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RECEIVED
APR 24 2017
Public Service Commission

TRANSMITTAL

DATE: April 21, 2017

TO: Commonwealth of Kentucky
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615
Also emailed: pscfilings@ky.gov

2017-79

ENCLOSED: Response and Motion for Enlargement of Time
Of City of Flemingsburg

SENDER: **MacDonald, Walton & Razor, PLLC**

By: Thomas L. MacDonald (KLR)
Thomas L. MacDonald

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

CITY OF FLEMINGSBURG AND CITY OF FLEMINGSBURG UTILITY SYSTEM ALLEGED FAILURE TO COMPLY WITH KRS 278.495 AND 49 CFR PART 192.605 (a); 49 CFR PART 192.721; 49 CFR PART 199.105: AND 49 CFR 199.225	))))))	CASE NO. 2017-00079

RESPONSE TO ORDER
MOTION FOR ENLARGEMENT OF TIME
REQUEST FOR AN INFORMAL CONFERENCE

* * * * * * * * * * *

MOTION FOR ENLARGEMENT OF TIME

Comes the City of Flemingsburg and City of Flemingsburg Utility System, by and through counsel, and request an enlargement of time to respond to the Order entered March 6, 2017. As grounds for said motion, the City of Flemingsburg and City of Flemingsburg Utility System have not received by U.S. Mail the Order entered March 6, 2017. The documents attached to the Order reflect that the Order was mailed to 140 West Electric Avenue, Flemingsburg, Kentucky 41041. Mayor Marty Voiers has advised the undersigned that he has been attempting to get the Public Service Commission to correct the address for the City of Flemingsburg for several years, without success. The correct mailing address for City of Flemingsburg is P.O. Box 406, Flemingsburg, Kentucky 41041.

The City of Flemingsburg and City of Flemingsburg Utility System had no notice of this Order until Joe Dunaway, Jr., Utilities Director for the City of Flemingsburg, was telephoned on

March 31, 2017 by David Spennard. When Mr. Dunaway returned the call on April 4, 2017, he was told the date the Order had been e-mailed, he checked in spam and found this e-mail. Therefore, the City of Flemingsburg was not aware of the Order until April 4, 2017. Accordingly, the City is requesting an enlargement of time to file the Response below.

RESPONSE TO ORDER

Comes the City of Flemingsburg and City of Flemingsburg Utility Systems, by and through counsel, and submits to the Commission a written response to the Order entered March 6, 2017.

1. The City of Flemingsburg and Flemingsburg Utility System admit the allegations contained in the report attached to the Order and within the Order itself.

2. The City of Flemingsburg and City of Flemingsburg Utility System identifies the employees on site at the time of the January 28, 2016 incident as Michael (Mike) Brown, Isaiah (Scotty) Masters, and Coty Hunt. The employee who was injured is Mike Brown.

3. Attached hereto is the manual of written procedures for conducting operations and maintenance activities and for emergency response in effect at the time of the January 28, 2016 incident.

4. Attached are revisions or amendments made to the City of Flemingsburg and City of Flemingsburg Utility System manual of written procedures for conducting operation and maintenance activities and for emergency response as a result of the January 28, 2016 incident.

5. Since the City of Flemingsburg and City of Flemingsburg Utility System is admitting to the alleged violations contained within the Order, the City of Flemingsburg and Flemingsburg Utility System are requesting that the Commission set an informal conference with commission staff. Should this request be denied, the City of Flemingsburg and City of Flemingsburg Utility System

request that any hearing be limited to the sole issue of penalties described in KRS 278.992(1). Furthermore, if an informal conference is denied, the City of Flemingsburg and City of Flemingsburg Utility System requests that Joe Edward Dunaway, Jr. be permitted to testify at the hearing as opposed to all of the employees involved with the incident on January 28, 2016.

6. At the informal conference or at a hearing in this matter, the City of Flemingsburg and City of Flemingsburg Utility System is prepared to present evidence on the safety of its practices related to the construction, installation, and repair of natural gas facilities and any revisions as a result of the incident on January 28, 2016.

Respectfully Submitted,

MacDonald, Walton & Razor, PLLC

By: Thomas L. MacDonald (KMJ)
Thomas L. MacDonald

OPERATION AND MAINTENANCE PLAN

FOR

THE CITY OF FLEMINGSBURG

NATURAL GAS SYSTEM

Revised 08-15-15

OPERATION AND MAINTENANCE PLAN
FOR
THE CITY OF FLEMINGSBURG
NATURAL GAS SYSTEM

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OPERATION AND MAINTENANCE PLAN
FOR
THE CITY OF FLEMINGSBURG
NATURAL GAS SYSTEM

A. System Description

1. Map of System.

A map of the system is maintained that shows all of the following:

a. Gas pipeline location
b. Type of pipe, diameter of pipe
c. All shut off valves
d. Regulators and relief valves

2. Maximum Allowable Operating Pressure

The Maximum Allowable Operating Pressure (MAOP) for the gas distribution system is ninety (90) lbs. This is the pressure historically delivered by Columbia Gas.

