

- Review comments from Public Official and Emergency Responder who attend meetings or participate in drills.

The Program Administrator, after review of information, may incorporate the pertinent information received into The Ohio Rural Natural Gas Co-Op Public Awareness program on an annual basis.

11. PROGRAM EVALUATION

The PAC should coordinate and compile the results of the evaluation. The PAC will maintain documentation in location identified.

11.1. Overview & Purpose

The primary purposes of the evaluation of the Ohio Rural Natural Gas Co-Op's Public Awareness Program are to:

- Assess whether the current program is effective in achieving the objectives contained herein, and
- Provide the operator information on improving improvements in its Public Awareness Program effectiveness based on findings from the evaluations.

A secondary purpose for the evaluation is to demonstrate to company management and regulators, the status and validity of the Ohio Rural Natural Gas Co-Op's Public Awareness Program.

11.2. Elements of the Evaluation Plan

At a high level, this evaluation plan includes the measures, means and frequency for tracking performance. The selected set of measures reflects:

- Whether the program is being implemented as planned - the process.
- Whether the program is effective - program effectiveness.

11.3. Summary of Evaluation Process

APPROACH	TECHNIQUES	FREQUENCY
Self - Assessment of Implementation	Review <ul style="list-style-type: none"> • Internal Review • Third Party Review • Regulatory Inspection 	Annually
Pre-Test Effectiveness of Materials	Focus Groups either in-house or external participants	Upon Initial Design or major redesign of materials or messages
Effectiveness of Implementation <ul style="list-style-type: none"> • Outreach • Knowledge Level 	Survey (Choices) <ul style="list-style-type: none"> • Operator Designed • Third Party Designed 	Once every 4 years or when a major redesign of materials or messages

<ul style="list-style-type: none"> • Changes in Behavior • Bottom-line Results 	<ul style="list-style-type: none"> • Industry Assoc. Designed 	
Implement changes to the PAC as assessment methods suggest	Responsible person	As required by findings of evaluations

11.4. Measuring Program Implementation (Annual Review)

The purpose of this element of the Ohio Rural Natural Gas Co-Op's public awareness evaluation plan is to answer the following two questions:

- Has the Ohio Rural Natural Gas Co-Op's Public Awareness Program been developed and written to address the objectives, elements and baseline schedule as described in API RP 1162?
- Has the Ohio Rural Natural Gas Co-Op's Public Awareness Program been implemented and documented according to the written program?

11.4.1. Annual Review Process

To conduct an effective annual review, the Ohio Rural Natural Gas Co-Op's will implement the following process:

The PAC Committee will meet via telephone-conference or face-to-face, following 90 days of the receipt of the final program documentation and effectiveness results for the calendar year's program.

- This generally will take place in the 4th quarter of each calendar year.

Data points evaluated include, but are not limited to:

- Regulatory inspection findings
- Schedule of calendar year's program implementation
- Current organizational and/or pipeline system changes
- Personnel responsibilities
- Documentation from calendar year program implementations
- Required element implementation completion
- Effectiveness results
- Supplemental enhancement program triggers (Plan §8.1)
- Stakeholder feedback

During the evaluation, the PAC will assess the need for continuous improvement or other program changes or modifications, determine an implementation plan and schedule, and assign responsibility of implementation (if action is deemed appropriate).

Detailed meeting minutes will be kept and documented through the records keeping process outlined in the Public Awareness Plan.

11.5. Four-Year Effectiveness Evaluation

This section describes the Ohio Rural Natural Gas Co-Op's process for evaluating the effectiveness of its public awareness program. The purpose of the evaluation is to assess whether the Program is effective in achieving its objective of raising awareness of the defined stakeholders of the presence of pipelines in their communities and increase their understanding of the role of pipelines in transporting energy.

Effectiveness Evaluations should be conducted at intervals not to exceed four years.

A more informed public along the Ohio Rural Natural Gas Co-Op's pipeline routes should supplement the Ohio Rural Natural Gas Co-Op's safety measures and should contribute to reducing the likelihood and potential impact of pipeline emergencies and releases. The Ohio Rural Natural Gas Co-Op's Public Awareness Program will also help the public understand that while pipeline accidents are possible, pipelines are a relatively safe and reliable mode of transportation and that the Ohio Rural Natural Gas Co-Op conducts a variety of preventive and precautionary measures to prevent pipeline accidents, and that the Ohio Rural Natural Gas Co-Op anticipates and plans for the management of accidents if they occur.

This section will assess progress on the following measures to determine the effectiveness of the Ohio Rural Natural Gas Co-Op's Public Awareness Program:

- Whether the public awareness information is reaching the intended stakeholder audiences.
- Whether the recipient audiences understand the message delivered.
- Whether the public awareness information cause the appropriate stakeholder behavior.
- Whether the public awareness program provides bottom-line results.

11.5.1. *Determining Statistical Sample Size*

Sample size determination is the act of choosing the number of observations or replicates to include in a statistical sample. The sample size is an important feature of any empirical study in which the goal is to make inferences about a population from a sample. In practice, the sample size used in a study is determined based on the expense of data collection, and the need to have sufficient statistical power. To determine statistical sample size for survey results, the Ohio Rural Natural Gas Co-Op utilizes standard market research practices.

