

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF VALLEY)	
GAS, INC.'S FAILURE TO COMPLY WITH KRS)	CASE NO.
278.495, 807 KAR 5:027, AND 49 C.F.R. PART)	2022-00001
192)	

NOTICE OF FILING

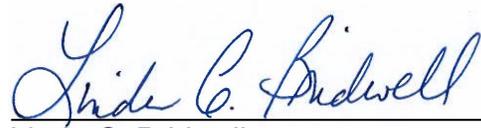
Notice is given to all parties that the following materials have been filed into the record of this proceeding:

- The digital video recording of the evidentiary hearing conducted on May 3, 2022 in this proceeding;
- Certification of the accuracy and correctness of the digital video recording;
- All exhibits introduced at the evidentiary hearing conducted on May 3, 2022 in this proceeding;
- A written log listing, inter alia, the date and time of where each witness' testimony begins and ends on the digital video recording of the evidentiary hearing conducted on May 3, 2022.

A copy of this Notice, the certification of the digital video record, and hearing log have been served upon all persons listed at the end of this Notice. Parties desiring to view the digital video recording of the hearing may do so at https://youtu.be/aa_Jqh5Ps1U.

Parties wishing an annotated digital video recording may submit a written request by electronic mail to pscfilings@ky.gov. A minimal fee will be assessed for a copy of this recording.

Done at Frankfort, Kentucky, this 27th day of May 2022.



Linda C. Bridwell
Executive Director
Public Service Commission of Kentucky

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PART 192)	

CERTIFICATION

I, Candace H. Sacre, hereby certify that:

1. The attached flash drive contains a digital recording of the Formal Hearing conducted in the above-styled proceeding on May 3, 2022. The Formal Hearing Log, Exhibits, and Exhibit List are included with the recording on May 3, 2022;
2. I am responsible for the preparation of the digital recording;
3. The digital recording accurately and correctly depicts the Formal Hearing of May 3, 2022; and
4. The Formal Hearing Log attached to this Certificate accurately and correctly states the events that occurred at the Formal Hearing of May 3, 2022, and the time at which each occurred.

Signed this 25th day of May, 2022.



Candace H. Sacre
Administrative Specialist III



Stephanie Schweighardt
Notary Public State at Large
Commission Expires: January 14, 2023
ID# 614400



Session Report - Detail

2022-00001 03May2022

Valley Gas, Inc. (Valley Gas)

Date:	Type:	Location:	Department:
5/3/2022	Public Hearing\Public Comments	Hearing Room 1	Hearing Room 1 (HR 1)

Witness: Kevin Kasey; David Nash
 Judge: Kent Chandler
 Clerk: Candace Sacre

Event Time	Log Event	
9:17:06 AM	Session Started	
9:17:36 AM	Chairman Chandler Note: Sacre, Candace	Good morning. We are on the record in Case No. 2022-00001, electronic investigation of Valley Gas, Inc.'s failure to comply with KRS 278.495, 807 KAR 5:027, and 49 C.F.R. Part 192.
9:17:54 AM	Chairman Chandler Note: Sacre, Candace	My name is Kent Chandler. I am Chairman of the Kentucky Public Service Commission and will be presiding over today's hearing.
9:18:00 AM	Chairman Chandler Note: Sacre, Candace	Hearing guidelines and recommendations. (Click on link for further comments.)
9:18:05 AM	Chairman Chandler Note: Sacre, Candace	Pursuant to Jan 10 2022 Order initiating matter, this hearing is for the purpose of presenting evidence concerning alleged violations of law and showing cause why Valley Gas should not be subject to penalties prescribed in KRS 278.992(1) for alleged violations.
9:18:25 AM	Chairman Chandler Note: Sacre, Candace	Entry of appearance of counsel.
9:18:30 AM	Staff Atty Park PSC Note: Sacre, Candace	John Park and with me Melissa Holbrook.
9:18:37 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Parker Wornall and associate Gregory Healey.
9:18:47 AM	Chairman Chandler Note: Sacre, Candace	Public comments. (Click on link for further comments.)
9:18:54 AM	Chairman Chandler Note: Sacre, Candace	Procedural discussions. (Click on link for further comments.)
9:19:31 AM	Chairman Chandler Note: Sacre, Candace	Any questions about process? (Click on link for further comments.)
9:19:39 AM	Chairman Chandler Note: Sacre, Candace	Do have witnesses today?
9:19:46 AM	Chairman Chandler Note: Sacre, Candace	Call first witness?
9:19:49 AM	Staff Atty Park PSC Note: Sacre, Candace	David Nash.
9:20:08 AM	Chairman Chandler Note: Sacre, Candace	Witness is sworn.
9:20:19 AM	Chairman Chandler - witness Nash Note: Sacre, Candace	Examination. Name and address?
9:20:29 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Direct Examination. Current employment?
9:20:54 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Current position?

9:21:01 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	How long employed in position?
9:21:06 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Certified by United States Pipeline and Hazardous Materials Safety Administration or PHMSA?
9:21:15 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Certified to conduct inspections?
9:21:19 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	What involve to obtain certification?
9:21:31 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	In capacity as inspector, conduct standard periodic inspection of Valley Gas on July 12 and 14 through 16 and August 10 2021?
9:21:46 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Describe what involved in standard periodic inspection?
9:22:15 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Who interview/interact with during inspection?
9:22:30 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Prepare a report?
9:23:08 AM	Staff Atty Park PSC Note: Sacre, Candace	Mark as PSC Hearing Exhibit 1.
9:23:19 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Review report and state whether true and accurate copy?
9:23:38 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Based upon inspection, make findings of violations?
9:23:49 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	How many regulations violated?
9:23:55 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Go through each violation, first 49 CFR 192.605, what violation find during inspection?
9:24:26 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Part of inspection process, review compliance history?
9:24:38 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Based upon review past inspection, first violation repeat violation from 2019 inspection?
9:24:51 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Second regulation cited 49 CFR 192.615, what violation find?
9:25:12 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	In 2020?
9:25:31 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	When conduct periodic inspection, look at period of time back to prior inspection, or what period look at?
9:25:45 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Third regulation found violated 49 CFR 192.625, what violation find?
9:26:04 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Required if leak customer or public detect smell and know danger?
9:26:17 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Next regulation violated, 49 CFR 192.721, what finding violation make?
9:26:50 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Fifth regulation cite violated 49 CFR 192.739, what violation find?
9:26:51 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Fifth regulation cite violated 49 CFR 192.739, what violation find?
9:27:17 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Repeat violation from 2019 inspection?

9:27:25 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Sixth regulation cite violated 49 CFR 192.807, what violation find?
9:27:53 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	What period cover?
9:28:13 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Seventh regulation cite violated 49 CFR 192.805, what finding violation this regulation?
9:28:46 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	How many tasks performed by individuals not OQed?
9:28:58 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Double check report, believe is four?
9:29:08 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Review report, indicate what covered tasks were?
9:29:30 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Repeat violation from 2019?
9:29:37 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	After prepare report, standard practice send report to operator, ask address and how mitigate/remediate violations?
9:29:54 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Did so in this case?
9:30:27 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	True and accurate copy Valley Gas response?
9:30:36 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Dated December 2, 2021?
9:30:46 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	In Valley Gas response, dispute findings of deficiency?
9:30:58 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Based on report and response to it, DOI enforcement staff sent demand for remedial measures, demand letter, role in preparing?
9:31:15 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	After preparing report, standard practice participate in whether enforcement action taken against operator?
9:31:28 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Role limited to inspecting system and determine compliance?
9:31:38 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	After received response, conduct follow-up inspection?
9:32:15 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Document provided marked DOI Exhibit 3, please describe?
9:32:28 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	True and accurate copy?
9:32:35 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Based upon follow-up inspection, find Valley Gas taken appropriate remedial action and cleared violations?
9:32:45 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Back through regulations violated, indicate measures Valley Gas took, first 49 CFR 192.605, failure review O&M manuals, what action address failure review procedures?
9:33:48 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	49 CFR 192.615, emergency procedures, what do address this?
9:34:14 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	USDI also provide training?
9:34:22 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	49 CFR 192.625, odorization, what measures take address violation?

9:34:52 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Fourth regulation, failure patrol distribution systems, what measure take address control effect?
9:35:18 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	USDI provide documents complete when patrolled?
9:35:28 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Fifth regulation, 49 CFR 192.739, failure inspect Bewleyville regulator station?
9:35:52 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Confirmed during supplemental review had fixed?
9:36:03 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Sixth regulation, 49 CFR 192.807, failure maintain records individuals covered tasks, what do address violation?
9:36:30 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Answer regarding applies to next, 49 CFR 192.805, qualification program, four covered tasks, personnel not qualified, what do correct?
9:37:14 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	After follow-up inspection, clear this inspection and send closing letter?
9:37:25 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Closing letter indicates action closed, enforcement action still be forthcoming?
9:37:37 AM	Chairman Chandler Note: Sacre, Candace	Questions?
9:37:40 AM	Atty Wornall Valley Gas - witness Nash Note: Sacre, Candace	Cross Examination. Say have general understanding how penalties calculated?
9:38:14 AM	Atty Wornall Valley Gas - witness Nash Note: Sacre, Candace	Clean up some of citations, walked through seven, Citations 1, 4, and 6 recordkeeping citations?
9:38:38 AM	Atty Wornall Valley Gas - witness Nash Note: Sacre, Candace	Citation 1, lack of OME annual reviews?
9:38:49 AM	Atty Wornall Valley Gas - witness Nash Note: Sacre, Candace	Citation 1, OME annual review, not saying OMEs insufficient, saying not do annual review?
9:39:15 AM	Atty Wornall Valley Gas - witness Nash Note: Sacre, Candace	Citation 6, qualifications program, any employees previously certifications lapsed or none ever properly certified?
9:39:57 AM	Chairman Chandler Note: Sacre, Candace	Questions?
9:40:02 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Redirect Examination. Violation 1, recordkeeping, did have procedural manual, not perform task of reviewing?
9:40:20 AM	Staff Atty Park PSC - witness Nash Note: Sacre, Candace	Had manual, just not perform task reviewing on annual basis?
9:40:28 AM	Chairman Chandler Note: Sacre, Candace	Witness excused.
9:40:34 AM	Chairman Chandler Note: Sacre, Candace	Anything else?
9:40:38 AM	Chairman Chandler Note: Sacre, Candace	Move introduce DOI Exhibits 1, 2, and 3? (Click on link for further comments.)
9:40:39 AM	PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 1 Note: Sacre, Candace	STAFF ATTY PARK PSC - WITNESS NASH

Note: Sacre, Candace INSPECTION REPORT NUMBER 08132021 REPORT DATE 8/13/2021
 9:40:40 AM PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 2
 Note: Sacre, Candace STAFF ATTY PARK PSC - WITNESS NASH
 Note: Sacre, Candace MEMORANDUM RESPONSE OF VALLEY GAS, INC.
 9:40:41 AM PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 3
 Note: Sacre, Candace STAFF ATTY PARK PSC - WITNESS NASH
 Note: Sacre, Candace INSPECTION REPORT NUMBER 03012022VG REPORT DATE
 3/1/2022
 9:41:05 AM Chairman Chandler
 Note: Sacre, Candace Is that all, Mr. Park?
 9:41:08 AM Chairman Chandler
 Note: Sacre, Candace Mr. Wornall? (Click on link for further comments.)
 9:41:19 AM Atty Wornall Valley Gas
 Note: Sacre, Candace Kevin Kasey.
 9:41:38 AM Chairman Chandler
 Note: Sacre, Candace Witness is sworn.
 9:41:45 AM Chairman Chandler - witness Kevin Kasey
 Note: Sacre, Candace Examination. Name and address?
 9:42:09 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace Direct Examination. Brief history Valley Gas as well as your
 involvement?
 9:42:55 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace Primarily involved in remediation efforts?
 9:43:07 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace How large Valley Gas, how many customers, how many employees?
 9:43:18 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace Overview of history of compliance and interactions between Valley
 Gas and PSC?
 9:43:55 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace Aside from couple repeat violations in 2019, previously no hearings
 such as having today?
 9:44:10 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace General overview, once citations came about, remediation efforts,
 procedures took, companies engaged, and issues experienced
 checking boxes?
 9:46:51 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace During time making efforts start remediating and hit obstacles?
 9:47:40 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace As of early March this year, all seven violations cleared?
 9:47:50 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace PSC acknowledged that?
 9:47:57 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace Turn to No. 2 in binder, walk through overview USDI services and
 proposal, what USDI engaged to do and whether did it?
 9:50:58 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace General understanding scope of services 17 items all 17 address
 seven violations?
 9:51:15 AM Atty Wornall Valley Gas - witness Kevin Kasey
 Note: Sacre, Candace Mentioned tools and equipment not seen, USDI equipped Valley Gas
 future compliance?
 9:51:33 AM Atty Wornall Valley Gas
 Note: Sacre, Candace Move introduce, skip 1, move introduce Respondent Exhibit 2.
 9:52:04 AM Chairman Chandler
 Note: Sacre, Candace Objection? (Click on link for further comments.)

9:52:05 AM	VALLEY GAS EXHIBIT 2 Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY
	Note: Sacre, Candace	UTILITY SAFETY & DESIGN INC 2021 SERVICES AND ACTIVITIES
9:52:27 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Tab 3 in binder, premarked Exhibit 3, confirmation letter from USDI indicating had Jan 27 completed scope of services?
9:52:59 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Confirm 17 tasks completed?
9:53:07 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move to introduce Exhibit 3.
9:53:13 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
9:53:14 AM	Chairman Chandler Note: Sacre, Candace	Marked as Exhibit 3.
9:53:15 AM	VALLEY GAS EXHIBIT 3 Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY
	Note: Sacre, Candace	UTILITY SAFETY & DESIGN INC SUMMARY OF REMEDIAL ACTIVITIES
9:53:21 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	No. 4, confirm annual review certification sheet and verification test?
9:53:51 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Printed names, signed names, who are people appear in table?
9:54:15 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Post-qualification efforts in last few months, lost some been certified?
9:54:25 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Anyone hired in interim?
9:54:30 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	As of date completed, this full list of individuals needed review OMEs?
9:54:41 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Remainder, show all individuals completed knowledge verification test?
9:54:54 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Prior engaging USDI, ever presented forms that walks through reviews and verification tests?
9:55:11 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Had OMEs sufficient, deficiency annual review, walk through annual review efforts prior 2019, what process look like?
9:55:50 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	How often need make adjustments to OMEs?
9:56:22 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move to introduce Exhibit 4.
9:56:29 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
9:56:30 AM	Chairman Chandler Note: Sacre, Candace	Marked as Exhibit 4.
9:56:31 AM	VALLEY GAS EXHIBIT 4 Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY
	Note: Sacre, Candace	USDI OME ANNUAL REVIEW 2021
9:56:35 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Exhibit 5, OME annual review pertained to Citation 1 need for recordkeeping for annual review of OMEs?

9:57:05 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding this, pertaining to annual emergency plan review, in correlation with Citation 2 for emergency plan training?
9:57:16 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Were to look through Exhibit 5, what do verification tests show?
9:57:39 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Anyone needed taken test not represented what being submitted?
9:57:53 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 5,
9:57:58 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
9:57:59 AM	Chairman Chandler Note: Sacre, Candace	Marked as Exhibit 5.
9:58:01 AM	VALLEY GAS EXHIBIT 5 Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY WRITTEN TESTS FOR EMERGENCY PLANS
9:58:02 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Turn to No. 6, explain invoice who from, pertaining to, and how much?
9:58:54 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding invoice covered testing development for Citations 1 and 2?
9:59:08 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Spent \$8,392?
9:59:19 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move to enter 6.
9:59:24 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
9:59:26 AM	Chairman Chandler Note: Sacre, Candace	Have it marked as Respondent 6.
9:59:27 AM	VALLEY GAS EXHIBIT 6 Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY USDI INVOICE 20213512 7/3/2021
9:59:31 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Exhibit 7A, walk through odorization citations, what USDI did, and what two pictures represent?
10:01:23 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding gauges, repiping done aid in preventative measures going forward?
10:01:40 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 7A.
10:01:42 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:01:43 AM	Chairman Chandler Note: Sacre, Candace	7A.
10:01:44 AM	VALLEY GAS EXHIBIT 7A Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY PHOTOGRAPH OF VALLEY GAS GAUGES
10:01:46 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	7B, invoice, tell us what invoice for, who from, and in what amount?
10:02:32 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding pertains to remediation Citation No. 3?
10:02:42 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Contracted with USDI future annual tests?

10:02:49 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	How often occur?
10:03:01 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Suggest four times a year, sound correct?
10:03:07 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	USDI retained on ongoing basis?
10:03:19 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce 7B.
10:03:24 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:03:26 AM	Chairman Chandler Note: Sacre, Candace	7B.
10:03:27 AM	VALLEY GAS EXHIBIT 7B Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY USDI ODORIZATION INVOICE IN20214563 9/30/2021
10:03:29 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Talk in general about Citation 4, contract with USDI perform leakage surveys?
10:04:00 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	What USDI do for you?
10:04:20 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	USDI provided forms and other recordkeeping aids?
10:04:33 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	USDI provide training in pipeline patrol?
10:04:41 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Been for same individuals enumerated in emergency plan and OME?
10:04:51 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Each one trained in pipeline patrol?
10:04:59 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Anyone need be trained has not?
10:05:11 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Fair to say USDI equipped you for preventative measures pertains pipeline patrol as well as remediation?
10:05:26 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Citation 5, contract with USDI reconfigure station and perform inspection?
10:05:42 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	What entail?
10:05:52 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Said that picture, second part of Exhibit 7A, tell us what going on here?
10:06:33 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	In addition, perform other testing, recordkeeping, anything that nature?
10:07:03 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Prior to engagement USDI, forms referencing now, have forms previously?
10:07:16 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Exhibit 8, who from, in what amount?
10:07:34 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding pertains to USDI scope of work regulating station compliance?
10:07:48 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 8.

10:07:55 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:08:00 AM	Chairman Chandler Note: Sacre, Candace	Moved as Exhibit 8.
10:08:01 AM	VALLEY GAS EXHIBIT 8 Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY USDI INVOICE VALLEY 3/29/2022
10:08:19 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding \$12,000 invoice for remediation Citation 5, regulatory stations?
10:08:45 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	USDI also equipped you for future compliance?
10:08:53 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Citations 6 and 7, qualification program and recordkeeping, individuals in past been certified?
10:09:21 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Give overview of individuals who had previous certifications, how lapsed, why lapsed, pertinent information?
10:10:06 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	One of guys that left?
10:10:13 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	What general experience in terms of years of engagement of the others?
10:10:33 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Overview of experience, time spent with Valley Gas of those individuals?
10:11:15 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Say any given point sending out inspectors underqualified or not know what doing in field?
10:11:41 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Flip to No. 9, tell me who Mark Randolph is and what scope of engagement for which hired him?
10:12:40 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 9.
10:12:45 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:12:46 AM	Chairman Chandler Note: Sacre, Candace	Marked No. 9.
10:12:47 AM	VALLEY GAS EXHIBIT 9 Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY ARC RANDOLPH INVOICE 3009 3/14/2020
10:12:50 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Flip to 10A, what 37 pages show as to qualification program training, OQ training?
10:13:54 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 10A.
10:14:00 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:14:01 AM	VALLEY GAS EXHIBIT 10A Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY 1/25/2022 USDI TASK STATUS RESULTS MASTER COVERED TASK LIST
10:14:02 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Flip to 10B, confirm more of same recordation OQ training?

10:14:25 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Two documents show OQ training everyone who needed it?
10:14:39 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Anyone need go through OQ training that has not that not appear in 10A or 10B?
10:14:49 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 10B.
10:14:54 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:14:55 AM	VALLEY GAS EXHIBIT 10B Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY 11/30/2021 USDI TASK STATUS RESULTS MAST COVERED TASK LIST
10:14:58 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Flip to 10C, invoice, who from, what for, what amount?
10:15:36 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding \$350 towards remediations Citations 6 and 7?
10:15:52 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 10C.
10:16:00 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:16:02 AM	Chairman Chandler Note: Sacre, Candace	10C.
10:16:05 AM	VALLEY GAS EXHIBIT 10C Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY USDI INVOICE NUMBER IN20213606 07/31/2021
10:16:06 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Flip to 10D, walk us through who from, what for, and what amount?
10:16:43 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding \$6,372.20 was put towards remediation efforts OQ training?
10:16:55 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 10D.
10:17:00 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:17:02 AM	Chairman Chandler Note: Sacre, Candace	10D.
10:17:03 AM	VALLEY GAS EXHIBIT 10D Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY USDI INVOICE NUMBER IN20215629 11/30/2021
10:17:10 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	No. 11, who from, what for, what amount?
10:17:35 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Fair to say \$140 not related to any particular citation but overall compliance?
10:17:51 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 1.
10:17:59 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:18:00 AM	Chairman Chandler Note: Sacre, Candace	All right, 11.
10:18:01 AM	VALLEY GAS EXHIBIT 11 Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY USDI INVOICE NUMBER IN20215285 11/29/2021

10:18:05 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Flip to No. 12, quote from HSC Cloud, explain what is, what having quoted, and what hoping can do for Valley Gas?
10:19:11 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Soliciting quotes from similar companies similar scope of services?
10:19:47 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Looking engage companies for future compliance?
10:20:09 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Direct to middle of page and walk through potential amount spending per month in future compliance efforts?
10:21:23 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding amount be incurred indefinitely?
10:21:32 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	In addition \$3,300 per month future compliance, all invoices excluding this quote USDI and ARC Randolph contract add up to \$31,149.13?
10:21:58 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Spent roughly \$31,000 efforts remediate seven citations talking about?
10:22:06 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	In addition to prospective possibly \$3,300 month moving forward prevent future hearings?
10:22:17 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Pending assessment \$42,000, if levied against Valley Gas, what effects have on Valley Gas and end user?
10:23:39 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	When last rate increase?
10:23:48 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Anything not discussed would like to put before Commission for consideration?
10:25:45 AM	Atty Wornall Valley Gas Note: Sacre, Candace	No further.
10:25:55 AM	Atty Wornall Valley Gas Note: Sacre, Candace	Move introduce Exhibit 12.
10:25:58 AM	Chairman Chandler Note: Sacre, Candace	Mr. Park? (Click on link for further comments.)
10:26:05 AM	Chairman Chandler Note: Sacre, Candace	Have 12 introduced as well.
10:26:06 AM	VALLEY GAS EXHIBIT 12 Note: Sacre, Candace Note: Sacre, Candace	ATTY WORNALL VALLEY GAS - WITNESS KEVIN KASEY HOLLAND HSC CLOUD QUOTE 4/20/2022
10:26:25 AM	Chairman Chandler Note: Sacre, Candace	Questions?
10:26:28 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Cross Examination. Testified incurred \$31,100 in response to findings of violation?
10:26:43 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Expenditures necessary achieve compliance?
10:26:51 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Indicated Valley Gas had employees operator qualified in past?
10:27:00 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Recurring necessary expenditure every gas operator incurs?
10:27:07 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Valley Gas in response to citations purchase equipment?

10:27:15 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace What equipment was that?

10:27:39 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Purchased plastic piping?

10:27:47 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Amount spent on tools?

10:28:01 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Which vendor provided?

10:28:18 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Purchase from them?

10:28:28 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Invoice in exhibits?

10:28:37 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Indicated USDI contractual relationship, no time period, renewable on monthly basis?

10:29:13 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Anticipate seek adjustment of rates to recover additional expenses?

10:29:27 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Valley Gas not previously cited?

10:29:36 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Subject to enforcement action, periodic inspection reports cited previously?

10:30:54 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Document marked DOI Exhibit 5, describe?

10:31:23 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Indicate when performed?

10:31:38 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Third page, indicate Valley Gas cited for noncompliance 2015 inspection?

10:31:56 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Deficiencies cleared?

10:32:01 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Recognize report?

10:32:22 AM Staff Atty Park PSC
Note: Sacre, Candace Move Exhibit 5 introduced.

10:32:27 AM Chairman Chandler
Note: Sacre, Candace Mr. Wornall? (Click on link for further comments.)

10:32:30 AM Chairman Chandler
Note: Sacre, Candace DOI Exhibit 5.

10:32:31 AM PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 5
Note: Sacre, Candace STAFF ATTY PARK PSC - WITNESS KEVIN KASEY
Note: Sacre, Candace INSPECTION REPORT VALLEY GAS 06232015 REPORT DATE 6/29/15

10:33:03 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Describe document?

10:33:25 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Page 3, indicate inspector made findings of probable violations?

10:33:36 AM Staff Atty Park PSC - witness Kevin Kasey
Note: Sacre, Candace Nine violations here?

10:33:43 AM Staff Atty Park PSC
Note: Sacre, Candace Move introduce DOI Exhibit 4.

10:33:50 AM Chairman Chandler
Note: Sacre, Candace Objection? (Click on link for further comments.)

10:33:51 AM	PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 4 Note: Sacre, Candace Note: Sacre, Candace	STAFF ATTY PARK PSC - WITNESS KEVIN KASEY INSPECTION REPORT NUMBER 09132019 REPORT DATE 10/02/2019
10:34:25 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Describe document handed you?
10:34:43 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Recollection Valley Gas received warning letter?
10:35:08 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Pertain to inspection conducted in 2019?
10:35:21 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Nine violations?
10:35:28 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Second to last paragraph, bottom of page 1, indicate Staff decided no penalty be assessed?
10:35:51 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Paragraph bottom of page 1 continues to page 2?
10:36:18 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Correct Staff not propose civil penalty for violation cited in report?
10:36:29 AM	Staff Atty Park PSC - witness Kevin Kasey Note: Sacre, Candace	Staff also advised be inspected on annual basis, if found in violation again, past history taken into account?
10:36:52 AM	Staff Atty Park PSC Note: Sacre, Candace	Move introduced Exhibit 6.
10:36:59 AM	Chairman Chandler Note: Sacre, Candace	Mr. Wornall? (Click on link for further comments.)
10:37:02 AM	Chairman Chandler Note: Sacre, Candace	DOI 6.
10:37:03 AM	PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 6 Note: Sacre, Candace Note: Sacre, Candace	STAFF ATTY PARK PSC - WITNESS KEVIN KASEY WARNING LETTER DATED DEC 1 2020 TO KERRY KASEY PRESIDENT RE: PERIODIC INSPECTION VALLEY GAS, INC. GAS SYSTEM BRECKINRIDGE COUNTY KENTUCKY
10:37:11 AM	Chairman Chandler Note: Sacre, Candace	Recess until 10:50.
10:37:27 AM	Session Paused	
10:53:27 AM	Session Resumed	
10:53:31 AM	Chairman Chandler Note: Sacre, Candace	Back on record in Case No. 2022-00001.
10:53:47 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Examination. In memorandum response counsel filed, initial request no fine levied, alternative be reduced, and finally any penalty further discounted performing remedial measures and suspended certain conditions, aware seven violations?
10:54:55 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Know how many violations remediation costs, measures OQ, operator should have already been qualified, cost should have already incurred ongoing basis?
10:55:27 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Contract with USDI something should have been in place?
10:55:41 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Know how many costs incurred, perfect example yellow piping Exhibit 7B, fixed that piping?
10:56:01 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Capital costs?

10:56:05 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Tools purchased, capital costs or expenses?

10:56:17 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Of costs incurred ensure remediate violations, know breakdown between expenses and capitalized costs?

10:57:04 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace In memorandum response, states violations 1, 4, 5, and 7, noted repeat deficiencies from '19 cleared in '19, documentation indicate cleared in '19?

10:57:33 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Regardless of breakdown capitalized costs and expenses, know how much incurred total basis to remediate seven violations?

10:57:58 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Exhibit referenced?

10:58:27 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Characterized couple violations were just related to recordkeeping?

10:58:54 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace What was phrase used there?

10:59:27 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Conduct odorization correctly but not write down did it, impossible prove did it?

11:00:01 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Patrolling, unless noted did patrolling, would be impossible other taking somebody's word actually ensured compliance?

11:01:22 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace In past, not cited for that?

11:01:29 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Had been in past seemingly writing down had done patrol?

11:01:37 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Don't know that form matters as much as documentation was actually done?

11:01:58 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Exhibit 5, 2015 inspection, have copy of that?

11:02:20 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace 2015 inspection asked about earlier June 29 2015?

11:02:33 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace See at bottom references 2014 inspection on first page?

11:02:44 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace How many deficiencies in 2014 inspection?

11:02:50 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace All deficiencies cleared for 2014 inspection?

11:03:11 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace In 2015, on page 3, one of issues is OQ?

11:03:27 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Four tasks, employees still overdue be qualified?

11:03:43 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Have copy DOI Exhibit 4, 2019 inspection?

11:03:54 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Asked about inspection earlier?

11:03:57 AM Chairman Chandler - witness Kevin Kasey
Note: Sacre, Candace Page three, nine probable violations, see that No. 3 documentation annual review O&M manual?

11:04:16 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	No. 4 is records provided indicated all employees OQ certifications not current as required?
11:04:30 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	All tasks completed that require qualification, all employees completing tasks qualified?
11:05:15 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Lastly, DOI Exhibit 3, follow-up inspection, report dated March 1 2022, have copy?
11:05:36 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Most have your brother as person interviewed until 2021, also interviewed for this one?
11:05:59 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Page 3, issue regarding OQ, Finding 6, see additional notes, are no records between Sept 2014 and Feb 2020 regarding operator qualifications covered tasks?
11:06:34 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Know if accurate, distinction between ability produce records and records actually existing, for our purposes see them and ensure compliance, aware of records between Sept 2014 and Feb 2020, or think accurate statement?
11:07:06 AM	Chairman Chandler - witness Kevin Kasey Note: Sacre, Candace	Asked for records and could not be provided?
11:07:14 AM	Chairman Chandler Note: Sacre, Candace	Redirect?
11:07:15 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Redirect Examination. DOI Exhibit 1, 2021 inspection, top of page 3, middle third line, read sentence into record?
11:08:38 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	Understanding deficiencies cleared from 2019 inspection?
11:08:51 AM	Atty Wornall Valley Gas - witness Kevin Kasey Note: Sacre, Candace	PSC-generated document acknowledging remediation of deficiencies from 2019?
11:09:13 AM	Chairman Chandler Note: Sacre, Candace	Any other evidence or witnesses?
11:09:22 AM	Atty Wornall Valley Gas Note: Sacre, Candace	No further witnesses.
11:09:27 AM	Chairman Chandler Note: Sacre, Candace	Review of exhibits. (Click on link for further comments.)
11:11:03 AM	Chairman Chandler Note: Sacre, Candace	Any additional comments? (Click on link for further comments.)
11:11:25 AM	Chairman Chandler Note: Sacre, Candace	Briefs. (Click on link for further comments.)
11:12:04 AM	Chairman Chandler Note: Sacre, Candace	Post-hearing data requests. (Click on link for further comments.)
11:14:12 AM	Chairman Chandler Note: Sacre, Candace	Initial briefs, responses. (Click on link for further comments.)
11:15:27 AM	Chairman Chandler Note: Sacre, Candace	Anything else?
11:15:32 AM	Chairman Chandler Note: Sacre, Candace	Hearing adjourned.
11:15:46 AM	Session Ended	



Exhibit List Report

2022-00001 03May2022
Valley Gas, Inc. (Valley Gas)

Name:	Description:
PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 1	INSPECTION REPORT NUMBER 08132021 REPORT DATE 8/13/2021
PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 2	MEMORANDUM RESPONSE OF VALLEY GAS, INC.
PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 3	INSPECTION REPORT NUMBER 03012022VG REPORT DATE 3/1/2022
PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 4	INSPECTION REPORT NUMBER 09132019 REPORT DATE 10/02/2019
PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 5	INSPECTION REPORT VALLEY GAS 06232015 REPORT DATE 6/29/15
PSC DIVISION OF INSPECTIONS HEARING EXHIBIT 6	WARNING LETTER DEC 1 2020 TO KERRY KASEY PRESIDENT RE: PERIODIC INSPECTION VALLEY GAS, INC. GAS SYSTEM BRECKINRIDGE COUNTY KENTUCKY
VALLEY GAS EXHIBIT 02	UTILITY SAFETY & DESIGN INC 2021 SERVICES AND ACTIVITIES
VALLEY GAS EXHIBIT 03	UTILITY SAFETY & DESIGN INC SUMMARY OF REMEDIAL ACTIVITIES
VALLEY GAS EXHIBIT 04	USDI OME ANNUAL REVIEW 2021
VALLEY GAS EXHIBIT 05	WRITTEN TESTS FOR EMERGENCY PLANS
VALLEY GAS EXHIBIT 06	USDI INVOICE 20213512 7/3/2021
VALLEY GAS EXHIBIT 07A	PHOTOGRAPH OF VALLEY GAS GAUGES
VALLEY GAS EXHIBIT 07B	USDI ODORIZATION INVOICE IN20214563 9/30/2021
VALLEY GAS EXHIBIT 08	USDI INVOICE VALLEY 3/29/2022
VALLEY GAS EXHIBIT 09	ARC RANDOLPH INVOICE 3009 3/14/2020
VALLEY GAS EXHIBIT 10A	1/25/2022 USDI TASK STATUS RESULTS MASTER COVERED TASK LIST
VALLEY GAS EXHIBIT 10B	11/30/2021 USDI TASK STATUS RESULTS MASTER COVERED TASK LIST
VALLEY GAS EXHIBIT 10C	USDI INVOICE NUMBER IN20213606 07/31/2021
VALLEY GAS EXHIBIT 10D	USDI INVOICE NUMBER IN20215629 11/30/2021
VALLEY GAS EXHIBIT 11	USDI INVOICE NUMBER IN20215285 11/29/2021
VALLEY GAS EXHIBIT 12	HOLLAND HSC CLOUD QUOTE 4/20/2022

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	David Nash	Report Number:	08132021
Inspection Date(s):	7/12,14,15,16,19 & 8/10/2021	Report Date:	8/13/2021
Inspection Type:	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	Valley Gas, Inc.	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	39515
Type of Facility:	Private Distribution	Location of Facility:	Irvington, KY
Area of Operation:	City of Irvington & Breckinridge County		
Official Operator Contact and Address: (Contact for Inspection Letter)		Unit Name and Address	
Kerry Kasey, President Valley Gas, Inc. P.O. Box 55, 401 First Street Irvington, KY 40146			
Phone # and Email:	270-547-2455 igenergy@bbtel.com		
Records Location:	401 First Street, Irvington, KY 40146		
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>
Kevin Kasey	VP Valley Gas	270-547-0504	igenergy@bbtel.com
Jason Brangers	PE - USDI	502-819-1338	jason@usdi.us
Zack Farhat	Engineer - USDI	502-260-0064	zfarhat@usdi.us
Has the Operator provided an updated Emergency Contact List?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Number of Customers:	480		
Number of Gas Employees:	7		
Gas Supplier:	Texas Gas Transmission		
Unaccounted for Gas:	2%		
7100 Submitted Date:	# of Leaks	# Excavation Tickets	# Excavation Damages
	0	51	0
Operating Pressure(s):	MAOP (within last year)		Actual Operating Pressure (at time of inspection)
	Feeder:	200	145
	Town:	60	40
Other:			
Does the Operator have any transmission pipeline (above 20% SMYS):		n/a	
Additional Operator Information:			

Date of Last Inspection:	9/13/2019 - Nantz		
Number of Deficiencies:	9	Deficiencies not Cleared:	0

Summary of Areas Inspected

PHMSA Question Set

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

Other:

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

Other:

Summary

On July 12,14,15,16,19 & August 10, 2021, a standard periodic inspection was conducted on the Valley Gas distribution system. The last standard inspection was on September 11-13, 2019, and resulted in 9 deficiencies. These deficiencies were cleared by the previous inspector through review of documents provided by, and conversation with, the operator. The piping system consists of 12 miles coated steel and plastic piping serving 480 customers. Valley Gas system has 1 point of delivery from the Texas Gas Transmission gas system.

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Drug and Alcohol, Distribution Integrity Management, and Public Awareness Plans were reviewed virtually. During the office visit, records pertaining to leakage surveys, valve inspections, patrolling, corrosion control, pressure recordings, distribution integrity management, public awareness, and odorant verifications were reviewed. The field portion of the inspection consisted of inspecting pipeline markers, mainline valve locations, meter installations and the point of delivery from Texas Gas Transmission.

An exit interview was conducted via conference call on July 23, 2021. David Nash – PSC Staff, Kerry Kasey - President and Kevin Kasey - VP with Valley Gas and Jason Brangers – PE, Compliance Specialist with USDI, attending. PSC staff observations and findings were reviewed and discussed. This included discussion of areas of operations where the operator should consider hiring a third party contractor to provide services. A follow-up email listing updated findings was sent to Valley Gas on August 13, 2021.

Findings

1. Operator has not conducted annual review of written procedures as required per 192.605(a)
2. Operator has not conducted Emergency Response Training as required per 192.615(b)(2)
3. Records indicate the operator has not maintained sufficient odorant levels to the meet requirement of readily detectable at a concentration of 1/5 of Lower Explosive Limit – (1% Gas in Air) per 192.625(a) - Reviewed 2019-2021 records – majority of readings above 1/5 LEL – (Above 1% Gas in Air)
4. Operator could not produce records that Patrolling of Distribution System had been conducted per 192.721(b)
5. Records indicated the regulator station at 2115 Bewleyville Road has not been inspected once each calendar year, not to exceed 15 months. The current configuration does not allow proper testing of the station per 192.739(a)
6. Operator could not produce complete operator qualification records for Valley gas employees performing covered tasks per 192.807(b) – No records between 9/2014 & 2/2020
7. Valley Gas employees were performing covered tasks for which they did not have current operator qualification certifications per CFR 192.805(b) Records indicate that employees are not currently qualified to perform the following tasks
 - #7 Pipe-To-Soil Potentials (CP Readings) – No record of training
 - #14 Emergency Valve Inspection - No record of training
 - #35 Odorization Testing - Expired 9/26/2017

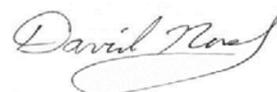
Inspector Comments

Findings 1, 4, 5 & 7 were cited in the previous inspection conducted in September of 2019. These deficiencies were cleared by the previous inspector through review of documents provided by, and conversation with, the operator.

Valley Gas management is currently in discussions with USDI Utility Services to conduct a number of Valley Gas's annual tasks/surveys and also rebuild the Bewleyville Road regulator station to bring it into compliance. USDI was hired in 2019 for cathodic protection troubleshooting and remediation. USDI has also recently provided updated plans and manuals for Valley Gas.

Concerning the NTSB Supplemental Inspection Questions, please see the comments in that question set on pages 60 thru 62 of this report.