This pressure will not be exceeded without following the Uprating section of this plan.

All new pipelines must be tested to establish MAOP. The following records must be maintained to document the MAOP:

a. Date pipeline put into operation
b. Type of pipe (all known details)
c. Diameter and wall thickness of pipe
d. Test results for the pipe
e. MAOP for safe operation of the system

B. Incident Notification

1. Incident Definition

An incident is an event that involves release of gas from a pipeline that results in:

a. Death, or personal injury
b. Gas igniting unintentionally
c. Estimated property damaged, including cost of gas lost, of $25,000 or more.
d. Unscheduled outage for forty (40) or more customers for four (4) of more hours
e. Any other significant occurrence that is newsworthy

2. State Notification of Incident

The Engineering Division of the Kentucky Public Service Commission (PSC) will be promptly notified by telephone of all incidents. The phone number for notification is (502)782-7903 ext. 416. After business hours please call 1-800-255-2587

C. Continuing Surveillance

The condition of the gas pipeline system will be continually evaluated based on failures, leakage history, exposed pipeline reports, corrosion, substantial changes in cathodic protection requirements and maintenance needs. Each time new information is available, an evaluation of the system will be done. If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the segment shall be repaired, replaced or abandoned.

D. Design, Materials & Construction

1. All new pipeline and components will be coated steel or plastic. Coated steel pipelines and components will be cathodically protected and will have a protective coating applied at all joints and exposed surfaces.

2. Plastic pipelines will have tracer wire buried with the pipe to enable electronic location of the pipeline in the future.

3. All pipelines will be buried a minimum of 24 inches.

4. Personnel joining pipeline segments will be qualified under either Subpart E or F of 49 CFR 192. The PSC maintains a list of qualified individuals for installing and repairing pipelines that master meter operators may select from.

E. Pressure Tests

1. All new pipelines or pipelines that have been relocated or replaced must be tested for leaks and to substantiate MAOP.

2. All pipelines, except service lines and plastic pipe, will be tested to discover all leaks. The pipe will be tested for 10 minutes as follows:

Operating Pressure	Test Pressure
less than 1 psig	at least 10 psig
at or above 1 psig	at least 90 psig

3. Service lines other than plastic must be leak tested before being placed into service. The service line connection to the main must be included in this test, if feasible. If not, the connection to the main must be given a leak test at operating pressure. The following test pressures apply:

Operating Pressure	Test Pressure
up to 40 psig	at least 50 psig
above 40 psig	at least 90 psig

4. Plastic mains and services must be tested to 1.5 times the MAOP or 90 psig, whichever is greater. The temperature of the pipe must be less that 100° F during the test.

5. Leak repairs will be tested at operating pressure by soap suds test to verify that the leak has stopped.

F. Damage Prevention Program

When an excavation is planned on any property, or when an excavation by someone else on any property is discovered, the following actions will be taken:

1. Determine if the excavation is planned within five (5) feet of the horizontal plane of an underground gas line, or whether a blasting operation will be close enough to disrupt or damage an underground gas line.

2. Notify the excavator that you do or do not have underground gas lines in danger from this excavation. If you do, mark the lines within 18 inches on either side of the line with high visibility yellow paint.

3. Once excavation begins, the excavation will be monitored to ensure that underground gas lines are not damaged by the excavator.

G. Uprating

1. Before increasing pressure in any pipeline, a written, detailed plan will be developed.
2. Detailed records of the uprating process will be maintained to substantiate the new MAOP.
3. The process will comply with all applicable portions of 49 CFR 192.555 and .557 .

H. General Maintenance Procedure

1. All pipelines will be maintained in accordance with this manual.
2. Pipelines that become unsafe will be replaced, repaired or removed from service.
3. Hazardous leaks will be repaired promptly.

I. Leak Survey Procedure

1. Instruments Used

All instruments used in leak surveys must be calibrated in accordance with the manufacturer's specifications. All leakage surveys will use one of the two methods below:

a. Hydrogen Flame Ionization (HFI) instrument sampling air at ground level.
b. Combustible Gas Indicator (CGI) instrument sampling air from a hole driven into the ground.

2. Area Surveyed

Gas has a tendency to travel by the path of least resistance and may not appear directly over the pipeline. All leak surveys will be done directly over the pipeline and at nearby manholes for other underground facilities and cracks in pavement or sidewalks.

3. Survey Frequency

A leakage survey of the entire distribution system will be done annually depending on the following conditions:

- Leakage survey of areas where more than 100 people may congregate (Place of Public Assembly) must be done annually.
- For bare steel, cast iron, or pipelines without adequate corrosion control the frequency is once every three (3) years.
- All other lines must be surveyed at least once every five (5) years.

