



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington DC 20590

# 2012 Natural Gas State Program Evaluation

for

KENTUCKY PUBLIC SERVICE COMMISSION

## Document Legend

### PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2012 Natural Gas State Program Evaluation -- CY 2012  
Natural Gas

**State Agency:** Kentucky

**Agency Status:**

**Date of Visit:** 08/20/2013 - 08/22/2013

**Agency Representative:** Jason Brangers, Manager, Gas Branch

**PHMSA Representative:** Don Martin

**Commission Chairman to whom follow up letter is to be sent:**

**Name/Title:** David Armstrong,, Chairman

**Agency:** Kentucky Public Service Commission

**Address:** 211 Sower Boulevard

**City/State/Zip:** Frankfort, Kentucky 40602-0615

**Rating:**

**60105(a):** Yes **60106(a):** No **Interstate Agent:** No

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**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2012 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

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**Field Inspection (PART G):**

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

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**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

A    Progress Report and Program Documentation Review  
B    Program Inspection Procedures  
C    Program Performance  
D    Compliance Activities  
E    Incident Investigations  
F    Damage Prevention  
G    Field Inspections  
H    Interstate Agent State (If Applicable)  
I    60106 Agreement State (If Applicable)

10                    10  
15                    13  
46                    46  
15                    15  
3                     3  
8                     8  
11                    11  
0                     0  
0                     0

**TOTALS**

**108                    106**

**State Rating ..... 98.1**

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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

The information contained in Attachment 1 was verified from the KPSC's operator records. Inspection unit information matched Attachment 3.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The inspection person days on Attachment 2 were supported by the KPSC's records documenting inspection person days.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The KPSC operator records were consistent with the information entered into Attachment 3.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

There were no reportable incidents listed on Attachment 4. PHMSA incident data base information did not show any reportable incidents for intrastate operators in Kentucky during 2012.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The KPSC's inspection records supported the probable violation information entered into Attachment 5. Two civil penalties will be issued in 2013 for certain probable violations found in 2012.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

**Evaluator Notes:**

Information requested for the evaluation was easily accessed from the KPSC's files. The files were organized appropriately.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The staff information in Attachment 7 was correct. Training information was downloaded from the SABA system administered by PHMSA's Training and Qualification Division

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

The KPSC has automatic adoption of federal pipeline safety regulations.

- 9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No issues identified with Attachment 10.

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10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The KPSC has generally complied with the requirements of Part A of this evaluation.

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Total points scored for this section: 10  
Total possible points for this section: 10



## PART B - Program Inspection Procedures

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Standard Inspections (B1a)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Inspections are scheduled based upon a risk assessment. Each inspection unit will be inspected at a minimum once every three years.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | IMP Inspections (including DIMP) (B1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0 |
|----------|---|---|---|

**Evaluator Notes:**

Gas Transmission IMP inspections and Distribution IMP inspections need to be included in the KPSC's Inspection Process document.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | OQ Inspections (B1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0 |
|----------|---|---|---|

**Evaluator Notes:**

Operator Qualification inspections need to be added into the KPSC's Inspection Process document.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Damage Prevention Inspections (B1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The KPSC does not schedule Damage Prevention Inspections separately from its Periodic Regulatory Inspection (same as Standard Inspection). Inspections of an operator's Damage Prevention Program are part of the Periodic Regulatory Inspection when covering the requirements of 192.614.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | On-Site Operator Training (B1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The KPSC schedules on-site training meetings upon request from operators.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Construction Inspections (B1f)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

The KPSC has requirements for certain operator types to inform the KPSC of scheduled construction projects if the capital cost exceeds \$25,000 for small operators and \$100,000 for large operators. The KPSC procedures state that inspections will be scheduled based on notifications received by the KPSC.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Incident/Accident Investigations (B1g)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

The procedures address incident investigations. Incident investigations are scheduled immediately after notification.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)<br>Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---|---|---|

- |    |  |                                      |                          |   |
|----|--|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Type of activity being undertaken by operators (i.e. construction)   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

- e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)

Yes ☒ No ☐ Needs Improvement ☐

- f. Are inspection units broken down appropriately?