Submitted By:



Utility Regulatory and Safety Investigator

Procedures - Reporting *

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

191.5(b) (191.7)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 5(C)

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

191.15(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 5(C)

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

191.15(c)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 5(C)

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

191.22

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 5(G)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 5(D)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No GOM piping in system

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

192.605(d)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 5(D)

Procedures - Customer and EFV Installation Notification

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 3(G)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 3(G)

Procedures - Normal Operating And Maintenance

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

192.605(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 1

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 15(A)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(L) & 14(A)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 1(A)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 15(A)

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No holders in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(G)

Procedures - Change In Class Location

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

Procedures - Continuing Surveillance

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 11(E)

Procedures - Damage Prevention Program

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

192.614(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 3

Procedures - Emergency

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

192.615(a)(1)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(B)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(A)(B)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(B)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(D)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(D)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(D)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(I)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 5(E)

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

192.615(b)(2)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(A)

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

192.615(b)(3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(A)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 2(A)

Procedures - Public Awareness Program

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

192.616(a) (192.616(h))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed PA plan

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section A

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

192.616(b) (API RP 1162 Section 2.7 Step 4)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section B & OM&E Section 6

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

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section E

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

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section F

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

192.616(c) (API RP 1162 Section 6.2)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section G(5)

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

192.616(g) (API RP 1162 Section 2.3.1)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section D

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

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section G

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

192.616(j) (192.616(h))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Valley Gas is a distribution system

Procedures - Failure Investigation

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

192.617

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 5(E)

Procedures - MAOP

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 6

Procedures - Pressure Test

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 6(D)

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 §192.625? (MO.GOODOR.ODORIZE.P) (detail)*

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 7(A)

Procedures - Tapping Pipelines Under Pressure

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

(AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 16(E) – Procedure Manual - Covered task 34

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.HOTTAQUAL.P) (detail)*

192.627 (192.805(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 16(E) – Procedure Manual - Covered task 34

Procedures - Pipeline Purging

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

(MO.GOODOR.PURGE.P) (detail)

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 14 – Procedure Manual - Covered task 58

Procedures – Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

Procedures - Distribution System Patrolling & Leakage Survey

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 13

Procedures - Line Marker

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 3(E)

Procedures - Transmission Record Keeping

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

Procedures - Transmission Field Repair

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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.WELDTTEST.P) (detail)

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

Procedures - Test Requirements For Reinstating Service Lines

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 14(H)

Procedures - Abandonment Or Deactivation Of Facilities

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 14

Procedures - Pressure Limiting And Regulating Station

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 10(B)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 10(D)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 10(B)

Procedures - Valve And Vault Maintenance

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E – Section 9

Procedures - Vault Inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No vaults in system

Procedures - Prevention Of Accidental Ignition

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Covered in multiple tasks in Procedure Manual

Procedures - Caulked Bell And Spigot Joints

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

192.753(a) (192.753(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No cast iron pipe in system

Procedures - Protecting Cast-Iron Pipeline

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

192.755(a) (192.755(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No cast iron pipe in system

Procedures - Welding And Weld Defect Repair/Removal

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

192.225(a) (192.225(b))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: USDI Welding Procedure Manual – Section A

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

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: USDI Welding Procedure Manual – Section B

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

192.227(b) (192.225(a); 192.225(b); 192.805(b))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: USDI Welding Procedure Manual – Section B

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

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: USDI Welding Procedure Manual – Section B

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

192.303 (192.231)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: USDI Welding Procedure Manual – Section A

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

192.303 (192.233(a); 192.233(b); 192.233(c))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: USDI Welding Procedure Manual – Section A

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

192.303 (192.235)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: USDI Welding Procedure Manual – All Weld Procedure Specifications

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: USDI Welding Procedure Manual – Section H

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: USDI Welding Procedure Manual – Section I

Procedures - Nondestructive Testing

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: USDI Welding Procedure Manual – Appendix A

Procedures - Joining Of Pipeline Materials

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 16(H) – USDI KY Procedures Manual Covered Tasks 21-25

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 16(H) – USDI KY Procedures Manual Covered Tasks 21-25

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 16(H) – USDI KY Procedures Manual Covered Tasks 21-25

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

192.287 (192.805(h))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 16(H) – USDI KY Procedures Manual Covered Tasks 21-25

Procedures - Corrosion Control

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

192.453 (192.805(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(A)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8 – Appendix 1

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No pipe converted to service

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8 – Appendix 1

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No use of buried aluminum

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8 – Appendix 1

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

192.605(b)(2) (192.459)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 8

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

192.605(b)(2) (192.459)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 8

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8 – Appendix 1

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No use of amphoteric metals

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 4

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C)

PHMSA Form 2 Question Set (IA Equivalent)
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15. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?* (TD.CP.UNPROTECT.P) (detail)

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No unprotected pipe in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 3

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 2

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 4

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No corrosive gas in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 8

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

PHMSA Form 2 Question Set (IA Equivalent)
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22. Internal Corrosion Corrosive Gas Actions (detail) *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.P) (detail)

192.605(b)(2) (192.477)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No corrosive gas in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(E) & Operations Procedure Manual – Covered Task 12

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(E) & Operations Procedure Manual – Covered Task 12

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 8

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(C) & Operations Procedure Manual – Covered Task 8

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No ductile or cast iron pipe in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Manual – Section 8(G)

Field Review - Pipeline Inspection (Field)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

192.463(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Digital multi-meter & copper/copper sulfate half cell

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

192.465(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No rectifiers in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Verified in field

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

192.605(b)(8)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Verified in field

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Verified in field

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

192.719(a) (192.719(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

PHMSA Form 2 Question Set (IA Equivalent)
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10. Pressure Telemetering or Recording Gauges (detail) *Are telemetering or recording gauges properly utilized as required for distribution systems? (MO.GMOPP.PRESSREGMETER.O) (detail)*

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

Notes: Recorder in office

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

192.739(a) (192.739(b); 192.743)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Last conducted by Danny Shelly – 12/11/2020

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

192.745(a) (192.745(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No transmission main in system

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

192.751(a) (192.751(b); 192.751(c))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: No issues identified

Records - Regulatory Reporting Performance

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

191.5(a) (191.7(a))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Note: No reportable incidents since previous inspection

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

191.15(a)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No reportable incidents since previous inspection

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

191.15(c)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No reportable incidents since previous inspection

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

191.17(a)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Reviewed 2019-2021

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No SRC's

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No new customers added since previous inspection

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

192.727(g)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No applicable piping in system

Records - Construction Performance

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

192.225(a) (192.225(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No welding performed since previous inspections

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No welding performed since previous inspections

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No welding performed since previous inspections

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No welding performed since previous inspections

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No welding performed since previous inspections

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Note: No welding performed since previous inspections

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&E Section H – Procedures manual covered tasks 21-26

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No plastic pipe installed since previous inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No plastic pipe installed since previous inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No main installed since previous inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No main installed since previous inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No service lines installed since previous inspection

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

192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No main installed since previous inspection

Records - Operations And Maintenance Performance

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

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No main >30% SMYS in system

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

192.517(a) (192.507(a); 192.507(b); 192.507(c))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No main installed since previous inspection

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

192.517(a) (192.509(a); 192.509(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No main installed since previous inspection

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

192.517(a) (192.513(a); 192.513(b); 192.513(c); 192.513(d))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No main installed since previous inspection

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

192.605(a)	Sat +	Sat	Concern	Unsat	NA	NC
				X		

Notes: Operator has not conducted annual review of written procedures as required per 192.605(a)

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

192.605(a) (192.605(b)(3))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records are available to all appropriate personnel

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Supervisor reviews all work order completion reports – Work routinely photographed for records

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No abnormal operations since previous inspection

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

192.614(c)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed Damage Prevention plan - USDI

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No recorded/reported emergencies since previous inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Operator has not conducted Emergency Response Training as required per 192.615(b)(2)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Last conducted 7/15/2021

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

192.605(a) (192.617)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No incidents since previous inspection

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

192.503(a) (192.503(b); 192.503(c); 192.503(d))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No main installed since previous inspection

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

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A mailings & records – Reviewed records

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

192.616(d) (192.616(f))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Reviewed Paradigm message

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

192.709 (192.619; 192.621; 192.623)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: No record of abnormal operations of pressure limiting devices since previous inspection

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

192.616(e) (192.616(f))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A mailings & records - Reviewed Paradigm message

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

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))	Sat +	Sat	Concern	Unsat	NA	NC
				X		

Notes: Records indicate the operator has not sufficiently maintained odorant levels to meet the requirement of readily detectable at a concentration of 1/5 of Lower Explosive Limit – (1% Gas in Air) per 192.625(a) Reviewed 2019-2021 records – majority of readings above 1/5 LEL – (Above 1% Gas in Air)

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21. Baseline Message Delivery Frequency (detail) *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3? (PD.PA.MESSAGEFREQUENCY.R) (detail)*

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator contracts Paradigm for P/A mailings – Last sent 7/9/2021

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

192.721

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Operator could not produce records that Patrolling of Distribution System had been conducted per 192.721

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

192.616(c) (API RP 1162 Section 4.4)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator routinely meets with local public and emergency officials- Most recent – 7/15/2021

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

192.616(g) (API RP 1162 Section 2.3.1)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator contracts Paradigm for P/A mailings – English & Spanish

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed 2019-2020 leakage survey records - 2019 1-Grade 2 leak – 2020 3-Grade 3 leaks Avery Bellfield – Russmar – M1 – 9/12/2018

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

192.603(b) (192.725(a), 192.725(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No reinstated service lines since previous inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator contracts Paradigm for P/A mailings – Conducted annually

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

192.616(c) (192.616(i); API RP 1162 Section 8.3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: 3rd Party - Paradigm

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

192.709(c) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No facilities abandoned since previous inspection

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

192.616(c) (API RP 1162 Section 8.3)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No program changes since previous inspection

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

192.709(c) (192.739(a); 192.739(b))	Sat +	Sat	Concern	Unsat	NA	NC
				X		

Notes: 2019-2020 records indicated the regulator station at 2115 Bewleyville Road has not inspected once each calendar year, not to exceed 15 months. The current configuration does not allow proper testing of the station per 192.739(a)

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

192.616(c) (API RP 1162 Section 8.4)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

192.709(c) (192.743(a); 192.743(b); 192.743(c))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Reviewed 2019-2020 records – Last conducted 12/11/2020 – Danny Shelly – OQ M4 – 7/30/2020

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

192.616(c) (API RP 1162 Section 8.4.1)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission main in system

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

192.616(c) (API RP 1162 Section 8.4.2)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

192.603(b) (192.747)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed 2019-2020 records – Last conducted 5/3/2021 – Daniel Griffith/Brad Fackler

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No vaults in system

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

192.616(c) (API RP 1162 Section 8.4.3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: No issues indicated

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

192.616(c) (API RP 1162 Section 8.4.4)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No cast iron in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No changes to program since previous inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Distribution system only – LP system operated as separate company

Records - Operator Qualification

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

192.807(b)

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Operator could not produce complete records for Valley gas employees performing covered tasks per 192.807(b) – No records between 9/2014 & 2/2020

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

192.807(a) (192.807(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed records for RussMar & USDI

Records - Corrosion Control Performance

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

192.491(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Note: No steel pipe exposed since previous inspection

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

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

Notes: Reviewed 2019-2020 records

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

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

Notes: No rectifiers in system

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

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

Notes: None in system

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

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

Notes: Deficiencies noted on 11/5/2019 were corrected by 11/19/2019

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

192.491(c) (192.465(e))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No unprotected pipe in system

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

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: None in system

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

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: All CP readings taken at meter risers, regulator stations and valves

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.491(c) (192.473(a))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No issues on system

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

192.491(c) (192.475(a))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No pipe exposed/removed since previous inspection

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

192.491(c) (192.475(a); 192.475(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No pipe exposed/removed since previous inspection

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

192.476(a) (192.476(b); 192.476(c); .476(d))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No transmission main in system

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

192.491(c) (192.477)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No corrosive gasses transported – Pipeline quality gas

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

192.491(c) (192.481(a); 192.481(b); 192.481(c))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Last conducted 12/11/2020 by Danny Shelly during regulator inspections

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

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No new steel pipe installed since previous inspection

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

192.485(a) (192.485(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No pipe exposed/removed since previous inspection

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

192.491(c) (192.485(c))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No pipe exposed/removed since previous inspection

Procedures (Distribution Compressor Station) - Compressor Station

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

192.605(b)(6)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.605(b) (192.736(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

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

192.163(c)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.163(d)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.163(e)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.141 (192.165(a); 192.615(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.167(a)(2)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.167(a)(1)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.167(a)(3)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.167(a)(4)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.167(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.167(c)(1)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.171(a)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.171(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.171(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.171(d)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.171(e)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.173	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.457(b)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

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

Notes: No compressors in system

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

192.605(b)(5)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.605(b)(3)	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

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

192.605(a) (192.615(b))	Sat +	Sat	Concern	Unsat	NA	NC
					X	

Notes: No compressors in system

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

24. Placement of ROW Markers (detail) Are line markers placed and maintained as required?

(PD.RW.ROWMARKER.O) (detail)

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.735(a) (192.735(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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

192.736(a) (192.736(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

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.CSSYSROT.CMPRELIEF.R) (detail)

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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.CSSYSROT.CMPGASDETOM.R) (detail)

192.709(c) (192.736(c))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No compressors in system

Instructions

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

Name of Operator	Valley Gas Inc.	Op ID #	39515
Inspector	David Nash	Unit #	
Date of Inspection	7/15/2021		
Inspection Location City & State	Irvington, KY		
Operator Employee Interviewed	Kevin Kasey	Phone #	270-547-0504
Position/Title	VP – Valley Gas		
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)	Kevin Kasey		
DER Phone #	270-547-0504		

§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	Operator is a member of Mann Consultants Consortium & recognizes their D/A plan			
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.	X		
Comments	Operator is a member of Mann Consultants Consortium – pool is pulled from quarterly			
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.	X		
Comments	Kerry Kasey and/or Kevin Kasey			
.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	Kerry Kasey – 7/8/2021, Kevin Kasey – 7/8/2021			
.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	Pamphlets to be distributed to employees & posted in common areas			

Training and Qualification - Operator Qualification

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

192.805(a) (192.801(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: USID OQ Plan

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

192.805(g)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Appendix A

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.OO.OQPLANCONTRACTOR.P) (detail)*

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section IX

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section IX

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

192.807(a) (192.807(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed sample of records for RussMar, USDI & Danny Shelly

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section X - No current MAA's

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VI

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Written Test & Hands-On

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

192.803

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VI (D)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed records for Valley Gas & contractors

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

192.807

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Citing CFR 49 Part 192.805(b) – Ensure through evaluation that individuals performing covered tasks are qualified.
Records indicate that employees are not currently qualified to perform the following tasks
 #7 Pipe-To-Soil Potentials (CP Readings) – No record of training
 #14 Emergency Valve Inspection – No record of training
 #35 Odorization Testing – Expired 9/26/2017
 # 54 Locate and Mark Underground Facilities – Expired 9/26/2017

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

192.805(b) (192.803)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VII (D)

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

192.805(h)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VI

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

192.805(c)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VI (G)

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

192.805(d) (192.805(e))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VI (H) (I)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section IV(D)

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

192.805(f)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VII (A)

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

192.805(i)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section VII (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.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
					X

Notes: No covered tasks performed for which operator had OQ qualified personnel at time of inspection.

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

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
					X

Notes: No covered tasks performed for which operator had OQ qualified personnel at time of inspection.

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

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
					X

Notes: No covered tasks performed for which operator had OQ qualified personnel at time of inspection.

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

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
					X

Notes: No covered tasks performed for which operator had OQ qualified personnel at time of inspection.

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

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
					X

Notes: No covered tasks performed for which operator had OQ qualified personnel at time of inspection.

Operator and General Audit Information

Company:	Name: Valley Gas Inc.
	Mailing and Official Address (If different): P.O. Box 55, 401 First Street Irrington, KY 40146
	Doing Business as or Affiliation:
PHMSA Operator Identification (OPID) No.	39515

Unit ID Number/ Unit Name inspected	Valley Gas Inc.		
Address:	401 First Street Irvington, KY 40146	Lead Auditor or Inspector	Name: David Nash
			Agency: KYPSC
	Date of Audit or Inspection:	7/15&19/2021 7/19/2021 conducted remotely	

Company Representatives Participating

Key Persons	Name/Title/Mailing Address	Phone/Email Address
Primary Operator or Representative Interviewed or Providing Information	Kevin Kasey – Valley Gas	270-547-0504 igenergy@bbtel.com
Others Interviewed, Providing Information or Present at Audit	Jason Brangers - USDI	502-819-1338 jason@usdi.us

or Inspection:		

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Gas Distribution Integrity Management - Knowledge of the System

1. System Knowledge - Information Considered *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)? (GDIM.RA.INFORMATION.P)*

192.1007(a)(2)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Consideration given to information gained

Gas Distribution Integrity Management - Identify Threats

2. Identify Threats - Information Considered *In identifying threats did the information considered include all of the required data and information sources? (GDIM.RA.INFOCONSIDERED.R)*

192.1007(b)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Consideration for identifying threats given to required information sources

4. Identify Threats - Threats Considered *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline? (GDIM.RA.THREATCATEGORIES.P)*

192.1007(b)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Consideration for identifying threats given to required threat categories

Gas Distribution Integrity Management - GDIM Implementation

1. Issues Identified in Previous Integrity Management Inspections *Have all issues raised in previous DIMP inspections been satisfactorily addressed? (GDIM.QA.ISSUESIMPL.R)*

192.1005

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Previous issues satisfactorily addressed

2. Identify Threats - Outside Sources *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks? (GDIM.RA.OUTSIDESOURCESIMPL.R)*

192.1007(b)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: None that require re-evaluation of threats/risks

3. System Knowledge - Gaps *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?* (GDIM.RA.GAPSIMPL.R)

192.1007(a)(3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Data continually collected

4. System Knowledge - Information Needed (Systems) *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?* (GDIM.RA.SYSINFONEEDSIMPL.R)

192.1007(a)(3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Information is continually gathered

5. System Knowledge - Information Needed (O&M) *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?* (GDIM.RA.OMINFONEEDSIMPL.R)

192.1007(a)(3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: One mile of pipe added to system in 2019 for industrial customer

6. System Knowledge - New Pipe Data *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?* (GDIM.RA.NEWPIPEIMPL.R)

192.1007(a)(5)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: One mile of pipe added to system in 2019 for industrial customer

7. System Knowledge - Data Collection Forms *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?* (GDIM.RA.DATAFORMIMPL.R)

192.1007(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: USDI will be supplying Valley Gas with updated forms.

8. System Knowledge - SME Input *If Subject Matter Experts (SMEs), is their documented knowledge and experience being appropriately used in the DIMP Program? (GDIM.RA.SMEIMPL.R)*

192.1007(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: No new SME at this time. Valley Gas to hire USDI to manage DIMP plan

9. System Knowledge - Understanding *Do operator personnel in the field understand their responsibilities under the DIMP plan? (GDIM.RA.DEMOUNDERSTANDINGIMPL.O)*

192.1007(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Verified in field review

10. Identify Threats - Threats Considered (New Information) *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification? (GDIM.RA.THREATCATEGORIESIMPL.R)*

192.1007(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No new information acquired since previous audit

11. Identify Threats - Information Considered (Changes) *Have any changes occurred that require re-evaluation of threats and risks? (GDIM.RA.INFOCONSIDEREDIMPL.R)*

192.1007(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No changes requiring re-evaluation

12. Identify Threats - Implementation (Update) *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge? (GDIM.RA.IMPLEMENTTHUPDATEIMPL.R)*

192.1007(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No updates required based on new information

13. Identify Threats - Implementation (DIMP Process) *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?* (GDIM.RA.IMPLEMENTHUPDATEPLANIMPL.R)

192.1007(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No modifications since previous inspection

14. Rank Risk - System Subdivision (Adequacy) *Does the 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 the system?* (GDIM.RA.SUBDIVIDEADEQIMPL.R)

192.1007(c)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: System subdivision meets requirements

15. Rank Risk - System Subdivision (Update) *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?* (GDIM.RA.SUBDIVIDEUPDATEIMPL.R)

192.1007(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No modifications since previous inspection

16. Rank Risk - System Subdivision (DIMP) *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?* (GDIM.RA.SUBDIVIDEDIMPIMPL.R)

192.1007(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No modifications since previous inspection

17. Rank Risk - System Subdivision (Result) *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?* (GDIM.RA.SUBDIVIDERESULTIMPL.R)

192.1007(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No modifications since previous inspection

18. Measures to Reduce Risk - Implementation (Update) *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented? (GDIM.PM.IMPLEMENTPMIMPL.R)*

192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Risk reduction measures continually implemented

19. Measures to Reduce Risk - Implementation (Completion) *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)? (GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R)*

192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: Threats are adequately addressed by current O&M activities

20. Measures to Reduce Risk - Implementation (Re-Evaluate) *Have risks been re-evaluated and re-ranked because of the elimination/mitigation of an identified threat? (GDIM.PM.IMPLEMENTPMREEVALIMPL.R)*

192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No Changes to risk ranking

21. Measures to Reduce Risk - Implementation (Specific Risk) *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks? (GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R)*

192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Threats are adequately addressed by current O&M activities

22. Measures to Reduce Risk - Leak Management *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)? (GDIM.PM.LEAKMANAGEMENTIMPL.R)*

192.1007(d)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: Operator repairs leaks when found

23. Measure Performance - Implementation (Data) *Is data being collected for the required performance measures in 192.1007(e)? (GDIM.QA.IMPLEMENTEVDATAIMPL.R)*

192.1007(e)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Required data is being collected

24. Measure Performance - Implementation (DIMP) *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan? (GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R)*

192.1007(e)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Field observation and review of records

25. Measure Performance - Implementation (Baseline) *Is each performance measure being monitored from an established baseline? (GDIM.QA.IMPLEMENTEVBASELINEIMPL.R)*

192.1007(e)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Performance measures found in Chapter 7 of DIMP continually monitored

26. Measure Performance - Implementation (Specific Risk) *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures? (GDIM.QA.IMPLEMENTEVRIKIMPL.R)*

192.1007(e)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: No changes since last update

27. Periodic Evaluation - Implementation (Frequency) *Have periodic evaluations of the DIMP plan been performed 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".] (GDIM.CA.PERIODICEVALFREQIMPL.R)*

192.1007(f)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Plan evaluation due 2021

28. Periodic Evaluation - Implementation (Requirements) *Did the periodic evaluation include all required elements? (GDIM.CA.PERIODICEVALREQTSIMPL.R)*

192.1007(f)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Plan evaluation due 2021

29. Periodic Evaluation - Implementation (High Risk) *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures? (GDIM.CA.PERIODICEVALHIRISKIMPL.R)*

192.1007(f) (192.1007(e))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Plan evaluation due 2021

30. Periodic Evaluation - Implementation (Risk Reduction Measures) *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added? (GDIM.CA.PERIODICEVALRISKREDIMPL.R)*

192.1007(f)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Plan evaluation due 2021

31. Periodic Evaluation - Implementation (Performance Measures) *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added? (GDIM.CA.PERIODICEVALPRFMESIMPL.R)*

192.1007(f)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Plan evaluation due 2021

32. Periodic Evaluation - Implementation (DIMP Plan) *Were procedures followed in conducting periodic evaluations and program improvements? (GDIM.CA.PERIODICEVALDIMPIMPL.R)*

192.1007(f)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Plan evaluation due 2021

33. Report Results - Submittal *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?* (GDIM.RR.SUBMITREPORTSIMPL.R)

192.1007(g)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed 2019-2020 Annual Reports

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

192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No reports of mechanical fitting failures

35. Mechanical Fitting Failures - Information Collection (Reporting) *Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?* (GDIM.RR.MECHANICALFITTINGRPTIMPL.R)

192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No reports of mechanical fitting failures

36. Mechanical Fitting Failures - Information Collection (DIMP) *Were procedure(s) followed for collecting the appropriate information and submitting PHMSA Form F-7100.1-2?* (GDIM.RR.MECHANICALFITTINGDIMPIMPL.O)

192.1009 (191.12)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No reports of mechanical fitting failures

37. Records - Implementation *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?* (GDIM.QA.RECORDREQUIREMENTSIMPL.R)

192.1011

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records retained as required

38. Records - Implementation (Plan Retention) *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)? (GDIM.QA.RECORDREQTSRETAINIMPL.R)*

192.1011

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records retained as required

39. Records - Implementation (DIMP) *Were DIMP procedures followed as applicable to records retention? (GDIM.QA.RECORDREQTSDIMPIMPL.R)*

192.1011

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: records retained as require

40. Deviation from Periodic Inspections - Approval *Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".] (GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R)*

192.1013(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No request made for deviation

41. Deviation from Periodic Inspections - Implementation *Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals? (GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R)*

192.1013(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No request made for deviation

42. Deviation from Periodic Inspections - Requirements or Conditions *Have all conditions been complied with that were required as part of the alternate inspection interval approval? (GDIM.PI.PERIODICINSPDEVREQTIMPL.R)*

192.1013(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No request made for deviation

43. Deviation from Periodic Inspections - Performance Measures *Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?* (GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R)

192.1013(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No request made for deviation

44. Deviation from Periodic Inspections - Corrective Action *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?* (GDIM.PI.PERIODICINSPDEVACTIONIMPL.R)

192.1013(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No request made for deviation

Master Meter and Small LPG Distribution Integrity Management - Knowledge of the System

1. System Knowledge - Information Considered *Does the plan include an explanation of the mechanisms or procedures to address how the operator will demonstrate knowledge of its pipeline which, to the extent known, should include the approximate location and material of its pipeline?* (MMLPGIM.RA.INFORMATION.P)

192.1015(b)(1)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Valley Gas Inc. is a private distribution system

Master Meter and Small LPG Distribution Integrity Management - Identify Threats

2. Identify Threats - Threats Considered *In identifying threats, do the written mechanisms or procedures include consideration of all of the required categories of threats to each gas distribution pipeline?*
(MMLPGIM.RA.THREATCATEGORIES.P)
192.1015(b)(2)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: Valley Gas Inc. is a private distribution system

Reporting - Regulatory Reporting (Traditional)

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No reports of mechanical fitting failures

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

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

THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS				
SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator or its contractors have directional drilling/ boring procedures?	X			
Do the procedures include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?	X			
Comments: USID Construction Procedures				
Is operator following written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?	X			
Comments: Reviewed sample of completed 811 locate requests				
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities? If no, encourage and promote the adoption of CGA Best Practices document.	X			
Comments: PSC staff provided a copy of CGA Best Practices				

Do the operator's records of accidents and failures due to excavation damage ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?			X	
Comments: No accidents or failures since previous inspection				

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

PERMALOCK MECHANICAL TAPPING TEE ASSEMBLIES				
SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator use PermaLock Mechanical Tapping Tee Assemblies? If yes, are they experience any issues with these type of installations?			X	
Comments: Operator does not use PermaLock Mechanical Tapping Tee Assemblies				
Are they using best practices recommended by the manufacturer in their O&M Manual and/or distribution integrity management programs?			X	
Comments: Operator does not use PermaLock Mechanical Tapping Tee Assemblies				
Are they using the specified tools and methods to correctly install these Assemblies?			X	
Comments: Operator does not use PermaLock Mechanical Tapping Tee Assemblies				

OPERATOR PROCEDURES FOR CONSIDERING LOW PRESSURE SYSTEMS IN THREAT ANALYSIS				
SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
Does the operator include low pressure systems in DIMP Plan?			X	
Comments: No Low Pressure mains in system				
Does the operator have procedures for considering low pressure distribution systems in threat analysis?			X	
Comments: No Low Pressure mains in system				

DISTRIBUTION- INDOOR METER SETS WITH REGULATORS

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

TRANSMISSION ONLY

SUPPLEMENTAL INSPECTION QUESTIONS	Yes	No	N/A	N/C
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?			X	
Comments: No transmission main in system				
Does operator have any reversal flows, product changes, conversion of service? (ADB-2014-0040)			X	
Comments: No reversal flows, product changes, conversion of service.				

CYBERSECURITY QUESTIONNAIRE

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

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

Yes	No	NA	NC
	X		

Notes: Operator does not utilize any systems that may be vulnerable to cyber security concerns

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

Yes	No	NA	NC
		X	

Notes: See note #1 above

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

Yes	No	NA	NC
		X	

Notes: See note #1 above

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

Yes	No	NA	NC
		X	

Notes: See note #1 above

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

Yes	No	NA	NC
		X	

Notes: See note #1 above

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

Yes	No	NA	NC
		X	

Notes: See note #1 above

Public Awareness Program Effectiveness

1. Public Education Program (detail) <i>Has the continuing public education (awareness) program been established as required? (PD.PA.PROGRAM.P) (detail)</i>						
192.616(a) (192.616(h))	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: Reviewed PA Plan						

2. Management Support of Public Awareness Program (detail) <i>Does the operator's program documentation demonstrate management support? (PD.PA.MGMTSUPPORT.P) (detail)</i>						
192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: OM&E – Section 4 - PA Plan Section A						

3. Asset Identification (detail) <i>Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each? (PD.PA.ASSETS.P) (detail)</i>						
192.616(b) (API RP 1162 Section 2.7 Step 4)	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: OM&E – Section 4 - PA Plan Section B & OM&E Section 6						

4. Audience Identification (detail) <i>Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents? (PD.PA.AUDIENCEID.P) (detail)</i>						
192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: OM&E – Section 4 - PA Plan Section E						

5. Audience Identification Records (detail) <i>Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages? (PD.PA.AUDIENCEID.R) (detail)</i>						
192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: Operator contracts Paradigm for P/A mailings & records – Reviewed records						

6. Messages, Delivery Methods, and Frequencies (detail) <i>Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported? (PD.PA.MESSAGES.P) (detail)</i>						
192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: OM&E – Section 4 - PA Plan Section F						

7. Consideration of Supplemental Enhancements (detail) <i>Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162? (PD.PA.SUPPLEMENTAL.P) (detail)</i>						
192.616(c) (API RP 1162 Section 6.2)	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: OM&E – Section 4 - PA Plan Section G(5)						

8. Educational Provisions (detail) <i>Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event? (PD.PA.EDUCATE.R) (detail)</i>						
192.616(d) (192.616(f))	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: Reviewed Paradigm message						

9. Messages on Pipeline Facility Locations (detail) <i>Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations? (PD.PA.LOCATIONMESSAGE.R) (detail)</i>						
192.616(e) (192.616(f))	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: Operator contracts Paradigm for P/A mailings & records - Reviewed Paradigm message						

10. Baseline Message Delivery Frequency (detail) <i>Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3? (PD.PA.MESSAGEFREQUENCY.R) (detail)</i>						
192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				
Notes: Operator contracts Paradigm for P/A mailings – Last sent 7/9/2021						

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

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); 192.616(c); ADB-05-03)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Last conducted 7/15/2021

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

192.616(g) (API RP 1162 Section 2.3.1)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section D

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

192.616(g) (API RP 1162 Section 2.3.1)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A mailings – English & Spanish

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

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: OM&E – Section 4 - PA Plan Section G

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

192.616(c) (192.616(i); API RP 1162 Section 8.3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A mailings – Conducted annually

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

192.616(c) (192.616(i); API RP 1162 Section 8.3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: 3rd party - Paradigm

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

192.616(c) (API RP 1162 Section 8.3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: No changes since previous inspection

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

192.616(c) (API RP 1162 Section 8.4)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

192.616(c) (API RP 1162 Section 8.4.1)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

192.616(c) (API RP 1162 Section 8.4.2)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

192.616(c) (API RP 1162 Section 8.4.3)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

192.616(c) (API RP 1162 Section 8.4.4)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator contracts Paradigm for P/A – Conducted twice annually

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

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: No changes to program since previous inspection

RECEIVED

September 2, 2021

Ms. Melissa Holbrook
Assistant Director, Gas Pipeline Safety
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

SEP 20 2021

PUBLIC SERVICE
COMMISSION

Re: Valley Gas – 2021 Periodic Compliance Inspection

Dear Ms. Holbrook,

We are in receipt of the Inspection Report dated August 13, 2021 concerning the periodic regulatory compliance inspection conducted by Mr. David Nash July and August 2021 regarding the natural gas facilities of Valley Gas in Irvington, KY. As a result of that inspection, seven (7) deficiencies were documented and a response outlining corrective actions was requested. To follow is the requested response as well as the action(s) taken or planned to be taken to correct the noted deficiencies and maintain compliance with applicable state and federal pipeline safety regulations.

To address the deficiency noted during the July/August 2021 regulatory compliance inspection, Valley Gas submits the following:

- 1. Operator has not conducted annual review of written procedures as required per 49 CFR 192.605(a).**

To correct this deficiency, Valley Gas has contracted with USDI to develop new plans and manuals (Operations and Maintenance, Emergency, etc.) in accordance with 49 CFR 192.605, which will include a Procedural Manual and new forms. The O&M and Procedural Manual include the requirements to review, update, and document the manuals annually, not to exceed 15 months using the **Annual Manual Review Form-101** of 192.491 & 192.459 and applicable procedures, regarding the examination of buried pipelines when exposed. Through use of the O&M, Procedures, and Form 101- *Annual Manual Review Form*, Valley Gas will have the necessary tools to properly document its review.

Appropriate documentation and records will be maintained for the actions performed to correct the noted deficiency and provided to the KY PSC, upon request.

- 2. Operator has not conducted Emergency Response Training as required per 192.615(b)(2).**

To correct this deficiency, Valley Gas has contracted with USDI to develop new plans and manuals (Operations and Maintenance, Emergency, etc.) in accordance with 49 CFR 192.605, which will include a Procedural Manual and new forms. The O&M and Procedural Manual include the requirements to review the Emergency Plan annually and review with all employees the requirements of the Plan. Section 2 of the O&M contains the Emergency Plan and includes the following section:

EMERGENCY REVIEW

*This plan shall be reviewed annually by the supervisor, Kerry R. Kasey as part of the operation and maintenance manual review to provide any necessary updates (See Section 1 of this manual). After completion of the annual review and, if necessary, modifications to the plan are complete, then all employees shall sit for a review concerning the requirements of this plan. **This will be considered training and the date of the emergency plan review will be recorded along with signatures of the employees present for the review. This training shall be performed, at a minimum, annually.** Employees will not be allowed to perform gas related tasks or be on after-hours call until they have received training concerning all aspects of the emergency plan. Gas employees shall be considered effectively trained after sitting for the review of the emergency plan and after completing all OQ training/testing/evaluation requirements for all related covered tasks. The supervisor, Kerry R. Kasey is responsible for determining the effectiveness of this training. The supervisor, Kerry R. Kasey shall continually evaluate the performance of all employees as they respond to emergencies. The effectively trained gas employee will complete all training requirements and make continual proper response to emergency situations. All gas employees will have access to this plan at all times.*

The effectiveness of the training may be determined through the use of a written test following the annual review with employees. Appropriate documentation and records will be maintained for the actions performed to correct the noted deficiency and provided to the KY PSC, upon request.

- 3. Records indicate the operator has not maintained odorant levels to the requirement of readily detectable at a concentration of 1/5th of Lower Explosive Limit (1% Gas in Air) per 192.625(a) – Reviewed 2019-2021 records – majority of readings above 1/5th LEL – (Above 1% Gas in Air)**

To correct this deficiency, Valley Gas has reviewed the requirements and procedures for conducting odorant tests to determine the concentration is readily detectable at a concentration of 1/5th the LEL (1% Gas in Air) and recently had its odorization equipment re-calibrated and tested by the manufacturer. Furthermore, Valley Gas had USDI perform a cursory inspection of its odorizer and provided appropriate odorizer inspection forms with the newly developed manuals.

Appropriate documentation and records will be maintained for the actions performed to correct the noted deficiency and provided to the KY PSC, upon request.

- 4. Operator could not produce records that Patrolling of Distribution System had been conducted per 192.721(b).**

Patrolling of the distribution system is performed each summer while reading meters. Valley gas usually reads meters with an automatic device (ITRON), but once a year we manually read and do our patrolling of the system. We have documents showing our manual readings for each customer, but failed to properly document the patrol on the appropriate forms.

To correct this deficiency, Valley Gas contracted with USDI to develop new plans and manuals (Operations and Maintenance, Emergency, etc.) in accordance with 49 CFR 192.605, which includes a Procedural Manual and new forms. Patrols will be documented on *Form 1101 – Pipeline Patrol Report* following the procedures contained in *Covered Task 56 – Pipeline Patrol* in the

Operations Procedural Manual. The new OME states the minimum patrolling schedule for this system as annually, not to exceed 15 months, unless there are mains in places or on structures where anticipated physical movement or external loading could cause failure or leaks. Those areas will be patrolled at least two (2) times per year, not to exceed 7 ½ months if outside a business district, or at least four (4) times per year, not to exceed 4 ½ months if within a business district. Through use of the O&M, Procedures, and appropriate forms, Valley Gas will have the necessary tools to properly perform and document patrols. USDI will provide training for Valley Gas personnel with regards to these manuals, implementation, and instructions on proper methods for filling out applicable forms and reports.

Appropriate documentation and records will be maintained for the actions performed to correct the noted deficiency and provided to the KY PSC, upon request.

- 5. Records indicated the regulator station at 2115 Bewleyville Road has not been inspected once each calendar year, not to exceed 15 months. The current configuration does not allow proper testing of the station per 192.739(a).**

Regulator station inspections have been performed annually as required by 192.739 in which the regulators were visually inspected, checked for leaks, and lock-up tests performed, however as noted, the configuration of the Bewleyville Road station did not allow for testing lock-up of the regulators. To correct this deficiency, Valley Gas contracted with USDI to reconfigure the station and perform appropriate inspection and testing as required by 192.739(a). This work, along with performing inspections on the remaining stations, was completed on August 3-4, 2021.

- 6. Operator could not produce complete operator qualification records for Valley Gas employees performing covered tasks per 192.807(b) – No records between 9/2014 & 2/2020.**

During the previous audit it was determined that Valley Gas did not have current Operator Qualification records for some covered tasks, so we contracted with Arc Randolph and Associates to requalify Valley Gas employees in February 2020. Recently, we contracted with USDI to complete the appropriate OQ training and evaluations for all Valley Gas employees that did not have current qualifications for tasks they were expected to perform. Employees are working to complete the online modules and, upon successful completion, will be field evaluated by USDI in accordance with 192.807.

Appropriate documentation and records will be maintained for the actions performed to correct the noted deficiency and provided to the KY PSC, upon request.

