



ILLINOIS COMMERCE COMMISSION

May 28, 2014

Mr. Charles Smith
Mayor
Village of Rantoul
333 South Tanner
Rantoul, IL 61866

Re: Notice of Amendments (NOA #'s 2014-A001-00034, 2014-A001-00035, 2014-A002-00035, and 2014-A001-00036)

Dear Mayor Smith:

Representatives of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a review of the Village of Rantoul ("Rantoul") Village of Rantoul Distribution Integrity Management Plan ("DIMP") on April 15-17-2014 (Inspection # 2014-P-00207). The audit has established that Rantoul's DIMP Plan is inadequate.

Below is the applicable section of the Code of Federal Regulations ("CFR") and the subsection language applicable to the violation. In some instances, additional sections of the CFR are referenced to clarify the inadequacy identified. Following the CFR or subsection language is a description of each inadequacy.

NOA # 2014-A001-00035

CFR §192.1007 titled: **"What are the required elements of an integrity management plan?"** states in paragraph (a, 3), "A written integrity management plan must contain procedures for developing and implementing the following elements:

- (a) Knowledge. An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information."
- (3) Identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities).

The plan does not contain written procedure to identify when additional information is needed to fill gaps due to missing, inaccurate, or incomplete records.

NOA # 2014-A002-00035

Listed below is one other instance detailing the failure to meet the requirements as stipulated under **CFR §192.1007 (a) (3)**:

The plan does not specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records. The plan should identify the form or record to be used for additional information collection.

NOA # 2014-A001-00034

CFR §192.1007 titled: **“What are the required elements of an integrity management plan?”** states in paragraph (c) Evaluate and rank risk. An operator must evaluate the risks associated with its distribution pipeline. In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline. This evaluation must consider each applicable current and potential threat, the likelihood of failure associated with each threat, and the potential consequences of such a failure. An operator may subdivide its pipeline into regions with similar characteristics (e.g., contiguous areas within a distribution pipeline consisting of mains, services and other appurtenances; areas with common materials or environmental factors), and for which similar actions likely would be effective in reducing risk.).

The following risks associated with its distribution pipeline must be reevaluated. In this re-evaluation, you must determine the relative importance of each threat and estimate and rank the risks posed to your pipeline. You should not use leakage as the sole means of ranking the threats to your pipeline. You failed to consider the following threats and/or potential threats:

- **Natural Forces:** The plan does not consider potential threats posed by natural forces. Natural forces must be considered a potential threat to the pipeline system.
- **Corrosion:** The plan does not consider external corrosion. External Corrosion must always be considered a potential threat to any pipeline system including metallic pipe. If corrosion threat subdivision occurs, atmospheric corrosion and external corrosion must be considered as potential threats.
- **Excavation Damage:** The plan does not consider excavation damage due to potential third party or unknown damages to the distribution system. Excavation damage is always a potential threat to pipeline system unless the system is fully contained on private property.
- **Other Outside Force Damage:** The plan does not consider other outside force damage. Other outside force damage is a potential threat due to leaks caused by fire, explosions, and deliberate or willful acts, such as “vandalism” or “damages caused by other persons”. The plan must

consider other outside force damage a potential threat to the pipeline system.

- **Incorrect Operations:** The plan does not consider incorrect operations due to inadequate procedures, or safety practices or failure to follow correct procedures. Incorrect Operations must be considered a potential threat to the pipeline system.

NOA # 2014-A001-00036

CFR §192.1007 titled: **“What are the required elements of an integrity management plan?”** states in paragraph (e) (1),

- (e) Measure performance, monitor results, and evaluate effectiveness.
- (1) Develop and monitor performance measures from an established baseline to evaluate the effectiveness of its IM program. An operator must consider the results of its performance monitoring in periodically re-evaluating the threats and risks. These performance measures must include the following:
 - (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
 - (ii) Number of excavation damages;
 - (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
 - (iv) Total number of leaks either eliminated or repaired, categorized by cause;
 - (v) Number of hazardous leaks either eliminated or repaired as required by §192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material; and
 - (vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.

The plan did not develop or establish a baseline for each of the performance measures listed 192.1007 (e) (1).

This letter serves as notice of inadequate procedure(s). A written response to this notice is requested by June 27, 2014. If you are contesting this Notice, include a detailed written explanation and any necessary supporting documents with your response.

If you are not contesting this Notice, the written response must acknowledge that amended procedures will be provided to this office by August 26, 2014, by uploading the new version of the DIMP Plan and providing a copy of the new DIMP plan. Once the inadequacies identified herein have been addressed in your amended procedures,

this enforcement action will be closed. Any correspondence must include the Inspection Report Number as well as the corresponding NOA Number.

Failure to respond to this Notice and take corrective action will result in the issuance of a Notice of Probable Violation and initiation of a Citation Order that will subject Village of Rantoul to a penalty assessment as allowed under Section 7 of the Illinois Gas Pipeline Safety Act (220 ILCS 20/7).

Please be advised that pursuant to IL Adm. Code Part 596 of the Commission's Rules, all information regarding this inspection in possession of the Commission, including communications regarding this inspection will be made available to the public and posted on the Commission's website. Confidential and/or personal information including, but not limited to social security numbers, drivers license numbers, credit card numbers, debit card numbers, and medical records, etc. should be included in neither inspection documents nor correspondence with the Commission. Any person, as set forth in Section 596.20, who believes that any inspection information is confidential or proprietary shall request that the Commission enter an order to protect the confidential or proprietary information pursuant to 83 Ill. Adm. Code 200.430.

If you have any questions concerning this matter, please contact Charles Gribbins at (217) 414-5393, or I may be contacted at (217) 785-1165.

Sincerely,



Darin R. Burk
Manager- Pipeline Safety

DRB/mn