



ILLINOIS COMMERCE COMMISSION

July 21, 2014

Mrs. Nancy Jordan
Executive Director
White County Housing Authority
P.O. Box 277
Crossville, Illinois 62827

Re: Notice of Amendments (NOA #'s 2014-A001-00073, 2014-A001-00074, 2014-A001-00075, and 2014-A001-00076)

Dear Mrs. Jordan:

A representative of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a review of the White County Housing Authority ("White County") Distribution Integrity Management Plan ("DIMP") on May 29-30, 2014, (Inspection # 2014-P-00315). The audit has established that the DIMP 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-A001-00073

CFR §192. 1015 titled: **"What must a master meter or small liquefied petroleum gas (LPG) operator do to implement this subpart?** States in paragraph (b) Elements. A written integrity management plan must address, at a minimum, the following elements:

- (1) Knowledge. The operator must demonstrate knowledge of its pipeline, which, to the extent known, should include the approximate location and material of its pipeline. The operator must identify additional information needed and provide a plan for gaining knowledge over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities).

System description is defined under Introduction and System Description on pages 7-8. Review of the system maps indicate pipe size and location but do not

indicate material. Staff requests the maps to be revised to include materials as defined in the DIMP plan.

NOA # 2014-A001-00075

CFR §192.1015 titled: What must a master meter or small liquefied petroleum gas (LPG) operator do to implement this subpart? States in paragraph (b) Elements. A written integrity management plan must address, at a minimum, the following elements:

- (2) Identify threats. The operator must consider, at minimum, the following categories of threats (existing and potential): Corrosion, natural forces, excavation damage, other outside force damage, material or weld failure, equipment failure, and incorrect operation.

External corrosion threat is considered in Section #2 Identify Threats, located on page 8 of the plan. External corrosion was not identified as an applicable sub threat under corrosion during the threat evaluation. Staff is aware of an atmospheric corrosion instance occurring in the Grayville system in 2011 on the outlet riser at the site located at 3rd and Martin. Staff requests that Atmospheric Corrosion be reviewed as a potential threat.

NOA # 2014-A001-00076

CRF §192.1015 titled: What must a master meter or small liquefied petroleum gas (LPG) operator do to implement this subpart? States in paragraph (c) Records. The operator must maintain, for a period of at least 10 years, the following records:

- (1) A written IM plan in accordance with this section, including superseded IM plans;

Section #5 of the plan on page 14 defines the records to be retained, but does not indicate the retention period of 10 years. Staff requests the plan to be amended to include the retention interval and also include retention of past versions of the plan shall be retained.

NOA # 2014-A001-00074

CFR §192.1015 titled: What must a master meter or small liquefied petroleum gas (LPG) operator do to implement this subpart? States in Paragraph (c) Records. The operator must maintain, for a period of at least 10 years, the following records:

- (3) Documents showing the location and material of all piping and appurtenances that are installed after the effective date of the operator's IM

program and, to the extent known, the location and material of all pipe and appurtenances that were existing on the effective date of the operator's program.

The plan does not currently define the retention interval for records that indicate the location and materials of all pipe and appurtenances that are installed after the effective date of the IM program. Staff requests the 10 year interval shall include the above system information.

This letter serves as notice of inadequate procedures. A written response to this notice is requested by August 20, 2014, to confirm you received this notice and are aware that USDI has responded with a revised DIMP plan. 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, no further action is required by White County due to Utility Safety and Design ("USDI") having submitting a revised DIMP for Staff's review. 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 the White County 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 Jim Watts at 217-414-9609, or I may be contacted at (217) 785-1165.

Sincerely,

A handwritten signature in black ink that reads "Darin R. Burk / mn". The signature is written in a cursive style.

Darin R. Burk
Manager- Pipeline Safety

DRB/mn