- 7. Valley Gas employees were performing covered tasks for which they did not have current operator qualification certifications per CFR 192.805(b). Records indicate that employees are not currently qualified to perform the following tasks:**

Task #7 – Pipe-to-Soil Potentials (CP Readings)	- No record of training
Task #14 – Emergency Valve Inspection	- No record of training
Task #35 – Odorization Testing	- Expired 9/26/2017
Task #54 – Locate and Mark Underground Facilities	- Expired 9/26/2017

To correct this deficiency, Valley Gas contracted with USDI to review and update its Operator Qualification (OQ) Plan to ensure it satisfies the requirements of 192.805 and provide OQ Training and Evaluations on applicable covered tasks for Valley Gas personnel. This will be accomplished by utilizing Energy WorldNet (EWN) for online training and testing to satisfy the "knowledge" requirement of applicable regulations. Upon successful completion of the online training, USDI will perform field evaluations (hands-on, performance evaluations) for Valley Gas personnel, whereby they will be required to successfully demonstrate they have the "skills and ability" to perform the task(s) as well as recognize and react to abnormal operating conditions (AOCs). It is expected that this should be completed by October 31, 2021.

We trust that these actions resolve the deficiencies noted by Mr. Nash during the July/August 2021 periodic regulatory compliance inspection. Should you have any questions or concerns please let me know.

Sincerely,

A handwritten signature in blue ink that reads "Kerry R. Kasey". The signature is written in a cursive style with a large initial "K" and a long, sweeping underline.

Kerry R. Kasey
Valley Gas, Inc.

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	David Nash	Report Number:	03012022VG
Inspection Date(s):	11/2/2021, 1/6/2022 & 3/1/2022	Report Date:	3/1/2022
Inspection Type:	<input type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input checked="" type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	Valley Gas, Inc.	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	39515
Type of Facility:	Private Distribution	Location of Facility:	Irvington, KY
Area of Operation:	City of Irvington & Breckinridge County		
Official Operator Contact and Address: (Contact for Inspection Letter)		Unit Name and Address	
Kerry Kasey, President Valley Gas, Inc. P.O. Box 55, 401 First Street Irvington, KY 40146			
Phone # and Email:	270-547-2455 igenenergy@bbtel.com		
Records Location:	401 First Street, Irvington, KY 40146		
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>
Kevin Kasey	VP Valley Gas	270-547-0504	igenenergy@bbtel.com
Jason Brangers	PE - USDI	502-819-1338	jason@usdi.us
Zack Farhat	Engineer - USDI	502-260-0064	zfarhat@usdi.us
Has the Operator provided an updated Emergency Contact List?		<input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No
Number of Customers:	480		
Number of Gas Employees:	7		
Gas Supplier:	Texas Gas Transmission		
Unaccounted for Gas:	2%		
7100 Submitted Date:	# of Leaks	# Excavation Tickets	# Excavation Damages # EFV's installed
	0	51	0 0
Operating Pressure(s):	MAOP (within last year)		Actual Operating Pressure (at time of inspection)
	Feeder:	200	145
	Town:	60	40
Other:			
Does the Operator have any transmission pipeline (above 20% SMYS):		n/a	
Additional Operator Information:			
Follow-Up inspection for the August 10, 2021 inspection resulted in 7 violations			

Date of Last Inspection:	8-10-2021 Nash		
Number of Violations:	7	Violations not Cleared:	0

Summary of Areas Inspected

PHMSA Question Set

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

Other: Follow-up inspection

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

Other:

Summary

The following 7 violations were cited in the July 12,14,15,16,19, & August 10, 2021, standard inspection of the Valley Gas natural gas system. A follow-up inspection and records review were required to clear the violations and check the operators progress. The violations were reviewed as follows.

Findings

1. Operator has not conducted annual review of written procedures as required per 192.605(a) **See additional notes in follow-up report**
2. Operator has not conducted Emergency Response Training as required per 192.615(b)(2) **See additional notes in follow-up report**
3. Records indicate the operator has not maintained sufficient odorant levels to meet the requirement of readily detectable at a concentration of 1/5 of Lower Explosive Limit – (1% Gas in Air) per 192.625(a) **See additional notes in follow-up report**
4. Operator could not produce records that Patrolling of Distribution System had been conducted per 192.721(b) **See additional notes in follow-up report**
5. Records indicated the regulator station at 2115 Bewleyville Road has not been inspected once each calendar year, not to exceed 15 months. The current configuration does not allow proper testing of the station per 192.739(a) **See additional notes in follow-up report**
6. Operator could not produce complete operator qualification records for Valley gas employees performing covered tasks per 192.807(b) – No records between 9/2014 & 2/2020 **See additional notes in follow-up report**
7. Valley Gas employees were performing covered tasks for which they did not have current operator qualification certifications per CFR 192.805(b) Records indicate that employees are not currently qualified to perform the following tasks
 - #7 Pipe-To-Soil Potentials (CP Readings) – No record of training
 - #14 Emergency Valve Inspection - No record of training
 - #35 Odorization Testing - Expired 9/26/2017
 - # 54 Locate and Mark Underground Facilities - Expired 9/26/2017

See additional notes in follow-up report

Submitted By:

A handwritten signature in cursive script that reads "David Noel".

Utility Regulatory and Safety Investigator

Records - Operations And Maintenance Performance

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

192.605(a)	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator has not conducted annual review of written procedures as required per 192.605(a)

Follow-up:

USDI provided updated plans and manuals for Valley Gas on 7/12/2021

On 11/2/2022, operator produced document indicating new manuals were reviewed 7/13/2021 by Kerry Kasey & Kevin Kasey

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

192.605(a) (192.615(b)(2))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Operator has not conducted Emergency Response Training as required per 192.615(b)(2)

Follow-up:

Valley Gas employees received Emergency Response Procedure training 11/2/2021
Reviewed records

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

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records indicate the operator has not maintained odorant levels to the requirement of readily detectable at a concentration of 1/5 of Lower Explosive Limit – (1% Gas in Air) per 192.625(a)

Reviewed 2019-2021 records – majority of readings above 1/5 LEL – (Above 1% Gas in Air)

Follow-up:

Records reviewed on 11/2/2022, from 8/6/2021 thru 10/29/2021, indicate that valley Gas has maintained required odorant levels

USDI has made repairs to site glass and valve on odorator unit

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

192.721

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator could not produce records that Patrolling of Distribution System had been Conducted per 192.721

Operator indicated that patrolling has been conducted annually in conjunction with manual meter reading once per year. This was last conducted on May 17, 2021, however, there is no indication on the meter reading records that patrolling was performed.

Follow-up:

To rectify this deficiency, USDI has provided operator with Pipeline Patrol Report – 1101 to properly document patrolling conducted in the future

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: 2019-2020 records indicated the regulator station at 2115 Bewleyville Road has not been inspected once each calendar year, not to exceed 15 months. The current configuration does not allow proper testing of the station per 192.739(a)

Follow-up:

Operator contracted USDI to rebuild and properly test the Bewleyville Rd. Regulator Station. Records reviewed – Conducted 8/3/2021 – Daniel Jefferson - USDI

Records - Operator Qualification

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

192.807(b)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Operator could not produce complete records for Valley gas employees performing covered tasks Per 192.807(b) – No records between 9/2014 & 2/2020

Follow-up:

Operator contracted USDI to conduct OQ training on multiple tasks for Valley Gas employees Reviewed 2021 USDI /Energy World Net records for 5 Valley Gas employees

Training and Qualification - Operator Qualification

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

192.807

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes: Citing CFR 49 Part 192.805(b) – Ensure through evaluation that individuals performing covered tasks are qualified.

Records indicate that employees are not currently qualified to perform the following tasks

- #7 Pipe-To-Soil Potentials (CP Readings) – No record of training
- #14 Emergency Valve Inspection - No record of training
- #35 Odorization Testing - Expired 9/26/2017
- # 54 Locate and Mark Underground Facilities - Expired 9/26/2017

Follow-up:

Operator contracted USDI to conduct OQ training for Valley Gas employees

Records reviewed: Pipe to soil Potentials: David Doutaz – Qualified 10/22/2021
 Heath Eskridge – Qualified 10/20/2021
 Brad Fackler – Qualified 10/19/2021
 Daniel Griffith – Qualified 10/22/2021

Valve Inspection: David Doutaz – Qualified 10/21/2021
 Heath Eskridge – Qualified 10/20/2021
 Brad Fackler – Qualified 10/19/2021
 Daniel Griffith – Qualified 10/21/2021

Odorization Testing: David Doutaz – Qualified 10/22/2021
 Heath Eskridge – Qualified 10/20/2021
 Brad Fackler – Qualified 10/19/2021
 Daniel Griffith – Qualified 10/22/2021

Locating Facilities: Jason Brooks – Qualified 10/19/2021
 David Doutaz – Qualified 10/22/2021
 Heath Eskridge – Qualified 10/20/2021
 Brad Fackler – Qualified 10/19/2021
 Daniel Griffith – Qualified 10/22/2021

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Mike Nantz/Matt Caudill	Report Number:	09132019
Inspection Date(s):	9/11-13/2019	Report Date:	10/02/2019
Inspection Type:	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	Valley Gas, Inc.	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	39515
Type of Facility:	Private Distribution	Location of Facility:	Irvington, KY
Area of Operation:	City of Irvington and Breckinridge County		
Official Operator Contact and Address: (Contact for Inspection Letter)		Unit Name and Address	
Mr. Kerry Kasey, President Valley Gas, Inc. P.O. Box 55, 401 First Street Irvington, KY 40146			
Phone # and Email:	270-547-2455 igenergy@bbtel.com		
Records Location:	401 First Street, Irvington, KY 40146		

Persons Interviewed	Title	Phone No.	Email
Kerry Kasey	President	270-547-2455	igenergy@bbtel.com

Has the Operator provided an updated Emergency Contact List?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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Number of Customers:	480								
Number of Gas Employees:	7								
Gas Supplier:	Texas Gas Transmission								
Unaccounted for Gas:	2.0%								
Services:	<table style="width: 100%; border: none;"> <tr> <td style="width: 25%; border: none;">Residential</td> <td style="width: 25%; border: none;">Commercial</td> <td style="width: 25%; border: none;">Industrial</td> <td style="width: 25%; border: none;">Other</td> </tr> <tr> <td style="border: none;">480</td> <td style="border: none;"></td> <td style="border: none;"></td> <td style="border: none;"></td> </tr> </table>	Residential	Commercial	Industrial	Other	480			
Residential	Commercial	Industrial	Other						
480									
Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)							
	Feeder:	200 psig MAOP 150 psig							
	Town:	60 psig MAOP 50 psig							
	Other:								

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

Date of Last Inspection:	9/5/2017		
Number of Deficiencies:	0	Deficiencies not Cleared:	0

Summary of Areas Inspected

<u>PHMSA Question Set</u>		
<input checked="" type="checkbox"/> Emergency Plan (PHMSA Form 2)	<input checked="" type="checkbox"/> Operations and Maintenance Plan (PHMSA Form 2)	<input checked="" type="checkbox"/> Critical Valves Maintenance Inspections
<input checked="" type="checkbox"/> Cathodic Protection (PHMSA Form 2)	<input type="checkbox"/> Accidents - (PHMSA Form 11)	<input checked="" type="checkbox"/> Leak Surveys
<input checked="" type="checkbox"/> Odorization - (PHMSA Form 2)	<input checked="" type="checkbox"/> Operator Qualification (PHMSA Form 14 & 15 – Protocol 9)	<input checked="" type="checkbox"/> Damage Prevention (PHMSA Form 2)
<input checked="" type="checkbox"/> Pipeline ROW Markers (PHMSA Form 2)	<input type="checkbox"/> Regulator Stations	<input checked="" type="checkbox"/> DIMP – (PHMSA Form 24)
<input checked="" type="checkbox"/> Field Inspection (PHMSA Form 2)	<input checked="" type="checkbox"/> NTSB Supplemental Questions	<input type="checkbox"/> PAPE – (PHMSA Form 2)
<input checked="" type="checkbox"/> Public Awareness (PHMSA Form 2)	<input type="checkbox"/> Other	
<u>Other:</u>		

<u>State Question Set</u>	
<input checked="" type="checkbox"/> Cybersecurity	<input type="checkbox"/> Other
<u>Other:</u>	

Summary

On September 11-13, 2019 a standard inspection of the Valley Gas distribution system. The system consists of 12 miles of mains and services providing natural gas to 480 customers. The inspection included review of the following plans: Operations and Maintenance, Emergency, Damage Prevention, Operator Qualification, Drug and Alcohol, Distribution Integrity Management (DIMP), and Public Awareness. Records were reviewed relating to: Leak Surveys and repairs, Cathodic Protection (CP), Valve Inspections, DIMP, Public Awareness, and Odorant testing. Field inspections made of various customer meter locations, pipeline markers, CP readings, and the Town Border Station. A Protocol 9 was not performed due to no Valley employees certifications were current. (See Violation listed below)

An exit interview was conducted with Operator detailing the findings of this report.

Probable Violations

- (1) 192.605(d): Operations and Maintenance manual did not include instructions for reporting and recognizing Safety Related Conditions as required.
- (2) 192.614(a): Operator could not provide an approved Damage Prevention Plan for review.
- (3) 192.605(a): Operator could not provide documentation of the annual review of the Operations and Maintenance manual as required.
- (4) 192.805(b): Records provided indicated that all Valley Gas employees' Operator Qualification certifications were not current as required.
- (5) 192.465(d): 2018 Cathodic Protection survey indicated low readings at 12 locations that the Operator had not taken prompt remedial actions to correct as required.
- (6) 192.739(a): Records indicated that the Bewleyville Road Station had not been inspected in 2018 as required.
- (7) 192.721(b)(1): Patrolling records were not available for dates after 7/2017 to present as required.
- (8) 192.747(a): Critical Valve inspection records were not available for dates 9/2016 to present as required.
- (9) 192.625(f): Odorization field testing with an instrument records were not available for dates 7/2017 to present as required.

Areas of Concern

There were no Areas of Concern noted.

Submitted By:



Inspector

10/03/2019

Utility Regulatory and Safety Investigator

Procedures - Reporting *

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

191.5(b) (191.7)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan

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

191.15(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan

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

191.15(c)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

191.22

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: No procedures for reporting SCRs

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.605(d)

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: No instructions for recognizing SRCs.

Procedures - Customer and EFV Installation Notification

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Previous 7100 reporting in 2017 referenced EFVs installed. None installed in 2018. No new services or replacements in 2018-2019.

Procedures - Normal Operating And Maintenance

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

192.605(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes:

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 5 Appendix A (IX)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 8

Procedures - Change In Class Location

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures - Continuing Surveillance

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 9

Procedures - Damage Prevention Program

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

192.614(a)

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: No plan available for review.

Procedures - Emergency

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

192.615(a)(1)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 8-9

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 8-9

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 8-9

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 5

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 12

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.615(b)(2)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 14

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

192.615(b)(3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 14

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan page 14

Procedures - Public Awareness Program

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

192.616(a) (192.616(h))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 1

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 1-2

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 4

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.616(c) (API RP 1162 Section 6.2)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.616(g) (API RP 1162 Section 2.3.1)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Materials are offered in English and Spanish

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 6

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

192.616(j) (192.616(h))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Procedures - Failure Investigation

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

192.617

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures - MAOP

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 13

Procedures - Pressure Test

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures - Odorization Of Gas

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 13

Procedures - Tapping Pipelines Under Pressure

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

(AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 12

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

192.627 (192.805(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 12

Procedures - Pipeline Purging

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

(MO.GOODOR.PURGE.P) (detail)

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 14

Procedures – Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No Transmission

Procedures - Distribution System Patrolling & Leakage Survey

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures - Line Marker

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 11

Procedures - Transmission Record Keeping

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Procedures - Transmission Field Repair

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Procedures - Test Requirements For Reinstating Service Lines

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 7

Procedures - Abandonment Or Deactivation Of Facilities

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 17

Procedures - Pressure Limiting And Regulating Station

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 12

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 12

Procedures - Valve And Vault Maintenance

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No Transmission

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 13

Procedures - Vault Inspection

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No vaults

Procedures - Prevention Of Accidental Ignition

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 18

Procedures - Caulked Bell And Spigot Joints

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

192.753(a) (192.753(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Procedures - Protecting Cast-Iron Pipeline

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

192.755(a) (192.755(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Procedures - Welding And Weld Defect Repair/Removal

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

192.225(a) (192.225(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.303 (192.231)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.303 (192.235)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures - Nondestructive Testing

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures - Joining Of Pipeline Materials

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 20-21

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 21

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 21

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

192.287 (192.805(h))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 21

Procedures - Corrosion Control

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

192.453 (192.805(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: O&M page 9

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.605(b)(2) (192.459)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.605(b)(2) (192.459)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Page 8-9

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Page 8-9

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Page 9

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Page 9

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Gas monitored at City Gate connection with Texas Gas

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.605(b)(2) (192.477)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Page 8

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Page 8

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Field Review - Pipeline Inspection (Field)

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.463(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Page 8-9

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

192.465(b)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.605(b)(8)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.719(a) (192.719(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.741(a) (192.741(b); 192.741(c))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.745(a) (192.745(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records - Regulatory Reporting Performance

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

191.5(a) (191.7(a))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: None to report

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

191.15(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: None to report

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

191.15(c)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: None to report

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

191.17(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: None to report

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.727(g)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Records - Construction Performance

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

192.225(a) (192.225(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.327(a) (192.327(b); 192.327(c), 192.327(d); 192.327(e))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes

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

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes

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

192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes

Records - Operations And Maintenance Performance

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

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes

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

192.517(a) (192.507(a); 192.507(b); 192.507(c))	Sat +	Sat	Concern	Unsat	NA	NC
		X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.605(a)

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Operator had not reviewed and documented O&M annually as required.

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records Reviewed

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records Reviewed

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.614(c)

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: No Damage Prevention Program available for review.

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: No study required

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.605(a) (192.617)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records Reviewed

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.616(d) (192.616(f))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.709 (192.619; 192.621; 192.623)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.616(e) (192.616(f))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Records reviewed indicated a lapse in recording odorization testing by Operator. The last records provided were from 7/2017.

21. Baseline Message Delivery Frequency (detail) Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3? (PD.PA.MESSAGEFREQUENCY.R) (detail)

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Records reviewed indicated a lapse in recording patrolling by Operator. The last records provided were from 7/2017.

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

192.616(c) (API RP 1162 Section 4.4)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes: No transmission

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

192.616(g) (API RP 1162 Section 2.3.1)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Survey results were reviewed from USDI and Russmar.

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

192.603(b) (192.725(a), 192.725(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records Reviewed

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.616(c) (API RP 1162 Section 8.3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Records reviewed indicated the regulator station at 2115 Bewleyville Road could not be inspected on 12/26/2018 due to no outlet valve or gauge point. There were no records available of repairs made and subsequent testing.

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

192.616(c) (API RP 1162 Section 8.4)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Records reviewed indicated the regulator station relief valve at 2115 Bewleyville Road could not be inspected on 12/26/2018 due to no outlet valve or gauge point. There were no records available of repairs made and subsequent testing.

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

192.616(c) (API RP 1162 Section 8.4.1)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.616(c) (API RP 1162 Section 8.4.2)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.603(b) (192.747)

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Records reviewed indicated no records for 2018 inspection and partial operation of critical valves.

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.616(c) (API RP 1162 Section 8.4.3)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.616(c) (API RP 1162 Section 8.4.4)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Records - Operator Qualification

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

192.807(b)

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: Operator personnel's Operator Qualifications were not current.

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

192.807(a) (192.807(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records - Corrosion Control Performance

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

192.491(a)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.459)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.465(a))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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.CP.MONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.465(c))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.465(d))

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes: Records reviewed from Operator's 2018 Cathodic Protection Survey performed by USDI indicated 12 areas of low Pipe-To-Soil potential readings. Operator could not provide remedial measures taken or planned to be taken to correct.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.491(c) (192.465(e))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.473(a))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.475(a))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.477)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.485(a) (192.485(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

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

192.491(c) (192.485(c))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

Procedures (Distribution Compressor Station) - Compressor Station

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

192.605(b)(6)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.605(b) (192.736(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

192.163(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.163(d)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.163(e)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.167(a)(2)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.167(a)(1)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.167(a)(3)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

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

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.167(a)(4)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.167(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.167(c)(1)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.171(a)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.171(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.171(c)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.171(d)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.171(e)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

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

192.173

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.457(b)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

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

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded? (DC.MO.MAOPLIMIT.O) (detail)*

192.605(b)(5)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

21. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.O) (detail)*

192.605(b)(3)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site? (FS.CS.CMPERP.O) (detail)*

192.605(a) (192.615(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619? (MO.GOMAOP.MAOPRECORDING.O) (detail)*

192.605(b)(1) (192.619(a); 192.619(c))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

24. Placement of ROW Markers (detail) *Are line markers placed and maintained as required? (PD.RW.ROWMARKER.O) (detail)*

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

25. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines? (PD.RW.ROWMARKERABOVE.O) (detail)*

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (FS.CSSYSROT.CMPRELIEF.O) (detail)*

192.199 (192.731(a); 192.731(b); 192.731(c))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.O) (detail)*

192.735(a) (192.735(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings? (FS.CSSYSROT.CMPGASDET.O) (detail)*

192.736(a) (192.736(b))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval? (FS.CSSYSROT.CMPRELIEF.R) (detail)*

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required? (FS.CSSYSROT.CMPGASDETO.M.R) (detail)*

192.709(c) (192.736(c))

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	Valley Gas Inc.	Op ID #	39515
Inspector	Mike Nantz	Unit #	
Date of Inspection	09/12/2019		
Inspection Location City & State	Irvington, KY		
Operator Employee Interviewed	Kerry Kasey	Phone #	270-547-2455
Position/Title	President		
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)	Kerry Kasey		
DER Phone #	270-547-2455		

§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	Consortium: Mann Consulting Services/Nationwide Medical Review			
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.	X		
Comments				
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.	X		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?	X		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.	X		
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks? (TQ.OO.OOPLAN.P) (detail)*

192.805(a) (192.801(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes:

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task? (TQ.OO.REEVALINTERVAL.P) (detail)*

192.805(g)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 6 D Appendix C

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.OO.OOPLANCONTRACTOR.P) (detail)*

192.805(b) (192.805(f); 192.805(c))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 8

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified? (TQ.OO.OOCONTRACTOR.P) (detail)*

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 8

6. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OO.OOCONTRACTOR.R) (detail)*

192.807(a) (192.807(b))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

7. Management of Other Entities Performing Covered Tasks (detail) *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OO.OTHERENTITY.R) (detail)*

192.805(b) (192.805(c); 192.803)

Sat +	Sat	Concern	Unsat	NA	NC
				X	

Notes

8. Evaluation Methods (detail) *Are evaluation methods established and documented appropriate to each covered task? (TQ.OQ.EVALMETHOD.P) (detail)*

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 6-B & Appendix B

9. Evaluation Methods (detail) *Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)*

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

10. Abnormal Operating Conditions (detail) *Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)*

192.803

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section B-1

11. Abnormal Operating Conditions (detail) *Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)*

192.807(a) (192.807(b); 192.803)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section B-1

12. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)*

192.807

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: OQ Section B-1

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition? (TQ.OQ.MERGERACQ.P) (detail)*

192.805(b) (192.803)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?* (TQ.OQ.TRAINING.P) (detail)

192.805(h)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 4.7

16. Covered Task Performed by Non-Qualified Individual (detail) *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?* (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 4.4

17. Personnel Performance Monitoring (detail) *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes

19. Program Performance and Improvement (detail) *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 4.5.3

21. Management of Changes (detail) *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 4.6

22. Notification of Significant Plan Changes (detail) *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Section 4.8

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes: At the time of the inspection all Valley Gas employees' certifications had lapsed. Last certification was in October 2015. 3 year task certifications were due in October 2018.
There were no employees OQ certified to perform a Protocol 9.

2. Qualification Status (detail) *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes

3. Abnormal Operating Condition Recognition and Reaction (detail) *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes

4. Verification of Qualification (detail) *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes

5. Program Inspection Deficiencies (detail) *Have potential issues identified by the headquarters inspection process been corrected at the operational level?* (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	Concern	Unsat	NA	NC
			X		

Notes

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.

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):	Valley Gas Inc.
PHMSA Operator ID:	39515
Type of Operator:	<input type="checkbox"/> Investor Owned <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (Identify - e.g., cooperative)
State(s) included in this inspection	Kentucky
Headquarters Address:	401 First Street Irvington, KY 40146
Company Contact:	Kerry Kasey
Phone Number:	270-668-2234
Email:	igenergy@bbtel.com
Date(s) of Inspection	9/12/2019
Date of this Report	10/02/2019
Date of Current DIMP Plan/Revision	9/13/2019

Persons Interviewed:

Persons Interviewed (list primary contact first)	Title	Phone Number	Email
Kerry Kasey	President	270-668-2234	igenergy@bbtel.com

State/Federal Representatives:

Inspector Name and Agency	Phone Number	Email
Mike Nantz	502-545-2141	Michael.Nantz@ky.gov

System Description Narrative: Privately owned distribution system serving 480 customers. 12 miles of main and services. SHRIMP implemented effective date 08-02-2011

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
192.1005		Issues Identified in previous Integrity Management Inspection(s)				
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
192.1007(a)		Knowledge of the system				
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: <ul style="list-style-type: none"> • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) <ul style="list-style-type: none"> • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
10	.1007 (b)	<p>Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • 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) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator’s consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: <u>Locate</u> the leaks in the distribution system; <u>Evaluate</u> the actual or potential hazards associated with these leaks; <u>Act</u> appropriately to mitigate these hazards; <u>Keep</u> records; and <u>Self-assess</u> to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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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)	<p>Is the operator collecting data for the required performance measures in §192.1007(e)?</p> <p>i) Number of hazardous leaks either eliminated or repaired, categorized by cause? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>ii) Number of excavation damages? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>iii) Number of excavation tickets? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>iv) Total number of leaks either eliminated or repaired, categorized by cause? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>				
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	Periodic Evaluation and Improvement				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: <ul style="list-style-type: none"> • 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? 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Rev 0**

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 modified, deleted or added? (describe in Inspector comments)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1007 (g)	Report results				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1009	What must an operator report when mechanical fittings fail?				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
35	.1009	<p>Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year?</p> <p>Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
36	.1009	<p>Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1011	What records must an operator keep?				
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1013	When may an operator deviate from required periodic inspections under this part?				
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

***PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0***

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	.1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
44	.1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

Additional Inspector Comments:

SUPPLEMENTAL INSPECTION QUESTIONS

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked (U, N/A, or N/C must include an explanation if checked)

SUPPLEMENTAL INSPECTION QUESTIONS		S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS					
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.				X	
	If necessary, was remedial action taken?			X	
Review operator procedures for surveillance of cast iron pipelines				X	
	Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)			X	
Review operator emergency response procedures for leaks caused by excavation damage near buildings.		X			
	Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)	X			
Review operator records of previous accidents and failures (including reported third party damage and leak response) to ensure appropriate operator response as required by 192.617.		X			
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS					
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?		X			
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?		X			
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?		X			
	If no, encourage and promote the adoption of CGA Best Practices document.			X	
Review operators records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617.		X			
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS					
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?			X		
	If yes, what is operator doing to mitigate the safety concerns?			X	
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?				X	
Comments:					

CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
 807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?

Yes	No	NA	NC
	X		

Notes

2. Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.

Yes	No	NA	NC
		X	

Notes

3. Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.

Yes	No	NA	NC
		X	

Notes

4. Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?

Yes	No	NA	NC
		X	

Notes

5. Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.

Yes	No	NA	NC
		X	

Notes

6. Identify personnel with specific responsibilities for cybersecurity within your organization?

Yes	No	NA	NC
		X	

Notes

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Steve Samples	Report Number:	Valley Gas 06232015
Inspection Date(s):	5/28,6/17,23,24,25&26/15	Report Date:	6/29/15
Inspection Type:	<input checked="" type="checkbox"/> Standard Comprehensive <input type="checkbox"/> Integrity Management x Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	Valley Gas	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	21091 ?per valley Gas
Type of Facility:	Private Distribution	Location of Facility:	Irvington, KY.
Area of Operation:	Irvington, KY.		
Official Operator Contact and Address: (Contact for Inspection Letter)		Unit Name and Address	
Kerry Kasey (President, Valley Gas Inc.) P.O. Box 55, 401 First St. Irvington, KY. 40146			
Phone # and Email:	270-547-2455		
Records Location:	401 1 st Street, Irvington, KY.		
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>
Kerry Kasey	President	270-547-2455	igenergy@bbtel.com
Has the Operator provided an updated Emergency Contact List? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Number of Customers:	500		
Number of Gas Employees:	3 office and 7 field employees		
Gas Supplier:	Texas Gas Transmission		
Unaccounted for Gas:	2%		
Services:	Residential 500	Commercial	Industrial 1 Other
Operating Pressure(s):	MAOP (within last year)		Actual Operating Pressure (at time of inspection)
	Feeder:	200 MAOP	150 PSIG
	Town:	60 MAOP	50 PSIG
	Other:		
Does the Operator have any transmission pipeline (above 20% SMYS):			No
Additional Operator Information:			
Operator recently rebuilt main regulator town border station to accommodate new gas consumption for a blacktop plant.			

Date of Last Inspection:	8-18-14		
Number of Deficiencies:	5	Deficiencies not Cleared:	2

Summary of Areas Inspected

PHMSA Question Set

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Emergency Plan | <input checked="" type="checkbox"/> Operations and Maintenance Plan | <input checked="" type="checkbox"/> Critical Valves Maintenance Inspections |
| <input checked="" type="checkbox"/> Cathodic Protection | <input type="checkbox"/> Accidents | <input checked="" type="checkbox"/> Leak Surveys |
| <input checked="" type="checkbox"/> Odorization | <input checked="" type="checkbox"/> Operator Qualification | <input checked="" type="checkbox"/> Damage Prevention |
| <input checked="" type="checkbox"/> Pipeline Markers | <input type="checkbox"/> Regulator Stations | <input checked="" type="checkbox"/> DIMP |
| <input checked="" type="checkbox"/> Field Inspection | <input type="checkbox"/> Other | |

Other:

State Question Set

- | | |
|---|--------------------------------|
| <input checked="" type="checkbox"/> Cybersecurity | <input type="checkbox"/> Other |
|---|--------------------------------|

Other:

Summary

On May 28, and June 17,23,24,25&26, 2015 a standard periodic inspection was conducted on the Valley Gas System. The last inspection was a standard inspection on August 19, 2014 and resulted in 5 deficiencies. Two previous deficiencies are still outstanding from the previous 2014 inspection, #2 – some OQ task evaluations were not completed and # 3 – the 2 regulator inspections were not completed(#2 and #5 of this inspection). The piping system consists of 4” and under coated steel and plastic piping with pressures ranging from 50 to 150 PSIG. Valley Gas has 1 point of delivery from Texas Gas Transmission.

The Operating and Maintenance, Emergency, Damage Prevention, Operator Qualification, Drug and Alcohol, Distribution Integrity Management, and Public Awareness Plans were reviewed during the office visit. Also inspected were samples of 2013, 2014, and 2015 records pertaining to leakage surveys and repairs, valve inspections, patrolling, corrosion control, regulator inspections, pressure recordings, distribution integrity management, public awareness, and odorant verifications. The field portion of the inspection consisted of inspecting town border regulator settings, pipeline markers, mainline valve locations, and meter installations. Also inspected the point of delivery from Texas Gas Transmission and checked several corrosion control test points to verify corrosion records.

Probable Findings

- (1) 191.11(a) – Valley Gas did not submit the annual distribution system report (DOT Form PHMSA F 7100.1-1) by March 15th for the 2014 report year.
- (2) 192.805(b) – Valley Gas Operator Qualification plan has 4 tasks employees are still overdue to be qualified. (I-1A, M-4, M-5a, and M-10).
- (3) 192.225(b) – Valley Gas does not have welding procedures to be followed during welding processes on their system.
- (4) 192.203b(9) – Valley Gas new town border station control lines was not designed to prevent damage to any one control line from making both the regulator and the over-pressure protective device inoperative.
- (5) 192.739(a) – Valley Gas has not inspected the Landowell Rd. or the Town Border Station regulators as required each calendar year.
- (6) 192.465(d) – Valley Gas corrosion records indicate low readings below -.85 that require remedial action at the Pasco and Perks test points.

Recommendations and Comments

Valley Gas should correct the stated deficiencies in a timely manner.

Submitted By:

Steve

Inspector

Utility Regulatory and Safety Investigator IV

Samples Steve Samples

(date)6/29/15

Procedures - Reporting

*** 1. Immediate Reporting: Incidents (detail)** *Is there a process to immediately report incidents to the National Response Center? (RPT.RR.IMMEDREPORT.P) (detail)*

191.5(b) (191.7)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Process in O & M plan.

*** 2. Incident Reports (detail)** *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident? (RPT.RR.INCIDENTREPORT.P) (detail)*

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Supplemental Incident Reports (detail) *Does the process require preparation and filing of supplemental incident reports? (RPT.RR.INCIDENTREPORTSUPP.P) (detail)*

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 4. National Registry of Pipeline and LNG Operators (OPID) (detail)** *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs)? (RPT.RR.OPID.P) (detail)*

191.22

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Safety Related Condition Reports (detail) *Do the procedures require reporting of safety-related conditions? (RPT.RR.SRCR.P) (detail)*

192.605(a) (191.23(a); 191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Offshore Pipeline Condition Reports (detail) *Does the process require reports to be submitted within 60 days after completing inspection of underwater pipelines in GOM and its inlets? (RPT.RR.OPCR.P) (detail)*

191.27(a) (191.27(b); 192.612(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

7. Safety Related Conditions (detail) *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions? (MO.GO.SRC.P) (detail)*

192.605(d)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
Found new town border regulator station with a concern during the field checks with the design of the control lines. 192.203b(9). See findings #4.