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Excerpts from the KPSC Inspection Process document are shown below:

"The operators to be inspected are researched with the data available from previous inspections to determine the schedule of the annual safety inspection. Many items determine the priority of our inspections and may include the following:

1. The lost and unaccounted-for gas.
2. The number of leaks from recent surveys.
3. The known past history of the system (i.e. compliance history).
4. The type and condition of pipe.
5. The elapsed time since last inspection.
6. The total miles of main throughout the system.
7. The current number of customers.

After the priority list of operators to be inspected has been determined, the operators are listed on a spreadsheet and a schedule is drafted indicating which inspector will conduct which inspection, as well as the approximate month for inspection. There will be times when the schedule will be changed for construction inspections or incident investigations. At that time the inspection will be rescheduled for a later date. All intrastate operators will be inspected at intervals dictated by the priority/risk-ranking, but should not exceed 3 years."

"The Kentucky Pipeline Safety Branch has adopted a similar approach, therefore, risk factors are considered for each operator and higher risk inspection units will be identified during the scheduling of inspections, which may result in more frequent inspections for certain operators."

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Question B.2 and B.3 - IMP, DIMP and OQ inspections need to added to the KPSC's inspection process document.

Total points scored for this section: 13  
Total possible points for this section: 15

## PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 (A12) 5 5  
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):  
476.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 3.50 = 770.00

Ratio: A / B  
476.00 / 770.00 = 0.62

If Ratio  $\geq$  0.38 Then Points = 5, If Ratio  $<$  0.38 Then Points = 0  
Points = 5

### Evaluator Notes:

The KPSC's ration was 0.62 which exceeded the minimum of 0.32.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4

- |    |  |                                      |                                     |   |
|----|--|--------------------------------------|-------------------------------------|---|
| a. | Completion of Required OQ Training before conducting inspection as lead?                                     | Yes <input checked="" type="radio"/> | No <input type="radio"/>            | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input type="radio"/>            | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager  | Yes <input checked="" type="radio"/> | No <input type="radio"/>            | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed  | Yes <input checked="" type="radio"/> | No <input type="radio"/>            | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

The required courses listed as Mandatory Training for Gas Inspectors in Appendix C of the Guidelines For States Participating in the Pipeline Safety Program have been completed.

All of the required courses listed as Mandatory Training for Gas Integrity Management Inspectors have not been completed. The deadline for completing these courses is CY2013. Therefore, if any Gas Transmission Integrity Management inspections are performed in 2013, points could be deducted during the evaluation of the KPSC's CY2013 pipeline safety program.

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Jason Brangers has been the Program Manager for nine years. Jason is very knowledgeable of PHMSA's pipeline safety program and pipeline safety regulations.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 (A6-7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

The KPSC Chairman responded to the evaluation letter in 46 days. An acceptable response to the deficiencies was included.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2  
Yes = 2 No = 0

### Evaluator Notes:

The last two seminars were held in May, 2010 and May, 2013. No issues found.

- 6 Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) 5 5

Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

Based upon the number of operators and units inspected in 2012 the KPSC is on pace to inspect each operator and units on a three year cycle. 2012 inspections were primarily focused on small operators. DIMP and Public Awareness were a focus area during 2012.

- 
- |   |   |   |   |
|---|---|---|---|
| 7 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5) | 2 | 2 |
|---|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Except for Master Meter operators the KPSC utilizes federal inspection forms. The Standard Inspection form for Master Meters was developed from the federal distribution standard inspection form by eliminating portions that do not apply to Master Meter pipeline facilities. It addresses the code requirements in relation to Master Meter facilities.

- 
- |   |  |   |   |
|---|--|---|---|
| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 (B7) | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0

Evaluator Notes:

Yes. The KPSC utilizes the federal distribution standard inspection which includes this requirement.

- 
- |   |   |   |   |
|---|---|---|---|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1 (B8) | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0

Evaluator Notes:

Yes. The KPSC utilizes the federal distribution standard inspection which includes this requirement.