I. Leak Survey Procedure (cont.)

4. Grading Leaks

All leaks are defined and will be grades as either:

a. Class 1 – A leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous.
b. Class 2 – A leak that is recognized as being non-hazardous at time of detection, but justifies scheduled repair based on probable future hazard.
c. Class 3 – A leak that is non-hazardous at the time of detection and can be reasonably expected to remain non-hazardous.

These classifications and definitions were developed by The American Society of Mechanical Engineers; more information can be obtained on page 21 of the student manual of Industrial Training Services GDS 2.50Q Task M1.

5. Responding to Leaks

The action criteria listed on page 21 of the manual stated above will be followed.

6. Leak Survey Records

Leak survey records will be maintained for the life of the pipeline and will include all of the following:

a. Diagram showing location of leak and CGI readings
b. Leak Grade
c. Suspected cause of leak
d. Pipe type and diameter
e. Follow up monitoring of leak, if any

7. Leak Repair Records

Detailed records of all leak repairs will be maintained for the life of the pipeline and will include all of the following:

a. Date of repair
b. Method of repair
c. Diagram showing location of repair
d. Leak test results after repair

J. Reinstating Service Lines

Before reinstating any service line, it must be tested as if it were a new service line in accordance with the Pressure and Leak Test section of this manual.

K. Abandonment and Inactivation of Pipeline

1. Each pipeline that is abandoned or not being maintained will be physically disconnected from the source of supply and purged of gas. All abandoned vaults and valve boxes must be filled with a suitable compacted material.

2. Whenever service to a customer is discontinued, one of the following will be done:

    a. The valve that is closed to prevent the flow of gas must be provided with a lock or other means to prevent opening of the valve.
    b. A mechanical device of fitting to prevent the flow of gas will be installed in the service line or in the meter assembly.
    c. The customer's piping will be physically disconnected from the gas supply and the open pipe ends sealed.

L. Key Valve Testing

1. Definition

Each valve that may be needed in an emergency situation to control the flow of gas in the system is considered a key valve.

2. Testing Method

Each key valve will be tested by operating the valve one quarter of a turn.

3. Testing Frequency

Each key valve will be tested each calendar year, with intervals not exceeding 15 months.

4. Remedial Action

Each valve that does not operate easily will be greased or otherwise repaired.

L. Key Valve Testing (cont.)

5. Records

Key valve testing records will be maintained for the life of the pipeline and will include all of the following:

a. Date of test
b. List of valves tested, including location
c. Description of any valve that did not operate properly
d. Maintenance or repairs done an any valve

M. Prevention of Accidental Ignition

1. When gas is being vented to open air, each potential source of ignition will be removed and a fire extinguisher will be provided.

2. Gas or electric welding or cutting may not be performed on pipelines that contain a combustible mixture of gas and air.

3. When venting gas, warning signs will be posted when appropriate.

N. Corrosion Control

1. Cathodic Protection – General

All steel pipelines with an effective external coating will be cathodically protected in accordance with this procedure.

2. Existing Underground Bare Steel Pipe

Pipe is considered bare if it has no external coating or the cathodic protection requirements are substantially the same as bare pipe.

a. These pipelines will be monitored for active corrosion every three (3) years by electrical survey, study of leak history records, leak survey or other means.
b. These pipelines will be cathodically protected in areas of active corrosion.

3. Examination of Buried Pipe

Whenever buried metallic pipelines are exposed, the condition of the pipe must be recorded and remedial action taken if necessary. The record will contain:

a. Precise location of the pipeline section viewed
b. Type of pipe and diameter
c. Condition of external coating
d. Extent of corrosion, if any

N. Corrosion Control (cont.)

4. Level of Cathodic Protection

Negative voltage of at least 0.85 volt with reference to a saturated copper-copper sulfate half cell will be maintained on the pipelines.

5. Cathodic Protection Monitoring

a. Each test station will be checked once every calendar year, at intervals not exceeding 15 months.

b. Records – Detailed records of this monitoring will be kept for the life of the pipeline.

c. Prompt remedial action will be taken whenever unacceptable readings are found.

6. Electrical Isolation

Cathodically protected pipelines will be electrically isolated from all other underground structures, unless the structures are protected as a unit.

7. Test Leads and Test Stations

a. A sufficient number of test stations will be established and monitored to ensure adequate protection of the pipeline.

b. Test lead wires and connections to the pipe will be coated to protect them from corrosion.

8. Remedial Measures – Steel

a. General Corrosion

Pipe that has lost 30% of its wall thickness will be replaced. If the affected area is small the pipe will be repaired.

b. Localized Corrosion Pitting

If a leak might result from localized corrosion pitting, the pipe will be repaired or replaced.

O. Regulator Station Inspection

1. Each regulator used to control the flow of gas in the system will be inspected and tested at intervals not to exceed 15 months, but at least once each calendar year. This requirement does not apply to the regulators at the meter bar at a residence.

2. The inspection and test will consist of:

    a. Visual inspection to ensure that the regulators are in good condition.
    b. Reviewing piping details to ensure adequate capacity and proper installation to protect each regulator from dirt and liquids.
    c. Ensure each regulator vent to the atmosphere is clear.
    d. Each regulator will be stroked to ensure proper internal functioning and will be locked up.