Procedures - Customer and EFV Installation Notification

1. Customer Notification (detail) *Is a customer notification process in place that satisfies the requirements of 192.16? (MO.GO.CUSTNOTIFY.P) (detail)*

192.13(c) (192.16(a); 192.16(b); 192.16(c); 192.16(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. EFV Installation (detail) *Is there an adequate excess flow valve (EFV) installation and performance program in place? (MO.GO.EFVINSTALL.P) (detail)*

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Normal Operating And Maintenance

1. Normal Maintenance and Operations (detail) *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year? (MO.GO.OMANNUALREVIEW.P) (detail)*

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Normal Operations and Maintenance Procedures - History (detail) *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.P) (detail)*

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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3. Normal Operations and Maintenance Procedures (detail) *Does the process include procedures for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices? (MO.GOMAOP.MAOPLIMIT.P) (detail)*

192.605(a) (192.605(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Normal Operations and Maintenance Procedures - Review (detail) *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.P) (detail)*

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Safety While Making Repairs (detail) *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property? (AR.RMP.SAFETY.P) (detail)*

192.605(b)(9) (192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Holders (detail) *Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders? (MO.GM.HOLDER.P) (detail)*

192.605(a) (192.605(b)(10))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Gas Odor Response (detail) *Does the process require prompt response to the report of a gas odor inside or near a building? (MO.GO.ODDOR.P) (detail)*

192.605(a) (192.605(b)(11))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Change In Class Location

1. Change in Class Location Required Study (detail) *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS? (MO.GOCLASS.CLASSLOCATESTUDY.P) (detail)*

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c);
192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 2. Change in Class Location Confirmation or Revision of MAOP (detail)** *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location? (MO.GOCLASS.CLASSLOCATEREV.P) (detail)*

192.605(b)(1) (192.611(a); 192.611(b); 192.611(c);
192.611(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Continuing Surveillance

1. Continuing Surveillance (detail) *Does the process include procedures for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists? (MO.GO.CONTSURVEILLANCE.P) (detail)*

192.605(e) (192.613(a); 192.613(b); 192.703(b); 192.703(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Damage Prevention Program

1. Damage Prevention Program (detail) *Is a damage prevention program approved and in place? (PD.OC.PDPROGRAM.P) (detail)*

192.614(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Emergency

1. Receiving Notices (detail) *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response? (EP.ERG.NOTICES.P) (detail)*

192.615(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Emergency Response Communication (detail) *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials? (EP.ERG.COMMSYS.P) (detail)*

192.615(a) (192.615(a)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

*** 3. Emergency Response (detail)** *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster? (EP.ERG.RESPONSE.P) (detail)*

192.615(a) (192.615(a)(3)); 192.615(a)(11); 192.615(b)(1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Emergency Response (detail) *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency? (EP.ERG.READINESS.P) (detail)*

192.615(a) (192.615(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Emergency Response - Actions (detail) *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property? (EP.ERG.PUBLICPRIORITY.P) (detail)*

192.615(a) (192.615(a)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Emergency Response (detail) *Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property? (EP.ERG.PRESSREDUCESD.P) (detail)*

192.615(a) (192.615(a)(6))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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7. Emergency Response - Hazards (detail) *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property? (EP.ERG.PUBLICHAZ.P) (detail)*

192.605(a) (192.615(a)(7))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Public Official Notification (detail) *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency? (EP.ERG.AUTHORITIES.P) (detail)*

192.615(a) (192.615(a)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Service Outage Restoration (detail) *Does the emergency plan include procedures for safely restoring any service outage? (EP.ERG.OUTAGERESTORE.P) (detail)*

192.615(a) (192.615(a)(9))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Incident Investigation Actions (detail) *Does the process include procedures for beginning action under §192.617, if applicable, as soon after the end of the emergency as possible? (EP.ERG.INCIDENTACTIONS.P) (detail)*

192.615(a) (192.615(a)(10))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Emergency Response Training (detail) *Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective? (EP.ERG.TRAINING.P) (detail)*

192.615(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Emergency Response Performance (detail) *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVENTREVIEW.P) (detail)*

192.615(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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13. Liaison with Public Officials (detail) *Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners? (EP.ERG.LIAISON.P) (detail)*

192.615(c) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Public Awareness Program

1. Public Education Program (detail) *Has the continuing public education (awareness) program been established as required? (PD.PA.PROGRAM.P) (detail)*

192.616(a) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Management Support of Public Awareness Program (detail) *Does the operator's program documentation demonstrate management support? (PD.PA.MGMTSUPPORT.P) (detail)*

192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Asset Identification (detail) *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each? (PD.PA.ASSETS.P) (detail)*

192.616(b) (API RP 1162 Section 2.7 Step 4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Audience Identification (detail) *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents? (PD.PA.AUDIENCEID.P) (detail)*

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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5. Messages, Delivery Methods, and Frequencies (detail) *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?* (PD.PA.MESSAGES.P) (detail)

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Consideration of Supplemental Enhancements (detail) *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?* (PD.PA.SUPPLEMENTAL.P) (detail)

192.616(c) (API RP 1162 Section 6.2)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Other Languages (detail) *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?* (PD.PA.LANGUAGE.P) (detail)

192.616(g) (API RP 1162 Section 2.3.1)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Evaluation Plan (detail) *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?* (PD.PA.EVALPLAN.P) (detail)

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Master Meter and Petroleum Gas Systems (detail) *Does the master meter or petroleum gas system operator's process meet the requirements of 192.616(j)?* (PD.PA.MSTRMETER.P) (detail)

192.616(j) (192.616(h))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Failure Investigation

1. Incident Investigation (detail) *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence? (EP.ERG.INCIDENTANALYSIS.P) (detail)*

192.617

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - MAOP

1. Maximum Allowable Operating pressure Determination (detail) *Does the process include procedures for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619? (MO.GOMAOP.MAOPDETERMINE.P) (detail)*

192.605(b)(1) (192.619(a); 192.619(b); 192.621(a); 192.621(b); 192.623(a); 192.623(b))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pressure Test

1. Test Acceptance Criteria and Procedures (detail) *Were test acceptance criteria and procedures sufficient to assure the basis for an acceptable pressure test? (AR.PTI.PRESSTESTACCEP.P) (detail)*

192.503(a) (192.503(b); 192.503(c); 192.503(d); 192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e); 192.507(a); 192.507(b); 192.507(c))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Odorization Of Gas

1. Odorization of Gas (detail) *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with §192.625? (MO.GOODOR.ODORIZE.P) (detail)*

192.605(b)(1) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Tapping Pipelines Under Pressure

1. Tapping Pipelines Under Pressure (detail) *Is the process adequate for tapping pipelines under pressure?*

(AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Qualification of Personnel Tapping Pipelines under Pressure (detail) *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?* (TQ.QU.HOTTAPQUAL.P) (detail)

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pipeline Purging

1. Pipeline Purging (detail) *Does the process include requirements for purging of pipelines in accordance with 192.629?*

(MO.GOODOR.PURGE.P) (detail)

192.605(b)(1) (192.629(a); 192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures – Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

1. Patrolling Requirements (detail) *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?* (PD.RW.PATROL.P) (detail)

192.705(a) (192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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2. Leakage Surveys (detail) *Does the process require leakage surveys to be conducted?* (PD.RW.LEAKAGE.P) (detail)

192.706 (192.706(a); 192.706(b))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Distribution System Patrolling & Leakage Survey

1. Distribution System Leakage Surveys (detail) *Does the process require distribution system patrolling and leakage surveys to be conducted?* (PD.RW.DISTLEAKAGE.P) (detail)

192.721 (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Line Marker

1. ROW Markers Requirements (detail) *Does the process adequately cover the requirements for placement of ROW markers?* (PD.RW.ROWMARKER.P) (detail)

192.707(a) (192.707(b); 192.707(c); 192.707(d); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Transmission Record Keeping

1. Transmission Lines Record Keeping (detail) *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?* (MO.GM.RECORDS.P) (detail)

192.605(b)(1) (192.709(a); 192.709(b); 192.709(c); 192.743(f))

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes
No Transmission

Procedures - Transmission Field Repair

1. Transmission Lines Permanent Field Repair of Defects (detail) *Is the process adequate for the permanent field repair of defects in transmission lines?* (AR.RMP.FIELDREPAIRDEFECT.P) (detail)

192.605(b)(1) (192.713(a); 192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Transmission Lines Permanent Field Repair of Welds (detail) *Is the process adequate for the permanent field repair of welds?* (AR.RMP.FIELDREPAIRWELDS.P) (detail)

192.605(b) (192.715(a); 192.715(b); 192.715(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Transmission Lines Permanent Field Repair of Leaks (detail) *Is there an adequate process for the permanent field repair of leaks on transmission lines?* (AR.RMP.FIELDREPAIRLEAK.P) (detail)

192.605(b) (192.717(a); 192.717(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Transmission Lines Testing of Repairs (detail) *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTTEST.P) (detail)

192.605(b) (197.719(a); 197.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Test Requirements For Reinstating Service Lines

1. Test Reinstated Service Lines (detail) *Is the process adequate for the testing of disconnected service lines?* (AR.RMP.TESTREINSTATE.P) (detail)

192.605(b) (197.725(a); 197.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Abandonment Or Deactivation Of Facilities

1. Abandonment or Deactivation of Pipe and Facilities (detail) *Does the process include procedures for the abandonment and deactivation of pipelines that are in accordance with 192.727? (MO.GM.ABANDONPIPE.P) (detail)*

192.605(b)(1) (192.727(a); 192.727(b); 192.727(c);
192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Pressure Limiting And Regulating Station

1. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment at intervals not exceeding 15 months, but at least once each calendar year as required? (MO.GMOPP.PRESSREGTEST.P) (detail)*

192.605(b)(1) (192.739(a); 192.739(b))

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes
No records for the Landowell Rd. and the Town Border annual regulator inspections

2. Pressure Telemetry or Recording Gauges (detail) *Does the process require telemetry or recording gauges be utilized as required for distribution systems? (MO.GMOPP.PRESSREGMETER.P) (detail)*

192.605(b)(1) (192.741(a); 192.741(b); 192.741(c))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Does the process include procedures for ensuring, either by testing or a review of calculations, at intervals not exceeding 15 months, but at least once each calendar year, that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations has sufficient capacity, and for installing a new or additional device if a relief device is determined to have insufficient capacity? (MO.GMOPP.PRESSREGCAP.P) (detail)*

192.605(b)(1) (192.743(a); 192.743(b); 192.743(c))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Valve And Vault Maintenance

1. Valve Maintenance Transmission Lines (detail) *Does the process include procedures for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.VALVEINSPECT.P) (detail)

192.605(b)(1) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Valve Maintenance Distribution Lines (detail) *Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.DISTVALVEINSPECT.P) (detail)

192.605(b)(1) (192.747(a); 192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Vault Inspection

1. Vault Inspection (detail) *Does the process provide adequate direction for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment and are inspections to be performed at the required interval?* (FS.FG.VAULTINSPECTFAC.P) (detail)

192.605(b)(1) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No Vaults

Procedures - Prevention Of Accidental Ignition

1. Prevention of Accidental Ignition (detail) *Does the manual include procedures for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?* (MO.GM.IGNITION.P) (detail)

192.605(b)(1) (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Caulked Bell And Spigot Joints

1. Bell and Spigot Joints (detail) *Does the process require that caulked bell and spigot joints be correctly sealed?*
(MO.GM.BELLSPIGOTJOINT.P) (detail)

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No cast Iron (Per Operator)

Procedures - Protecting Cast-Iron Pipeline

1. Protecting Cast-Iron Pipeline (detail) *Does the process require adequate protection for segments of a buried cast-iron pipeline for which support has been disturbed?* (MO.GM.CASTIRONPROTECT.P) (detail)

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Welding And Weld Defect Repair/Removal

1. Welding Procedures (detail) *Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?*
(DC.WELDPROCEDURE.WELD.P) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

New construction using RussMar contract welders. Valley Gas does not have Welding Procedures to be used during this process.

*** 2. Qualification of Welders (detail)** *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?* (TQ.QUOMCONST.WELDER.P) (detail)

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

No procedures.

3. Qualification of Welders for Low Stress Pipe (detail) *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*
(TQ.QUOMCONST.WELDERLOWSTRESS.P) (detail)

192.227(b) (192.225(a); 192.225(b); 192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

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4. Limitations on Welders (detail) *Does the process require certain limitations be placed on welders?*
(DC.WELDERQUAL.WELDERLIMITNDT.P) (detail)

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

5. Welding Weather (detail) *Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld?* (DC.WELDPROCEDURE.WELDWEATHER.P) (detail)

192.303 (192.231)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

6. Miter joints (detail) *Does the process prohibit the use of certain miter joints?* (DC.WELDPROCEDURE.MITERJOINT.P) (detail)

192.303 (192.233(a); 192.233(b); 192.233(c))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

7. Preparation for Welding (detail) *Does the process require certain preparations for welding, in accordance with §192.235?* (DC.WELDPROCEDURE.WELDPREP.P) (detail)

192.303 (192.235)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

8. Inspection and Test of Welds (detail) *Does the process require visual inspections of welds to be conducted by qualified inspectors?* (DC.WELDINSPECTOR.WELDVISUALQUAL.P) (detail)

192.303 (192.241(a); 192.241(b); 192.241(c))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

9. Repair or Removal of Weld Defects (detail) *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?* (DC.WELDINSPECTOR.WELDREPAIR.P) (detail)

192.303 (192.245(a); 192.245(b); 192.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

Procedures - Nondestructive Testing

1. Nondestructive Test and Interpretation Procedures (detail) *Is there a process for nondestructive testing and interpretation?* (DC.WELDINS.P.WELDNDT.P) (detail)

192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243(e).)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

Procedures - Joining Of Pipeline Materials

1. Plastic Pipe Joints (detail) *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?* (DC.CO.PLASTICJOINT.P) (detail)

192.303 (192.273(b); 192.281(a); 192.281(b); 192.281(c); 192.281(d); 192.281(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Plastic pipe - Qualifying Joining Procedures (detail) *Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints?* (DC.CO.PLASTICJOINTPROCEDURE.P) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Plastic pipe - Qualifying Joining Procedures (detail) *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?* (DC.CO.PLASTICJOINTQUAL.P) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.805)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?* (DC.CO.PLASTICJOINTINS.P) (detail)

192.287 (192.805(h))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures - Corrosion Control

1. Corrosion Control Personnel Qualification (detail) *Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel? (TQ.QU.CORROSION.P) (detail)*

192.453 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. New Buried Pipe Coating (detail) *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)? (TD.COAT.NEWPIPE.P) (detail)*

192.605(b)(2) (192.455(a); 192.461; 192.463; 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Conversion to Service - Pipe Coating (detail) *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)? (TD.COAT.CONVERTPIPE.P) (detail)*

192.605(b)(2) (192.452(a); 192.455(a); 192.455(b); 192.461(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Cathodic Protection post July 1971 (detail) *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.P) (detail)*

192.605(b)(2) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Use of Aluminum (detail) *Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline? (TD.CP.ALUMINUM.P) (detail)*

192.605(b)(2) (192.455(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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6. Cathodic Protection pre August 1971 (detail) *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.P) (detail)*

192.605(b)(2) (192.457(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Examination of Exposed Portions of Buried Pipe (detail) *Does the process require that exposed portions of buried pipeline must be examined for external corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.P) (detail)*

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Further Examination of Exposed Portions of Buried Pipe (detail) *Does the process require further examination of exposed buried pipe if corrosion is found? (TD.CPEXPOSED.EXPOSECORRODE.P) (detail)*

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Cathodic Protection Monitoring Criteria (detail) *Does the process require CP monitoring criteria to be used that is acceptable? (TD.CPEXPOSED.MONITORCRITERIA.P) (detail)*

192.605(b)(2) (192.463(a); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Cathodic Protection of Amphoteric Metals (detail) *Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline? (TD.CP.AMPHOTERIC.P) (detail)*

192.605(b)(2) (192.463(b); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
2 test points in the downtown Irvington area (Pasco and Perks) test stations records indicated 2 years readings below -.85, also took several field checks in the downtown area to confirm.

11. Cathodic Protection Monitoring (detail) *Does the process adequately describe how to monitor CP that has been applied to pipelines? (TD.CP.MONITOR.TEST.P) (detail)*

192.605(b)(2) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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12. Rectifiers or other Impressed Current Sources (detail) *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?* (TD.CPMONITOR.CURRENTTEST.P) (detail)

192.605(b)(2) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Bonds, Diodes and Reverse Current Switches (detail) *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?* (TD.CPMONITOR.REVCURRENTTEST.P) (detail)

192.605(b)(2) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Correction of Corrosion Control Deficiencies (detail) *Does the process require that the operator correct any identified deficiencies in corrosion control?* (TD.CPMONITOR.DEFICIENCY.P) (detail)

192.605(b)(2) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?* (TD.CP.UNPROTECT.P) (detail)

192.605(b)(2) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No bare pipe.

16. Isolation from Other Metallic Structures (detail) *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?* (TD.CP.ELECISOLATE.P) (detail)

192.605(b)(2) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Test Leads Installation (detail) *Does the process provide adequate instructions for the installation of test leads?* (TD.CPMONITOR.TESTLEAD.P) (detail)

192.605(b)(2) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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18. Interference Currents (detail) *Does the process give sufficient guidance and detail for identifying areas of potential stray current so the detrimental effects of stray currents can be minimized through a continuing program?* (TD.CPMONITOR.INTFRCURRENT.P) (detail)

192.605(b)(2) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

19. Internal Corrosion (detail) *If the process does not preclude corrosive gas to be transported by pipeline, does the process also require that the corrosive effect of the gas on the pipeline be investigated and steps be taken to minimize internal corrosion?* (TD.ICP.CORRGAS.P) (detail)

192.605(b)(2) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

20. Internal Corrosion in Cutout Pipe (detail) *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?* (TD.ICP.EXAMINE.P) (detail)

192.605(b)(2) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

21. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of §192.476?* (DC.DPC.INTCORRODE.P) (detail)

192.453 (192.476(a); 192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

22. Internal Corrosion Corrosive Gas Actions (detail) *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.P) (detail)

192.605(b)(2) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

23. Atmospheric Corrosion (detail) *Does the process give adequate guidance for protecting above ground pipe from atmospheric corrosion?* (TD.ATM.ATMCORRODE.P) (detail)

192.605(b)(2) (192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

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24. Atmospheric Corrosion Monitoring (detail) *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.P) (detail)*

192.605(b)(2) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

25. Repair of Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall? (AR.RCOM.REPAIR.P) (detail)*

192.491(c) (192.485(a); 192.485(b); 192.487(a); 192.487(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

26. Evaluation of Internally Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded? (TD.ICP.EVALUATE.P) (detail)*

192.605(b)(2) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

27. Graphitization of Cast Iron and Ductile Iron (detail) *Does the process give adequate guidance for remediation of graphitization of cast iron or ductile iron pipe? (TD.CP.GRAPHITIZE.P) (detail)*

192.605(b)(2) (192.489(a); 192.489(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

28. Corrosion Control Records (detail) *Does the process include records requirements for the corrosion control activities listed in 192.491? (TD.CP.RECORDS.P) (detail)*

192.605(b)(2) (192.491(a); 192.491(b); 192.491(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Field Review - Pipeline Inspection (Field)

1. Transmission Line Valve Spacing (detail) *Are transmission line valves being installed as required of 192.179? (DC.DPC.VALVESPACE.O) (detail)*

192.141 (192.179(a); 192.179(b); 192.179(c); 192.179(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

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2. Cathodic Protection Monitoring Criteria (detail) *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?* (TD.CPMONITOR.MONITORCRITERIA.O) (detail)

192.463(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Rectifier or other Impressed Current Sources (detail) *Are impressed current sources properly maintained and are they functioning properly?* (TD.CPMONITOR.CURRENTTEST.O) (detail)

192.465(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the transmission project's design and construction comply with 192.476?* (DC.DPC.INTCORRODE.O) (detail)

192.476(a) (192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected?* (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Normal Operations and Maintenance Procedures - Review (detail) *Are operator personnel knowledgeable of the procedures used in normal operations?* (MO.GO.OMEFFECTREVIEW.O) (detail)

192.605(b)(8)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?* (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines? (PD.RW.ROWMARKERABOVE.O) (detail)*

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Transmission Lines Testing of Repairs (detail) *Does the operator properly test replacement pipe and repairs made by welding on transmission lines? (AR.RMP.WELDTTEST.O) (detail)*

192.719(a) (192.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Pressure Telemetry or Recording Gauges (detail) *Are telemetry or recording gauges properly utilized as required for distribution systems? (MO.GMOPP.PRESSREGMETER.O) (detail)*

192.741(a) (192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate? (MO.GMOPP.PRESSREGTEST.O) (detail)*

192.739(a) (192.739(b); 192.743)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
2 regulator stations have not been inspected in 2014.

12. Valve Maintenance Transmission Lines (detail) *Are field inspection and partial operation of transmission line valves adequate? (MO.GM.VALVEINSPECT.O) (detail)*

192.745(a) (192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Prevention of Accidental Ignition (detail) *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition. (AR.RMP.IGNITION.O) (detail)*

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Records - Regulatory Reporting Performance

1. Immediate Reporting: Incidents (detail) *Do records indicate immediate notifications of incidents were made in accordance with 191.5? (RPT.RR.IMMEDREPORT.R) (detail)*

191.5(a) (191.7(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
None to report

2. Incident Reports (detail) *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe? (RPT.RR.INCIDENTREPORT.R) (detail)*

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Supplemental Incident Reports (detail) *Do records indicate accurate supplemental incident reports were filed and within the required timeframe? (RPT.RR.INCIDENTREPORTSUPP.R) (detail)*

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Annual Report Records (detail) *Have complete and accurate Annual Reports been submitted? (RPT.RR.ANNUALREPORT.R) (detail)*

191.17(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

191.11(a)—Distribution Annual Report—DOT Form PHMSA F 7100.1-1—Valley Gas could not produce records the 7100 form had been submitted for 2014. (They had filled out an old form to submit to SHRIMP for distribution integrity management , but no fillings to PHMSA.)

5. Safety Related Condition Reports (detail) *Do records indicate safety-related condition reports were filed as required? (RPT.RR.SRCR.R) (detail)*

191.23(a) (191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Customer Notification (detail) *Do records indicate the customer notification process satisfies the requirements of 192.16? (MO.GO.CUSTNOTIFY.R) (detail)*

192.16(d) (192.16(a); 192.16(b); 192.16(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

7. NPMS: Abandoned Underwater Facility Reports (detail) *Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? (RPT.RR.NPMSABANDONWATER.R) (detail)*

192.727(g)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Construction Performance

1. Welding Procedures (detail) *Do records indicate weld procedures are being qualified in accordance with 192.225? (DC.WELDPROCEDURE.WELD.R) (detail)*

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
No welding procedures.

2. Qualification of Welders (detail) *Do records indicate adequate qualification of welders? (TQ.QUOMCONST.WELDER.R) (detail)*

192.227(a) (192.227(b); 192.229(a); 192.229(b); 192.229(c); 192.229(d); 192.328(a); 192.328(b); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Using RussMar contract welders.

3. Inspection and Test of Welds (detail) *Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)? (DC.WELDINSPECTION.WELDVISUALQUAL.R) (detail)*

192.241(a) (192.241(b); 192.241(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

4. Qualification of Nondestructive Testing Personnel (detail) *Do records indicate the qualification of nondestructive testing personnel? (TQ.QUOMCONST.NDT.R) (detail)*

192.243(b)(2) (192.807(a); 192.807(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

PHMSA Form 2 Question Set (IA Equivalent)
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5. Nondestructive Test and Interpretation Procedures (detail) *Do records indicate that NDT implementation is adequate?* (DC.WELDINSP.WELDNDT.R) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

6. Transmission Lines Record Keeping (detail) *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?* (MO.GM.RECORDS.R) (detail)

192.605(b)(1) (192.243(f); 192.709(a); 192.709(b); 192.709(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Plastic pipe - Qualifying Joining Procedures (detail) *Have plastic pipe joining procedures been qualified in accordance with 192.283?* (DC.CO.PLASTICJOINTPROCEDURE.R) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Plastic pipe - Qualifying Joining Procedures (detail) *Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?* (DC.CO.PLASTICJOINTQUAL.R) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?* (DC.CO.PLASTICJOINTINSPE.R) (detail)

192.287 (192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Underground Clearance (detail) *Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe?* (DC.CO.CLEAR.R) (detail)

192.325(a) (192.325(b); 192.325(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
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11. Depth of Cover - Onshore (detail) *Is onshore piping minimum cover as specified in 192.327? (DC.CO.COVER.R) (detail)*

192.327(a) (192.327(b); 192.327(c), 192.327(d); 192.327(e))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

12. EFV Installation (detail) *Do records indicate the EFV program satisfies the requirements for installation and performance? (MO.GO.EFVINSTALL.R) (detail)*

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

13. Cathodic Protection post July 1971 (detail) *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.R) (detail)*

192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

Records - Operations And Maintenance Performance

1. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with 192.505? (DC.PT.PRESSTESTHIGHSTRESS.R) (detail)*

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes
Nothing tested > 30%.

2. Strength Test Duration Requirements for SMYS < 30% (detail) *Do records indicate that pressure testing is conducted in accordance with 192.507? (DC.PT.LOWPRESS.PRESSTESTLOWSTRESS.R) (detail)*

192.517(a) (192.507(a); 192.507(b); 192.507(c))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

3. Strength Test Requirements for Operations < 100 psig (detail) *Do records indicate that pressure testing is conducted in accordance with 192.509(a)?* (DC.PT.LOWPRESS.PRESSTEST100PSIG.R) (detail)

192.517(a) (192.509(a); 192.509(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Test Requirements for Plastic Pipe (detail) *Do records indicate that pressure testing is conducted in accordance with 192.513?* (DC.PT.PRESSTESTPLASTIC.R) (detail)

192.517(a) (192.513(a); 192.513(b); 192.513(c); 192.513(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Normal Maintenance and Operations (detail) *Has the operator conducted annual reviews of the written procedures in the manual as required?* (MO.GO.OMANNUALREVIEW.R) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.R) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Normal Operations and Maintenance Procedures - Review (detail) *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found?* (MO.GO.OMEFFECTREVIEW.R) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Abnormal Operations (Review) (detail) *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation procedures and corrective action taken where deficiencies are found?* (MO.GO.ABNORMAL.ABNORMALREVIEW.R) (detail)

192.605(a) (192.605(c)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
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9. Damage Prevention Program (detail) *Does the damage prevention program meet minimum requirements specified in 192.614(c)? (PD.OC.PDPROGRAM.R) (detail)*

192.614(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Change in Class Location Required Study (detail) *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? (MO.GOCLASS.CLASSLOCATESTUDY.R) (detail)*

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Emergency Response Performance (detail) *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVTREVIEW.R) (detail)*

192.605(a) (192.615(b)(1); 192.615(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Emergency Response Training (detail) *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures? (EP.ERG.TRAINING.R) (detail)*

192.605(a) (192.615(b)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Liaison with Public Officials (detail) *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures? (EP.ERG.LIAISON.R) (detail)*

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Incident Investigation (detail) *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures? (EP.ERG.INCIDENTANALYSIS.R) (detail)*

192.605(a) (192.617)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
No incidents to investigate.

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

15. General - Testing Requirements (detail) *Do records indicate that pressure testing is conducted in accordance with 192.503? (DC.PT.PRESSTEST.R) (detail)*

192.503(a) (192.503(b); 192.503(c); 192.503(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. Audience Identification Records (detail) *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages? (PD.PA.AUDIENECID.R) (detail)*

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2;
API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Educational Provisions (detail) *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event? (PD.PA.EDUCATE.R) (detail)*

192.616(d) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

18. Maximum Allowable Operating pressure (detail) *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required? (MO.GOMAOP.MAOPDETERMINE.R) (detail)*

192.709 (192.619; 192.621; 192.623)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

19. Messages on Pipeline Facility Locations (detail) *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations? (PD.PA.LOCATIONMESSAGE.R) (detail)*

192.616(e) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

20. Odorization of Gas (detail) Do records indicate appropriate odorization of its combustible gases in accordance with its procedures and conduct of the required testing to verify odorant levels met requirements? (MO.GOODOR.ODORIZE.R) (detail)

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

21. Baseline Message Delivery Frequency (detail) Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3? (PD.PA.MESSAGEFREQUENCY.R) (detail)

192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

22. Patrolling Requirements (detail) Do records indicate that ROW surface conditions have been patrolled as required? (PD.RW.PATROL.R) (detail)

192.709(c) (192.705(a); 192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

23. Liaison with Emergency and Other Public Officials (detail) Have liaisons been established and maintained with appropriate fire, police, and other public officials? (PD.PA.LIAISON.R) (detail)

192.616(c) (API RP 1162 Section 4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

24. Leakage Surveys (detail) Do records indicate leakage surveys conducted as required? (PD.RW.LEAKAGE.R) (detail)

192.709(c) (192.706; 192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

25. Other Languages (detail) Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas? (PD.PA.LANGUAGE.R) (detail)

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

26. Distribution Leakage Surveys (detail) *Do records indicate distribution leakage surveys were conducted as required?* (PD.RW.DISTLEAKAGE.R) (detail)

192.603(b) (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

27. Test Reinstated Service Lines (detail) *From the review of records, did the operator properly test disconnected service lines?* (AR.RMP.TESTREINSTATE.R) (detail)

192.603(b) (192.725(a), 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

28. Evaluate Program Implementation (detail) *Has an audit or review of the operator's program implementation been performed annually since the program was developed?* (PD.PA.EVALIMPL.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

29. Acceptable Methods for Program Implementation Audits (detail) *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?* (PD.PA.AUDITMETHODS.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

30. Abandonment or Deactivation of Pipeline and Facilities (detail) *Do records indicate pipelines were abandoned or deactivated as required?* (MO.GM.ABANDONPIPE.R) (detail)

192.709(c) (192.727(a); 192.727(b); 192.727(c); 192.727(d);
192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

31. Program Changes and Improvements (detail) *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?* (PD.PA.PROGRAMIMPROVE.R) (detail)

192.616(c) (API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

32. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals? (MO.GMOPP.PRESSREGTEST.R) (detail)*

192.709(c) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

33. Evaluating Program Effectiveness (detail) *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program? (PD.PA.EVALEFFECTIVENESS.R) (detail)*

192.616(c) (API RP 1162 Section 8.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

34. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity? (MO.GMOPP.PRESSREGCAP.R) (detail)*

192.709(c) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

35. Measure Program Outreach (detail) *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked? (PD.PA.MEASUREOUTREACH.R) (detail)*

192.616(c) (API RP 1162 Section 8.4.1)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

36. Valve Maintenance Transmission Lines (detail) *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary? (MO.GM.VALVEINSPECT.R) (detail)*

192.709(c) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

37. Measure Understandability of Message Content (detail) *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined? (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)*

192.616(c) (API RP 1162 Section 8.4.2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

38. Valve Maintenance Distribution Lines (detail) Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable? (MO.GM.DISTVALVEINSPECT.R) (detail)

192.603(b) (192.747)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

39. Vault Inspection (detail) Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? (FS.FG.VAULTINSPECTFAC.R) (detail)

192.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

40. Measure Desired Stakeholder Behavior (detail) In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited? (PD.PA.MEASUREBEHAVIOR.R) (detail)

192.616(c) (API RP 1162 Section 8.4.3)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

41. Prevention of Accidental Ignition (detail) Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? (MO.GM.IGNITION.R) (detail)

192.709 (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

42. Measure Bottom-Line Results (detail) Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? (PD.PA.MEASUREBOTTOM.R) (detail)

192.616(c) (API RP 1162 Section 8.4.4)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

43. Bell and Spigot Joints (detail) Do records indicate that caulked bell and spigot joints were correctly sealed? (MO.GM.BELLSPIGOTJOINT.R) (detail)

192.603(b) (192.753(a); 192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

44. Program Changes (detail) *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?* (PD.PA.CHANGES.R) (detail)

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

45. Master Meter and Petroleum Gas Systems (detail) *Do records indicate the master meter or petroleum gas system operator has met the requirements of 192.616(j)?* (PD.PA.MSTRMETER.R) (detail)

192.616(j) (192.616(h); API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Operator Qualification

1. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?* (TQ.OO.RECORDS.R) (detail)

192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Arc Randall contractors provided training. 4 tasks per OQ plan still not up to date. Corrosion, M-4, M-5a, and M-10. All other tasks were completed.

2. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OO.OOCONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Russmar contractors used for construction projects for new blacktop plant.

Records - Corrosion Control Performance

1. Corrosion Control Records (detail) *Do records indicate the location of all items listed in 192.491(a)?* (TD.CP.RECORDS.R) (detail)

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

2. Examination of Exposed Portions of Buried Pipe (detail) *Do records adequately document that exposed buried piping was examined for corrosion?* (TD.CPEXPOSED.EXPOSEINSPECT.R) (detail)

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Cathodic Protection Monitoring (detail) *Do records adequately document cathodic protection monitoring tests have occurred as required?* (TD.CPMONITOR.TEST.R) (detail)

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Rectifier or other Impressed Current Sources (detail) *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?* (TD.CPMONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Bonds, Diodes and Reverse Current Switches (detail) *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?* (TD.CPMONITOR.REVCURRENTTEST.R) (detail)

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Correction of Corrosion Control Deficiencies (detail) *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?* (TD.CPMONITOR.DEFICIENCY.R) (detail)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
2 test points with low readings 2 years in a row.

7. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?* (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Isolation from Other Metallic Structures (detail) Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECISOLATE.R) (detail)

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Test Leads Installation (detail) Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (TD.CP.MONITOR.TESTLEAD.R) (detail)

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Interference Currents (detail) Do records document that the operator has minimized the detrimental effects of stray currents when found? (TD.CP.MONITOR.INTERCURRENT.R) (detail)

192.491(c) (192.473(a))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Internal Corrosion (detail) Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Internal Corrosion in Cutout Pipe (detail) Do records document examination of removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.R) (detail)

192.491(c) (192.475(a); 192.475(b))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Internal Corrosion Control: Design and Construction (192.476) (detail) Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476? (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
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14. Internal Corrosion Corrosive Gas Actions (detail) *Do records document the actions taken when corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.R) (detail)*

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. Atmospheric Corrosion Monitoring (detail) *Do records document inspection of aboveground pipe for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.R) (detail)*

192.491(c) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. New Buried Pipe Coating (detail) *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? (TD.COAT.NEWPIPE.R) (detail)*

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Repair of Internally Corroded Pipe (detail) *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall? (TD.ICP.REPAIR.R) (detail)*

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

18. Evaluation of Internally Corroded Pipe (detail) *Do records document adequate evaluation of internally corroded pipe? (TD.ICP.EVALUATE.R) (detail)*

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service? (FS.CS.CMPMAINT.P) (detail)*

192.605(b)(6)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices? (FS.CS.CMPUSUD.P) (detail)*

192.605(b)(5) (192.605(b)(7))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks? (FS.CSSYSROT.CMPRELIEF.P) (detail)*

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.P) (detail)*

192.303 (192.735(a); 192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - Permanent Gas Detection (detail) *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings? (FS.CSSYSROT.CMPGASDETREQ.P) (detail)*

192.605(b) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?* (FS.CS.BLDGEXITS.O) (detail)

192.163(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Fence Gates (detail) *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?* (FS.CS.FENCEGATES.O) (detail)

192.163(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - NFPA 70 (detail) *Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station?* (FS.CS.CMPNFPA70.O) (detail)

192.163(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations Liquid Removal (detail) *Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165?* (DC.DPCCMP.CMPLIQPROT.O) (detail)

192.141 (192.165(a); 192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?* (FS.CSSYSPROT.ESDGASDISCH.O) (detail)

192.167(a)(2)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
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6. Compressor Station Design/Construction - ESD Gas Block (detail) *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less. (FS.CSSYSROT.ESDGASBLK.O) (detail)*

192.167(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Compressor Station Design/Construction - ESD (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings? (FS.CSSYSROT.ESDGASSD.O) (detail)*

192.167(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Compressor Station Design/Construction - ESD Electrical (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings? (FS.CSSYSROT.ESDELECSO.O) (detail)*

192.167(a)(3)(i) (192.167(a)(3)(ii))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Compressor Station Design/Construction - ESD Locations (detail) *Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station? (FS.CSSYSROT.ESDLOCATION.O) (detail)*

192.167(a)(4)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) *Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages? (FS.CSSYSROT.ESDDISTSD.O) (detail)*

192.167(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

11. Compressor Station Design/Construction - Unattended Platform ESD (detail) *Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform. (FS.CSSYSROT.UNATTPLATCMPSD.O) (detail)*

192.167(c)(1)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Compressor Station Design/Construction - Fire Protection (detail) *Do compressor stations have adequate fire protection facilities? (FS.CSSYSROT.CMPFP.O) (detail)*

192.171(a)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Compressor Station Design/Construction - Over-Speed Protection (detail) *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven? (FS.CSSYSROT.CMPOVSPD.O) (detail)*

192.171(b)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Compressor Station Design/Construction - Lubrication (detail) *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication? (FS.CSSYSROT.CMPLUBPROT.O) (detail)*

192.171(c)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented? (FS.CSSYSROT.CMPGASENGSD.O) (detail)*

192.171(d)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler? (FS.CSSYSROT.CMPGASENGMFL.O) (detail)*

192.171(e)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

17. Compressor Station Design/Construction - Ventilation (detail) *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas? (FS.CS.CMPBLDGVENT.O) (detail)*

192.173

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

18. Cathodic Protection of Underground Piping (detail) *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.O) (detail)*

192.457(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

19. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected? (TD.ATM.ATMCORRODEINSP.O) (detail)*

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded? (DC.MO.MAOPLIMIT.O) (detail)*

192.605(b)(5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

21. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.O) (detail)*

192.605(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site? (FS.CS.CMPERP.O) (detail)*

192.605(a) (192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619? (MO.GOMAOP.MAOPRECORDING.O) (detail)*

192.605(b)(1) (192.619(a); 192.619(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

24. Placement of ROW Markers (detail) *Are line markers placed and maintained as required? (PD.RW.ROWMARKER.O) (detail)*

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

25. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines? (PD.RW.ROWMARKERABOVE.O) (detail)*

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (FS.CSSYSROT.CMPRELIEF.O) (detail)*

192.199 (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.O) (detail)*

192.735(a) (192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings? (FS.CSSYSROT.CMPGASDET.O) (detail)*

192.736(a) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval? (FS.CSSYSROT.CMPRELIEF.R) (detail)*

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required? (FS.CSSYSROT.CMPGASDETOM.R) (detail)*

192.709(c) (192.736(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	Valley Gas Inc.	Op ID #	21090
Inspector	Steve Samples	Unit #	
Date of Inspection	6-25-15		
Inspection Location City & State	Irvington, KY.		
Operator Employee Interviewed	Kerry Kasey	Phone #	270-547-2455
Position/Title	president		
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)		Kerry	
DER Phone #			

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?	x		
Comments				
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.	x		
Comments	At least 1 employee per month.			
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.	x		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?	x		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.	x		
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks? (TQ.OO.OOPLAN.P) (detail)*

192.805(a) (192.801(b))	Sat+	xSat	Concern	Unsat	NA	NC
Notes						

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task? (TQ.OO.REEVALINTERVAL.P) (detail)*

192.805(g)	Sat+	xSat	Concern	Unsat	NA	NC
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.OO.OOPLANCONTRACTOR.P) (detail)*

192.805(b) (192.805(f); 192.805(c))	Sat+	xSat	Concern	Unsat	NA	NC
Notes						

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified? (TQ.OO.OOCONTRACTOR.P) (detail)*

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))	Sat+	xSat	Concern	Unsat	NA	NC
Notes						

6. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OO.OOCONTRACTOR.R) (detail)*

192.807(a) (192.807(b))	Sat+	xSat	Concern	Unsat	NA	NC
Notes						

7. Management of Other Entities Performing Covered Tasks (detail) *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OO.OTHERENTITY.R) (detail)*

192.805(b) (192.805(c); 192.803)	Sat+	xSat	Concern	Unsat	NA	NC
Notes						

8. Evaluation Methods (detail) *Are evaluation methods established and documented appropriate to each covered task? (TQ.OO.EVALMETHOD.P) (detail)*

192.805(b) (192.803; 192.809(d); 192.809(e))	Sat+	xSat	Concern	Unsat	NA	NC
Notes						

9. Evaluation Methods (detail) *Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)*

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

10. Abnormal Operating Conditions (detail) *Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)*

192.803

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

11. Abnormal Operating Conditions (detail) *Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)*

192.807(a) (192.807(b); 192.803)

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

12. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)*

192.807

Sat+	Sat	xConcern	Unsat	NA	NC
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Notes

Records indicated 4 tasks still overdue to be re-qualified.

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition? (TQ.OQ.MERGERACQ.P) (detail)*

192.805(b) (192.803)

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.P) (detail)*

192.805(h)

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

16. Covered Task Performed by Non-Qualified Individual (detail) *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities? (TQ.OQ.NONQUALIFIED.P) (detail)*

192.805(c)

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

17. Personnel Performance Monitoring (detail) *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

19. Program Performance and Improvement (detail) *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

21. Management of Changes (detail) *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

22. Notification of Significant Plan Changes (detail) *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat+	xSat	Concern	Unsat	NA	NC
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Notes

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	Concern	xUnsat	NA	NC
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Notes

5 O Q qualified employees. 4 tasks not re-qualified. Was going to use corrosion (cp) tasks to check low readings but the individuals were not re-qualified in this task.

2. Qualification Status (detail) *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	xConcern	Unsat	NA	NC
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Notes

All tasks completed in Sept. of 2014, except I1a,M-4, M-5a, and M-10.

3. Abnormal Operating Condition Recognition and Reaction (detail) *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	xConcern	Unsat	NA	NC
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Notes

Did not check because not re-qualified.

4. Verification of Qualification (detail) *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	xConcern	Unsat	NA	NC
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Notes

Jim, travis, billy, kevin, and chris qualified, but not in corrosion.

5. Program Inspection Deficiencies (detail) *Have potential issues identified by the headquarters inspection process been corrected at the operational level?* (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))

Sat +	Sat	xConcern	Unsat	NA	NC
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Notes

Kerry Kasey was made aware of the tasks that wre needed to be re-qualified and he will be scheduling to get corrected.

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.

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):		Valley Gas Inc.	
PHMSA Operator ID:		21090	
Type of Operator:	<input type="checkbox"/> Investor Owned <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (Identify - e.g., cooperative)		
State(s) included in this inspection	KY.		
Headquarters Address:	401 1 st street, Irvington, KY		
Company Contact:	Kerry Kasey		
Phone Number:	270-547-2455		
Email:			
Date(s) of Inspection	6/24/15		
Date of this Report	6/29/15		
Date of Current DIMP Plan/Revision			

Persons Interviewed:

Persons Interviewed <i>(list primary contact first)</i>	Title	Phone Number	Email
Kerry Kasey	V.P.	270-547-2455	

State/Federal Representatives:

Inspector Name and Agency	Phone Number	Email
Steve Samples	502-782-2612	Stevend.samples@ky.gov

System Description Narrative:

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
192.1005 Issues Identified in previous Integrity Management Inspection(s)						
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
192.1007(a) Knowledge of the system						
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: <ul style="list-style-type: none"> • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number 	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) <ul style="list-style-type: none"> • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare? 	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
10	.1007 (b)	<p>Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below) 	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator’s consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(d)	Identify and implement measures to address risks				
18	.1007 (d)	Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: <u>Locate</u> the leaks in the distribution system; <u>Evaluate</u> the actual or potential hazards associated with these leaks; <u>Act</u> appropriately to mitigate these hazards; <u>Keep</u> records; and <u>Self-assess</u> to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

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)	<p>Is the operator collecting data for the required performance measures in §192.1007(e)?</p> <p>i) Number of hazardous leaks either eliminated or repaired, categorized by cause?</p> <p>ii) Number of excavation damages?</p> <p>iii) Number of excavation tickets?</p> <p>iv) Total number of leaks either eliminated or repaired, categorized by cause?</p> <p>v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1)</p> <p>vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1)</p>	<p>x</p> <p>x</p> <p>x</p> <p>x</p> <p>x</p> <p>x</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	Periodic Evaluation and Improvement				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: <ul style="list-style-type: none"> • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary? 	x x x x x x x	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

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 modified, deleted or added? (describe in Inspector comments)	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1007 (g)	Report results				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1009	What must an operator report when mechanical fittings fail?				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

**PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014,
Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
35	.1009	<p>Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year?</p> <p>Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
36	.1009	<p>Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information 	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1011	What records must an operator keep?				
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1013	When may an operator deviate from required periodic inspections under this part?				
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	.1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
44	.1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

Additional Inspector Comments:

Conditions observed in the field can provide insights into the effectiveness of the operator’s DIMP plan implementation. Please comment on your general field observations.