- 
- |    |  |   |   |
|----|--|---|---|
| 10 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 (B9) | 1 | 1 |
|----|--|---|---|

Yes = 1 No = 0

Evaluator Notes:

Yes. The KPSC utilizes the federal distribution standard inspection which includes this requirement.

- 
- |    |   |   |   |
|----|---|---|---|
| 11 | Did the state 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? Chapter 5.1 (B10,E5) | 1 | 1 |
|----|---|---|---|

Yes = 1 No = 0

Evaluator Notes:

The KPSC utilizes the federal standard inspection form. This form covers this requirement.

- 
- |    |   |   |   |
|----|---|---|---|
| 12 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16) | 2 | 2 |
|----|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The KPSC reviews operators' annual reports each year as they are submitted. The KPSC communicates any discrepancies to the operators.



- 13 Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No IMP inspection results were found in PHMSA's IMP database for Baiden gas Company, Eastern Corporation of America, EQT Corporation, Gibbs Die Casting, K Petroleum, Kentucky Utilities Company, Matriks Energy, Minerals Management Group, NGAS, North Coast Energy Western, Riley - Scott Gas Company, Riverside Generating Co. LLC. NGAS (aka Magnum Hunter) and Kentucky Utilities IMP inspections are completed and have been uploaded into the PHMSA database. An inspection was conducted on K-Petroleum and deficiencies were cited for its IMP, a follow-up inspection is planned to verify the corrective actions taken and the results will be uploaded into the database. Eastern Corporation of America is a gathering company with one section (approximately 150 feet) of jurisdictional gathering. EQT Corporation is also a gathering company, except for a line that has FERC certification. (The status as a gathering company of Eastern Corporation of America and EQT will need to be reflected on the progress report). Riverside Generating (aka Dynegy) is a transmission with no HCA's, they do have a "Protocol A" plan. Baiden Gas Company, Matriks Energy, Minerals Management Group, and Riley-Scott should be classified as gathering line operators and North Coast Energy Western no longer exists.

- 
- 14 Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The KPSC's GIS department routinely uses the NPMS and reviews data submitted by operators within Kentucky. The GIS department confirmed that all transmission operators submitted information into the NPMS.

- 
- 15 Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The KPSC has completed the review of all operators' drug and alcohol testing programs in past years. There were no drug and alcohol program inspections during 2012; however, certain requirements of Part 199 are reviewed during standard inspections.

- 
- 16 Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N (I4-7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The KPSC performed seventy four (74) OQ related inspections (typically as part of comprehensive inspections). These consisted of plan reviews and/or Protocol 9 inspections. No issues found.

- 
- 17 Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0 (I8-12) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

KPSC focused on and completed all initial Gas Transmission IMP inspections in 2010.

- 18 Is state verifying operator's gas distribution integrity management Programs (DIMP)? 2 2  
This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P  
DIMP ? First round of program inspections should be complete by December 2014

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

KPSC made DIMP inspections a priority for 2012. The KPSC is on track to complete DIMP inspections of all distribution operators by the end of 2014.

- 19 Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16)  
PAPEI Effectiveness Inspections should be complete by December 2013 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Along with DIMP inspections, the KPSC has made the inspections of operator's Public Awareness Program Effectiveness (PAPEI) a priority in 2012. The KPSC is on track to complete PAPEI's by the end of 2013.

- 20 Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). (G20-21) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The KPSC maintains a pipeline safety section on its website. The KPSC revised the web site to make the pipeline safety section more accessible. The KPSC participates in Kentucky Gas Association meetings and conferences, Common Ground Alliance committee meetings and Kentucky 811 Board Meetings.

- 21 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Louisville Gas and Electric filed safety related condition reports during CY2012 resulting from In Line Inspections. The KPSC followed up with the operator on the progress of mitigating the safety related conditions and reported status to the Southern Region Office. Chris Taylor of the Southern Region Office reported that he received good information on followup communication from the KPSC but each update was not within a 30 day timeframe.

- 22 Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? (G13) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Operators have been requested to monitor plastic pipe and component failures. The KPSC has encouraged operators to share failure information with the AGA's Plastic Pipe Data Committee. The KPSC reviews this information when verifying that operators have complied with 192.617.