3. Any malfunctions found during the inspection and test will be corrected before putting the regulator back in service.

4. **Records**

    A record of each inspection and test will be kept that shows:

    a. Location or identifying number of regulator.
    b. Regulator set point.
    c. Regulator lock-up pressure.
    d. Any repairs made to the regulator or associated piping.

P. Relief Valve Testing

All relief valves will be tested for proper operation once each calendar year at intervals not to exceed 15 months. If testing of the valve is not feasible, the relief capacity calculations will be reviewed to ensure adequate capacity.

Q. Odorometer Test

Odorometer test (sniff test) shall be done on a weekly basis.

R. Records

1. The following records will be maintained to show compliance with this **Operations and Maintenance Plan**. Their frequency of generation, the part of the O & M plan describing these records, and space to enter dates of completion are shown below:

Record	Frequency	O & M Sect
Map of System	continual	A
Documentation of MAOP	all new pipe	A
Log of all Incidents	when needed	B
Pressure Tests	new/relocated pipe	E
Uprating	as needed	G
Leak Survey	annual	I
Leak Repairs	as needed	I
Abandonment and Inactivation	as needed	K
Key Valve Testing	annual	L
Review of Unprotected Steel Pipe	every three(3) years	N
Condition of Exposed Pipe	whenever exposed	N
Cathodic Protection Tests	annual	N
Regulator Station Testing	annual	O
Relief Valve Testing	annual	P
Odorometer Test	weekly	Q
Charts	weekly	

2. The following records are required by the **Emergency Plan**. Details about each record are in the Emergency Plan.

Record	Frequency
Maintenance Employee Training	annual
Customer Education	annual
Review of Emergency Response	as needed

EMERGENCY PROCEDURES PLAN
FOR
THE CITY OF FLEMINGSBURG
NATURAL GAS SYSTEM

Revised 8/20/2015

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INTRODUCTION

This manual has been prepared to provide City Personnel with data essential in an emergency situation.

It must be recognized that no emergency manual can cover all situations, that there is no substitute for the sound judgement of the situation by the person or persons involved, and that the safety and well being of the public must always be given prime consideration.

It is important that those who will have the responsibility of handling an emergency situation be familiar with the contents of the manual.

This manual is to be used as an emergency format and does not contain operational data.

DEFINITIONS OF EMERGENCY INCIDENT

An emergency is defined as an abnormal operating condition that could cause damage or injury to personal property or people.

COPIES OF THE EMERGENCY MANUAL HAVE BEEN GIVEN TO THE FOLLOWING:

1. Martin Voiers, Mayor
2. Joe Dunaway, Jr., Water and Gas Superintendent
3. Danny Shrout, Service Personnel
4. Coty Hunt, Service Personnel
5. Greg Hinton, Service Personnel
6. Mike Brown, Service Personnel
7. Colby McCloud, Service Personnel
8 Scotty Masters, Service Personnel

Note: 2 copies are located in City Hall near the telephone

CITY PERSONNEL TELEPHONE DIRECTORY

Communication Outline for Gas System Emergencies

Personnel	Office	Home	Cell
Joe Dunaway, Jr.	(606)845-6861	(606)876-2128	(606)748-8778
Danny Shrout	(606)845-6861	n/a	(606)782-0790
Coty Hunt	(606)845-6861	n/a	(606)782-3034
Greg Hinton	(606)845-6861	n/a	(606)748-3333
Mike Brown	(606)845-6861	(606)876-4803	(606)782-1631
Colby McCloud	(606)845-6861	(606)849-2572	(606)782-2907
Scotty Masters	(606)845-6861		(606)748-0965
Utilities Office	(606)845-6861	n/a	n/a
City Hall	(606)845-2021	n/a	n/a
Martin Voiers, Mayor	(606)845-5951	(606)845-4811	(606)782-2873

ORGANIZATIONAL CHART AND ORER OF NOTIFICATION

Utilities Supt.

Joe Dunaway, Jr.
Office (606)845-6861
Cell (606)748-8778

Utilities Service Personnel

Danny Shrout
Office (606)845-6861
Cell (606)782-0790

Coty Hunt
Office (606)845-6861
Cell (606)782-3034

Colby McCloud
Office (606-845-6861
Cell (606)782-2907

Mayor

Martin Voiers
Office (606)845-5951
Cell (606)782-2873
Home (606)845-6841

Fire & Police Departments

Flemingsburg Fire Department (606)845-2121 or 911
Flemingsburg Police Department (606)845-2321 or 911
Fleming Co. Sheriffs Department (606)845-4701 or 911

KEYS

PERSONS WITH KEYS TO REGULATOR STATIONS

1.	Joe Dunaway, Jr.	(606)748-8778
2.	Danny Shrout	(606)782-0790
3.	Coty Hunt	(606)782-3034
4.	Greg Hinton	(606)748-3333
5.	Mike Brown	(606)782-1631
6.	Colby McCloud	(606)782-2907
7.	Scotty Masters	(606)748-0965

CONTACT COLUMBIA GAS TRANSMISSIN COMPANY PERSONNEL

Personnel of Supplier to be Contacted in Case of Emergency.