Please comment on the operator’s safety culture. Safety Culture is the collective set of attitudes, values, norms and beliefs, which pipeline operator’s employees share that demonstrate a commitment to safety over competing goals and demands. A positive safety culture is essential to an organization's safety performance regardless of its size or sophistication. Characteristics of a positive safety culture include the following:

1. Embraces safety (personnel, public, and asset) as a core value,
2. Ensures everyone understands the organization's safety culture goals,
3. Inspires, enables, and nurtures culture change when necessary,
4. Allocates adequate resources to ensure individuals can successfully accomplish their safety management system responsibilities,
5. Encourages employee engagement and ownership,
6. Fosters mutual trust at all levels, with open and honest communication,
7. Promotes a questioning and learning environment,
8. Reinforces positive behaviors and why they are important ,
9. Encourages non-punitive reporting and ensures timely response to reported issues.

SUPPLEMENTAL INSPECTION QUESTIONS

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked (U, N/A, or N/C must include an explanation if checked)

SUPPLEMENTAL INSPECTION QUESTIONS		S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS					
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.				x	
	If necessary, was remedial action taken?			x	
Review operator procedures for surveillance of cast iron pipelines				x	
	Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)			x	
Review operator emergency response procedures for leaks caused by excavation damage near buildings.		x			
	Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)	x			
Review operator records of previous accidents and failures (including reported third party damage and leak response) to ensure appropriate operator response as required by 192.617.		x			
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS					
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?		x			
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?		x			
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?		x			
	If no, encourage and promote the adoption of CGA Best Practices document.	x			
Review operators records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617.		x			
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS					
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?				x	
	If yes, what is operator doing to mitigate the safety concerns?				
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?				x	
Comments:					

CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?

Yes	No	NA	NC
	x		

Notes

2. Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.

Yes	No	NA	NC
	x		

Notes

3. Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.

Yes	No	NA	NC
	x		

Notes

4. Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?

Yes	No	NA	NC
	x		

Notes

5. Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.

Yes	No	NA	NC
	x		

Notes

6. Identify personnel with specific responsibilities for cybersecurity within your organization?

Yes	No	NA	NC
		x	

Notes



Andy Beshear
Governor

Rebecca W. Goodman
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Michael J. Schmitt
Chairman

Robert Cicero
Vice Chairman

Talina R. Mathews
Commissioner

December 1, 2020

Mr. Kerry Kasey, President
Valley Gas, Inc.
P.O. Box 55, 401 First Street
Irvington, KY 40146

Re: Periodic Inspection
Valley Gas Inc. Gas System
Breckinridge County, Kentucky

WARNING LETTER

Dear Mr. Kasey:

On September 11-13, 2019, Public Service Commission Staff (Staff) performed a periodic regulatory compliance inspection of the gas distribution system of Valley Gas, Inc. (Valley Gas). Based on its review of the operations and management practices, Staff prepared an Inspection Report dated October 2, 2019 (Inspection Report) in which it cited Valley Gas for twelve violations of minimum federal pipeline safety standards. Valley Gas provided a response to the Inspection Report, and located and made available to Staff records that it had been unable to produce during the September 11-13, 2019 inspection. Additionally, Staff conducted a followup field inspection on October 16, 2019.

Based on its follow-up inspection, Valley Gas' response to the Inspection Report, and additional documents provided by Valley Gas, Staff finds that Valley Gas has remediated the twelve violations of minimum pipeline safety standards identified in the Inspection Report.

KRS 278.992(1) provides that any person who violates any minimum pipeline safety standard adopted by the United States Department of Transportation or any regulation adopted by the Commission governing the safety of pipeline facilities shall be subject to a civil penalty not to exceed the maximum civil penalty contained in 49 CFR § 190.223, as amended. Currently, the maximum civil penalty is \$218,647 for each violation for each day the violation continues, with a maximum administrative civil penalty not to exceed \$2,186,465 for any related series of violations.

Based on its investigation of this matter, Staff has determined that Valley Gas should not be assessed a civil penalty for the deficiencies set forth in the Inspection

Report. Valley Gas shall be inspected on an annual basis until such time as Valley Gas has demonstrated a record of compliance to Staff's satisfaction. Be advised that if Valley Gas is again found to be in violation of any pipeline safety standard, Valley Gas shall be subject to assessment of a civil penalty with due consideration of its compliance history.

This warning letter addresses only those matters specifically referred to in this document. This warning letter does not waive or otherwise affect any obligations or liabilities that may result from other activities by Valley Gas. If you have any questions, please contact John Park at 502-782-2589.

Sincerely,



Lindsey Flora
Deputy Executive Director

Attachment



Utility Safety & Design, Inc.
1018 Mt Vernon Drive
Shelbyville, KY 40065
P (502) 513-5127 Fax (502) 513-5127
www.usdi.us

January 27, 2022

Kerry Kasey
President
401 s 1st Street
Irvington, KY 40146

RE: Valley Gas System – 2021 Services and Activities

Kerry,

This letter is to serve as documentation that Valley Gas hired Utility Safety and Design, Inc. (USDI) in 2021 to assist with certain compliance activities as it relates to the operation and maintenance of the Valley Gas natural gas system. Included below is a list of the newly developed written plans and manuals, as well as services provided by USDI, at the request of Valley Gas, in accordance with applicable state and federal pipeline safety regulations.

1. Operations and Maintenance (O&M) Manual
2. Emergency Plan
3. Public Awareness Program Plan
4. Operator Qualification (OQ) Plan
5. Leakage Survey - Business District and Zone 3 of the system
6. Cathodic Protection (CP) Survey
7. Regulator and Relief Inspections
8. KY PSC Inspection representation and assistance
9. Regulator station reconfigurations
10. OQ online training enrollment and testing
11. OQ training and field evaluations
12. Emergency plan training and evaluations
13. OME procedures training
14. Odorizer adjustment and remediation
15. Odorant testing equipment – calibrated loaner equipment
16. Tool and equipment recommendations
17. Regulatory consultation

If you have any questions or need any additional information, please let me know. We appreciate the opportunity and look forward to our continued partnership.

Sincerely,

Jason Brangers, P.E.
Senior VP

VALLEY GAS EXHIBIT 2

OLNEY, ILLINOIS
1927 Miller Drive
Olney, IL 62450
(618) 392-5502

BELLEVILLE, IL
9 Executive Woods Ct.
Belleville, IL 62226
(618) 277-1520

UNIONVILLE, MO
28847 US HWY 136
Unionville, MO 63565
(660) 947-3316

WICHITA, KS
9540 W. Harry St.
Wichita, KS 67209
(316) 239-7313

PITTSBORO, IN
7421 n. Co Rd. 225 E.
Pittsboro, IN 46167
(317) 892-7662



Utility Safety & Design, Inc.
1018 Mt Vernon Drive
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P (502) 513-5127 Fax (502) 513-5127
www.usdi.us

January 27, 2022

Kerry Kasey
President
401 s 1st Street
Irvington, KY 40146

RE: Valley Gas System Operations and Maintenance Proposal

Kerry,

Utility Safety and Design, Inc. (USDI) is pleased to respond to your Request for Proposal (RFP) regarding operation and maintenance tasks on the Valley Gas natural gas distribution system located in Irvington, KY for 2022. USDI has prepared the enclosed proposal for conducting operation and maintenance tasks pursuant to state and federal pipeline safety regulations, as applicable, for the approximately 12 miles of distribution mains servicing 480 customers. We appreciate this opportunity and look forward to working with you in regards to this system.

If you have any questions, need any additional information, or are ready to enter into an agreement with USDI to perform the operation and maintenance tasks associated with this pipeline system, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jason Brangers', with a large, stylized flourish at the end.

Jason Brangers, P.E.
VP of Operations – KY

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1927 Miller Drive
Olney, IL 62450
(618) 392-5502

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VALLEY GAS NATURAL GAS DISTRIBUTION SYSTEM OPERATIONS AND MAINTENANCE PROPOSAL

Irvington, KY

Prepared By:



Utility Safety and Design, Inc.

January 27, 2022

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www.usdi.us

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1 USDI: WHO WE ARE

Utility Safety and Design, Inc. (USDI) is the premier provider of gas engineering and utility services and delivers full-spectrum natural gas solutions. Since the founding of our company in 1969, our goal has been to provide the highest level of service to our customers. From up-front consultation, to strategic engineering and design, to affordable construction services, to total operational support, USDI delivers full-spectrum natural gas solutions. In an industry where regulations and technologies seem to change daily, USDI works hard to stay ahead of the game. We develop quality, progressive solutions that meet expectations today and tomorrow. And, we keep up with federal and state compliance issues so you can focus on running your organization. Our goal is simple – *to be your trusted partner* – so you'll always find us working smartly and efficiently, treating your business as if it were our own. We don't believe in a "one-size-fits-all" approach, so we take an industry approach to every project and tailor our solutions to the specific needs of your organization. While engineering is our foundation at USDI, we also have operations, maintenance, and construction professionals and specialists that bring an operator's perspective to every project. That combined expertise and flexible approach helps ensure we deliver the best solutions for you and your specific needs.

1.1 QUALIFICATION OF FIRM - USDI

USDI proposes to fulfill the requirements as set forth and described in Sections 2 and 3 of this proposal. Since 1969, USDI has provided comprehensive engineering and consulting support to the natural gas industry throughout the Midwest and surrounding states. USDI delivers a range of individual engineering services, as well as complete management and operation of utilities, pipelines and master meter systems. USDI has served more than 450 municipal gas systems, local distribution companies, transmission pipeline operators, landfill gas operators, industrial direct sales, master meter systems, and universities. Many of our clients utilize our services to supplement their in-house expertise. By working with USDI, our clients can trust in the 90+ years of experience that our principal engineers bring to any project and emergency situations. USDI also has numerous technical staff available when necessary. Several of these employees have over 25 years of experience in the natural gas industry. This additional staff includes API certified welders, corrosion specialists, odorization specialists, regulator & relief valve specialists, leak survey technicians and drafting technicians.



1.2 QUALIFICATIONS AND EXPERIENCE OF TEAM

a) Principals

C. Lindsay Enloe, P.E. – President, USDI

Darin Houchin, P.E. – Executive Vice President, USDI

b) Project Manager

Anthony Everette, P.E. – Vice President, USDI

Jason Brangers, P.E. – Vice President, USDI

c) Engineering and Technical Staff

Zac Farhat

Jace Greenwood

Matt Rhody

Tyler Enloe, P.E.

Mike Wendling

USDI is comprised of approximately seventy-five (75) professional and technical staff, including five (5) professional engineers with more than 90 years of combined experience and numerous technical staff, several with over 25 years of experience in the natural gas industry. USDI also includes API certified welders, corrosion specialists, odorization specialists, regulator & relief valve specialists, leak survey technicians, and drafting technicians. USDI personnel are OQ qualified on any covered tasks that may be required as part of this project and have performed these activities on numerous gas pipeline facilities. Below is a sample of the experience of USDI personnel that may participate within the scope of this project.

Mr. Lindsay Enloe, President of USDI, has over 30 years of experience in the natural gas industry, is a NACE Certified Senior Corrosion Technologist, and routinely provides engineering support to more than 100 natural gas operators in the Midwest. Mr. Enloe will assist as needed with the management, operation, and maintenance activities required within the scope of this project.

Mr. Darin Houchin, CEO, has over 25 years of experience in the natural gas industry, serves as the General Manager and Chief Engineer of Illinois Gas Company, directs and supervises the employees of USDI, and daily provides engineering support to numerous natural gas operators, including master meters, universities, transmission companies, municipalities, and local distribution companies. Mr. Houchin will assist as needed with the management, operation, and maintenance activities required within the scope of this project.

Jason Brangers, P.E., will serve as the Project Manager and will be the first line of communication regarding this pipeline system. Mr. Brangers will ensure performance of activities required within the scope of this project and will be responsible for ensuring the Scope of Services of this project are carried out by qualified individuals in accordance with applicable pipeline safety regulations and completed within the timeframe outlined in the RFP. Mr. Brangers has over 25 years of combined experience working closely with utility companies, local governments, public safety officials, and natural gas operators. Mr. Brangers manages the daily operations of USDI's Shelbyville, KY office and previously served as the Pipeline Safety Manager for the Kentucky



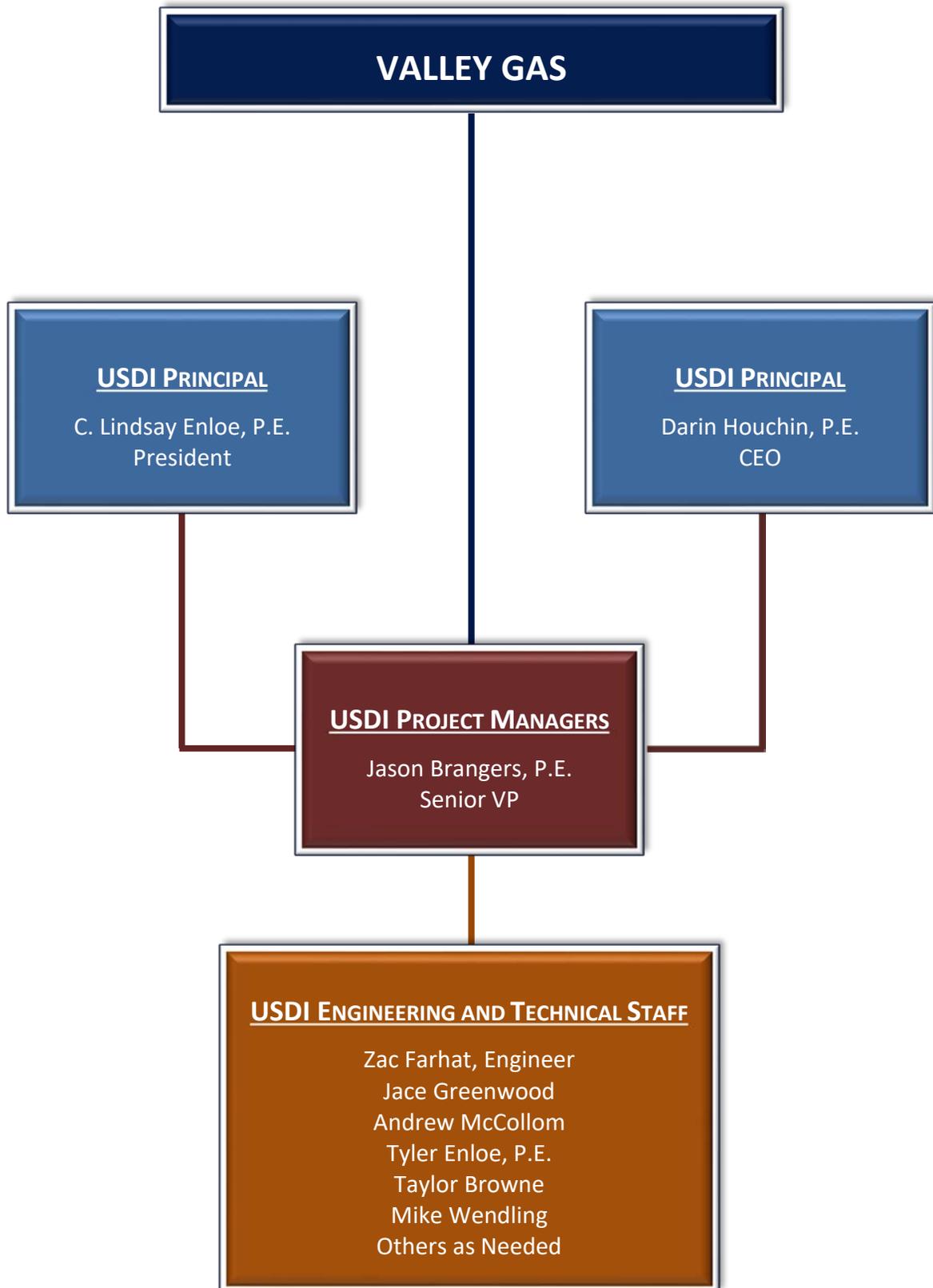
Public Service Commission where he was responsible for overseeing and administering the natural gas pipeline safety program for the Commonwealth of Kentucky.

Tyler Enloe, P.E. may serve as a Project Engineer on this project and perform operation and maintenance activities required within the scope of this project. Mr. Enloe is an Operator Qualified engineer and has performed these services for many natural gas operators. Mr. Enloe is NACE trained and certified, and has performed numerous cathodic protection surveys for clients across the Midwest.

Zac Farhat, Jace Greenwood, Andrew McCollom, Taylor Browne, Mike Wendling, and/or others may serve as Technical Staff on this project and perform activities required within the scope of this project. Mr. Jefferson, Mr. McCollum, Mr. Morris, Ms. Browne, and Mr. Wendling are Operator Qualified and have more than 50 years of combined experience in engineering and the natural gas industry, as well as performing cathodic protection surveys, leak surveys, odorization testing, pipeline patrols, inspections of mains and services, manual/plan development and review, public awareness liaison, line locating, computer aided drafting design (CADD), GPS, operator inspections and audits, and other services to natural gas utilities, pipelines, and master meter operators.



1.3 ORGANIZATIONAL CHART



2 PLANS AND MANUALS

2.1 OPERATIONS AND MAINTENANCE MANUAL

- a) Review and update, as necessary, the Operations and Maintenance Manual
- b) Conduct review and instruction for employees on O&M Procedures

USDI shall review and update, as necessary, the written Operations and Maintenance (O&M) Manual in accordance with 49 CFR 192.605. USDI will review the O&M Manual annually and make minor updates, as required. The O&M manual shall be written to meet the Natural Gas Pipeline Safety Act of 1968 and the Department of Transportation's "Transportation of Natural and Other Gases by Pipelines: Minimum Federal Safety Standards". The manual should contain the procedures employees should follow when completing tasks covered in the Operator Qualification plan.

USDI will provide a review to personnel with regards to O&M procedures, including a review of the O&M manual, its implementation, and instructions on proper methods for filling out applicable forms and reports.

2.2 EMERGENCY PLAN

- a) Review and update, as necessary, the written Emergency Plan
- b) Provide review and instructions for employees on the Emergency Plan

USDI shall review and update, as necessary, the written Emergency Plan in accordance with 49 CFR 192.615. The Emergency Plan shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency, including, where applicable, the following:

- Receiving, identifying, and classifying notifications requiring immediate response
- Establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials
- Prompt and effective response to a notice of each type of emergency
- Availability of personnel, equipment, tools, and materials needed in an emergency
- Actions directed toward protecting people first and then property
- Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazard to life or property
- Making safe any actual or potential hazard to life or property
- Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual response during an emergency



- Safely restoring any service outage
- Beginning action under 192.617, if applicable, as soon after the end of the emergency as possible

USDI will provide training to personnel with regards to emergency procedures, including a review of the Emergency manual, its implementation, and instructions on proper methods for filling out applicable forms and reports.

2.3 PUBLIC AWARENESS PROGRAM

- a) Review and update, as necessary, the written Public Awareness Program (PAP) in accordance with 49 CFR 192.616
- b) Perform and document an effectiveness evaluation of the PAP

USDI shall review and update, as necessary, the written Public Awareness Program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 and in accordance with the requirements of 49 CFR 192.616.

USDI shall enroll the facilities into the Paradigm Liaison Services, LLC Public Awareness Collaborative Program to assist in meeting the requirements of 49 CFR 192.616. USDI shall manage and ensure that all requirements of the Public Awareness and Education Program are met. Valley Gas will be billed for the cost of the mailings.

USDI will also perform an effectiveness evaluation of the PAP and associated data. This evaluation will be documented on appropriate forms and/or reports.

2.4 OPERATOR QUALIFICATION PROGRAM

- a) Review and update, as necessary, the written operator qualification (OQ) program in accordance with 49 CFR 192 Subpart N
- b) Enroll gas system personnel in Energy Worldnet (EWN) Online Training Program
- c) Provide Field Evaluations for gas system personnel*

USDI shall review and update, as necessary, the written operator qualification (OQ) program to establish the policies and procedures for individuals performing covered tasks on the pipeline facilities in accordance with 49 CFR 192 Subpart N. The plan will identify relevant operating and maintenance tasks (Covered Tasks) and provide guidance for achieving compliance with the requirements of Subpart N.

USDI partners with Energy Worldnet (EWN) to provide online training and testing for Operator Qualification (OQ). As part of this agreement, operator personnel will be enrolled in the EWN program for OQ purposes.

*USDI will provide OQ Performance Evaluations (field evaluations) for operator personnel at USDI T&M retainer rates.

2.5 DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM

- a) Review and update, as necessary, the written distribution integrity management program (DIMP) accordance with 49 CFR 192 Subpart O (General & Site Manuals)
- b) Provide training and instructions for employees on DIMP

USDI shall review and update, as necessary, the written distribution integrity management program (DIMP) in accordance with 49 CFR 192 Subpart O.

USDI will provide documentation of the DIMP manual review.

2.6 DRUG AND ALCOHOL PLAN, CONSORTIUM, AND TESTING

- a) Develop and update, as necessary, the written Anti-Drug and Alcohol Misuse Plans
- b) Enrollment in the USDI D/A Consortium
- c) D/A Program Management

USDI shall develop and update, as necessary, written Anti-Drug and Alcohol Misuse plans and manuals, enroll the Company in USDI's consortium, and assist the Company in managing the program, including the random selection of at least 50% of consortium participants and providing Management Information System (MIS) reports and data. The purpose of the plan is to establish a program designed to help prevent accidents and injuries resulting from the use of prohibited drugs by employees who perform covered functions for operators of certain pipeline facilities subject to part 192, 193, or 195 by following guidelines set forth by part 199. The plan is not intended to replace the rules; its purpose is to detail how the Company implements and follows said rules.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) is the agency within the Department of Transportation that regulates the operators in the natural gas and hazardous liquid pipeline industry. The written plan combines the anti-drug plan with the alcohol misuse prevention plan into one cohesive document. All requirements of 49 CFR Part 40 & Part 199 are covered within this one document.

The plan will meet the requirements of §199.101 & §199.202, respectfully, to develop and maintain a written anti-drug and alcohol misuse plan that conforms to the requirements of PHMSA Regulations and DOT Procedures concerning testing programs. The plan contains methods and procedures for compliance with all the requirements, including required testing, recordkeeping, reporting, education, and training elements.

A Consortium/Third Party Administrator (C/TPA) is utilized to assist in execution of the Plan. The C/TPA will offer guidance to the Designated Employee Representative in plan implementation, including but not limited to: locating collection facilities, administering the random selection, and consultation on program compliance issues. Periodic random drug tests will be conducted each calendar year that will meet or exceed the current annual percentage. The required annual minimum percentage rate is set by PHMSA and is currently set at 50% of the current covered employees. A C/TPA has been chosen to manage the random drug testing program. Since the services of a C/TPA are being utilized, the random number of employees that are tested will be based on the total number of employees within the Consortium's random pool.

One-time fee of \$1,500.00 + \$150/administered test



3 ANNUAL FIELD SERVICES

3.1 CATHODIC PROTECTION AND ATMOSPHERIC CORROSION SURVEYS

- a) Perform Cathodic Protection Test/Survey in accordance with 49 CFR 192.465(a)
- b) Perform Atmospheric Corrosion Inspection
- c) Create Compliance Record

USDI shall evaluate the condition of the corrosion control system by conducting a cathodic protection survey on the system. Recommendations will be made, as applicable, as to the cathodic protection status, observances of insulation, shorts, and pipe-to-soil readings.

Each survey will be conducted in accordance with 49 CFR 192 Subpart I to ensure the level of cathodic protection complies with one or more of the applicable criteria contained in 49 CFR 192 Appendix D. The survey will be performed to obtain pipe-to-soil potentials throughout the system using a digital multi-meter in conjunction with a copper-copper sulfate electrode. The pipe-to-soil potentials will be expressed and recorded in volts negative. Following the survey, the pipe-to-soil potential readings will be reviewed and any other tests necessary to adequately evaluate the system will be conducted.

A negative (cathodic) voltage of at least 0.85 volts, with reference to a saturated copper-copper sulfate half-cell, is the criterion for protection most commonly used.

USDI shall conduct an inspection of each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion in accordance with 49 CFR 192.481. USDI will give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbanded coatings at pipe supports, in splash zones, at deck penetrations, and in spans over water.

USDI will create a compliance record at the conclusion of the atmospheric corrosion inspection and cathodic protection survey. The record shall be completed documenting the area(s) covered, description of the inspection/survey, pipe-to-soil potential readings, and any issues noted.

3.2 SERVICE ALL KEY VALVES

- a) Identify, Inspect, and Service Key Valves
- b) Create Compliance Record

USDI shall identify, inspect, and service (i.e. partially operate where applicable) each main line valve that may be necessary for the safe operation of the system and each valve that may be required during an emergency and designated as a “key” valve (also known as critical or



emergency valve). USDI shall perform this task on the key valves in accordance with 49 CFR 192, Subpart M, Section 747.

USDI will create a compliance record of the valve inspections, including the location of the valve, the as-found position (open/closed), as-left position, any maintenance performed, and any issue(s) identified.

3.3 CONDUCT A GAS LINE LEAKAGE SURVEY

- a) Conduct a Gas Leakage Survey of System
- b) Record Results on a Leak Report
- c) Provide a Written Report of Leak Survey Results

USDI will perform a leakage survey of the pipelines using a Southern Cross Flame Pack 400 Flame-Ionization (FI) instrument and/or a Heath Consultants Remote Methane Leak Detector (RMLD) (or equivalent), both of which are capable of registering natural gas in concentrations at or below 50 ppm. USDI shall conduct leakage surveys on the pipelines in accordance with 49 CFR 192, Subpart M, Section 723; in business districts at least once per year, not to exceed 15 months and outside business districts at least once every five (5) calendar years, not to exceed 63 months.

USDI will provide the results of the leak surveys in a leak report and will provide a detailed written report at the conclusion of the leakage survey. A leak survey report shall be completed documenting the area(s) covered and a description, location, and an appropriate classification of all leaks discovered. These reports will be provided to Valley Gas and shall be kept for the life of the system.

All leaks shall be classified according to the Operation and Maintenance manual (O&M) or, if not specifically listed in the O&M, GPTC guidelines. In-building leaks shall be classified as Grade 1 leaks. Above ground leaks that can be repaired by lubrication, tightening, or adjustment are not considered reportable leaks, however, may be recorded in the survey for the use by the operator.

3.4 INSPECT AND TEST REGULATORS AND RELIEFS

- a) Inspect and test each pressure regulating station and relief device
- b) Provide a Written Report of Regulator/Relief Inspections

USDI shall identify, inspect, and test each regulating station and relief device on the jurisdictional facilities in accordance with 49 CFR 192.739. Inspection and testing will be conducted at least once each calendar year, not to exceed 15 months, to determine that it is in good mechanical condition, adequate from the standpoint of capacity and reliability of operation, set to control or relieve at the correct pressure, and properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

USDI will provide a written report of the inspections, including the set points of each regulator/relief, inlet and outlet pressures, capacity, condition, any maintenance performed, and any issue(s) identified.

3.5 ODORIZATION TESTING AND ODORIZER INSPECTION

- a) Conduct odorant tests
- b) Perform an odorizer inspection and fill with odorant, as required
- c) Provide a written report of the odorization testing results

USDI shall conduct odorant tests four (4) times per year to determine if the gas is readily detectable at a concentration in air of one-fifth the lower explosive limit (LEL) or, stated another way, 1% gas in air. Valley Gas will be responsible for conducting and documenting monthly odor tests.

USDI shall conduct odorant tests in accordance with 49 CFR 192.625 to determine the effectiveness of the odorization program. Tests shall be made utilizing an instrument capable of providing a percent gas in air at which the operator can readily detect the smell of gas. These tests shall be performed at the extremities of the system where possible. A Heath Odorator, DTEX DX1000, or equivalent, shall be used to accomplish this task. Tests indicating a readily detectable gas percentage equal to or less than 1% shall be considered normal while readings higher than 1% shall be considered abnormal. Company shall be notified of any abnormal tests in order to take any necessary action. Additional tests may then be required to verify readily detectable levels below 1% gas in air.

All odor tests shall be performed by a person with a normal sense of smell and who is Operator Qualified for odor testing. Odor test records shall be kept on file by the Company. The tests shall be recorded on the ***OdORIZATION Check Report Form*** (paper or electronic).

USDI shall conduct odorizer inspections at least four (4) times per year to determine if the odorizer is functioning properly, contains adequate levels of odorant and/or if any settings need to be modified. USDI will fill odorizer storage tanks, as appropriate, at current USDI rate.

USDI will provide a written report of the odorization testing and odorizer inspection results.

4 ANNUAL REPORTS & DOCUMENTATION

4.1 PHMSA/DOT AND KY PSC REPORTS

a) Provide assistance in preparing and/or filling out required state and federal reports, if applicable.

USDI shall provide assistance in preparing and/or filling out annual reports required by state and/or federal pipeline safety regulations and rules required within the scope of this project.

USDI is intimately familiar with pipeline safety regulations, the Pipeline and Hazardous Materials Safety Administration (PHMSA), state utility commissions, and recordkeeping and compliance documentation. USDI represents landfill, master meter, municipal, transmission, and distribution operators and has participated in numerous state and federal audits of their natural gas systems.

4.2 CONTINUING SURVEILLANCE

a) Review appropriate documentation and annual reports, document on continuing surveillance form.

USDI shall review appropriate annual documentation and reports to determine if changes in class location, failures, leakage history, corrosion, substantial changes in CP requirements, and other operating conditions exist on the pipeline and require appropriate follow-up action to address.

4.3 PUBLIC AWARENESS PROGRAM MAILINGS

a) Enrollment in Paradigm Liaison Services PA Collaborative Program

b) Perform required Public Awareness mailings and documentation (2x/year)

USDI shall enroll the facilities into the Paradigm Liaison Services, LLC Public Awareness Collaborative Program to assist in meeting the requirements of 49 CFR 192.616. The program will provide and send the required mailings at the appropriate frequencies, provide, collect, and tabulate surveys, and provide the results of the surveys. USDI shall manage and ensure that all requirements of the Public Awareness and Education Program are met.

\$0.85/mailing (\$585.00 minimum)

5 ANNUAL TRAINING & MEETINGS

5.1 EMERGENCY PLAN TRAINING AND TESTING

a) Provide emergency plan training and testing of Company personnel

USDI shall provide on-site training for personnel in which the emergency plan will be reviewed and updated, as appropriate, and a knowledge test will be administered to confirm the effectiveness of the training.

5.2 EMERGENCY AND PUBLIC OFFICIAL LIAISON MEETING(S)

a) Provide liaison with emergency and public officials

USDI shall establish and maintain liaison with appropriate fire, police, and other public officials to learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; Acquaint the officials with the operator's ability in responding to a gas pipeline emergency; identify the types of gas pipeline emergencies of which the operator notifies the officials; and plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

5.3 CALL TAKER TRAINING

a) Provide training and testing for Company personnel that may receive natural gas related emergency and/or customer calls

USDI shall provide training and testing of personnel that are “call-takers” of emergency calls related to the natural gas system. The training will include the properties and characteristics of natural gas, effects of carbon monoxide, what constitutes a gas emergency, basic information that should be obtained from the caller, appropriate responses, and customer call scenarios. A test will be administered to determine the effectiveness of the training.

5.4 OPERATOR QUALIFICATION (OQ) OF FIELD PERSONNEL

a) Conduct operator training and testing on covered tasks

b) Perform OQ field evaluations on covered tasks

c) Provide Detailed Documentation of OQ Results

USDI shall conduct Operator Qualification (OQ) training and testing for personnel on appropriate identified covered tasks to ensure the individual possess the knowledge and skills to perform each covered task.

USDI shall perform OQ field evaluations for personnel on the identified covered tasks to determine the individual’s skills and ability to perform each covered task. (Any employee to be



field evaluated shall have successfully passed the appropriate training module prior to the field evaluation). This includes two days on-site.

USDI will provide written documentation of the OQ evaluation and testing results.

5.5 OQ PROCEDURE AND PERFORMANCE EFFECTIVENESS REVIEW

a) Perform two (2) OQ Procedure and Performance Effectiveness Reviews per gas employee

USDI shall conduct two (2) task reviews of each gas personnel to determine the adequacy of the procedures to perform each task, that the employee performed the tasks correctly, recognition and reaction to AOCs, and determine if any additional training is necessary. These will be documented on the appropriate OQ Procedure and Performance Effectiveness Review Form.

5.6 CONSULTATION WITH REGULATORY AUTHORITIES

a) Provide assistance on code compliance efforts related to a regulatory audit.

USDI shall provide assistance to review plans, records, training, and records for compliance with applicable pipeline safety rules and regulations as well as provide recommendations and comments on code compliance efforts during a PSC audit or inspection.

USDI will participate in any applicable state and/or federal pipeline safety audits, this proposal includes up to five (5) days of on-site, phone, email, and/or internet (Zoom, WebEx, GoTo meeting, etc.).

Additional days (including on-site) for PSC audits will be performed at USDI current T&M rates.



6 ADDITIONAL SERVICES

6.1 USDI's 192 GIS COMPLIANCE TOOL SET

- a) *Data Conversion*
- b) 192 GIS and Survey 123 Apps, Implementation and Use
- c) ESRI License
- d) Training and Support Services

USDI has developed an ESRI-based mapping and compliance suite of solutions for the gas industry that allows for real-time, field-based records creations and compliance tracking and monitoring. The 192.GIS tool set is used to perform routine compliance activities (i.e. CP survey, leak survey, valve inspections, etc.), to create and maintain accurate maps, store data and information securely on the cloud, and allow access to maps and records on your phone or tablet to designated personnel. The compliance activity maps will update automatically as data is collected, allowing it to be viewed almost instantly.

USDI will convert the company's existing map and facilities information into a Master System Map to be utilized by gas personnel for collecting and storing inspection and maintenance records. USDI will also create and enable functions within its Survey 123 application that allows for real-time field-based records creation.

USDI will provide one (1) ESRI Level 2 User License for the ability to add, edit, and modify data through the ESRI web platform. This license will be included as part of the annual cost of this agreement. Additional Level 2 user Licenses can be purchased, if needed.

Compliance tools will be provided for the following items/actions at a minimum:

- Cathodic Protection Survey
- Leak Survey
- Customer Reported Leak Investigations
- Regulator/Relief and Station Inspections
- Damage Prevention (811 Response)
- Odor Intensity Checks
- CGI Calibration
- Main and Service Line Inspections
- Atmospheric Corrosion Survey
- System Leak Tracking
- Valve Inspections
- Pipeline Patrol
- Excavation Damage Reporting
- Odorizer Inspections
- New Construction As-Builts

TRAINING

USDI will provide one day of on-site implementation and training in the use of the Collector and Survey 123 application-based functions as well as the use/view of the online web maps and dashboards. Additional telephonic support will also be provided. Additional training is available at normal retainer client T and M rates.



SUPPORT SERVICES

USDI will support the company's continued use of 192.GIS by assisting in the extraction of data for annual reports that the company may wish to create. USDI will provide as part of this scope additional storage on its cloud-based storage (Sharefile) for the company to have the opportunity to backup any compliance records or reports it may wish to extract from the ESRI based compliance system. USDI will also provide updates, enhancements and improvements to the originally delivered set of tools so that pipeline safety compliance in the areas where the tools are utilized can occur to the satisfaction of the company and the Kentucky Public Service Commission. As needed, USDI will also provide technical support. As new features or enhancements become available, USDI can provide training for these items.

192.GIS and Survey 123 Cost of Services

1. Implementation Fee \$3,500.00
2. Annual 192.GIS Fee \$5,250.00 per year
 - a. Includes 10 hours of customization/support
 - b. Additional development will be billed at current T&M rate
3. Additional Licenses
 - a. ESRI ArcGIS Online Creator Users \$500 per user/ per year
 - b. ESRI ArcGIS Online Field Worker Users \$350 per user/ per year
 - c. ESRI ArcGIS Online Viewer Users \$100 per user/ per year



7 COST OF SERVICES

Client: Valley Gas
Accepted By: _____
Title: _____
Signature: _____
Date: _____

7.1 SERVICES

1. PLANS AND MANUALS:

- a. Operations and Maintenance (O&M) Manual
 - o Includes Procedures Manual and Forms
- b. Emergency Response Plan
- c. Public Awareness Program Manual
- d. Public Awareness Effectiveness Documentation
- e. Operator Qualification (OQ) Plan
- f. Damage Prevention Program (included in O&M)
- g. Distribution Integrity Management Plan (DIMP)
- h. Drug and Alcohol Plan, Consortium, and Testing \$150.00/test

2. OPERATION AND MAINTENANCE SERVICES

- a. Cathodic Protection (CP) Pipe to Soil Survey Annual
- b. Atmospheric Corrosion Survey Annual
- c. Valve Inspection and Maintenance Annual
- d. Leakage Survey Annual
- e. Regulator Station and Relief Testing and Inspections Annual
- f. Odorization Checks (Sniff Tests) 4 times/year
- g. Odorizer Inspection 4 times/year

3. ANNUAL REPORTS AND DOCUMENTATION

- a. PHMSA/DOT Report Annual
- b. KY PSC Report, if applicable Annual
- c. Continuing Surveillance Annual
 - o Public Awareness Mailings and Documentation (2x/year)
\$0.85/ mailing (\$585 minimum)

4. TRAINING AND MEETINGS

- a. Emergency Plan Training and Testing Annual
- b. Liaison Meeting w/Emergency and Public Officials Annual
- c. Call Taker Training Annual
- d. OQ Procedure and Performance Effectiveness Review Annual
- e. Operator Qualification (OQ) of Field Personnel
 - o EWN Enrollment for Gas Personnel \$95.00/person/year
 - o EWN Program Administration
 - o Field Evaluations USDI T&M Rates
- f. Consultation with Regulatory Authorities

ANNUAL COST OF SERVICES \$ 18,000.00 plus

Drug and Alcohol Program (one-time admin setup fee) \$ 1,500.00
Employee Drug Test (cost per test) \$ 150.00
Public Awareness Mailings (cost per mailing) \$ 0.85
OQ EWN Enrollment (cost per person) \$ 95.00
OQ Evaluations \$ USDI T&M Rates



Utility Safety & Design, Inc.
1018 Mt Vernon Drive
Shelbyville, KY 40065
P (502) 513-5127 Fax (502) 513-5127
www.usdi.us

January 27, 2022

Kerry Kasey
President
401 s 1st Street
Irvington, KY 40146

RE: Valley Gas System – 2021 Services and Activities

Kerry,

This letter is to serve as documentation that Valley Gas hired Utility Safety and Design, Inc. (USDI) in 2021 to assist with certain compliance activities as it relates to the operation and maintenance of the Valley Gas natural gas system. Included below is a list of the newly developed written plans and manuals, as well as services provided by USDI, at the request of Valley Gas, in accordance with applicable state and federal pipeline safety regulations.