- 23 Did the state participate in/respond to surveys or information requests from NAPS or PHMSA? (H4) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No information was discovered that indicated the KPSC had not complied with this requirement.

**24** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

All of the required courses listed as Mandatory Training for Gas Integrity Management Inspectors have not been completed. The deadline for completing these courses is CY2013. Therefore, if any Gas Transmission Integrity Management inspections are performed in 2013, points could be deducted during the evaluation of the KPSC's CY2013 pipeline safety program.

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Total points scored for this section: 46  
Total possible points for this section: 46



## PART D - Compliance Activities

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h)<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| a.       | Procedures to notify an operator (company officer) when a noncompliance is identified   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

The procedures are the same as they were in 2011. The KPSC's procedures provide the operators with 30 days to respond to alleged probable violations. A form for the operator to complete (if a deficiency is found) is included with the letter to the operator detailing the results of each inspection. The operator must completed the three questions on the form for the KPSC to consider closing the file on the inspection. The operator has the opportunity to argue their case if they feel like a probable violation did not occur. The procedures state that follow up inspections are scheduled after written notification of non compliance has been sent to an operator. Each inspection report describes the status of deficiencies found in previous inspections. Deficiency information is entered into the inspection database which can be used to report the status of probable violations.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 (B11,B18,B19)<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| a.       | Were compliance actions sent to company officer or manager/board member if municipal/government system?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Were probable violations documented?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Were probable violations resolved?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d.       | Was the progress of probable violations routinely reviewed?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

Upon a review of all inspection files from 2012, the KPSC documented probable violations found, corrective actions taken and closure of the inspection file. The KPSC maintains a spreadsheet to track the progress of probable violation corrections.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state issue compliance actions for all probable violations discovered? (B15)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

### Evaluator Notes:

Upon a review of all 2012 inspection reports, all inspections that discovered probable violations were followed up with written notifications of non compliance. Deficiency Tracking Report forms were attached to each letter with non-compliance notifications.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20)<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### Evaluator Notes:

As in past years, operators are given an opportunity to provide information that argues a probable violation did not occur on the Deficiency Tracking Report. If not satisfied with pipeline safety's decision an operator can petition the Commissioners for a "show cause" hearing.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) (B27)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### Evaluator Notes:

The process has not changed from last year which is:

Show Cause / Fines. If the operator fails to respond to the inspection report, responds inadequately, or continues to be cited

for similar deficiencies in two consecutive reports, the inspector may recommend that a show cause proceeding be initiated. The basis for the show cause is the most recent annual safety inspection which details the deficiencies for which the operator has been cited. Depending upon the situation, inspection reports previous to the most recent one may also be used. If a show cause hearing is required, the operator must appear and demonstrate what actions have been or will be initiated to correct the deficiencies cited and present a case as to why a fine should not be imposed regarding the past failure to take corrective actions. Exhibit P is the Schedule of Fines used to determine the amount of fine that may be recommended against an operator.

This Schedule has been developed pursuant to KRS 278.990 and KRS 278.992. In determining the amount of the penalty, the following guidelines are considered:

1. The appropriateness of the penalty to the size of the business of the person charged.
2. The gravity of the violation.
3. The good faith of the person charged in attempting to achieve compliance after notification of the violation(s).

During the course of the show cause hearing, the operator may present evidence as to why a fine should not be imposed. Subsequent to the show cause hearing, an operator may also request a conference to discuss the proposed fine, including the negotiation of a compromise amount or the suspension of the fine pending corrective action to be taken towards compliance.

- 
- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

The KPSC issued civil penalty fines to the City of Tompkinsville and Louisville Gas and Electric, both distribution operators.

- 
- |          |  |                    |
|----------|--|--------------------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info OnlyInfo Only |
|----------|--|--------------------|

Evaluator Notes:

The KPSC has generally complied with the requirements of Part D of this evaluation.