1. Columbia Gas Transmission
   Home: 1-(800)835-7191

2. Joel Caldwell
   Cell: (606)8421013
   Office (606)724-2704

3. Timmy Smith – Alexandria, KY
   Home: (606)635-4366
   Cell: (859)556-0810

OPERATION OF SYSTEM VALVES

A gas distribution system is a complex network of interconnected mains, fed by regulators, and having valves throughout for the purpose of shutting off or diverting the flow of gas. Pressure in the mains may vary from very few pounds to hundreds of pounds.

Before operating any valves a study should be made to determine the effect upon the entire system. Improper operation of a valve may create a hazardous condition or cause a hazardous condition to become worse.

Only properly authorized personnel shall operate valves. Fire, police, other officials or other outside individuals are not authorized to operate valves or to instruct others, including gas company personnel, to operate valves. (Except end use valve)

NATURAL GAS SYSTEM

EMERGENCY PROCEDURES PLAN

CITY OF FLEMINGSBURG

Subject: Emergency Key Valve Operating

Purpose: To outline procedure for shut-down of entire system or sectionalizing of the system by operation of key valves within the system.

Reference: D.O.T. 192.745 – D.O.T. 192.747

General:

(1) These Key valves shall be closed only upon authorization of Manager or in his absence of the person in charge. This authorization shall be relayed to and acted upon by the person turning off the valve only directly from the person in charge of the shut down.

(2) Each employee who might have to operate or follow these procedures shall familiarize themselves with these procedures. (All Personnel).

Key Valve Locations:

To discontinue gas service to the entire city, shut off valves inside Regulator Station next to city water plant.

To discontinue service _____

_____

_____

_____

NATURAL GAS SYSTEM

EMERGENCY PROCEDURES PLAN

CITY OF FLEMINGSBURG

Subject: Emergency Key Valve Operating

Key Valve Locations:

(Continued)

To discontinue service _____

BREAK IN SUPPLIER'S TRANSMISSION LINE

If time permits the person receiving notice of an interruption in the Columbia Gas Transmission Company's line should have the call transferred to the Utility Superintendent, or other city personnel, provided one of these parties can be reached. If not, the person receiving the call should obtain the following information:

1. Nature of interruption
2. Location
3. Minimum pressure expected at gate station
4. How fast pressure expected to drop and probable duration of minimum pressure.

TRANSMISSION LINE FAILURES PROCEDURES

Purpose: To outline emergency procedures for interruptions to supplier's transmission lines.

Step 1: Immediately go to the Transmission line regulator and metering station on Strode Run Road – Mason County and monitor pressure on the outside of the Company's Metering Station.

Note: Caution shall be taken in the shut down of Metering Station as damage to the suppliers regulation and metering equipment can occur if these valves are shut down while the Suppliers equipment is pressurized.

INTERRUPTION IN SUPPLY (TRANSMISSION) LINE
(LINE FROM COLUMBIA'S METERING STATION TO
CITY REGULATOR STATION NEAR CITY WATER PLANT)

An interruption in the supply (Transmission) line could be due to three causes:
1. Freezing of the regulators supplying the line, 2. A break in the line or 3. Sabotage in the form of closed valves.

If determined the fault is with the regulators, steps should be taken to by-pass regulator and manually regulate pressure to keep system properly pressured while correcting regulator malfunction.

If the trouble is due to a leak or major line break the odds are someone will report by phone by the time it will be noticed by company personnel. The person calling will be able to give the location of the leak or break, otherwise it will be necessary to patrol the line.

Emergency personnel will, at their discretion, close appropriate valves to isolate section containing the break.

FIRE OR EXPLOSION WHICH SHOULD PUT OUT OF SERVICE GATE STATION OR DISTRICT REGULATOR STATIONS

Fire or explosion, which should put out of service regulator station or District Regulator Station.

In the event of fire or explosion in a regulator station this procedure shall be followed:

Step 1. Upon arrival at the scene, determine the source of escaping gas – relief vent/regulation – etc.

Step 2. If possible: Shut down the relief valve on regulator without over pressure of distribution system.

Step 3. If unable to shut down regulator or relief valve without danger to employees or public – Designated Emergency valves for shut down of regulator station shall be closed. (A valve schematic showing valves and station follow this procedure.)

Step 4. If complete shut down of the distribution system is required – Emergency Procedure – No. 6. – Light up Procedure shall be followed.

(A copy of the Light-up Procedure follows this procedure.)

RESTORATION OF SERVICE DUE TO OUTAGE

When the supply of gas has been cut off to an area, no gas will be turned on to the affected area until the individual service to each customer has been turned off.