1. Operations and Maintenance (O&M) Manual
2. Emergency Plan
3. Public Awareness Program Plan
4. Operator Qualification (OQ) Plan
5. Leakage Survey - Business District and Zone 3 of the system
6. Cathodic Protection (CP) Survey
7. Regulator and Relief Inspections
8. KY PSC Inspection representation and assistance
9. Regulator station reconfigurations
10. OQ online training enrollment and testing
11. OQ training and field evaluations
12. Emergency plan training and evaluations
13. OME procedures training
14. Odorizer adjustment and remediation
15. Odorant testing equipment – calibrated loaner equipment
16. Tool and equipment recommendations
17. Regulatory consultation

If you have any questions or need any additional information, please let me know. We appreciate the opportunity and look forward to our continued partnership.

Sincerely,

Jason Brangers, P.E.
Senior VP

VALLEY GAS EXHIBIT 3

OLNEY, ILLINOIS
1927 Miller Drive
Olney, IL 62450
(618) 392-5502

BELLEVILLE, IL
9 Executive Woods Ct.
Belleville, IL 62226
(618) 277-1520

UNIONVILLE, MO
28847 US HWY 136
Unionville, MO 63565
(660) 947-3316

WICHITA, KS
9540 W. Harry St.
Wichita, KS 67209
(316) 239-7313

PITTSBORO, IN
7421 n. Co Rd. 225 E.
Pittsboro. IN 46167
(317) 892-7662



Annual Review of Operations & Maintenance Manual, Emergency Plan, Operations Procedure Manual, and Welding Procedure Manual - 101

City/Company: IRVINGTON, KY Completed By: MARK HOLODNEV
Date: 11/02/2021 Compliance Year: 2021

Manuals and Plans Reviewed

- Operations and Maintenance Manual
- Emergency Plan
- Operations Procedure Manual
- Welding Procedure Manual

Review Participants

<u>Print Full Name</u>	<u>Signature</u>
Daniel Griffith	
Sam Haycraft	
Heath Eskridge	
CHARLES D DOUTAR	
BRADLEY M FACKLER	
KENNETH KING	

Please summarize any modifications to the OME based on this annual review below:

Name Brad Fisher Date 11/2/21

Annual Emergency Plan Review Knowledge Verification Test

1. Operating personnel must review the emergency procedures
 - a. annually
 - b. every 3 years
 - c. monthly
 - d. daily

2. Which of the following is NOT an example of an emergency that requires the immediate attention of a gas company employee?
 - a. fire
 - b. customer leak complaint
 - c. explosion
 - d. report filled out incorrectly

3. Contact information for individuals and/or companies that may be needed in the event of an emergency is listed in the Emergency Plan of the Operations, Maintenance, and Emergency Manual.
 - a. True
 - b. False

4. What is the time duration for performing a flow test on an installed meter?
 - a. 1 min
 - b. 2 min
 - c. 5 min
 - d. Not needed

5. During the re-light procedure if the meter was not shut off, do you have to do a flow test?
 - a. Yes
 - b. No

Brent Jahn

6. In a Total Gas Outage in either a controlled area or the entire system, the gas meter valves on the risers to the affected customers do not have to be shut off.

A. True

B. False

7. At what concentration of gas during an inside leak complaint investigation should the building be evacuated and allowed to vent?

- a. 5% LEL
- b. 20% LEL
- c. 50% LEL
- d. 100 % LEL

8. You can only classify a leak with what instrument?

- a. Soap Solution
- b. CGI
- c. FI Unit
- d. Nose

9. Which one is a Safety Related Condition?

- a. Earthquake, Flood, Landslide that affects the pipeline.
- b. Exceeding the MAOP
- c. Any leak the constitutes an emergency
- d. All of the above.

10. All inside leaks are _____.

- a. Class 1
- b. Class 2
- c. Class 3
- d. Class 4

Name CHARLES DOUTAZ Date 11/2/21

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A. True

B. False

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Name Kevin Kozay Date 11/2/21

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Name Sam Haycraft Date 11-02-21

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9. Which one is a Safety Related Condition?

a. Earthquake, Flood, Landslide that affects the pipeline.

b. Exceeding the MAOP

c. Any leak the constitutes an emergency

d. All of the above.

10. All inside leaks are _____.

a. Class 1

b. Class 2

c. Class 3

d. Class 4

Name Heath E Date 11-2-21

Annual Emergency Plan Review Knowledge Verification Test

1. Operating personnel must review the emergency procedures
 - a. annually
 - b. every 3 years
 - c. monthly
 - d. daily

2. Which of the following is NOT an example of an emergency that requires the immediate attention of a gas company employee?
 - a. fire
 - b. customer leak complaint
 - c. explosion
 - d. report filled out incorrectly

3. Contact information for individuals and/or companies that may be needed in the event of an emergency is listed in the Emergency Plan of the Operations, Maintenance, and Emergency Manual.
 - a. True
 - b. False

4. What is the time duration for performing a flow test on an installed meter?
 - a. 1 min
 - b. 2 min
 - c. 5 min
 - d. Not needed

5. During the re-light procedure if the meter was not shut off, do you have to do a flow test?
 - a. Yes
 - b. No

6. In a Total Gas Outage in either a controlled area or the entire system, the gas meter valves on the risers to the affected customers do not have to be shut off.
- A. True
 - B. False
7. At what concentration of gas during an inside leak complaint investigation should the building be evacuated and allowed to vent?
- a. 5% LEL
 - b. 20% LEL
 - c. 50% LEL
 - d. 100 % LEL
8. You can only classify a leak with what instrument?
- a. Soap Solution
 - b. CGI
 - c. FI Unit
 - d. Nose
9. Which one is a Safety Related Condition?
- a. Earthquake, Flood, Landslide that affects the pipeline.
 - b. Exceeding the MAOP
 - c. Any leak the constitutes an emergency
 - d. All of the above.
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 - c. Class 3
 - d. Class 4

Name Doaniel Griffith Date 11-2-21

Annual Emergency Plan Review Knowledge Verification Test

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B. False

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d. All of the above.

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Name Brad Fisher Date 11/2/21

Annual Emergency Plan Review Knowledge Verification Test

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Brad O'Fallon

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c. Class 3

d. Class 4

Name CHARLES DOUTAZ Date 11/2/21

Annual Emergency Plan Review Knowledge Verification Test

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Name Kevin Kobay Date 11/2/21

Annual Emergency Plan Review Knowledge Verification Test

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Name Sam Haycraft Date 11-02-21

Annual Emergency Plan Review Knowledge Verification Test

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Name Heath E Date 11-2-21

Annual Emergency Plan Review Knowledge Verification Test

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Name Daniel Griffith Date 11-2-21

Annual Emergency Plan Review Knowledge Verification Test

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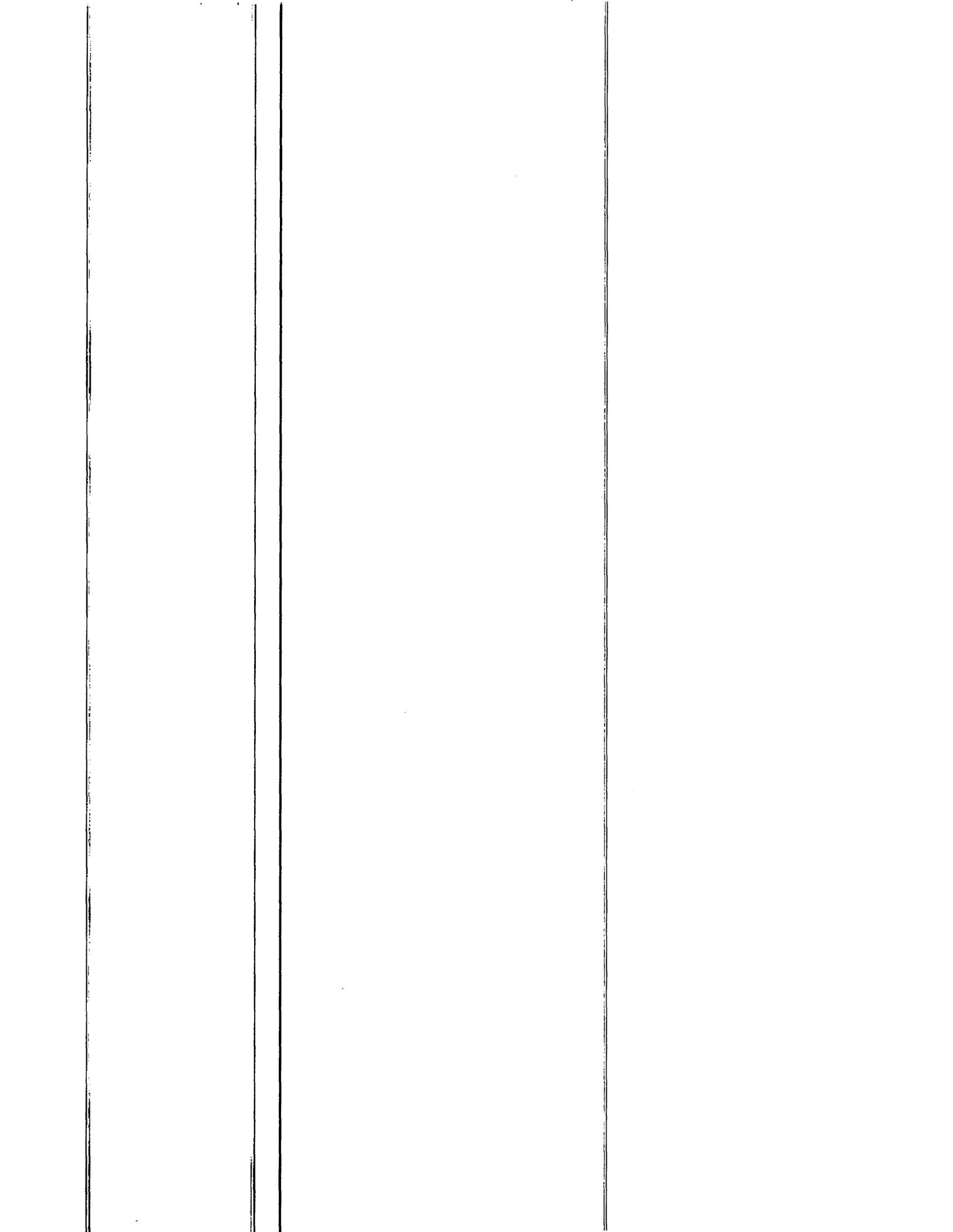
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Utility Safety and Design Inc.

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

INVOICE

Number:	IN20213512
Page:	1
Date:	7/31/2021

*pd
8-6-21*

Sold To: VALLEY GAS
PO BOX 390
IRVINGTON, KY 40146

Attn: KENNETH KASEY

Reference - P.O. #	Customer No.	Salesperson	Ship Via	Terms Code
	VALLEY	DH		NET30

Item No.	Description/Comments	Quantity	UOM	Unit Price	Amount
LABOR	Audit Representation (J Brangers)	24.00	HOUR	130.000000	3,120.00
MATERIAL	Mileage (J Brangers)	400.00000	EACH	0.680000	272.00
MATERIAL	Plans & Manuals Development Forms & Procedures (J Brangers)	1.00000	EACH	5,000.000000	5,000.00
	CODECOMP SubTotal				8,392.00
2021-VALLEYKY Tota					8,392.00
	Due Date Amount Due				
	8/30/2021 8,392.00				

Remit To:
Utility Safety and Design Inc.
PO Box 276
1927 Miller Drive
Olney 62450

Subtotal before taxes	8,392.00
Total taxes	0.00
Total amount	8,392.00
Amount due	8,392.00

Thank you for the opportunity to serve you.

16

14

12

10

CPI
UGESTATION
STATION
BEFORE DIGGING
CALL DIRECTOR
800-368-5898





Utility Safety and Design Inc.

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

INVOICE

Number: IN20214563
Page: 1
Date: 9/30/2021

Sold To: VALLEY GAS
PO BOX 390
IRVINGTON, KY 40146

Attn: KENNETH KASEY

Reference - P.O. #	Customer No.	Salesperson	Ship Via	Terms Code
	VALLEY	DH		NET30

Item No.	Description/Comments	Quantity	UOM	Unit Price	Amount
LABOR	Draft Response to KY PSC re: NOPV Le Pickup Odorator; Site Visit; Repair Valve Leak & Site Glass (J Brangers)	2.00	HOUR	140.000000	280.00
	CODECOMP SubTotal				280.00
LABOR	Draft Response to KY PSC re: NOPV Le Pickup Odorator; Site Visit; Repair Valve Leak & Site Glass (J Brangers)	1.50	HOUR	140.000000	210.00
	ODORIZER SubTotal				210.00
2021-VALLEYKY Tota					490.00
	Due Date	Amount Due			
	10/30/2021	490.00			

Remit To:
Utility Safety and Design Inc.
PO Box 276
1927 Miller Drive
Olney 62450

Subtotal before taxes	490.00
Total taxes	0.00
Total amount	490.00
Amount due	490.00

Thank you for the opportunity to serve you.

VALLEY GAS EXHIBIT 7B

Utility Safety and Design Inc.

PO Box 276
 1927 Miller Drive
 Olney, IL 62450
 (618) 392-5502

CUSTOMER NO.: VALLEY
PAGE: 1
DATE: 3/29/2022

CUSTOMER NO.: VALLEY
PAGE: 1
DATE: 3/29/2022

SOLD TO:

VALLEY GAS
 PO BOX 390
 IRVINGTON, KY 40146

 Attn: KENNETH KASEY

REMIT TO ADDRESS:

Utility Safety and Design Inc.
 PO Box 276
 1927 Miller Drive
 Olney 62450
 US

IN20221288	3/22/2022	IN	4/21/2022	12,169.93	IN20221288	12,169.93
<p><i>PAID 4-22-22</i></p>						

Credit Limit: 5,000.00
Credit Available: 0.00

TO ENSURE PROPER CREDIT, PLEASE CHECK THE ITEMS YOU ARE PAYING IN THE ✓ COLUMN.

IN - Invoice DB - Debit Note CR - Credit Note IT - Interest Payable	PY - Applied Receipt ED - Earned Discount AD - Adjustment PI - Prepayment	UC - Unapplied Cash RF - Refund	Total ⇨	12,169.93	Total ⇨	12,169.93
1 - 30 DAYS O/DUE	31 - 60 DAYS O/DUE	61 - 90 DAYS O/DUE	OVER 90 DAYS O/DUE	Utility Safety and Design Inc.		
0.00	0.00	0.00	0.00			



Utility Safety and Design Inc.

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

INVOICE

Number: IN20221288
Page: 1
Date: 3/22/2022

Sold To: VALLEY GAS
PO BOX 390
IRVINGTON, KY 40146
Attn: KENNETH KASEY

Table with 5 columns: Reference - P.O. #, Customer No., Salesperson, Ship Via, Terms Code. Values include VALLEY, DH, NET30.

Main invoice table with 6 columns: Item No., Description/Comments, Quantity, UOM, Unit Price, Amount. Lists various materials like NIPPLE, BUSHING REDUCER and labor costs.

Continued on next page..



Utility Safety and Design Inc.

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

INVOICE

Number: IN20221288
Page: 2
Date: 3/22/2022

Sold To: VALLEY GAS
PO BOX 390
IRVINGTON, KY 40146
Attn: KENNETH KASEY

Table with 5 columns: Reference - P.O. #, Customer No., Salesperson, Ship Via, Terms Code. Row 1: VALLEY, DH, NET30

Main item table with 6 columns: Item No., Description/Comments, Quantity, UOM, Unit Price, Amount. Lists 15 items including MATERIAL_TAXABLE with various descriptions like THREAD-O-LET, TEE, GAUGE, VALVES, etc.

Continued on next page..



Utility Safety and Design Inc.

INVOICE

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

Number: IN20221288
Page: 3
Date: 3/22/2022

Sold To: VALLEY GAS
PO BOX 390
IRVINGTON, KY 40146

Attn: KENNETH KASEY

Table with 5 columns: Reference - P.O. #, Customer No., Salesperson, Ship Via, Terms Code. Values include VALLEY, DH, and NET30.

Main invoice table with columns: Item No., Description/Comments, Quantity, UOM, Unit Price, Amount. Includes subtotal and due date information.

Remit To:
Utility Safety and Design Inc.
PO Box 276
1927 Miller Drive
Olney 62450

Summary table with 2 columns: Description, Amount. Rows include Subtotal before taxes, Total taxes, Total amount, and Amount due.

Thank you for the opportunity to serve you.

ARCRANDOLPH & ASSOCIATES, LLC

A REGULATORY COMPLIANCE AND TRAINING COMPANY

PAID
2-14-2020

INVOICE

Date 2/14/2020
Invoice No. 3009

Bill to: Mr. Kerry Kasey
Valley Gas Company
P.O. Box 55
Irvington, Kentucky 40146

Due 3/14/2020

Quantity	Description	Unit Cost	Total Cost
1 Day	DOT OQ Qualifications 2020 #24 Individual OQ Qualifications / Classes: H-1, H-2 & M-7 - Eight Students in Three Training Classes February 5, 2020 **Three Classes Charged at Two Class Rate**	\$ 1,195.00	\$ 1,195.00
24	OQ Modules (Training Book, Exam & Affidavit) **Cost Per Individual Qualification: \$124.80	\$ 75.00	\$ 1,800.00
	Instructor Travel From Lexington, KY & Postage		\$ 200.00
Federal EIN # 35-2431759			
Terms Payment Upon Receipt 1.5% per month after 30 days		Amount Due Amount Paid Balance Due	\$ 3,195.00

4017 Washington Road, STE 175, McMurray, PA 15317 / 859-543-0224 office / 412-580-8668 cell

Task Status Results (Printed on: 1/25/2022 3:45 PM)
Company Task List: USDI - Master Covered Task List 2020
Company: Utility Safety and Design, Inc. (USDI)



Brooks, Jason
 EWN-127440
 Irvington Gas
 Supervisor(s): Brangers, Jason; Enloe, Tyler; Gardner, Homer; Holdener, Mark; Kasey, Kevin; Kocher, Jordan; Martin, Mike; Wendling, Mike

Task Code	Task Name	Current Completion Date	Valid Until	Status				
0054	One-Call Response/Locating Facilites (2020) (1:1)	10/19/2021	10/19/2024	✔				
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	10/6/2021	10/6/2024	10/6/2021	✔	✔
2	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/19/2021	10/19/2024			✔
OR								
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/19/2021	10/19/2024			✔



Doutaz, David
EWN-106993
Irvington Gas

Supervisor(s): Brangers, Jason; Enloe, Tyler; Gardner, Homer; Holdener, Mark; Kasey, Kevin; Kocher, Jordan; Martin, Mike; Wendling, Mike

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0001	O&M, Emergency Plan, OQ Plan, Public Awareness, and Procedure Review (2020) (1:0)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2243	EWN-CBT-Emergency Plan	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	2314	EWN-CBT-Properties of Natural Gas	6/8/2021	6/8/2024	6/8/2021	✓	✓
3	Computer Based Training	13051	EWN-CBT-Abnormal Operating Conditions: Gas AOCs	6/8/2021	6/8/2024	6/8/2021	✓	✓
4	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/21/2021	10/21/2024			✓
0007	Pipe-To-Soil Potentials (2020) (1:2)				10/21/2021	10/21/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	87256	EWN-CBT-Measure Structure-To-Electrolyte Potential (0001)	6/8/2021	6/8/2024	6/8/2021	✓	✓	
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/21/2021	10/21/2024			✓	
OR								
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/21/2021	10/21/2024			✓	
0008	Visual Inspection and Measuring of External and Internal Corrosion (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85348	EWN-CBT-Perform Visual Inspection of Buried Pipe and Components When Exposed (0151)	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	86397	EWN-CBT-Perform Visual Inspection for Internal Corrosion (0161)	6/8/2021	6/8/2024	6/8/2021	✓	✓
3	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	6/8/2021	6/8/2024	6/8/2021	✓	✓
4	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0012	Atmospheric Corrosion Control and Monitoring (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2223	EWN-CBT- Measure Atmospheric Corrosion (0191)	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	18838	EWN-CBT-Perform Visual Inspection for Atmospheric Corrosion (0141)	6/8/2021	6/8/2024	6/8/2021	✓	✓
3	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/21/2021	10/21/2024			✓
0013	Valve Operation (2020) (1:1)				10/21/2021	10/21/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	85465	EWN-CBT-Open and Close Valves Manually (0301)	6/8/2021	6/8/2024	6/8/2021	✓	✓	
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/21/2021	10/21/2024			✓	
OR								
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/21/2021	10/21/2024			✓	
0014	Valve Inspection and Maintenance (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	38686	EWN-CBT-Maintenance of Service Valves Upstream of Customer Meter (1191)	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	84289	EWN-CBT-Operate Valves Manually to Adjust Flow/Pressure and Monitor for Changes (0311)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	85964	EWN-CBT-Perform Valve Preventive Maintenance (0341)	6/9/2021	6/9/2024	6/9/2021	✓	✓
4	Computer Based Training	86127	EWN-CBT-Perform Valve Corrective Maintenance (0321)	6/9/2021	6/9/2024	6/9/2021	✓	✓
5	Computer Based Training	88914	EWN-CBT-Perform Valve Visual Inspection and Partial Operation (0331)	6/9/2021	6/9/2024	6/9/2021	✓	✓
6	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0016	Spring/Pilot Operated Pressure Regulating Devices -Inspection and Maintenance Border Stations, Farm Taps, Compressors (2020) (1:2)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2210	EWN-CBT-AOC Unintended Release of Gas or Liquid from a Pressure Relief Device	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	18595	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure-Limiting, or Pressure-Relief Device (0421)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	80915	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure Regulating Device (0391)	6/10/2021	6/10/2024	6/10/2021	✓	✓
4	Computer Based Training	80916	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded, Pressure-Limiting, or Pressure-Relief Device (0411)	6/10/2021	6/10/2024	6/10/2021	✓	✓
5	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/21/2021	10/21/2024			✓
0018	Pressure Testing (2020) (1:2)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2197	EWN-CBT-AOC Overpressure (MAOP Exceeded)	6/10/2021	6/10/2024	6/10/2021	✓	✓
2	Computer Based Training	85006	EWN-CBT-Pressure Test - Nonliquid Medium - MAOP Greater Than or Equal to 100 Psi (0571)	6/10/2021	6/10/2024	6/10/2021	✓	✓
3	Computer Based Training	85673	EWN-CBT-Pressure Test: Nonliquid Medium - MAOP Less Than 100 psi (0561)	6/10/2021	6/10/2024	6/10/2021	✓	✓
4	Computer Based Training	92373	EWN-CBT-Inspect Chart Recorder	6/10/2021	6/10/2024	6/10/2021	✓	✓
5	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/21/2021	10/21/2024			✓
0021	Plastic Pipe Joining - Stab Fittings (2020) (1:1)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	84172	EWN-CBT-Joining of Plastic Pipe: Stab Fittings (0681)	10/21/2021	10/21/2024	10/21/2021	✓	✓
2	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/22/2021	10/22/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0025	Plastic Pipe Joining - Electrofusion (2020) (1:1)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2241	EWN-CBT-Joining of Plastic Pipe-Electrofusion (0781)	6/13/2021	6/13/2024	6/14/2021	✓	✓
2	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
0027	Joining of Pipe - Threaded and Flanged Connections (2020) (1:1)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11989	EWN-CBT-Joining of Pipe: Flange Assembly (0731)	10/21/2021	10/21/2024	10/21/2021	✓	✓
2	Computer Based Training	86307	EWN-CBT-Joining of Pipe: Threaded Joints (0721)	10/21/2021	10/21/2024	10/21/2021	✓	✓
3	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/22/2021	10/22/2024			✓
0028	Coating Application (2020) (1:2)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	13782	EWN-CBT-Coating Application and Repair: Brushed or Rolled (0991)	10/21/2021	10/21/2024	10/21/2021	✓	✓
2	Computer Based Training	15780	EWN-CBT-External Coating Application and Repair: Wrapped (1011)	10/21/2021	10/21/2024	10/21/2021	✓	✓
3	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	10/22/2021	10/22/2024			✓
0031	Plastic Pipe Squeeze Off (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85930	EWN-CBT-Squeeze Off Plastic Pipe (1141)	6/13/2021	6/13/2024	6/13/2021	✓	✓
2	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name					Current Completion Date	Valid Until	Status
0033	Self Tapping Tees (2020) (1:2)					11/4/2021	11/4/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11857	EWN-CBT-Tapping a Pipeline with a Built-In Cutter (1101)	6/13/2021	6/13/2024	6/13/2021	✓	✓
2	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
0035	Odorization Testing (2020) (1:1)					10/22/2021	10/22/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2218	EWN-CBT-AOC Under Odorization	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Computer Based Training	38687	EWN-CBT-Odorization - Periodic Sampling (1211)	6/17/2021	6/17/2024	6/17/2021	✓	✓
3	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/22/2021	10/22/2024			✓
0037	Visually Inspect Pipe and Components Prior to Installation (2020) (1:1)					11/4/2021	11/4/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	18864	EWN-CBT-Visually Inspect Pipe and Components Prior to Installation (0641)	11/3/2021	11/3/2024	11/3/2021	✓	✓
2	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	6/8/2021	6/8/2024	6/8/2021	✓	✓
3	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	11/4/2021	11/4/2024			✓
0046	Excavation and Backfilling (2020) (1:1)					10/21/2021	6/14/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2291	EWN-CBT-Damage Prevention during Excavation Activities by or On Behalf of the Operator (1321)	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Computer Based Training	17716	EWN-CBT-Pipeline Support During Excavation Activities (1341)	6/14/2021	6/14/2024	6/14/2021	✓	✓
3	Computer Based Training	18872	EWN-CBT-Backfilling (0981)	6/14/2021	6/14/2024	6/14/2021	✓	✓
4	Computer Based Training	84256	EWN-CBT-Backhoe Safety	6/14/2021	6/14/2024	6/14/2021	✓	✓
5	Performance Evaluation	95520	USDI-PEF-46 Damage Prevention During Excavation/Backfilling (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0049	Meter Set Installation /Spring Loaded Regulators Meters Sets (2020) (1:2)				10/21/2021	10/21/2024	✔	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2239	EWN-CBT-Temporary Isolation of Service Lines and Service Discontinuance (1201)	6/14/2021	6/14/2024	6/14/2021	✔	✔
2	Computer Based Training	80914	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded Pressure-Regulating Device (0381)	6/16/2021	6/16/2024	6/16/2021	✔	✔
3	Computer Based Training	86028	EWN-CBT-Installation of Customer Meters and Regulators - Residential and Small Commercial (1161)	6/16/2021	6/16/2024	6/16/2021	✔	✔
4	Computer Based Training	2246	EWN-CBT-Establishment of Gas	6/16/2021	6/16/2024	6/16/2021	✔	✔
5	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/21/2021	10/21/2024			✔
OR								
	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/21/2021	10/21/2024			✔
0051	Inside Leak Investigation (2020) (1:1)				10/21/2021	10/21/2024	✔	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	6/16/2021	6/16/2024	6/16/2021	✔	✔
2	Computer Based Training	2237	EWN-CBT-Inside Gas Leak Investigation (1231)	6/17/2021	6/17/2024	6/17/2021	✔	✔
3	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/21/2021	10/21/2024			✔
OR								
	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/21/2021	10/21/2024			✔
0052	Outside Leak Investigation (2020) (1:1)				10/22/2021	10/22/2024	✔	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	6/16/2021	6/16/2024	6/16/2021	✔	✔
2	Computer Based Training	2281	EWN-CBT-Outside Gas Leak Investigation (1241)	10/22/2021	10/22/2024	6/16/2021	✔	✔
3	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	10/22/2021	10/22/2024			✔
OR								
	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	10/22/2021	10/22/2024			✔
0054	One-Call Response/Locating Facilities (2020) (1:1)				10/21/2021	10/21/2024	✔	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	6/17/2021	6/17/2024	6/17/2021	✔	✔
2	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/21/2021	10/21/2024			✔
OR								
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/21/2021	10/21/2024			✔

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0057	Damage Prevention Inspection During Third Party Excavation (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	80925	EWN-CBT-Damage Prevention Inspection During Third-Party Excavation or Encroachment Activities as Determined Necessary by Operator (1331)	6/17/2021	6/17/2024	6/17/2021	✓	✓
2	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/21/2021	10/21/2024			✓
0059	Abandonment of Main and Service Lines (2020) (1:2)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	97138	EWN-CBT-Abandonment of Facilities	6/17/2021	6/17/2024	6/17/2021	✓	✓
2	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	11/4/2021	11/4/2024			✓
0061	Lighting Customer Equipment and Recognizing Unsafe Installations (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
1	Computer Based Training	2321	EWN-CBT-Red Tagging Appliances	6/17/2021	6/17/2024	6/17/2021	✓	✓
2	Computer Based Training	10584	EWN-CBT-Recognizing and Reporting Unsafe Meter Sets	6/17/2021	6/17/2024	6/17/2021	✓	✓
3	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/21/2021	10/21/2024			✓
OQ1	Performance Review (1:0)				10/22/2021	10/21/2022	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Performance Evaluation	97048	Procedure and Performance Effectiveness Review -1	10/21/2021	10/21/2022			✓	
Performance Evaluation	112347	Procedure and Performance Effectiveness Review -2	10/22/2021	10/22/2022			✓	



Eskridge, Heath
EWN-693418
Irvington Gas

Supervisor(s): Brangers, Jason; Enloe, Tyler; Gardner, Homer; Holdener, Mark; Kasey, Kevin; Kocher, Jordan; Martin, Mike; Wendling, Mike

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0001	O&M, Emergency Plan, OQ Plan, Public Awareness, and Procedure Review (2020) (1:0)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2243	EWN-CBT-Emergency Plan	9/21/2021	9/21/2024	9/21/2021	✓	✓
2	Computer Based Training	2314	EWN-CBT-Properties of Natural Gas	9/21/2021	9/21/2024	9/21/2021	✓	✓
3	Computer Based Training	13051	EWN-CBT-Abnormal Operating Conditions: Gas AOCs	9/21/2021	9/21/2024	9/21/2021	✓	✓
4	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/20/2021	10/20/2024			✓
0007	Pipe-To-Soil Potentials (2020) (1:2)				10/20/2021	10/20/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	87256	EWN-CBT-Measure Structure-To-Electrolyte Potential (0001)	5/28/2021	5/28/2024	5/28/2021	✓	✓	
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/20/2021	10/20/2024			✓	
OR								
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/20/2021	10/20/2024			✓	
0008	Visual Inspection and Measuring of External and Internal Corrosion (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85348	EWN-CBT-Perform Visual Inspection of Buried Pipe and Components When Exposed (0151)	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	86397	EWN-CBT-Perform Visual Inspection for Internal Corrosion (0161)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	5/28/2021	5/28/2024	5/28/2021	✓	✓
4	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/20/2021	10/20/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0012	Atmospheric Corrosion Control and Monitoring (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2223	EWN-CBT- Measure Atmospheric Corrosion (0191)	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	18838	EWN-CBT-Perform Visual Inspection for Atmospheric Corrosion (0141)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/20/2021	10/20/2024			✓
0013	Valve Operation (2020) (1:1)				10/20/2021	10/20/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	85465	EWN-CBT-Open and Close Valves Manually (0301)	9/21/2021	9/21/2024	9/21/2021	✓	✓	
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/20/2021	10/20/2024			✓	
OR								
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/20/2021	10/20/2024			✓	
0014	Valve Inspection and Maintenance (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	38686	EWN-CBT-Maintenance of Service Valves Upstream of Customer Meter (1191)	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	84289	EWN-CBT-Operate Valves Manually to Adjust Flow/Pressure and Monitor for Changes (0311)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Computer Based Training	85964	EWN-CBT-Perform Valve Preventive Maintenance (0341)	5/28/2021	5/28/2024	5/28/2021	✓	✓
4	Computer Based Training	86127	EWN-CBT-Perform Valve Corrective Maintenance (0321)	5/28/2021	5/28/2024	5/28/2021	✓	✓
5	Computer Based Training	88914	EWN-CBT-Perform Valve Visual Inspection and Partial Operation (0331)	5/28/2021	5/28/2024	5/28/2021	✓	✓
6	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/20/2021	10/20/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0016	Spring/Pilot Operated Pressure Regulating Devices -Inspection and Maintenance Border Stations, Farm Taps, Compressors (2020) (1:2)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2210	EWN-CBT-AOC Unintended Release of Gas or Liquid from a Pressure Relief Device	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	18595	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure-Limiting, or Pressure-Relief Device (0421)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Computer Based Training	80915	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure Regulating Device (0391)	6/2/2021	6/2/2024	6/2/2021	✓	✓
4	Computer Based Training	80916	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded, Pressure-Limiting, or Pressure-Relief Device (0411)	6/2/2021	6/2/2024	6/2/2021	✓	✓
5	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/20/2021	10/20/2024			✓
0018	Pressure Testing (2020) (1:2)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2197	EWN-CBT-AOC Overpressure (MAOP Exceeded)	6/2/2021	6/2/2024	6/2/2021	✓	✓
2	Computer Based Training	85006	EWN-CBT-Pressure Test - Nonliquid Medium - MAOP Greater Than or Equal to 100 Psi (0571)	9/21/2021	9/21/2024	9/21/2021	✓	✓
3	Computer Based Training	85673	EWN-CBT-Pressure Test: Nonliquid Medium - MAOP Less Than 100 psi (0561)	6/2/2021	6/2/2024	6/2/2021	✓	✓
4	Computer Based Training	92373	EWN-CBT-Inspect Chart Recorder	6/2/2021	6/2/2024	6/2/2021	✓	✓
5	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/20/2021	10/20/2024			✓
0021	Plastic Pipe Joining - Stab Fittings (2020) (1:1)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	84172	EWN-CBT-Joining of Plastic Pipe: Stab Fittings (0681)	11/4/2021	11/4/2024	11/4/2021	✓	✓
2	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	11/4/2021	11/4/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0025	Plastic Pipe Joining - Electrofusion (2020) (1:1)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2241	EWN-CBT-Joining of Plastic Pipe-Electrofusion (0781)	6/2/2021	6/2/2024	6/2/2021	✓	✓
2	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
0027	Joining of Pipe - Threaded and Flanged Connections (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11989	EWN-CBT-Joining of Pipe: Flange Assembly (0731)	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Computer Based Training	86307	EWN-CBT-Joining of Pipe: Threaded Joints (0721)	10/20/2021	10/20/2024	10/20/2021	✓	✓
3	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/20/2021	10/20/2024			✓
0028	Coating Application (2020) (1:2)				11/2/2021	11/2/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	13782	EWN-CBT-Coating Application and Repair: Brushed or Rolled (0991)	11/2/2021	11/2/2024	11/2/2021	✓	✓
2	Computer Based Training	15780	EWN-CBT-External Coating Application and Repair: Wrapped (1011)	11/2/2021	11/2/2024	11/2/2021	✓	✓
3	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	11/2/2021	11/2/2024			✓
OR								
	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	11/2/2021	11/2/2024			✓
0031	Plastic Pipe Squeeze Off (2020) (1:1)				11/2/2021	11/2/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85930	EWN-CBT-Squeeze Off Plastic Pipe (1141)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	11/2/2021	11/2/2024			✓
OR								
	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	11/2/2021	11/2/2024			✓