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Total points scored for this section: 15  
Total possible points for this section: 15



## PART E - Incident Investigations

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2   | 2                                       |
| a.       | Acknowledgement of MOU between NTSB and PHMSA (Appendix D)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

The KPSC provides operators with instructions on how to report an incident to the KPSC. The KPSC logs reported incidents. The KPSC program manager exhibited knowledge of both the MOU and the cooperation between a state program and PHMSA when an incident occurs.

- |          |   |   |    |
|----------|---|---|----|
| <b>2</b> | If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

**Evaluator Notes:**

There were no reportable incidents in Kentucky during 2012.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3   | NA                                      |
| a.       | Observations and document review   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences when appropriate  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

There were no reportable incidents in Kentucky during 2012.

- |          |  |   |    |
|----------|--|---|----|
| <b>4</b> | Did the state initiate compliance action for violations found during any incident/accident investigation? (D6)<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

**Evaluator Notes:**

There were no reportable incidents in Kentucky during 2012.

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

**Evaluator Notes:**

There were no reportable incidents in Kentucky during 2012.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

The program manager covered incidents that occurred in 2011 during his summary of state activities at the NAPS Region Meeting.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

The KPSC has generally complied with the requirements of Part E of this evaluation.

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Total points scored for this section: 3  
Total possible points for this section: 3



## PART F - Damage Prevention

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB (E1)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The KPSC verifies that operators' procedures address the issue of directional drilling procedures during standard inspections and also during construction inspections where directional drilling is being utilized.

- |   |  |   |   |
|---|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (E2)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

The KPSC covers these requirements on the portion of the inspection form covering Part 192.614.

- |   |   |   |   |
|---|---|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Jason Brangers represents NAPSR on the CGA Best Practices Committee. The KPSC participates on the Central Kentucky Damage Prevention Council. The KPSC has an item on the federal standard inspection form to promote best practices to operators.

- |   |  |   |   |
|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

The KPSC is now collecting the pipeline damage data submitted on operators' annual reports. The information is being reviewed but only two years of data is available since operators were required to report this information on its annual reports. Additional years of data will be needed to establish a trend.

- |   |  |           |           |
|---|--|-----------|-----------|
| 5 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

The KPSC has generally complied with the requirements of Part F of this evaluation.

Total points scored for this section: 8  
Total possible points for this section: 8



## PART G - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only  
Info Only = No Points

Name of Operator Inspected:

Eliabethtown Natural Gas, OPID 4360

Name of State Inspector(s) Observed:

Steve Samples

Location of Inspection:

Eliabethtown, KY

Date of Inspection:

8/21 - 22, 2013

Name of PHMSA Representative:

Don Martin

Evaluator Notes:

The KPSC conducted an inspection of Eliabethtown Natural Gas (ENG), a municipal operator. ENG operates natural gas distribution and transmission facilities. The scope of the inspection covered primarily focused on DIMP and Public Awareness but also addressed other subparts of CFR192. The KPSC inspector utilized Form 2, Form 23 - DIMP inspection and Form 21 -Public Awareness.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes. The KPSC notified the operator approximately one month prior to the inspection. The operator was represented by Matthew Hobbs, System Engineer, for the office and records portion of the inspection.

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) (F3) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The KPSC inspector used federal forms Form 2, 21 and 23.

- 4 Did the inspector thoroughly document results of the inspection? (F4) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The results of the DIMP and Public Awareness portion was entered into the electronic forms which can be uploaded to PHMSA. Other results were entered into Form 2.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) (F5) 1 NA  
Yes = 1 No = 0

Evaluator Notes:

The portion of the inspection observed consisted of DIMP plan inspection and Public Awareness including the effectiveness review. No testing was performed during the evaluation visit.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures ☒

b. Records ☒

c. Field Activities ☐

d. Other (please comment) ☒

Evaluator Notes:

The KPSC inspector covered emergency procedures but not all of the procedures required by 192.605. Records covered those required by 192.616 (including API RP1162) and Subpart P.

- |   |  |   |   |
|---|--|---|---|
| 7 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes. Mr. Samples has completed all of the required "core" training courses at Training and Qualifications in Oklahoma City. He has completed DIMP and Public Awareness inspection courses. Mr. Samples had considerable natural gas distribution experience with Columbia Gas prior to his employment with the KPSC.