A house-to-house operation is mandatory. The individual service of each customer must be turned off, either at the meter or at service valves. If the service valve cannot be located, the service line must be uncovered, a service valve installed and cut off. In restoring service to an affected area all gas piping and meters must be purged and appliances relighted. In the event a customer is not at home, a card must be left in a conspicuous location requesting the customer to call the gas company to arrange for restoration of service.

The person in charge is to coordinate this operation and be responsible for same.

A complete record of the incident, with drawings, etc., shall be kept of file.

EMERGENCY CUSTOMER LIGHT-UP PROCEDURE

Step 1. After completing the shut down of the Transmission Line valves; begin the closing of all customer 1st stage regulator valves and meter stops. The customer shall be informed of the interruption in service and that it will be restored as soon as possible.

Note: A list of customers with stand-by facilities are on file in the office and shall be notified in an expedient manner, either by telephone or personal contact of any interruption in their service area.

Step 2. After all customer meter stops are closed, personnel shall stand-by to re-load the system as soon as pressures are adequate from the supplier.

Step 3. If purging is necessary, the distribution system will be reenergized during the purging process. If the purging operation was not required, Step 4 will be to reenergize the system on a street by street basis.

Step 4. Simultaneously or as each street is reenergized the light-up procedure shall begin.

FORMS: (a) The Office of Pipeline Safety Failure Report shall be completed and filed as soon as possible after the interruption.

(b) All other leak report and repair forms to show the cause, repair, and test procedures used to restore service.

RESPONDING TO GAS LEAK REPORTS

The employee receiving a report of a gas leak will ask the person reporting the leak the necessary questions to properly fill out the leak report form.

It is important that as much information as possible be obtained in order that the person receiving the call may properly evaluate the urgency of the call.

All reports of leaks on consumer premises will receive priority – with top priority going to a reported leak inside a building.

After the necessary questions have been asked and it has been determined that a hazardous gas leak exists inside a building, the customer should be advised to:

1. Evacuate the occupants of the structure to a safe distance.
2. Not operate any electric switches.
3. Do not use phone.
4. Extinguish all open flames, do not use matches, cigarettes or other possible sources of ignition.
5. Turn off gas meter if feasible.

Necessary personnel will be dispatched to the location of the reported leak to make an evaluation.

It is the responsibility of the supervisors to make sure the proper employees are familiar with the procedure concerning gas leak calls.

A complete file of completed leak report forms will be kept along with any other pertinent records concerning the leak.

TELEPHONIC REPORTS TO DEPARTMENT OF TRANSPORTATION

Gas leaks that are not intended by the operator and that require immediate or scheduled repair and test failures, by persons engaged in the transportation of gas must be reported to the Office of Pipeline Safety by the person in charge or whosoever be designated, provided that the leak or test failure meets one of the requirements listed below:

DOT Requirements:

1. Caused a death or a person injured requiring hospitalization.
2. Required the taking of any segment of transmission pipeline out of service unless part of planned or routine operation.
3. Resulted in gas igniting unless part of planned or routine operation.
4. Caused total damage in excess of $5,000 (Total of operators damage and damage to others.)
5. Could have resulted in or was a significant incident to the operation, this being in the judgement of the operator even though it does not meet the criteria of the above requirements.

Test Failures: A break or rupture that occurs during a strength-proof testing of transmission lines that is of such magnitude as to require repair.

Transmission Line: Any line operation over 20% of S.M.Y.S.

The telephone report to D.O.T. should contain:

1. Name of Company
2. The location and time and date of incident
3. Fatalities and personal injuries
4. All other significant known facts that are relevant to the cause of the leak or extent of the damages. (Describe accident)
5. Who in management should be contacted upon arrival at accident site.

The telephonic report, if required, should be made at the earliest practicable moment following discovery.

CALL (202)426-0700 FEDERAL DEPARTMENT OF TRANSPORTATION

GAS LEAKS OUTSIDE

The first gas company employee to arrive at the scene of a gas leak shall take every corrective action necessary to protect life and property from danger.

The employee shall:

1. Assess danger to public, surrounding building occupants, and property.
2. If necessary, evacuate and/or assist all persons to safety.
3. If necessary, notify Fire and Police Departments and ambulances.
4. Notify supervisor and/or other responsible persons.
5. If necessary, blockade the area. (Police help may be needed.)

It will be the responsibility of the person in charge to:

1. Set up communications.
2. Coordinate the operation.
3. Make all decisions concerning emergency valves, isolating areas and the use of emergency equipment.
4. Implement the check list.

The above describes a catastrophic condition, an extremely hazardous condition, or a condition requiring major pressure changes and the re-routing of gas. Small routine leaks will normally be handled in the field.

It will be the responsibility of the person in charge of the operation and repair to give careful consideration to any action taken to assure that nothing is done which may endanger life or property, create another emergency or unnecessarily disrupt service.

