

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 10/14/2014, 10/15/2014 (Half)	Man Days: 1.5
Inspection Unit: Canton	
Location of Audit: Canton	
Exit Meeting Contact: Chris Juliusson	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Kevin Hecker	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: (800) 755-5000 Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
Chris Juliusson	Quality Assurance Consultant	

Gas System Operations	Status
Gas Transporter	Ameren Illinois
Annual Report (Form 7100.1-1) reviewed for the year:	Satisfactory
Unaccounted for Gas	.32%
Number of Services	824016
Miles of Main	16941
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Satisfactory
Operating Pressure (Feeder)	281-285 psig
Operating Pressure (Town)	30 psig
Operating Pressure (Other)	Not Applicable

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<u>General Comment:</u> <i>Ameren classifies all pipelines as either high-pressure distribution (feeder) or distribution (town)</i>		
MAOP (Feeder)		300 psig
MAOP (Town)		60 psig
MAOP (Other)		Not Applicable
<u>General Comment:</u> <i>Ameren classifies all pipelines as either high-pressure distribution (feeder) or distribution (town)</i>		
Does the operator have any transmission pipelines?		No
<u>General Comment:</u> <i>While Ameren maintains several transmission pipelines, there are none maintained out of the Canton Operating Center.</i>		
Regulatory Reporting Records		Status
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
<u>General Comment:</u> <i>Ameren Canton did not experience any reportable incidents in 2013.</i>		
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u> <i>Ameren Canton did not experience any reportable incidents in 2013.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Applicable
<u>General Comment:</u> <i>Ameren Canton did not experience any reportable incidents in 2013, therefore no supplemental reports were necessary.</i>		
Did the operator have any plastic pipe failures in the past calendar year?		No
<u>General Comment:</u> <i>Ameren Canton did not experience any plastic pipe failures in 2013.</i>		
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		Not Applicable
<u>General Comment:</u> <i>Ameren Canton did not experience any plastic pipe failures in 2013.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<u>General Comment:</u>		

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<i>Ameren Canton did not experience any safety related conditions in 2013.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<u>General Comment:</u>		
<i>Ameren Canton did not experience any safety related conditions in 2013.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Satisfactory
<u>General Comment:</u>		
<i>In addition to the public awareness message, all Ameren customers are provided information about their responsibilities regarding buried piping at the time they sign up for service.</i>		
DRUG TESTING		Status
<u>Category Comment:</u>		
<i>An audit of the Drug and Alcohol plan was conducted during a previous audit.</i>		
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
TEST REQUIREMENTS		Status
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Not Applicable
<u>General Comment:</u>		
<i>No pressure tests were necessary on the main feeder line during 2013.</i>		
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
<u>General Comment:</u>		
<i>Staff reviewed several service cards indicating that new mains and services were properly pressure tested.</i>		
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
<u>General Comment:</u>		
<i>Staff reviewed several service cards indicating that services were properly pressure tested.</i>		
UPRATING		Status
<u>Category Comment:</u>		
<i>Ameren Canton conducted an extensive renewal project in the business district which is operating at a higher pressure than before, however, no existing pipeline was uprated to a higher pressure in 2013.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating	Not Applicable

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	activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Satisfactory
General Comment:		
<i>Ameren Canton was able to provide documentation of their annual O&M review.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Yes
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Satisfactory
CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Satisfactory
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
General Comment:		
<i>Ameren Canton has no cast iron pipe remaining in the gas system.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
General Comment:		
<i>Ameren Canton has no cast iron pipe remaining in the gas system.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
General Comment:		
<i>Ameren Canton has no cast iron pipe remaining in the gas system.</i>		

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[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
General Comment:		
<i>Ameren Canton has no cast iron pipe remaining in the gas system.</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
Category Comment:		
<i>Operator Qualification reviews were not conducted as part of this audit.</i>		
Refer to operator Qualification Inspection Forms and Protocols		Not Checked
DAMAGE PREVENTION RECORDS		Status
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Satisfactory
Has the number of damages increased or decreased from prior year?		Decreased
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Satisfactory
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Satisfactory
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Yes
Do pipeline operators include performance measures in facility locating contracts?		Yes
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Satisfactory
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		Yes
If no, were Common Ground Alliance Best Practices discussed with Operator?		Yes
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
General Comment:		
<i>Emergency plan is reviewed annually. In addition to emergency training, Ameren conducts mock emergency training annually.</i>		