- |   |  |   |   |
|---|--|---|---|
| 8 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (F9)<br>Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

The KPSC inspector provided an exit interview with the operator for the portion of the inspection performed during the evaluation visit. Four probable violations were identified.

- |   |   |   |   |
|---|---|---|---|
| 9 | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10)<br>Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes. Four probable violations were identified during the portion of the inspection that was observed during the evaluation visit. The operator was verbally notified of the probable violations during the exit interview.

- |    |  |           |           |
|----|--|-----------|-----------|
| 10 | General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other.<br>Info Only = No Points | Info Only | Info Only |
|----|--|-----------|-----------|

- |    |                               |                                     |
|----|-------------------------------|-------------------------------------|
| a. | Abandonment                   | <input type="checkbox"/>            |
| b. | Abnormal Operations           | <input type="checkbox"/>            |
| c. | Break-Out Tanks               | <input type="checkbox"/>            |
| d. | Compressor or Pump Stations   | <input type="checkbox"/>            |
| e. | Change in Class Location      | <input type="checkbox"/>            |
| f. | Casings                       | <input type="checkbox"/>            |
| g. | Cathodic Protection           | <input type="checkbox"/>            |
| h. | Cast-iron Replacement         | <input type="checkbox"/>            |
| i. | Damage Prevention             | <input type="checkbox"/>            |
| j. | Deactivation                  | <input type="checkbox"/>            |
| k. | Emergency Procedures          | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way    | <input checked="" type="checkbox"/> |
| m. | Line Markers                  | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials | <input type="checkbox"/>            |
| o. | Leak Surveys                  | <input type="checkbox"/>            |
| p. | MOP                           | <input type="checkbox"/>            |
| q. | MAOP                          | <input type="checkbox"/>            |
| r. | Moving Pipe                   | <input type="checkbox"/>            |
| s. | New Construction              | <input type="checkbox"/>            |
| t. | Navigable Waterway Crossings  | <input type="checkbox"/>            |
| u. | Odorization                   | <input type="checkbox"/>            |
| v. | Overpressure Safety Devices   | <input checked="" type="checkbox"/> |
| w. | Plastic Pipe Installation     | <input type="checkbox"/>            |
| x. | Public Education              | <input checked="" type="checkbox"/> |
| y. | Purging                       | <input type="checkbox"/>            |

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |
| A. | Repairs                           | <input type="checkbox"/>            |
| B. | Signs                             | <input checked="" type="checkbox"/> |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input type="checkbox"/>            |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |
| F. | Welding                           | <input type="checkbox"/>            |
| G. | OQ - Operator Qualification       | <input type="checkbox"/>            |
| H. | Compliance Follow-up              | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion             | <input type="checkbox"/>            |
| J. | Other                             | <input checked="" type="checkbox"/> |

Evaluator Notes:

The KPSC inspector primarily covered the operator's DIMP plan and Public Awareness Effectiveness Evaluation in addition to those items checked above.

---

Total points scored for this section: 11  
Total possible points for this section: 11



**PART H - Interstate Agent State (If Applicable)****Points(MAX)    Score**

- |          |   |   |    |
|----------|---|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (C1)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The KPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The KPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>4</b> | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (C4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The KPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>7</b> | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC is not an interstate agent.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>8</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

The KPSC is not an interstate agent.

Total points scored for this section: 0  
Total possible points for this section: 0

**PART I - 60106 Agreement State (If Applicable)****Points(MAX)    Score**

- |          |  |   |    |
|----------|--|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (B21)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC does not have a Section 60106(a agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC does not have a Section 60106(a agreement with PHMSA.

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (B23)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The KPSC does not have a Section 60106(a agreement with PHMSA.

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The KPSC does not have a Section 60106(a agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC does not have a Section 60106(a agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <b>6</b> | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The KPSC does not have a Section 60106(a agreement with PHMSA.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

The KPSC does not have a Section 60106(a agreement with PHMSA.

Total points scored for this section: 0  
Total possible points for this section: 0