A comprehensive report shall be prepared for each incident. This report shall contain:

1. The location and time and date of the incident.
2. Fatalities and personal injuries.
3. All other significant known facts that are relevant to the cause of the leak or extent of the damages. (Describe incident)

A complete record of the report shall be kept on file.

CHECK LIST (MAJOR DISASTER)

_____ 1. Has Fire Department been called?

_____ 2. Have persons been evacuated and area blockaded?

_____ 3. Has Police Department been notified?

_____ 4. Has repair crew been notified?

_____ 5. Has company call list been executed?

_____ 6. Have communications been established?

_____ 7. Has outside help been requested?

_____ 8. Have ambulances been called?

_____ 9. Has leak been shut off or brought under control?

_____ 10. Has Civil Defense been notified?

_____ 11. Have emergency valves or proper valves to shut down or reroute gas been identified and located?

_____ 12. If an area has been cut off from a supply of gas, has the individual service of each customer been cut off?

_____ 13. Is the situation under control and had the possibility of reoccurrence been eliminated?

_____ 14. Has surrounding area been probed for the possibility of further leakage?

_____ 15. Has Telephonic Report to OPS/DOT been made?

_____ 16. Has radio and T.V. been given instructions?

GAS LEAK: HOUSE, BUILDING

The first gas company employee to arrive at the scene of a gas leak shall take every corrective action necessary to protect life and property from danger. (Do Not Ring Door Bell)

Immediately after entering house, sample air in rooms, basement or crawl space with a gas indicator. If the presence of a dangerous concentration of gas in the house is indicated – 40% on L.E.L. (Lower Explosive Limit) or 2% on percentage (%) scale, proceed as follows:

1. Evacuate the house immediately.
2. Do not operate any electrical switches.
3. Do not use phone.
4. Shut off gas meter valve.
5. Open doors and windows if below 15%.
6. Probe outside house with rod and gas indicator for gas in ground outside building; check water meter and available openings.
7. If ground is gas free outside house and after house is properly aired out, turn on meter valve and check all gas piping and appliances for leaks. Use meter test hand and soap water – be sure meter test hand is operative. Check walls and openings with gas indicator.
8. Repair leak or notify customer to correct the situation, turn off, lock meter and leave off.
9. Return occupants to house, but only after you are positively sure it is safe to do so.

NOTES

1. If gas is found in ground outside building, call your supervisor immediately after performing steps 1, 2, 3, 4 and 5 above. Open water meter boxes and available openings to allow gas to escape to atmosphere. Care must be taken to make these openings safe for traffic and to avoid ignition.
2. If ever in doubt call your supervisor. (Phone outside of contaminated area.)
3. If gas is found in ground outside building, be sure to check neighboring buildings even if they have no gas service. If there is a possibility of gas from a leak entering premises that are closed, notify police to request a forcible entry to the premises.
4. Do not rely on your sense of smell to determine if gas is present in a building or in the ground. Use instruments provided you for this use.
5. Electric meters may be removed to shut down all lights and electric appliances in the house. Do not attempt this if the electric meter is inside the house or in an area of gas concentration. Houses or commercial building where no gas is present at the master fuse panel, the switch or switches may be turned off. However, it is imperative that the combustible gas indicator shows that no gas is present in or around the area of the panel.
6. If it is determined it is unsafe to enter the basement of the house, knock out the basement windows from the outside to air out basement.
7. After all gas has been cleared and it has been determined it is safe to reset the electric meter, call the electric company to reset and seal the electric meter.

8. When checking a house or building consider 40% on the L.E.L. (Lower explosive limits) scale or 2% on the 100% scales of a combustible gas indicator to be dangerous. This reading should be in free air.

9. Be sure your gas indicating instrument is set on the proper scale and that all connections on the sampling tube are tight.

10. When sampling air in a building have your instrument set on the L.E.L. scale. Remember that natural gas is lighter that air.

11. When sampling in probe holes in ground have your instrument set on 0-100% scale, if a very low reading is obtained (2% or less) then the instrument may be set to the L.E.L. scale. (This applies only to multi – scale instruments).

EMERGENCY EQUIPMENT

Mr. Joe Dunaway, Jr., Utility Superintendent, shall be responsible for the adequacy, availability and condition of emergency equipment.

LOCATION OF EQUIPMENT

VALVE KEYS – Set of valve keys are on all trucks and in shop.

MAPS – Maps of distribution system are at water plant.

SHOVELS, LEAK REPAIR EQUIPMENT, JACK HAMMER – City service truck and shop.

A check of emergency equipment will be made every three (3) months and inspection report filed.

MUTUAL AID GAS SYSTEMS:

1.	Columbia Gas Trans. Corp. Mt. Olivet, Kentucky 41024	Phone: (606)724-5712 Night: (859)556-2364
2.	Columbia Gas of Kentucky Maysville, Kentucky 41056	Phone: 1-800-432-9345
3.	Shawn Martin Construction	Phone: (859)771-0659 (270)566-2401 Cell: (606)305-6434
4.	Team Fishel	Office: (859)254-1786 Cell: (859)621-5484
5.	Norman Swartz	Cell: (606)782-1052

EMPLOYEE TRAINING

Periodically an employee meeting shall be scheduled to discuss and train employees in emergency procedures. This training shall be coordinated by the General Manager.