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[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Satisfactory
General Comment: <i>Emergency plan is reviewed annually. In addition to emergency training, Ameren conducts mock emergency training annually.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Satisfactory
General Comment: <i>This was confirmed when the public awareness plan review was conducted in Pawnee in February 2014.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Satisfactory
General Comment: <i>Staff review odor complaint/leak complaints for 2013. All response times observed were within O&M guidelines.</i>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
General Comment: <i>An audit of the Public Awareness Plan was conducted in Pawnee in February 2014.</i>		
ODORIZATION OF GAS		Status
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Satisfactory
General Comment: <i>Staff reviewed odorant concentration level testing records for 2013.</i>		
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Satisfactory
General Comment: <i>Staff reviewed odorant tank records for 2013.</i>		
[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Not Applicable
General Comment: <i>Ameren Canton is not a master meter operator.</i>		
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Not Applicable

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<u>General Comment:</u>		
<i>Ameren Canton is not a master meter operator.</i>		
PATROLLING & LEAKAGE SURVEY		Status
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Not Applicable
<u>General Comment:</u>		
<i>No areas within the Canton operating territory meet the criteria for code section 192.721(b)(1).</i>		
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Not Applicable
<u>General Comment:</u>		
<i>No areas within the Canton operating territory meet the criteria for code section 192.721(b)(2).</i>		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Satisfactory
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Satisfactory
YARD LINES - RESIDENTIAL		Status
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Satisfactory
<u>General Comment:</u>		
<i>There are approximately 50 yard lines within the Ameren Canton.</i>		
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Satisfactory
<u>General Comment:</u>		
<i>Ameren does not provide cathodic protection for yard lines, but does include them in their regular leak survey cycle.</i>		
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Satisfactory
<u>General Comment:</u>		
<i>Ameren does not provide cathodic protection for yard lines, but does include them in their regular leak survey cycle.</i>		

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ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Satisfactory
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Satisfactory
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Satisfactory
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Satisfactory
General Comment:		
<i>There are 2 8" lines that cross under the river at Havana but neither line has been abandoned.</i>		
PRESSURE LIMITING AND REGULATION		Status
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	Satisfactory
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Satisfactory
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Yes

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[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Satisfactory
VALVE MAINTENANCE		Status
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
General Comment:		
<i>There are no vaults that meet the code criteria within the Ameren Canton operating territory.</i>		
Investigation Of Failures		Status
Category Comment:		
<i>Ameren Canton experienced no accidents or failures requiring analysis in 2013.</i>		
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable
WELDING OF STEEL PIPE		Status
Category Comment:		
<i>Welding records were not reviewed as part of this audit. These records are housed at the Decatur Operations Center and will be reviewed during a subsequent audit.</i>		
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Not Checked
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification as required?	Not Checked
[192.807]	Does the operator have documentation of welder OQ records?	Not Checked
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
JOINING OF MATERIAL OTHER THAN WELDING		Status
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Satisfactory
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Satisfactory
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Satisfactory
CORROSION CONTROL RECORDS		Status
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities,	Satisfactory

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	galvanic anodes, and neighboring structures bonded to the cathodic protection system?	
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Satisfactory
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Satisfactory
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Satisfactory
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Applicable
General Comment:		
<i>No deficiencies were identified with interference bonds in the Ameren Canton territory in 2013.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Applicable
General Comment:		
<i>There are no unprotected pipelines in the Ameren Canton operating territory, aside from customer-owned yard lines.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Satisfactory
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Satisfactory
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Applicable
General Comment:		
<i>Ameren Canton did not experience any issues where a test lead was no longer electrically conductive.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Satisfactory

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[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
General Comment: <i>Ameren Canton does not transport corrosive gas.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
General Comment: <i>Ameren Canton does not utilize internal corrosion couponing for corrosion control.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
[192.491][192.483(a), 192.483(b), 192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Applicable
General Comment: <i>Ameren has not removed any pipe due to external corrosion.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Satisfactory
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
General Comment: <i>Ameren Canton is not a municipal operator.</i>		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory

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