Task Code	Task Name					Current Completion Date	Valid Until	Status
0033	Self Tapping Tees (2020) (1:2)					10/20/2021	10/20/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11857	EWN-CBT-Tapping a Pipeline with a Built-In Cutter (1101)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	10/20/2021	10/20/2024			✓
0035	Odorization Testing (2020) (1:1)					10/20/2021	10/20/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2218	EWN-CBT-AOC Under Odorization	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	38687	EWN-CBT-Odorization - Periodic Sampling (1211)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/20/2021	10/20/2024			✓
0037	Visually Inspect Pipe and Components Prior to Installation (2020) (1:1)					11/4/2021	11/4/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	18864	EWN-CBT-Visually Inspect Pipe and Components Prior to Installation (0641)	11/4/2021	11/4/2024	11/4/2021	✓	✓
2	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	11/4/2021	11/4/2024			✓
0046	Excavation and Backfilling (2020) (1:1)					10/20/2021	6/9/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2291	EWN-CBT-Damage Prevention during Excavation Activities by or On Behalf of the Operator (1321)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	17716	EWN-CBT-Pipeline Support During Excavation Activities (1341)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	18872	EWN-CBT-Backfilling (0981)	6/9/2021	6/9/2024	6/9/2021	✓	✓
4	Computer Based Training	84256	EWN-CBT-Backhoe Safety	6/9/2021	6/9/2024	6/9/2021	✓	✓
5	Performance Evaluation	95520	USDI-PEF-46 Damage Prevention During Excavation/Backfilling (Performance Assessment)	10/20/2021	10/20/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0049	Meter Set Installation /Spring Loaded Regulators Meters Sets (2020) (1:2)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2239	EWN-CBT-Temporary Isolation of Service Lines and Service Discontinuance (1201)	9/21/2021	9/21/2024	9/21/2021	✓	✓
2	Computer Based Training	80914	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded Pressure-Regulating Device (0381)	9/21/2021	9/21/2024	9/21/2021	✓	✓
3	Computer Based Training	86028	EWN-CBT-Installation of Customer Meters and Regulators - Residential and Small Commercial (1161)	9/21/2021	9/21/2024	9/21/2021	✓	✓
4	Computer Based Training	2246	EWN-CBT-Establishment of Gas	9/21/2021	9/21/2024	9/21/2021	✓	✓
5	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/20/2021	10/20/2024			✓
0051	Inside Leak Investigation (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	2237	EWN-CBT-Inside Gas Leak Investigation (1231)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/20/2021	10/20/2024			✓
0052	Outside Leak Investigation (2020) (1:1)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	2281	EWN-CBT-Outside Gas Leak Investigation (1241)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	11/4/2021	11/4/2024			✓
0054	One-Call Response/Locating Facilities (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	9/2/2021	9/2/2024	9/2/2021	✓	✓
2	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/20/2021	10/20/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0057	Damage Prevention Inspection During Third Party Excavation (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	80925	EWN-CBT-Damage Prevention Inspection During Third-Party Excavation or Encroachment Activities as Determined Necessary by Operator (1331)	9/21/2021	9/21/2024	9/21/2021	✓	✓
2	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/20/2021	10/20/2024			✓
0058	Purging (2020) (1:2)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2315	EWN-CBT-Purge - Flammable or Inert Gas (1651)	11/2/2021	11/2/2024	11/2/2021	✓	✓
2	Performance Evaluation	95506	USDI-PEF-58 Purging (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95506	USDI-PEF-58 Purging (Performance Assessment)	11/4/2021	11/4/2024			✓
0059	Abandonment of Main and Service Lines (2020) (1:2)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	97138	EWN-CBT-Abandonment of Facilities	11/4/2021	11/4/2024	11/4/2021	✓	✓
2	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	11/4/2021	11/4/2024			✓
0061	Lighting Customer Equipment and Recognizing Unsafe Installations (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
1	Computer Based Training	2321	EWN-CBT-Red Tagging Appliances	9/21/2021	9/21/2024	9/21/2021	✓	✓
2	Computer Based Training	10584	EWN-CBT-Recognizing and Reporting Unsafe Meter Sets	9/21/2021	9/21/2024	9/21/2021	✓	✓
3	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/20/2021	10/20/2024			✓
OQ1	Performance Review (1:0)				10/20/2021	10/20/2022	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Performance Evaluation	97048	Procedure and Performance Effectiveness Review -1	10/20/2021	10/20/2022			✓	
Performance Evaluation	112347	Procedure and Performance Effectiveness Review -2	10/20/2021	10/20/2022			✓	



Fackler, Brad
EWN-457005
Irvington Gas

Supervisor(s): Brangers, Jason; Enloe, Tyler; Gardner, Homer; Holdener, Mark; Kasey, Kevin; Kocher, Jordan; Martin, Mike; Wendling, Mike

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0001	O&M, Emergency Plan, OQ Plan, Public Awareness, and Procedure Review (2020) (1:0)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2243	EWN-CBT-Emergency Plan	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	2314	EWN-CBT-Properties of Natural Gas	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	13051	EWN-CBT-Abnormal Operating Conditions: Gas AOCs	9/21/2021	9/21/2024	9/21/2021	✓	✓
4	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/19/2021	10/19/2024			✓
0007	Pipe-To-Soil Potentials (2020) (1:2)				10/20/2021	10/20/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	87256	EWN-CBT-Measure Structure-To-Electrolyte Potential (0001)	6/8/2021	6/8/2024	6/8/2021	✓	✓	
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/20/2021	10/20/2024			✓	
OR								
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/20/2021	10/20/2024			✓	
0008	Visual Inspection and Measuring of External and Internal Corrosion (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85348	EWN-CBT-Perform Visual Inspection of Buried Pipe and Components When Exposed (0151)	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	86397	EWN-CBT-Perform Visual Inspection for Internal Corrosion (0161)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	6/10/2021	6/10/2024	6/10/2021	✓	✓
4	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/19/2021	10/19/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0012	Atmospheric Corrosion Control and Monitoring (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2223	EWN-CBT- Measure Atmospheric Corrosion (0191)	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	18838	EWN-CBT-Perform Visual Inspection for Atmospheric Corrosion (0141)	6/10/2021	6/10/2024	6/10/2021	✓	✓
3	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/19/2021	10/19/2024			✓
0013	Valve Operation (2020) (1:1)				10/20/2021	10/20/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	85465	EWN-CBT-Open and Close Valves Manually (0301)	6/8/2021	6/8/2024	6/8/2021	✓	✓	
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/20/2021	10/20/2024			✓	
OR								
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/20/2021	10/20/2024			✓	
0014	Valve Inspection and Maintenance (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	38686	EWN-CBT-Maintenance of Service Valves Upstream of Customer Meter (1191)	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	84289	EWN-CBT-Operate Valves Manually to Adjust Flow/Pressure and Monitor for Changes (0311)	6/10/2021	6/10/2024	6/10/2021	✓	✓
3	Computer Based Training	85964	EWN-CBT-Perform Valve Preventive Maintenance (0341)	6/10/2021	6/10/2024	6/10/2021	✓	✓
4	Computer Based Training	86127	EWN-CBT-Perform Valve Corrective Maintenance (0321)	6/10/2021	6/10/2024	6/10/2021	✓	✓
5	Computer Based Training	88914	EWN-CBT-Perform Valve Visual Inspection and Partial Operation (0331)	6/10/2021	6/10/2024	6/10/2021	✓	✓
6	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/19/2021	10/19/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0016	Spring/Pilot Operated Pressure Regulating Devices -Inspection and Maintenance Border Stations, Farm Taps, Compressors (2020) (1:2)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2210	EWN-CBT-AOC Unintended Release of Gas or Liquid from a Pressure Relief Device	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	18595	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure-Limiting, or Pressure-Relief Device (0421)	6/10/2021	6/10/2024	6/10/2021	✓	✓
3	Computer Based Training	80915	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure Regulating Device (0391)	6/10/2021	6/10/2024	6/10/2021	✓	✓
4	Computer Based Training	80916	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded, Pressure-Limiting, or Pressure-Relief Device (0411)	6/14/2021	6/14/2024	6/14/2021	✓	✓
5	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/20/2021	10/20/2024			✓
0018	Pressure Testing (2020) (1:2)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2197	EWN-CBT-AOC Overpressure (MAOP Exceeded)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	85006	EWN-CBT-Pressure Test - Nonliquid Medium - MAOP Greater Than or Equal to 100 Psi (0571)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	85673	EWN-CBT-Pressure Test: Nonliquid Medium - MAOP Less Than 100 psi (0561)	6/9/2021	6/9/2024	6/9/2021	✓	✓
4	Computer Based Training	92373	EWN-CBT-Inspect Chart Recorder	6/14/2021	6/14/2024	6/14/2021	✓	✓
5	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/19/2021	10/19/2024			✓
0021	Plastic Pipe Joining - Stab Fittings (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	84172	EWN-CBT-Joining of Plastic Pipe: Stab Fittings (0681)	10/19/2021	10/19/2024	10/19/2021	✓	✓
2	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0025	Plastic Pipe Joining - Electrofusion (2020) (1:1)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2241	EWN-CBT-Joining of Plastic Pipe-Electrofusion (0781)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
0027	Joining of Pipe - Threaded and Flanged Connections (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11989	EWN-CBT-Joining of Pipe: Flange Assembly (0731)	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Computer Based Training	86307	EWN-CBT-Joining of Pipe: Threaded Joints (0721)	10/20/2021	10/20/2024	10/20/2021	✓	✓
3	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/20/2021	10/20/2024			✓
0028	Coating Application (2020) (1:2)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	13782	EWN-CBT-Coating Application and Repair: Brushed or Rolled (0991)	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Computer Based Training	15780	EWN-CBT-External Coating Application and Repair: Wrapped (1011)	10/21/2021	10/21/2024	10/21/2021	✓	✓
3	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	10/21/2021	10/21/2024			✓
0031	Plastic Pipe Squeeze Off (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85930	EWN-CBT-Squeeze Off Plastic Pipe (1141)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0033	Self Tapping Tees (2020) (1:2)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11857	EWN-CBT-Tapping a Pipeline with a Built-In Cutter (1101)	10/19/2021	10/19/2024	10/19/2021	✓	✓
2	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
0035	Odorization Testing (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2218	EWN-CBT-AOC Under Odorization	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Computer Based Training	38687	EWN-CBT-Odorization - Periodic Sampling (1211)	6/14/2021	6/14/2024	6/14/2021	✓	✓
3	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/19/2021	10/19/2024			✓
0036	Odorizer Monitoring, Maintenance and Filling (2020) (1:1)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85058	EWN-CBT-Odorization-Odorizer Inspection, Testing, Preventative and Corrective Maintenance (1221)	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Performance Evaluation	95510	USDI-PEF-36 Odorizer Monitoring, Maintenance (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95510	USDI-PEF-36 Odorizer Monitoring, Maintenance (Performance Assessment)	10/20/2021	10/20/2024			✓
0043	Installing Plastic Mains and Services - Trenching (2020) (1:3)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2273	EWN-CBT-Installation of Plastic Pipe in a Ditch (0901)	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Computer Based Training	17430	EWN-CBT-Install Tracer Wire (0941)	6/14/2021	6/14/2024	6/14/2021	✓	✓
3	Performance Evaluation	95518	USDI-PEF-43 Installing Plastic Mains & Services - Trenching (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95518	USDI-PEF-43 Installing Plastic Mains & Services - Trenching (Performance Assessment)	10/20/2021	10/20/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0046	Excavation and Backfilling (2020) (1:1)				10/19/2021	6/14/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2291	EWN-CBT-Damage Prevention during Excavation Activities by or On Behalf of the Operator (1321)	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Computer Based Training	17716	EWN-CBT-Pipeline Support During Excavation Activities (1341)	6/14/2021	6/14/2024	6/14/2021	✓	✓
3	Computer Based Training	18872	EWN-CBT-Backfilling (0981)	6/14/2021	6/14/2024	6/14/2021	✓	✓
4	Computer Based Training	84256	EWN-CBT-Backhoe Safety	6/14/2021	6/14/2024	6/14/2021	✓	✓
5	Performance Evaluation	95520	USDI-PEF-46 Damage Prevention During Excavation/Backfilling (Performance Assessment)	10/19/2021	10/19/2024			✓
0049	Meter Set Installation /Spring Loaded Regulators Meters Sets (2020) (1:2)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2239	EWN-CBT-Temporary Isolation of Service Lines and Service Discontinuance (1201)	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Computer Based Training	80914	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded Pressure-Regulating Device (0381)	6/14/2021	6/14/2024	6/14/2021	✓	✓
3	Computer Based Training	86028	EWN-CBT-Installation of Customer Meters and Regulators - Residential and Small Commercial (1161)	10/17/2021	10/17/2024	10/17/2021	✓	✓
4	Computer Based Training	2246	EWN-CBT-Establishment of Gas	10/17/2021	10/17/2024	10/17/2021	✓	✓
5	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/19/2021	10/19/2024			✓
0051	Inside Leak Investigation (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Computer Based Training	2237	EWN-CBT-Inside Gas Leak Investigation (1231)	10/17/2021	10/17/2024	10/17/2021	✓	✓
3	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/19/2021	10/19/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0052	Outside Leak Investigation (2020) (1:1)				11/2/2021	11/2/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Computer Based Training	2281	EWN-CBT-Outside Gas Leak Investigation (1241)	9/1/2021	9/1/2024	9/1/2021	✓	✓
3	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	11/2/2021	11/2/2024			✓
OR								
	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	11/2/2021	11/2/2024			✓
0054	One-Call Response/Locating Facilities (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/19/2021	10/19/2024			✓
0057	Damage Prevention Inspection During Third Party Excavation (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	80925	EWN-CBT-Damage Prevention Inspection During Third-Party Excavation or Encroachment Activities as Determined Necessary by Operator (1331)	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/19/2021	10/19/2024			✓
0058	Purging (2020) (1:2)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2315	EWN-CBT-Purge - Flammable or Inert Gas (1651)	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Performance Evaluation	95506	USDI-PEF-58 Purging (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95506	USDI-PEF-58 Purging (Performance Assessment)	10/20/2021	10/20/2024			✓
0059	Abandonment of Main and Service Lines (2020) (1:2)				10/20/2021	10/20/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	97138	EWN-CBT-Abandonment of Facilities	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	10/20/2021	10/20/2024			✓
OR								
	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	10/20/2021	10/20/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0061	Lighting Customer Equipment and Recognizing Unsafe Installations (2020) (1:1)				10/19/2021	10/19/2024	✔	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
1	Computer Based Training	2321	EWN-CBT-Red Tagging Appliances	9/1/2021	9/1/2024	9/1/2021	✔	✔
2	Computer Based Training	10584	EWN-CBT-Recognizing and Reporting Unsafe Meter Sets	9/1/2021	9/1/2024	9/1/2021	✔	✔
3	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/19/2021	10/19/2024			✔
OR								
	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/19/2021	10/19/2024			✔
OQ1	Performance Review (1:0)				10/21/2021	10/19/2022	✔	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Performance Evaluation	97048	Procedure and Performance Effectiveness Review -1	10/19/2021	10/19/2022			✔	
Performance Evaluation	112347	Procedure and Performance Effectiveness Review -2	10/21/2021	10/21/2022			✔	



Griffith, Daniel
EWN-929181
Irvington Gas

Supervisor(s): Brangers, Jason; Enloe, Tyler; Gardner, Homer; Holdener, Mark; Kasey, Kevin; Kocher, Jordan; Martin, Mike; Wendling, Mike

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0001	O&M, Emergency Plan, OQ Plan, Public Awareness, and Procedure Review (2020) (1:0)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2243	EWN-CBT-Emergency Plan	9/21/2021	9/21/2024	9/21/2021	✓	✓
2	Computer Based Training	2314	EWN-CBT-Properties of Natural Gas	9/21/2021	9/21/2024	9/21/2021	✓	✓
3	Computer Based Training	13051	EWN-CBT-Abnormal Operating Conditions: Gas AOCs	9/21/2021	9/21/2024	9/21/2021	✓	✓
4	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/21/2021	10/21/2024			✓
0007	Pipe-To-Soil Potentials (2020) (1:2)				10/21/2021	10/21/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	87256	EWN-CBT-Measure Structure-To-Electrolyte Potential (0001)	5/28/2021	5/28/2024	5/28/2021	✓	✓	
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/21/2021	10/21/2024			✓	
OR								
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/21/2021	10/21/2024			✓	
0008	Visual Inspection and Measuring of External and Internal Corrosion (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85348	EWN-CBT-Perform Visual Inspection of Buried Pipe and Components When Exposed (0151)	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	86397	EWN-CBT-Perform Visual Inspection for Internal Corrosion (0161)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	5/28/2021	5/28/2024	5/28/2021	✓	✓
4	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0012	Atmospheric Corrosion Control and Monitoring (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2223	EWN-CBT- Measure Atmospheric Corrosion (0191)	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	18838	EWN-CBT-Perform Visual Inspection for Atmospheric Corrosion (0141)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	10/21/2021	10/21/2024			✓
0013	Valve Operation (2020) (1:1)				10/21/2021	10/21/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	85465	EWN-CBT-Open and Close Valves Manually (0301)	9/21/2021	9/21/2024	9/21/2021	✓	✓	
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/21/2021	10/21/2024			✓	
OR								
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	10/21/2021	10/21/2024			✓	
0014	Valve Inspection and Maintenance (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	38686	EWN-CBT-Maintenance of Service Valves Upstream of Customer Meter (1191)	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	84289	EWN-CBT-Operate Valves Manually to Adjust Flow/Pressure and Monitor for Changes (0311)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Computer Based Training	85964	EWN-CBT-Perform Valve Preventive Maintenance (0341)	5/28/2021	5/28/2024	5/28/2021	✓	✓
4	Computer Based Training	86127	EWN-CBT-Perform Valve Corrective Maintenance (0321)	5/28/2021	5/28/2024	5/28/2021	✓	✓
5	Computer Based Training	88914	EWN-CBT-Perform Valve Visual Inspection and Partial Operation (0331)	5/28/2021	5/28/2024	5/28/2021	✓	✓
6	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0016	Spring/Pilot Operated Pressure Regulating Devices -Inspection and Maintenance Border Stations, Farm Taps, Compressors (2020) (1:2)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2210	EWN-CBT-AOC Unintended Release of Gas or Liquid from a Pressure Relief Device	5/28/2021	5/28/2024	5/28/2021	✓	✓
2	Computer Based Training	18595	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure-Limiting, or Pressure-Relief Device (0421)	5/28/2021	5/28/2024	5/28/2021	✓	✓
3	Computer Based Training	80915	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure Regulating Device (0391)	6/9/2021	6/9/2024	6/9/2021	✓	✓
4	Computer Based Training	80916	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded, Pressure-Limiting, or Pressure-Relief Device (0411)	6/9/2021	6/9/2024	6/9/2021	✓	✓
5	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	10/21/2021	10/21/2024			✓
0018	Pressure Testing (2020) (1:2)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2197	EWN-CBT-AOC Overpressure (MAOP Exceeded)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	85006	EWN-CBT-Pressure Test - Nonliquid Medium - MAOP Greater Than or Equal to 100 Psi (0571)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	85673	EWN-CBT-Pressure Test: Nonliquid Medium - MAOP Less Than 100 psi (0561)	6/9/2021	6/9/2024	6/9/2021	✓	✓
4	Computer Based Training	92373	EWN-CBT-Inspect Chart Recorder	6/9/2021	6/9/2024	6/9/2021	✓	✓
5	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	10/21/2021	10/21/2024			✓
0021	Plastic Pipe Joining - Stab Fittings (2020) (1:1)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	84172	EWN-CBT-Joining of Plastic Pipe: Stab Fittings (0681)	10/21/2021	10/21/2024	10/21/2021	✓	✓
2	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/22/2021	10/22/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0025	Plastic Pipe Joining - Electrofusion (2020) (1:1)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2241	EWN-CBT-Joining of Plastic Pipe-Electrofusion (0781)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
0027	Joining of Pipe - Threaded and Flanged Connections (2020) (1:1)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11989	EWN-CBT-Joining of Pipe: Flange Assembly (0731)	10/21/2021	10/21/2024	10/21/2021	✓	✓
2	Computer Based Training	86307	EWN-CBT-Joining of Pipe: Threaded Joints (0721)	10/21/2021	10/21/2024	10/21/2021	✓	✓
3	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	10/22/2021	10/22/2024			✓
0028	Coating Application (2020) (1:2)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	13782	EWN-CBT-Coating Application and Repair: Brushed or Rolled (0991)	10/21/2021	10/21/2024	10/21/2021	✓	✓
2	Computer Based Training	15780	EWN-CBT-External Coating Application and Repair: Wrapped (1011)	10/21/2021	10/21/2024	10/21/2021	✓	✓
3	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	10/22/2021	10/22/2024			✓
0031	Plastic Pipe Squeeze Off (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85930	EWN-CBT-Squeeze Off Plastic Pipe (1141)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name					Current Completion Date	Valid Until	Status
0033	Self Tapping Tees (2020) (1:2)					11/4/2021	11/4/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11857	EWN-CBT-Tapping a Pipeline with a Built-In Cutter (1101)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
0035	Odorization Testing (2020) (1:1)					10/22/2021	10/22/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2218	EWN-CBT-AOC Under Odorization	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Computer Based Training	38687	EWN-CBT-Odorization - Periodic Sampling (1211)	6/29/2021	6/29/2024	6/29/2021	✓	✓
3	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/22/2021	10/22/2024			✓
0046	Excavation and Backfilling (2020) (1:1)					10/21/2021	6/29/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2291	EWN-CBT-Damage Prevention during Excavation Activities by or On Behalf of the Operator (1321)	6/29/2021	6/29/2024	6/29/2021	✓	✓
2	Computer Based Training	17716	EWN-CBT-Pipeline Support During Excavation Activities (1341)	6/29/2021	6/29/2024	6/29/2021	✓	✓
3	Computer Based Training	18872	EWN-CBT-Backfilling (0981)	6/29/2021	6/29/2024	6/29/2021	✓	✓
4	Computer Based Training	84256	EWN-CBT-Backhoe Safety	6/29/2021	6/29/2024	6/29/2021	✓	✓
5	Performance Evaluation	95520	USDI-PEF-46 Damage Prevention During Excavation/Backfilling (Performance Assessment)	10/21/2021	10/21/2024			✓
0049	Meter Set Installation /Spring Loaded Regulators Meters Sets (2020) (1:2)					10/21/2021	10/21/2024	✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2239	EWN-CBT-Temporary Isolation of Service Lines and Service Discontinuance (1201)	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Computer Based Training	80914	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded Pressure-Regulating Device (0381)	9/1/2021	9/1/2024	9/1/2021	✓	✓
3	Computer Based Training	86028	EWN-CBT-Installation of Customer Meters and Regulators - Residential and Small Commercial (1161)	9/21/2021	9/21/2024	9/21/2021	✓	✓
4	Computer Based Training	2246	EWN-CBT-Establishment of Gas	9/21/2021	9/21/2024	9/21/2021	✓	✓
5	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0051	Inside Leak Investigation (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Computer Based Training	2237	EWN-CBT-Inside Gas Leak Investigation (1231)	9/1/2021	9/1/2024	9/1/2021	✓	✓
3	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	10/21/2021	10/21/2024			✓
0052	Outside Leak Investigation (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Computer Based Training	2281	EWN-CBT-Outside Gas Leak Investigation (1241)	9/1/2021	9/1/2024	9/1/2021	✓	✓
3	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	10/21/2021	10/21/2024			✓
0054	One-Call Response/Locating Facilities (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/21/2021	10/21/2024			✓
0057	Damage Prevention Inspection During Third Party Excavation (2020) (1:1)				10/21/2021	10/21/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	80925	EWN-CBT-Damage Prevention Inspection During Third-Party Excavation or Encroachment Activities as Determined Necessary by Operator (1331)	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/21/2021	10/21/2024			✓
OR								
	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/21/2021	10/21/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0061	Lighting Customer Equipment and Recognizing Unsafe Installations (2020) (1:1)				10/21/2021	10/21/2024	✔	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
1	Computer Based Training	2321	EWN-CBT-Red Tagging Appliances	9/1/2021	9/1/2024	9/1/2021	✔	✔
2	Computer Based Training	10584	EWN-CBT-Recognizing and Reporting Unsafe Meter Sets	9/1/2021	9/1/2024	9/1/2021	✔	✔
3	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/21/2021	10/21/2024			✔
OR								
	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	10/21/2021	10/21/2024			✔
OQ1	Performance Review (1:0)				10/22/2021	10/21/2022	✔	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Performance Evaluation	97048	Procedure and Performance Effectiveness Review -1	10/21/2021	10/21/2022			✔	
Performance Evaluation	112347	Procedure and Performance Effectiveness Review -2	10/22/2021	10/22/2022			✔	



Haycraft, Sam
EWN-406420
Irvington Gas

Supervisor(s): Brangers, Jason; Enloe, Tyler; Gardner, Homer; Holdener, Mark; Kasey, Kevin; Kocher, Jordan; Martin, Mike; Wendling, Mike

Task Code	Task Name			Current Completion Date	Valid Until	Status		
0001	O&M, Emergency Plan, OQ Plan, Public Awareness, and Procedure Review (2020) (1:0)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2243	EWN-CBT-Emergency Plan	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	2314	EWN-CBT-Properties of Natural Gas	6/8/2021	6/8/2024	6/8/2021	✓	✓
3	Computer Based Training	13051	EWN-CBT-Abnormal Operating Conditions: Gas AOCs	6/8/2021	6/8/2024	6/8/2021	✓	✓
4	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	11/3/2021	11/3/2024			✓
0007	Pipe-To-Soil Potentials (2020) (1:2)			11/3/2021	11/3/2024			✓
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	87256	EWN-CBT-Measure Structure-To-Electrolyte Potential (0001)	6/8/2021	6/8/2024	6/8/2021	✓	✓	
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	11/3/2021	11/3/2024			✓	
OR								
Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	11/3/2021	11/3/2024			✓	
0008	Visual Inspection and Measuring of External and Internal Corrosion (2020) (1:1)			11/3/2021	11/3/2024			✓
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85348	EWN-CBT-Perform Visual Inspection of Buried Pipe and Components When Exposed (0151)	6/8/2021	6/8/2024	6/8/2021	✓	✓
2	Computer Based Training	86397	EWN-CBT-Perform Visual Inspection for Internal Corrosion (0161)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	6/9/2021	6/9/2024	6/9/2021	✓	✓
4	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95476	USDI-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	11/3/2021	11/3/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0012	Atmospheric Corrosion Control and Monitoring (2020) (1:1)				11/3/2021	11/3/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2223	EWN-CBT- Measure Atmospheric Corrosion (0191)	8/17/2021	8/17/2024	8/17/2021	✓	✓
2	Computer Based Training	18838	EWN-CBT-Perform Visual Inspection for Atmospheric Corrosion (0141)	8/17/2021	8/17/2024	8/17/2021	✓	✓
3	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	11/3/2021	11/3/2024			✓
0013	Valve Operation (2020) (1:1)				11/3/2021	11/3/2024	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	85465	EWN-CBT-Open and Close Valves Manually (0301)	6/14/2021	6/14/2024	6/14/2021	✓	✓	
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	11/3/2021	11/3/2024			✓	
OR								
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)	11/3/2021	11/3/2024			✓	
0014	Valve Inspection and Maintenance (2020) (1:1)				11/3/2021	11/3/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	38686	EWN-CBT-Maintenance of Service Valves Upstream of Customer Meter (1191)	8/17/2021	8/17/2024	8/17/2021	✓	✓
2	Computer Based Training	84289	EWN-CBT-Operate Valves Manually to Adjust Flow/Pressure and Monitor for Changes (0311)	8/17/2021	8/17/2024	8/17/2021	✓	✓
3	Computer Based Training	85964	EWN-CBT-Perform Valve Preventive Maintenance (0341)	8/17/2021	8/17/2024	8/17/2021	✓	✓
4	Computer Based Training	86127	EWN-CBT-Perform Valve Corrective Maintenance (0321)	8/17/2021	8/17/2024	8/17/2021	✓	✓
5	Computer Based Training	88914	EWN-CBT-Perform Valve Visual Inspection and Partial Operation (0331)	8/17/2021	8/17/2024	8/17/2021	✓	✓
6	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	11/3/2021	11/3/2024			✓

Task Code	Task Name			Current Completion Date	Valid Until	Status		
0018	Pressure Testing (2020) (1:2)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2197	EWN-CBT-AOC Overpressure (MAOP Exceeded)	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Computer Based Training	85006	EWN-CBT-Pressure Test - Nonliquid Medium - MAOP Greater Than or Equal to 100 Psi (0571)	9/2/2021	9/2/2024	9/2/2021	✓	✓
3	Computer Based Training	85673	EWN-CBT-Pressure Test: Nonliquid Medium - MAOP Less Than 100 psi (0561)	11/3/2021	11/3/2024	11/3/2021	✓	✓
4	Computer Based Training	92373	EWN-CBT-Inspect Chart Recorder	11/3/2021	11/3/2024	11/3/2021	✓	✓
5	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	11/3/2021	11/3/2024			✓
0021	Plastic Pipe Joining - Stab Fittings (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	84172	EWN-CBT-Joining of Plastic Pipe: Stab Fittings (0681)	11/3/2021	11/3/2024	11/3/2021	✓	✓
2	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	11/3/2021	11/3/2024			✓
0025	Plastic Pipe Joining - Electrofusion (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2241	EWN-CBT-Joining of Plastic Pipe-Electrofusion (0781)	5/27/2021	5/27/2024	5/27/2021	✓	✓
2	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/3/2021	11/3/2024			✓
0027	Joining of Pipe - Threaded and Flanged Connections (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11989	EWN-CBT-Joining of Pipe: Flange Assembly (0731)	11/3/2021	11/3/2024	11/3/2021	✓	✓
2	Computer Based Training	86307	EWN-CBT-Joining of Pipe: Threaded Joints (0721)	11/3/2021	11/3/2024	11/3/2021	✓	✓
3	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	11/3/2021	11/3/2024			✓

Task Code	Task Name			Current Completion Date	Valid Until	Status		
0028	Coating Application (2020) (1:2)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	13782	EWN-CBT-Coating Application and Repair: Brushed or Rolled (0991)	11/3/2021	11/3/2024	11/3/2021	✓	✓
2	Computer Based Training	15780	EWN-CBT-External Coating Application and Repair: Wrapped (1011)	11/3/2021	11/3/2024	11/3/2021	✓	✓
3	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	11/3/2021	11/3/2024			✓
0031	Plastic Pipe Squeeze Off (2020) (1:1)			11/2/2021	11/2/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85930	EWN-CBT-Squeeze Off Plastic Pipe (1141)	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	11/2/2021	11/2/2024			✓
OR								
	Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	11/2/2021	11/2/2024			✓
0033	Self Tapping Tees (2020) (1:2)			11/4/2021	11/4/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11857	EWN-CBT-Tapping a Pipeline with a Built-In Cutter (1101)	5/27/2021	5/27/2024	5/27/2021	✓	✓
2	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	11/4/2021	11/4/2024			✓
0035	Odorization Testing (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2218	EWN-CBT-AOC Under Odorization	6/14/2021	6/14/2024	6/14/2021	✓	✓
2	Computer Based Training	38687	EWN-CBT-Odorization - Periodic Sampling (1211)	9/1/2021	9/1/2024	9/1/2021	✓	✓
3	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	11/3/2021	11/3/2024			✓

Task Code	Task Name			Current Completion Date	Valid Until	Status		
0037	Visually Inspect Pipe and Components Prior to Installation (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	18864	EWN-CBT-Visually Inspect Pipe and Components Prior to Installation (0641)	11/3/2021	11/3/2024	11/3/2021	✓	✓
2	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	6/9/2021	6/9/2024	6/9/2021	✓	✓
3	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	11/3/2021	11/3/2024			✓
0046	Excavation and Backfilling (2020) (1:1)			11/3/2021	9/2/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2291	EWN-CBT-Damage Prevention during Excavation Activities by or On Behalf of the Operator (1321)	9/2/2021	9/2/2024	9/2/2021	✓	✓
2	Computer Based Training	17716	EWN-CBT-Pipeline Support During Excavation Activities (1341)	11/2/2021	11/2/2024	11/2/2021	✓	✓
3	Computer Based Training	18872	EWN-CBT-Backfilling (0981)	11/2/2021	11/2/2024	11/2/2021	✓	✓
4	Computer Based Training	84256	EWN-CBT-Backhoe Safety	11/2/2021	11/2/2024	11/2/2021	✓	✓
5	Performance Evaluation	95520	USDI-PEF-46 Damage Prevention During Excavation/Backfilling (Performance Assessment)	11/3/2021	11/3/2024			✓
0049	Meter Set Installation /Spring Loaded Regulators Meters Sets (2020) (1:2)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2239	EWN-CBT-Temporary Isolation of Service Lines and Service Discontinuance (1201)	5/27/2021	5/27/2024	5/27/2021	✓	✓
2	Computer Based Training	80914	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded Pressure-Regulating Device (0381)	9/21/2021	9/21/2024	9/21/2021	✓	✓
3	Computer Based Training	86028	EWN-CBT-Installation of Customer Meters and Regulators - Residential and Small Commercial (1161)	9/21/2021	9/21/2024	9/21/2021	✓	✓
4	Computer Based Training	2246	EWN-CBT-Establishment of Gas	11/2/2021	11/2/2024	11/2/2021	✓	✓
5	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	11/3/2021	11/3/2024			✓

Task Code	Task Name			Current Completion Date	Valid Until	Status		
0051	Inside Leak Investigation (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	5/27/2021	5/27/2024	5/27/2021	✓	✓
2	Computer Based Training	2237	EWN-CBT-Inside Gas Leak Investigation (1231)	5/27/2021	5/27/2024	5/27/2021	✓	✓
3	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	11/3/2021	11/3/2024			✓
0052	Outside Leak Investigation (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	5/27/2021	5/27/2024	5/27/2021	✓	✓
2	Computer Based Training	2281	EWN-CBT-Outside Gas Leak Investigation (1241)	5/27/2021	5/27/2024	5/27/2021	✓	✓
3	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	11/3/2021	11/3/2024			✓
0054	One-Call Response/Locating Facilities (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	11/3/2021	11/3/2024			✓
0057	Damage Prevention Inspection During Third Party Excavation (2020) (1:1)			11/3/2021	11/3/2024	✓		
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	80925	EWN-CBT-Damage Prevention Inspection During Third-Party Excavation or Encroachment Activities as Determined Necessary by Operator (1331)	6/9/2021	6/9/2024	6/9/2021	✓	✓
2	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	11/3/2021	11/3/2024			✓

Task Code	Task Name				Current Completion Date	Valid Until	Status	
0058	Purging (2020) (1:2)				11/3/2021	11/3/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2315	EWN-CBT-Purge - Flammable or Inert Gas (1651)	11/2/2021	11/2/2024	11/2/2021	✓	✓
2	Performance Evaluation	95506	USDI-PEF-58 Purging (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95506	USDI-PEF-58 Purging (Performance Assessment)	11/3/2021	11/3/2024			✓
0059	Abandonment of Main and Service Lines (2020) (1:2)				11/3/2021	11/3/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	97138	EWN-CBT-Abandonment of Facilities	11/2/2021	11/2/2024	11/2/2021	✓	✓
2	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	11/3/2021	11/3/2024			✓
0061	Lighting Customer Equipment and Recognizing Unsafe Installations (2020) (1:1)				11/3/2021	11/3/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status
1	Computer Based Training	2321	EWN-CBT-Red Tagging Appliances	9/1/2021	9/1/2024	9/1/2021	✓	✓
2	Computer Based Training	10584	EWN-CBT-Recognizing and Reporting Unsafe Meter Sets	9/1/2021	9/1/2024	9/1/2021	✓	✓
3	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	11/3/2021	11/3/2024			✓
OR								
	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	11/3/2021	11/3/2024			✓
Q01	Performance Review (1:0)				11/3/2021	11/2/2022	✓	
Type	ID	Evaluation Title	Completed	Valid Until	Training	Training Required	Status	
Performance Evaluation	97048	Procedure and Performance Effectiveness Review -1	11/2/2021	11/2/2022			✓	
Performance Evaluation	112347	Procedure and Performance Effectiveness Review -2	11/3/2021	11/3/2022			✓	

Task Status Results (Printed on: 11/30/2021 10:19 AM)
Company Task List: USDI - Master Covered Task List 2020
Company: Utility Safety and Design, Inc. (USDI)



Kasey, Kevin
 EWN-219618

Irvington Gas

Supervisor(s): Enloe, Tyler; Gardner, Homer; Holdener, Mark; Kocher, Jordan; Martin, Mike; Wendling, Mike

Task Code	Task Name	Current Completion Date	Expires On	Status				
0001	O&M, Emergency Plan, OQ Plan, Public Awareness, and Procedure Review (2020) (1:0)	10/19/2021	10/19/2024	✓				
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2243	EWN-CBT-Emergency Plan	5/31/2021	5/31/2024	5/31/2021	✓	✓
2	Computer Based Training	2314	EWN-CBT-Properties of Natural Gas	10/6/2021	10/6/2024	10/6/2021	✓	✓
3	Computer Based Training	13051	EWN-CBT-Abnormal Operating Conditions: Gas AOCs	10/7/2021	10/7/2024	10/7/2021	✓	✓
4	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95096	USDI-PEF-01 O&M, Emergency Plan, Natural Gas Basics (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Record Only	79149	TNG ASME-Abnormal Operating Conditions (MEA11519)	Not Complete	Not Complete			⚠
	Record Only	79150	TNG ASME-GAS01 Hazards of Natural Gas and Prevention of Accidental Ignition (MEA11524)	Not Complete	Not Complete			⚠
	Record Only	79297	KNT ASME-Abnormal Operating Conditions (MEA11520)	Not Complete	Not Complete			⚠
	Record Only	79298	KNT ASME-GAS01 Hazards of Natural Gas and Prevention of Accidental Ignition (MEA11523)	Not Complete	Not Complete			⚠

Task Code	Task Name	Current Completion					Expires	Status
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
0002	Cathodic Protection System Installation and Maintenance (2020) (1:2)							
Preferred Condition for Task Qualification								
1	Computer Based Training	93503	EWN-CBT-Installation and Maintenance of Mechanical Electrical Connections (0041)	11/4/2021	11/4/2024	11/4/2021	✓	
2	Computer Based Training	86687	EWN-CBT-Install Exothermic Electrical Connections (0051)	11/4/2021	11/4/2024	11/4/2021	✓	
3	Computer Based Training	11780	EWN-CBT-Drive In Magnesium Anodes	11/4/2021	11/4/2024	11/4/2021	✓	
4	Computer Based Training	86145	EWN-CBT-Install Galvanic Anodes (9.2)	11/4/2021	11/4/2024	11/4/2021	✓	
5	Computer Based Training	85005	EWN-CBT-Inspect and Monitor Galvanic Ground Beds/Anodes (0031)	Not Complete	Not Complete	Not Complete		
6	Performance Evaluation	95097	USDI-PEF-02 Cathodic Protection System Installation and Maintenance (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95097	USDI-PEF-02 Cathodic Protection System Installation and Maintenance (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79155	TNG ASME-0041 Installation And Maintenance Of Mechanical Electrical Connections (MEA11143)	Not Complete	Not Complete			
	Record Only	79156	TNG ASME-0051 Installation Of Exothermic Electrical Connections (MEA11144)	Not Complete	Not Complete			
	Record Only	79303	KNT ASME-0041 Installation And Maintenance Of Mechanical Electrical Connections (MEA1817)	Not Complete	Not Complete			
	Record Only	79304	KNT ASME-0051 Installation Of Exothermic Electrical Connections (MEA1818)	Not Complete	Not Complete			
	Record Only	79154	TNG ASME-0031 Inspect And Monitor Galvanic Ground Beds/Anodes (MEA11142)	Not Complete	Not Complete			
	Record Only	79302	KNT ASME-0031 Inspect And Monitor Galvanic Ground Beds/Anodes (MEA1816)	Not Complete	Not Complete			
OR								
	Computer Based Training	11780	EWN-CBT-Drive In Magnesium Anodes	Not Complete	Not Complete	11/4/2021	✓	
	Computer Based Training	18668	EWN-CBT-Install and Maintain Mechanical Electrical Connections (0041)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	86687	EWN-CBT-Install Exothermic Electrical Connections (0051)	Not Complete	Not Complete	11/4/2021	✓	
	Performance Evaluation	95097	USDI-PEF-02 Cathodic Protection System Installation and Maintenance (Performance Assessment)	Not Complete	Not Complete			
0007	Pipe-To-Soil Potentials (2020) (1:2)					10/19/2021	10/19/2024	
Preferred Condition for Task Qualification								
	Computer Based Training	87256	EWN-CBT-Measure Structure-To-Electrolyte Potential (0001)	10/7/2021	10/7/2024	10/7/2021	✓	
	Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/19/2021	10/19/2024			
OR								
	Performance Evaluation	95474	USDI-PEF-07 Pipe-to-Soil Potentials (Performance Assessment)	10/19/2021	10/19/2024			
OR								
	Record Only	79151	TNG ASME-0001 Measure Structure-to-Electrolyte Potential (MEA11139)	Not Complete	Not Complete			
	Record Only	79299	KNT ASME-0001 Measure Structure-to-Electrolyte Potential (MEA1813)	Not Complete	Not Complete			