The employee training and discussions shall include, but not limited to, the following:

1. Location of Emergency Manual.
2. Review of Emergency Manual Procedures. (Employee responsibility)
3. Review the location and use of emergency equipment.
4. Review the locations and use of the following:
   - A. System maps
   - B. Main records
   - C. Service records
   - D. Valve records
   - E. Regulator station schematics
   - F. Properties of natural gas
5. Take a hypothetical emergency situation and, step by step, review the action to be taken. (Including public officials, firemen, police and contractors, etc.)
6. Record keeping

Records shall be kept on file of attendance and items discussed at each meeting.

PUBLIC EDUCATION

There shall be a continuing education program to enable customers, the public, appropriate governmental organizations, and persons engaged in excavation related activities to recognize a gas emergency for the purpose of reporting it to the gas company.

The program material shall include, but not be limited to:

1. Information about gas properties
2. Recognition of gas odors
3. What to do and not to do when there is a strong gas odor
4. Notification of the gas company prior to making excavations or excavation related activities. (No phone contaminated area)
5. Gas company phone number and after hours numbers to call for information or to report an emergency.

This information may be conveyed to the public by:

1. Radio and Television
2. Newspaper
3. Meetings
4. Bill stuffers
5. Mailings
6. Hand-outs

A record shall be maintained of the public education program and related activities.

LIAISON WITH PUBLIC OFFICIALS

Liaison shall be established with fire, police, civil defense, and medical officials with respect to emergency procedures.

Set up means of communications.

Meetings shall be held with the appropriate officials to acquaint them with the company capabilities and procedures respecting gas emergencies and to learn the capability and responsibility of each government organization that may respond to an emergency.

Training sessions, as required, may be scheduled with fire, police, civil defense, and medical organizations to train them in the proper procedures to follow during a gas emergency.

Participation of fire, police, and civil defense meetings, both on local and state levels.

The General Superintendent, or his designate, will implement and coordinate this program.

A record shall be filed of all meetings, training sessions, and other related activities.

NOTES ON INFORMATION GIVEN TO NEWS MEDIA

In case of an emergency, should any employee receive requests for information from TV station, radio stations, newspaper reporters, etc., refer them to the General Superintendent, or in his absence, his assistant. Explain that you do not have the authority to provide information.

The following suggested plan of Public Announcement may be followed:

1. Allay any unfounded fears.
2. Do not make reckless comments.
3. Tell precisely what the public can do to help.
4. Tell specifically what the gas company is doing about it.
5. Give the facts to prevent baseless rumors.
6. Repeat most encouraging view of situation that facts will permit.
7. Do not speculate regarding the situation in absence of facts.

ACCIDENT INVESTIGATION

Each operator shall establish procedures for analyzing accidents and failures including the following:

1. Investigation of all company facilities to determine if accident was gas related.
   - A. Leak Survey
   - B. Pressure tests of piping
   - C. Meter and Regulator check
   - D. Questioning persons on the scene
   - E. Examining Burn and Debris patterns
   - F. Odorization Level
   - G. Recording Meter Reading
   - H. Weather conditions

2. Procedures to follow if accident was gas related.
   - A. Selection of samples of the failed facility or equipment for laboratory examination for the purpose of determining the causes of the failure and minimizing the possibility of reoccurrence.
   - B. Notify insurance company.

Amendment to the Operation and Maintenance plan for the City of Flemingsburg Natural Gas System Revised 8-2-2016

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APR 24 2017

Public Service Commission

Section S Page 10

Description:

Procedures for natural gas blowdown before any work shall be conducted on a natural gas leak on any natural gas line or any gas component.

S. Procedures for natural gas blowdown before any work shall be conducted on a natural gas leak on any natural gas line or any gas component.

All natural gas lines larger than one inch in diameter that is in need of a repair due to a leak must be completely isolated with no natural gas present before any work can be conducted. The closest line valve upstream and downstream of the leak must be shut off completely, the line can either be blowdown thru the leak or thru a meter set, whichever is more relevant to get the natural gas escaped from the line. After the natural gas has escaped a leak detection must be performed to insure there is no natural gas present. At this time an outside contractor will be notified to repair the leak.

All natural gas lines one inch or smaller in diameter that is in need of a repair due to a leak must be completely isolated with no natural gas present before any work can be conducted. Three ways to isolate the natural gas are as follows, inline valve to be shut off, squeeze off tools to be clamped on the line or emergency shut off placed on the line. Proper PPE must be worn at all times when natural gas is escaping. After the natural gas has escaped a leak detection must be performed to insure there is no natural gas present. At this time the repair may be performed by any City of Flemingsburg Natural Gas Certified employees.