-7992

TDD # 1-800-247-2510



- 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 lob 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...."
 - Explain why Liberty Gas confirmed that leakage surveys had not been performed either inside or outside Liberty's business districts since 2009.
 - 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.
- 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
 - 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 City of Liberty

Bridgett Blake

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) <u>Binding Nature of Agreement</u>. 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) <u>Provisions Separable</u>. 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) <u>Paragraph Headings</u>. 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.

WITNESS: Mali El Type	HEATH CONSULTANTS INCORPORATED By:	D
and the second s	Name: Gary Lape (Print)	
	Title: VP Operations (Print) Thereunto duly authorized Date: 6-72-16	
WITNESS: Budgett Blake	LIBERTY GAS COMPANY By:	
0	Name: Steven Brown (Print)	
	Title: Mayor (Print) Thereunto duly authorized	
	Date: 06/13/16	

PLEASE RETURN EXECUTED CONTRACT TO: contructsuduintalheathus.com

-OR-

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

Option to Renew

	ion to renew its Independent Contract Dated	
·	HEATH CONSULTANTS INCO	ORPORATED
	BY:	
WITNESS:		····
•	Signature	
	Name:	(Print)
•	Title:Thereunto duly authorized	(Print)
,	Date:	.
	LIBERTY GAS COMPANY	
ρ , σ	BY:	
WITNESS: BULGAN BLAKE	Stan Bre	<u></u>
	Signature	
	Name: <u>Hoven Brown</u>	(Print)
	Title: ///////// Thereunto duly authorized	(Print)
	Date: 06/13/16	

PLÉASE RETURN EXECUTED CONTRACT TO: contract unit be headings une

-OR

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

<u>EXHIBIT A</u>

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-IRTM, 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-IRTM, 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

And Total

Cc: Jessie Spires William Luttrell Nashville Office File



CERTIFICATE OF LIABILITY INSURANCE

DATE (MWDDYYYY) 5/16/2016

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(les) 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

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Liberty, KS 42539	AUTHORIZED REPRESENTATIVE
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CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

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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.							
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Workers' Compensation Insurance is limited to employees of Heath Consultants Incorporated through a co-employment contract with Strategic Outsourcing, Inc.							
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ATTN: Bridgett Blake .	AUTHORIZED REPRESENTATIVE	0 0 1					
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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.
- 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