Task Code	Task Name			Current Completion Date	Expires On	Status	
0008	Visual Inspection and Measuring of External and Internal Corrosion (2020) (1:1)						
Order	Type	ID	Evaluation Title	Completed	Expires	Training Required	Status
Preferred Condition for Task Qualification							
1	Computer Based Training	85348	EWN-CBT-Perform Visual Inspection of Buried Pipe and Components When Exposed (0151)	Not Complete	Not Complete	Not Complete	
2	Computer Based Training	86397	EWN-CBT-Perform Visual Inspection for Internal Corrosion (0161)	Not Complete	Not Complete	Not Complete	
3	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	Not Complete	Not Complete	Not Complete	
4	Performance Evaluation	95476	USDJ-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	Not Complete	Not Complete		
OR							
	Performance Evaluation	95476	USDJ-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	Not Complete	Not Complete		
OR							
	Record Only	79166	TNG ASME-0151 Visual Inspection Of Buried Pipe And Components When Exposed (MEA11154)	Not Complete	Not Complete		
	Record Only	/916/	TNG ASME-0161 Visual Inspection For Internal Corrosion (MEA11155)	Not Complete	Not Complete		
	Record Only	79314	KNT ASME-0151 Visual Inspection Of Buried Pipe And Components When Exposed (MEA1828)	Not Complete	Not Complete		
	Record Only	79315	KNT ASME-0161 Visual Inspection For Internal Corrosion (MEA1829)	Not Complete	Not Complete		
	Record Only	79316	KNT ASME-0171 Measure External Corrosion (MEA1830)	Not Complete	Not Complete		
	Record Only	79171	TNG ASME-0201 Visual Inspection Of Installed Pipe And Components For Mechanical Damage (MEA11159)	Not Complete	Not Complete		
	Record Only	79319	KNT ASME-0201 Visual Inspection Of Installed Pipe And Components For Mechanical Damage (MEA1833)	Not Complete	Not Complete		
OR							
	Computer Based Training	85348	EWN-CBT-Perform Visual Inspection of Buried Pipe and Components When Exposed (0151)	Not Complete	Not Complete	Not Complete	
	Computer Based Training	86397	EWN-CBT-Perform Visual Inspection for Internal Corrosion (0161)	Not Complete	Not Complete	Not Complete	
	Performance Evaluation	95476	USDJ-PEF-08 Visual Inspection and Measuring of External and Internal Corrosion (Performance Assessment)	Not Complete	Not Complete		

Task Code	Task Name			Current Completion Date	Expires On	Status		
0012	Atmospheric Corrosion Control and Monitoring (2020) (1:1)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2223	EWN-CBT- Measure Atmospheric Corrosion (0191)	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	18838	EWN-CBT-Perform Visual Inspection for Atmospheric Corrosion (0141)	Not Complete	Not Complete	Not Complete		
3	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95479	USDI-PEF-12 Atmospheric Corrosion Survey (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79165	TNG ASME-0141 Visual Inspection For Atmospheric Corrosion (MEA11153)	Not Complete	Not Complete			
	Record Only	79170	TNG ASME-0191 Measure Atmospheric Corrosion (MEA11158)	Not Complete	Not Complete			
	Record Only	79313	KNT ASME-0141 Visual Inspection For Atmospheric Corrosion (MEA1827)	Not Complete	Not Complete			
	Record Only	79318	KNT ASME-0191 Measure Atmospheric Corrosion (MEA1832)	Not Complete	Not Complete			
0013	Valve Operation (2020) (1:1)			10/20/2021	10/20/2024			
Type	ID	Evaluation Title		Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
Computer Based Training	85465	EWN-CBT-Open and Close Valves Manually (0301)		10/19/2021	10/19/2024	10/19/2021		
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)		10/20/2021	10/20/2024			
OR								
Performance Evaluation	95482	USDI-PEF-13 Valve Operation (Performance Assessment)		10/20/2021	10/20/2024			
OR								
Record Only	79181	TNG ASME-0301 Manually Opening And Closing Valves (MEA11169)		Not Complete	Not Complete			
Record Only	79329	KNT ASME-0301 Manually Opening And Closing Valves (MEA1843)		Not Complete	Not Complete			

Task Code	Task Name				Current Completion Date	Expires On	Status	
0014	Valve Inspection and Maintenance (2020) (1:1)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	38686	EWN-CBT-Maintenance of Service Valves Upstream of Customer Meter (1191)	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	84289	EWN-CBT-Operate Valves Manually to Adjust Flow/Pressure and Monitor for Changes (0311)	Not Complete	Not Complete	Not Complete		
3	Computer Based Training	85964	EWN-CBT-Perform Valve Preventive Maintenance (0341)	Not Complete	Not Complete	Not Complete		
4	Computer Based Training	86127	EWN-CBT-Perform Valve Corrective Maintenance (0321)	Not Complete	Not Complete	Not Complete		
5	Computer Based Training	88914	EWN-CBT-Perform Valve Visual Inspection and Partial Operation (0331)	Not Complete	Not Complete	Not Complete		
6	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95483	USDI-PEF-14 Valve Inspection and Maintenance (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79182	TNG ASME-0311 Adjust And Monitor Flow Or Pressure - Manual Valve Operation (MEA11170)	Not Complete	Not Complete			
	Record Only	79183	TNG ASME-0321 Valve Correction Maintenance (MEA11171)	Not Complete	Not Complete			
	Record Only	79184	TNG ASME-0331 Valve - Visual Inspection And Partial Maintenance (MEA11172)	Not Complete	Not Complete			
	Record Only	79185	TNG ASME-0341 Valve - Preventive Maintenance (MEA11173)	Not Complete	Not Complete			
	Record Only	79270	TNG ASME-1191 Maintenance Of Service Valves Upstream Of Customer Meter (MEA11258)	Not Complete	Not Complete			
	Record Only	79330	KNT ASME-0311 Adjust And Monitor Flow Or Pressure - Manual Valve Operation (MEA1844)	Not Complete	Not Complete			
	Record Only	79331	KNT ASME-0321 Valve Correction Maintenance (MEA1845)	Not Complete	Not Complete			
	Record Only	79332	KNT ASME-0331 Valve - Visual Inspection And Partial Maintenance (MEA1846)	Not Complete	Not Complete			
	Record Only	79333	KNT ASME-0341 Valve - Preventive Maintenance (MEA1847)	Not Complete	Not Complete			
	Record Only	79418	KNT ASME-1191 Maintenance Of Service Valves Upstream Of Customer Meter (MEA1932)	Not Complete	Not Complete			

Task Code	Task Name			Current Completion Date	Expires On	Status		
0016	Spring/Pilot Operated Pressure Regulating Devices -Inspection and Maintenance Border Stations, Farm Taps, Compressors (2020) (1:2)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2210	EWN-CBT-AOC Unintended Release of Gas or Liquid from a Pressure Relief Device	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	18595	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure-Limiting, or Pressure-Relief Device (0421)	Not Complete	Not Complete	Not Complete		
3	Computer Based Training	80915	EWN-CBT-Inspect, Test, and Maintain Pilot-Operated, Pressure Regulating Device (0391)	Not Complete	Not Complete	Not Complete		
4	Computer Based Training	80916	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded, Pressure-Limiting, or Pressure-Relief Device (0411)	Not Complete	Not Complete	Not Complete		
5	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95484	USDI-PEF-16 Spring/Pilot Operated Pressure Regulating Devices - Inspection and Maintenance of of Border Stations, Farm Taps, Compressors (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79190	TNG ASME-0391 Pilot-Operated Pressure Regulating Device - Inspection, Testing, Preventive And Corrective Maintenance (MEA11178)	Not Complete	Not Complete			
	Record Only	79192	TNG ASME-0411 Spring-Loaded Pressure Limiting And Relief - Inspection, Testing, Preventive And Corrective Maintenance (MEA11180)	Not Complete	Not Complete			
	Record Only	79193	TNG ASME-0421 Pilot-Operated Pressure Limiting and Relief: Inspect, Test, Preventive & Corrective Maintenance (MEA11181)	Not Complete	Not Complete			
	Record Only	79338	KNT ASME-0391 Pilot-Operated Pressure Regulating Device - Inspection, Testing, Preventive And Corrective Maintenance (MEA1852)	Not Complete	Not Complete			
	Record Only	79340	KNT ASME-0411 Spring-Loaded Pressure Limiting And Relief - Inspection, Testing, Preventive And Corrective Maintenance (MEA1854)	Not Complete	Not Complete			
	Record Only	79341	KNT ASME-0421 Pilot-Operated Pressure Limiting and Relief: Inspect, Test, Preventive & Corrective Maintenance (MEA1855)	Not Complete	Not Complete			

Task Code	Task Name				Current Completion Date	Expires On	Status	
0018	Pressure Testing (2020) (1:2)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2197	EWN-CBT-AOC Overpressure (MAOP Exceeded)	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	85006	EWN-CBT-Pressure Test - Nonliquid Medium - MAOP Greater Than or Equal to 100 Psi (0571)	Not Complete	Not Complete	Not Complete		
3	Computer Based Training	85673	EWN-CBT-Pressure Test: Nonliquid Medium - MAOP Less Than 100 psi (0561)	Not Complete	Not Complete	Not Complete		
4	Computer Based Training	92373	EWN-CBT-inspect Chart Recorder	Not Complete	Not Complete	Not Complete		
5	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95487	USDI-PEF-18 Pressure Testing (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79207	TNG ASME-0561 Pressure Test - Nonliquid Medium - MAOP Less Than 100psi (MEA11195)	Not Complete	Not Complete			
	Record Only	79208	TNG ASME-0571 Pressure Test - Nonliquid Medium - MAOP Greater Than Or Equal To 100psi (MEA11196)	Not Complete	Not Complete			
	Record Only	79355	KNT ASME-0561 Pressure Test - Nonliquid Medium - MAOP Less Than 100psi (MEA1869)	Not Complete	Not Complete			
	Record Only	79356	KNT ASME-0571 Pressure Test - Nonliquid Medium - MAOP Greater Than Or Equal To 100psi (MEA1870)	Not Complete	Not Complete			
0021	Plastic Pipe Joining - Stab Fittings (2020) (1:1)				10/22/2021	10/22/2024		
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	84172	EWN-CBT-Joining of Plastic Pipe: Stab Fittings (0681)	10/19/2021	10/19/2024	10/19/2021		
2	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/22/2021	10/22/2024			
OR								
	Performance Evaluation	95493	USDI-PEF-21 Plastic Pipe Joining - Mechanical Fitting (Performance Assessment)	10/22/2021	10/22/2024			
OR								
	Record Only	79219	TNG ASME-0681 Joining Of Plastic Pipe - Stab Fittings (MEA11207)	Not Complete	Not Complete			
	Record Only	79367	KNT ASME-0681 Joining Of Plastic Pipe - Stab Fittings (MEA1881)	Not Complete	Not Complete			

Task Code	Task Name				Current Completion Date	Expires On	Status	
0025	Plastic Pipe Joining - Electrofusion (2020) (1:1)				11/4/2021	11/4/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2241	EWN-CBT-Joining of Plastic Pipe-Electrofusion (0781)	11/4/2021	11/4/2024	11/4/2021	✓	✓
2	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Performance Evaluation	95489	USDI-PEF-25 Plastic Pipe Joining - Electrofusion (Performance Assessment)	11/4/2021	11/4/2024			✓
OR								
	Record Only	79229	TNG ASME-0781 Joining Of Plastic Pipe - Electrofusion (MEA11217)	Not Complete	Not Complete			!
	Record Only	79377	KNT ASME-0781 Joining Of Plastic Pipe - Electrofusion (MEA1891)	Not Complete	Not Complete			!
0027	Joining of Pipe - Threaded and Flanged Connections (2020) (1:1)						!	
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11989	EWN-CBT-Joining of Pipe: Flange Assembly (0731)	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Computer Based Training	86307	EWN-CBT-Joining of Pipe: Threaded Joints (0721)	Not Complete	Not Complete	Not Complete	!	!
3	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	Not Complete	Not Complete			!
OR								
	Performance Evaluation	95494	USDI-PEF-27 Joining of Pipe - Threaded & Flanged Connections (Performance Assessment)	Not Complete	Not Complete			!
OR								
	Record Only	79223	TNG ASME-0721 Joining Of Pipe - Threaded Joints (MEA11211)	Not Complete	Not Complete			!
	Record Only	79224	TNG ASME-0731 Joining Of Pipe - Flange Assembly (MEA11212)	Not Complete	Not Complete			!
	Record Only	79371	KNT ASME-0721 Joining Of Pipe - Threaded Joints (MEA1885)	Not Complete	Not Complete			!
	Record Only	79372	KNT ASME-0731 Joining Of Pipe - Flange Assembly (MEA1886)	Not Complete	Not Complete			!

Task Code	Task Name				Current Completion Date	Expires On	Status	
0028	Coating Application (2020) (1:2)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	13782	EWN-CBT-Coating Application and Repair: Brushed or Rolled (0991)	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	15780	EWN-CBT-External Coating Application and Repair: Wrapped (1011)	Not Complete	Not Complete	Not Complete		
3	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95495	USDI-PEF-28 Coating Application (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79250	TNG ASME-0991 Coating Application And Repair - Brushed Or Rolled (MEA11238)	Not Complete	Not Complete			
	Record Only	79252	TNG ASME-1011 External Coating Application And Repair - Wrapped (MEA11240)	Not Complete	Not Complete			
	Record Only	79398	KNT ASME-0991 Coating Application And Repair - Brushed Or Rolled (MEA1912)	Not Complete	Not Complete			
	Record Only	79400	KNT ASME-1011 External Coating Application And Repair - Wrapped (MEA1914)	Not Complete	Not Complete			
0031	Plastic Pipe Squeeze Off (2020) (1:1)				11/4/2021	11/4/2024		
Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status	
Preferred Condition for Task Qualification								
Computer Based Training	85930	EWN-CBT-Squeeze Off Plastic Pipe (1141)	Not Complete	Not Complete	11/4/2021			
Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	11/4/2021	11/4/2024				
OR								
Performance Evaluation	95498	USDI-PEF-31 Plastic Pipe Squeeze-Off (Performance Assessment)	11/4/2021	11/4/2024				
OR								
Record Only	79265	TNG ASME-1141 Squeeze-Off Plastic Pipe (MEA11253)	Not Complete	Not Complete				
Record Only	79413	KNT ASME-1141 Squeeze-Off Plastic Pipe (MEA1927)	Not Complete	Not Complete				
0033	Self Tapping Tees (2020) (1:2)				10/19/2021	10/19/2024		
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	11857	EWN-CBT-Tapping a Pipeline with a Built-In Cutter (1101)	10/17/2021	10/17/2024	10/17/2021		
2	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	10/19/2021	10/19/2024			
OR								
	Performance Evaluation	95504	USDI-PEF-33 Tapping and Stopping - Self Tapping Tees (Performance Assessment)	10/19/2021	10/19/2024			
OR								
	Record Only	79261	TNG ASME-1101 Tapping A Pipeline With A Built-In Cutter (MEA11249)	Not Complete	Not Complete			
	Record Only	79409	KNT ASME-1101 Tapping A Pipeline With A Built-In Cutter (MEA1925)	Not Complete	Not Complete			

Task Code	Task Name				Current Completion Date	Expires On	Status	
0035	Odorization Testing (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2218	EWN-CBT-AOC Under Odorization	10/8/2021	10/8/2024	10/8/2021	✓	✓
2	Computer Based Training	38687	EWN-CBT-Odorization - Periodic Sampling (1211)	6/29/2021	6/29/2024	6/29/2021	✓	✓
3	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95508	USDI-PEF-35 Odorization Testing	10/19/2021	10/19/2024			✓
OR								
	Record Only	79272	TNG ASME-1211 Odorization - Periodic Sampling (MEA11260)	Not Complete	Not Complete			⚠
	Record Only	79420	KNT ASME-1211 Odorization - Periodic Sampling (MEA1934)	Not Complete	Not Complete			⚠
0036	Odorizer Monitoring, Maintenance and Filling (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	85058	EWN-CBT-Odorization-Odorizer Inspection, Testing, Preventative and Corrective Maintenance (1221)	10/8/2021	10/8/2024	10/8/2021	✓	✓
2	Performance Evaluation	95510	USDI-PEF-36 Odorizer Monitoring, Maintenance (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95510	USDI-PEF-36 Odorizer Monitoring, Maintenance (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Record Only	79273	TNG ASME-1221 Odorization - Odorizer Inspection, Testing, Preventive And Corrective Maintenance (MEA11261)	Not Complete	Not Complete			⚠
	Record Only	79421	KNT ASME-1221 Odorization - Odorizer Inspection, Testing, Preventive And Corrective Maintenance (MEA1935)	Not Complete	Not Complete			⚠
0037	Visually Inspect Pipe and Components Prior to Installation (2020) (1:1)							⚠
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	18864	EWN-CBT-Visually Inspect Pipe and Components Prior to Installation (0641)	Not Complete	Not Complete	Not Complete	⚠	⚠
2	Computer Based Training	85118	EWN-CBT-Perform Visual Inspection of Installed Pipe and Components for Mechanical Damage (0201)	Not Complete	Not Complete	Not Complete	⚠	⚠
3	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	Not Complete	Not Complete			⚠
OR								
	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	Not Complete	Not Complete			⚠
OR								
	Record Only	79215	TNG ASME-0641 Visually Inspect Pipe And Components Prior To Installation (MEA11203)	Not Complete	Not Complete			⚠
	Record Only	79383	KNT ASME-0641 Visually Inspect Pipe And Components Prior To Installation (MEA1877)	Not Complete	Not Complete			⚠
	Performance Evaluation	95513	USDI-PEF-37 Visually Inspect Pipe & Components Prior to Installation (Performance Assessment)	Not Complete	Not Complete			⚠

Task Code	Task Name						Current Completion Date	Expires On	Status
0043	Installing Plastic Mains and Services - Trenching (2020) (1:3)						10/20/2021	10/20/2024	✓
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status	
Preferred Condition for Task Qualification									
1	Computer Based Training	2273	EWN-CBT-Installation of Plastic Pipe in a Ditch (0901)	10/19/2021	10/19/2024	10/19/2021	✓	✓	
2	Computer Based Training	17430	EWN-CBT-Install Tracer Wire (0941)	6/29/2021	6/29/2024	6/29/2021	✓	✓	
3	Performance Evaluation	95518	USDI-PEF-43 Installing Plastic Mains & Services - Trenching (Performance Assessment)	10/20/2021	10/20/2024			✓	
OR									
	Performance Evaluation	95518	USDI-PEF-43 Installing Plastic Mains & Services - Trenching (Performance Assessment)	10/20/2021	10/20/2024			✓	
OR									
	Record Only	79241	TNG ASME-0901 Installation Of Plastic Pipe In A Ditch (MEA11229)	Not Complete	Not Complete			!	
	Record Only	79245	TNG ASME-0941 Install Tracer Wire (MEA11233)	Not Complete	Not Complete			!	
	Record Only	79389	KNT ASME-0901 Installation Of Plastic Pipe In A Ditch (MEA1903)	Not Complete	Not Complete			!	
	Record Only	79393	KNT ASME-0941 Install Tracer Wire (MEA1907)	Not Complete	Not Complete			!	
0046	Excavation and Backfilling (2020) (1:1)						10/19/2021	6/29/2024	✓
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status	
Preferred Condition for Task Qualification									
1	Computer Based Training	2291	EWN-CBT-Damage Prevention during Excavation Activities by or On Behalf of the Operator (1321)	10/17/2021	10/17/2024	10/17/2021	✓	✓	
2	Computer Based Training	17716	EWN-CBT-Pipeline Support During Excavation Activities (1341)	6/29/2021	6/29/2024	6/29/2021	✓	✓	
3	Computer Based Training	18872	EWN-CBT-Backfilling (0981)	6/29/2021	6/29/2024	6/29/2021	✓	✓	
4	Computer Based Training	84256	EWN-CBT-Backhoe Safety	6/29/2021	6/29/2024	6/29/2021	✓	✓	
5	Performance Evaluation	95520	USDI-PEF-46 Damage Prevention During Excavation/Backfilling (Performance Assessment)	10/19/2021	10/19/2024			✓	
OR									
	Record Only	79249	TNG ASME-0981 Backfilling (MEA11237)	Not Complete	Not Complete			!	
	Record Only	79283	TNG ASME-1321 Damage Prevention During Excavation Activities By Or On Behalf Of The Operator (MEA11271)	Not Complete	Not Complete			!	
	Record Only	79397	KNT ASME-0981 Backfilling (MEA1911)	Not Complete	Not Complete			!	
	Record Only	79431	KNT ASME-1321 Damage Prevention During Excavation Activities By Or On Behalf Of The Operator (MEA1945)	Not Complete	Not Complete			!	
OR									
	Computer Based Training	2226	EWN-CBT-Backhoe Safety	Not Complete	Not Complete	Not Complete	!	!	
	Computer Based Training	2291	EWN-CBT-Damage Prevention during Excavation Activities by or On Behalf of the Operator (1321)	Not Complete	Not Complete	10/17/2021	✓	!	
	Computer Based Training	18872	EWN-CBT-Backfilling (0981)	Not Complete	Not Complete	6/29/2021	✓	!	
	Performance Evaluation	95520	USDI-PEF-46 Damage Prevention During Excavation/Backfilling (Performance Assessment)	Not Complete	Not Complete			!	

Task Code	Task Name				Current Completion Date	Expires On	Status	
0049	Meter Set Installation /Spring Loaded Regulators Meters Sets (2020) (1:2)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2239	EWN-CBT-Temporary Isolation of Service Lines and Service Discontinuance (1201)	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	80914	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded Pressure-Regulating Device (0361)	Not Complete	Not Complete	Not Complete		
3	Computer Based Training	86026	EWN-CBT-Installation of Customer Meters and Regulators - Residential and Small Commercial (1161)	Not Complete	Not Complete	Not Complete		
4	Computer Based Training	2246	EWN-CBT-Establishment of Gas	Not Complete	Not Complete	Not Complete		
5	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79189	TNG ASME-0381 Spring-Loaded Pressure Regulating Device - Inspection And Testing, Preventive And Corrective Maintenance (MEA11177)	Not Complete	Not Complete			
	Record Only	79267	TNG ASME-1161 Installation Of Customer Meters And Regulators - Residential And Small Commercial (MEA11255)	Not Complete	Not Complete			
	Record Only	79337	KNT ASME-0361 Spring-Loaded Pressure Regulating Device - Inspection And Testing, Preventive And Corrective Maintenance (MEA1851)	Not Complete	Not Complete			
	Record Only	79415	KNT ASME-1161 Installation Of Customer Meters And Regulators - Residential And Small Commercial (MEA1929)	Not Complete	Not Complete			
OR								
	Computer Based Training	2271	EWN-CBT-Installing Gas Meters (1161, 1171)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	80914	EWN-CBT-Inspect, Test, and Maintain Spring-Loaded Pressure-Regulating Device (0361)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	86026	EWN-CBT-Installation of Customer Meters and Regulators - Residential and Small Commercial (1161)	Not Complete	Not Complete	Not Complete		
	Performance Evaluation	95525	USDI-PEF-49 Meter Set Installation Spring Loaded Regulating Devices (Performance Assessment)	Not Complete	Not Complete			
0051	Inside Leak Investigation (2020) (1:1)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	2237	EWN-CBT-Inside Gas Leak Investigation (1231)	Not Complete	Not Complete	Not Complete		
3	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95521	USDI-PEF-51 Inside Leak Investigation (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79274	TNG ASME-1231 Inside Gas Leak Investigation (MEA11262)	Not Complete	Not Complete			
	Record Only	79422	KNT ASME-1231 Inside Gas Leak Investigation (MEA1936)	Not Complete	Not Complete			

Task Code	Task Name			Current Completion Date	Expires On	Status		
0052	Outside Leak Investigation (2020) (1:1)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2216	EWN-CBT-AOC Report of Gas Odor/Liquid Release	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	2281	EWN-CBT-Outside Gas Leak Investigation (1241)	Not Complete	Not Complete	Not Complete		
3	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95519	USDI-PEF-52 Outside Leak Investigation (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79275	TNG ASME-1241 Outside Gas Leak Investigation (MEA11263)	Not Complete	Not Complete			
	Record Only	79423	KNT ASME-1241 Outside Gas Leak Investigation (MEA1937)	Not Complete	Not Complete			
0053	Leak Survey (2020) (1:1)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2280	EWN-CBT-Leak Classification	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	2282	EWN-CBT-Walking Gas Leakage Survey (1261)	Not Complete	Not Complete	Not Complete		
3	Computer Based Training	85009	EWN-CBT- Leak Test at Operating Pressure (0591)	Not Complete	Not Complete	Not Complete		
4	Computer Based Training	2255	EWN-CBT-Flame Ionization Unit (52.3, 1271)	Not Complete	Not Complete	Not Complete		
5	Performance Evaluation	95516	USDI-PEF-53 Leak Survey (Performance Assessment)	Not Complete	Not Complete			
OR								
	Computer Based Training	2280	EWN-CBT-Leak Classification	Not Complete	Not Complete	Not Complete		
	Computer Based Training	2282	EWN-CBT-Walking Gas Leakage Survey (1261)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	13186	EWN-CBT-Gas Detection with a Remote Methane Leak Detector (Heath RMLD) (1281)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	85009	EWN-CBT- Leak Test at Operating Pressure (0591)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	86306	EWN-CBT-Mobile Gas Leakage Survey (1271)	Not Complete	Not Complete	Not Complete		
	Performance Evaluation	95516	USDI-PEF-53 Leak Survey (Performance Assessment)	Not Complete	Not Complete			
OR								
	Computer Based Training	2280	EWN-CBT-Leak Classification	Not Complete	Not Complete	Not Complete		
	Computer Based Training	2282	EWN-CBT-Walking Gas Leakage Survey (1261)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	85009	EWN-CBT- Leak Test at Operating Pressure (0591)	Not Complete	Not Complete	Not Complete		
	Performance Evaluation	95516	USDI-PEF-53 Leak Survey (Performance Assessment)	Not Complete	Not Complete			
OR								
	Computer Based Training	2280	EWN-CBT-Leak Classification	Not Complete	Not Complete	Not Complete		

Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
	Computer Based Training	2282	EWN-CBT-Walking Gas Leakage Survey (1261)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	85009	EWN-CBT- Leak Test at Operating Pressure (0591)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	17003	EWN-CBT-Optical Methane Detector (OMD)-Heath Consultants, Inc.	Not Complete	Not Complete	Not Complete		
	Performance Evaluation	95516	USDI-PEF-53 Leak Survey (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95516	USDI-PEF-53 Leak Survey (Performance Assessment)	Not Complete	Not Complete			
OR								
	Record Only	79210	TNG ASME-0591 Leak Test At Operating Pressure (MEA11199)	Not Complete	Not Complete			
	Record Only	79277	TNG ASME-1261 Walking Gas Leakage Survey (MEA11265)	Not Complete	Not Complete			
	Record Only	79358	KNT ASME-0591 Leak Test At Operating Pressure (MEA1872)	Not Complete	Not Complete			
	Record Only	79425	KNT ASME-1261 Walking Gas Leakage Survey (MEA1939)	Not Complete	Not Complete			
OR								
	Computer Based Training	2255	EWN-CBT-Flame Ionization Unit (52.3, 1271)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	2280	EWN-CBT-Leak Classification	Not Complete	Not Complete	Not Complete		
	Computer Based Training	2282	EWN-CBT-Walking Gas Leakage Survey (1261)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	13186	EWN-CBT-Gas Detection with a Remote Methane Leak Detector (Heath RMLD) (1281)	Not Complete	Not Complete	Not Complete		
	Computer Based Training	85009	EWN-CBT- Leak Test at Operating Pressure (0591)	Not Complete	Not Complete	Not Complete		
	Performance Evaluation	95516	USDI-PEF-53 Leak Survey (Performance Assessment)	Not Complete	Not Complete			

0054 One-Call Response/Locating Facilities (2020) (1:1) 10/19/2021 10/19/2024

Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	10/11/2021	10/11/2024	10/11/2021		
2	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/19/2021	10/19/2024			
OR								
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	10/19/2021	10/19/2024			
OR								
	Record Only	79280	TNG ASME-1291 Locate Underground Pipelines (MEA11268)	Not Complete	Not Complete			
	Record Only	79428	KNT ASME-1291 Locate Underground Pipelines (MEA1942)	Not Complete	Not Complete			
OR								
	Computer Based Training	2285	EWN-CBT-Locating Underground Pipelines (1291)	Not Complete	Not Complete	10/11/2021		
	Computer Based Training	2285	EWN-CBT-Locating Facilities Part 2 (14.1, 17.1, 1291)	Not Complete	Not Complete	Not Complete		
	Performance Evaluation	95514	USDI-PEF-54 One-Call Response / Locating Facilities (Performance Assessment)	Not Complete	Not Complete			

Task Code	Task Name				Current Completion Date	Expires On	Status	
0057	Damage Prevention Inspection During Third Party Excavation (2020) (1:1)				10/19/2021	10/19/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	80925	EWN-CBT-Damage Prevention Inspection During Third-Party Excavation or Encroachment Activities as Determined Necessary by Operator (1331)	10/17/2021	10/17/2024	10/17/2021	✓	✓
2	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Performance Evaluation	95509	USDI-PEF-57 Damage Prevention Inspection During Third Party Excavation (Performance Assessment)	10/19/2021	10/19/2024			✓
OR								
	Record Only	79284	TNG ASME-1331 Damage Prevention Inspection During Third Party Excavation Or Encroachment As Determined By Operator (MEA11272)	Not Complete	Not Complete			⚠
	Record Only	79285	TNG ASME-1341 Provide Or Assure Adequate Pipeline Support During Operator Initiated Excavation Activities (MEA11273)	Not Complete	Not Complete			⚠
	Record Only	79432	KNT ASME-1331 Damage Prevention Inspection During Third Party Excavation Or Encroachment As Determined By Operator (MEA1946)	Not Complete	Not Complete			⚠
	Record Only	79433	KNT ASME-1341 Provide Or Assure Adequate Pipeline Support During Operator Initiated Excavation Activities (MEA1947)	Not Complete	Not Complete			⚠
0058	Purging (2020) (1:2)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	2315	EWN-CBT-Purge - Flammable or Inert Gas (1651)	10/20/2021	10/20/2024	10/20/2021	✓	✓
2	Performance Evaluation	95506	USDI-PEF-56 Purging (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95506	USDI-PEF-58 Purging (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Record Only	79295	TNG ASME-1651 Purging - Flammable or Inert Gas (MEA11747)	Not Complete	Not Complete			⚠
	Record Only	79443	KNT ASME-1651 Purging - Flammable or Inert Gas (MEA11746)	Not Complete	Not Complete			⚠
0059	Abandonment of Main and Service Lines (2020) (1:2)				10/22/2021	10/22/2024	✓	
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
Preferred Condition for Task Qualification								
1	Computer Based Training	97138	EWN-CBT-Abandonment of Facilities	10/22/2021	10/22/2024	10/22/2021	✓	✓
2	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Performance Evaluation	95505	USDI-PEF-59 Abandonment of Main & Service Lines (Performance Assessment)	10/22/2021	10/22/2024			✓
OR								
	Record Only	79271	TNG ASME-1201 Temporary Isolation Of Service Lines And Service Discontinuance (MEA11259)	Not Complete	Not Complete			⚠
	Record Only	79419	KNT ASME-1201 Temporary Isolation Of Service Lines And Service Discontinuance (MEA1933)	Not Complete	Not Complete			⚠
OR								
	Computer Based Training	2198	EWN-CBT-Abandonment of Facilities	Not Complete	Not Complete	Not Complete	⚠	⚠

Task Code	Task Name				Current Completion Date	Expires On	Status	
0061	Lighting Customer Equipment and Recognizing Unsafe Installations (2020) (1:1)							
Order	Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status
1	Computer Based Training	2321	EWN-CBT-Red Tagging Appliances	Not Complete	Not Complete	Not Complete		
2	Computer Based Training	10584	EWN-CBT-Recognizing and Reporting Unsafe Meter Sets	Not Complete	Not Complete	Not Complete		
3	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	Not Complete	Not Complete			
OR								
	Performance Evaluation	95501	USDI-PEF-61 Lighting Customer Equipment and Recognizing Unsafe Conditions (Performance Assessment)	Not Complete	Not Complete			
0Q1	Performance Review (1:0)				10/19/2021	10/19/2022		
Type	ID	Evaluation Title	Completed	Expires	Training	Training Required	Status	
Performance Evaluation	97048	Procedure and Performance Effectiveness Review -1	10/19/2021	10/19/2022				
Performance Evaluation	112347	Procedure and Performance Effectiveness Review -2	10/19/2021	10/19/2022				
OR								
Record Only	112348	OQ1 - PROCEDURE & PERFORMANCE EFFECTIVENESS REVIEW (1)	Not Complete	Not Complete				
Record Only	112349	OQ1 - PROCEDURE & PERFORMANCE EFFECTIVENESS REVIEW (2)	Not Complete	Not Complete				



Utility Safety and Design Inc.

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

INVOICE

Number: IN20213606
Page: 1
Date: 7/31/2021

AC
2-10-22

Sold To: VALLEY GAS
PO BOX 390
IRVINGTON, KY 40146

Attn: KENNETH KASEY

Reference - P.O. #	Customer No.	Salesperson	Ship Via	Terms Code
	VALLEY	DH		NET30

Item No.	Description/Comments	Quantity	UOM	Unit Price	Amount
LABOR	KY PSC Audit; OQ Records Submittal Exit Interview; Review Records & Regulator Needs (J Brangers)	2.50	HOUR	140.000000	350.00
	CODECOMP SubTotal				350.00
2021-VALLEYKY Total					350.00
	Due Date Amount Due				
	8/30/2021 350.00				

Remit To:
Utility Safety and Design Inc.
PO Box 276
1927 Miller Drive
Olney 62450

Subtotal before taxes	350.00
Total taxes	0.00
Total amount	350.00
Amount due	350.00

Thank you for the opportunity to serve you.



Utility Safety and Design Inc.

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

INVOICE

Number: IN20215629
Page: 1
Date: 11/30/2021

pc
12-11-21

Sold To: IRVINGTON GAS COMPANY
401 1ST STREET
IRVINGTON, KY 40146
Attn: KERRY KASEY

Table with 5 columns: Reference - P.O. #, Customer No., Salesperson, Ship Via, Terms Code. Row 1: IRVINGTON, JB, NET30

Main invoice table with 6 columns: Item No., Description/Comments, Quantity, UOM, Unit Price, Amount. Includes rows for LABOR, MATERIAL, CODECOMP, and a SubTotal of 6,372.20.

Remit To: Utility Safety and Design Inc.
PO Box 276
1927 Miller Drive
Olney 62450

Summary table with 2 columns: Description, Amount. Rows: Subtotal before taxes (6,372.20), Total taxes (0.00), Total amount (6,372.20), Amount due (6,372.20)

Thank you for the opportunity to serve you.



Utility Safety and Design Inc.

PO Box 276
1927 Miller Drive
Olney, IL 62450
6183925502

INVOICE

Number:	IN20215285
Page:	1
Date:	11/29/2021

Sold To: VALLEY GAS
PO BOX 390
IRVINGTON, KY 40146

Attn: KENNETH KASEY

Reference - P.O. #	Customer No.	Salesperson	Ship Via	Terms Code
	VALLEY	DH		NET30

Item No.	Description/Comments	Quantity	UOM	Unit Price	Amount				
LABOR	KY PSC Followup w/D Nash & K Kasey 10/25/21 (J Brangers)	1.00	HOUR	140.000000	140.00				
	CODECOMP				140.00				
	SubTotal				140.00				
2021-VALLEYKY Total					140.00				
	<table border="0"> <tr> <td><u>Due Date</u></td> <td><u>Amount Due</u></td> </tr> <tr> <td>12/29/2021</td> <td>140.00</td> </tr> </table>	<u>Due Date</u>	<u>Amount Due</u>	12/29/2021	140.00				
<u>Due Date</u>	<u>Amount Due</u>								
12/29/2021	140.00								

Handwritten: 11/29/21
12-7-21

Remit To:
Utility Safety and Design Inc.
PO Box 276
1927 Miller Drive
Olney 62450

Subtotal before taxes	140.00
Total taxes	0.00
Total amount	140.00
Amount due	140.00

Thank you for the opportunity to serve you.



Date: 4/20/2022
Expires: 7/1/2022

Customer: Valley Gas/Irvington Gas
Estimated users: < 10

Plan Options

Feature	Basic	Advanced	Premier
Maps	X	X	X
Inspections & Form Building	X	X	X
Work Orders & Scheduling	X	X	X
Analytics	X	X	X
Offline Work		X	X
Esri Integration		X	X
Advanced Reporting		X	X
Advanced Integrations & Open API			X
Machine Connect			X

Plan Pricing

Plan	List Price	Discount	Total
Basic	2,185.00/month	30%	1,529.50/month
Advanced	2,855.00/month	30%	1,998.50/month
Premier	4,770.00/month	30%	3,339.00/month

- All plans include 10 users
- All plans include implementation (see below)
- HSC Cloud is billed monthly and sold on a 3-year term

Additional Pricing

Pack of 5 additional users	\$416.67/month
Professional Services	\$162.73/hour

Implementation Scope

- Assets Import
- Esri Integration (if applicable)
- Asset Attributes
- Form configuration
- Scheduling work
- Standard reports
- Training

Applications

- Regulator station inspections
- Valve inspections
- Leak inspections
- Pipeline patrolling
- Odorizer inspections
- Rectifier inspections
- Cathodic protection surveys
- Propane applications

Note: Implementation does not include custom report building, this is included under additional professional services.

*Valley Gas, Inc.
401 S First Street
P. O. Box 366
Irvington, KY 40146

*Valley Gas, Inc.
Valley Gas, Inc.
401 S First Street
P. O. Box 366
Irvington, KY 40146

*Parker M Wornall
Commonwealth Counsel Group PLLC
10343 Linn Station Rd., Suite 100
Louisville, KENTUCKY 40223