To determine the sample size, the Ohio Rural Natural Gas Co-Op utilizes the following formula:

- $SS = (Z^2 * P * (1 - P)) / C^2$
 - Z = Confidence Interval (95% = 1.96)
 - P = Percentage (50%)
 - C = Margin of Error (based on 10%)
 - SS = 360 stakeholders

11.5.2. *Measure 1 – Outreach Measurement*

Outreach consists of two fundamental measurements to gauge the program outreach and the percentage of stakeholders actually reached with the public awareness campaign.

Measuring Outreach

The Ohio Rural Natural Gas Co-Op will document all outreach of each distribution of public awareness materials through stakeholder summary/outreach reports and stakeholder lists. Summaries of outreach will be provided throughout the implementation of annual programs.

Measuring Stakeholders Actually Reached

- Feedback on intended audience reception of the Ohio Rural Natural Gas Co-Op's Public Awareness Communications will be gathered via survey sent as part of the Public Awareness communications. The Ohio Rural Natural Gas Co-Op will make an estimate of the ultimate efficacy of the printed material campaigns in reaching end-users.
- The question, or some derivative of the question, "Do you recall receiving messages from the Ohio Rural Natural Gas Co-Op within the past [appropriate frequency - i.e. 12 months]?" will be asked of the stakeholders identified within the scope of the program.
- The percent whom respond "yes" will determine the stakeholders actually reached within the Ohio Rural Natural Gas Co-Op public awareness program.
- This measure will be documented and maintained under the direction of the Program Administrator. The indicators mentioned earlier in this section will be used to track and document an estimated percentage of stakeholders actually reached.

11.5.3. *Measure 2 – Understandability of the Public Awareness Content*

Pre-testing of Public Awareness Communication

The Ohio Rural Natural Gas Co-Op shall pre-test the contents of the Public Awareness Brochure for clarity and information retention before the brochures are direct mailed. The brochure may be pre-tested with a small representative audience consisting either of the Ohio Rural Natural Gas Co-Op employees or a small section of the public awareness audience.

Survey of the Four Audience Segments

A survey or participation in an industry survey may be once every four years and is intended to understand the effectiveness of the Ohio Rural Natural Gas Co-Op's Public Awareness Program and the understandability of the content of Ohio Rural Natural Gas Co-Op's Public Awareness communications.

Survey efforts will consist of knowledge and understandability relevant to the messages included in the public awareness communication. Examples are as follows, but are not limited to:

- How would you know if there is a pipeline near you?
- Are you aware of the National Pipeline Mapping System (NPMS)?
- Do you know how to recognize a pipeline right-of-way?
- Which of the following is the safest way for transporting oil or natural gas? (check one)
- Are you aware of the prevention measures pipeline companies take to maintain safe operations?

- Do you know how to recognize a pipeline leak?

The Public Awareness Administrator will receive the results of the survey.

Upon receipt of the results, the Public Awareness Administrator will consider the results and make the program changes necessary to improve the public awareness program in the year following the effectiveness review of the program.

11.5.4. Measure 3 - Audience Actions/Behavior

A survey, or participation in an industry survey, shall be conducted once every four years and is intended to understand the effectiveness of the Ohio Rural Natural Gas Co-Op Public Awareness Program and the stakeholder behavior related to the Ohio Rural Natural Gas Co-Op's Public Awareness communications.

Survey efforts will consist of stakeholder behavior relevant to the messages included in the public awareness communication. Examples are as follows, but are not limited to:

- If you were planning on digging, which of the following actions would you be likely to take? (check all that apply)
- What would you likely do if you saw suspicious or construction related activity on or near a pipeline right-of-way? (check all that apply)
- What would you do in the event of a pipeline emergency? (check all that apply)
- How well informed would you say you are regarding pipelines in your community?

Also, this is a measurement of whether the audience is taking action in alignment with the pipeline safety and damage prevention messages of the public awareness program.

Other data points included in measure may include:

- The number of Excavation Notifications received by the Ohio Rural Natural Gas Co-Op
- The number of Non-Compliant Excavation Notifications
- The number of Encroachment Violations received by the Ohio Rural Natural Gas Co-Op
- The percentage of Non-Compliant Excavation Notifications
- The Encroachment Violations as a total of all notifications received by the Ohio Rural Natural Gas Co-Op
- If applicable, whether the Public Awareness Brochure recipients correctly identified and reported a possible pipeline release and took the personal safety actions suggested in the brochure
- The percentage of responses returned from the annual direct mailings to the four stakeholder groups
- Evaluation of data gathered from the reply cards sorted by stakeholder group
- Evaluation of data gathered from group meetings conducted with stakeholder groups

The results of this measure shall be forwarded to the Operations Manager prior to the Public Awareness Committee's annual review of the Public Awareness Program. The Public Awareness Committee shall consider these results during its Annual review and make the program improvements necessary as indicated by the measure.

11.5.5. Measure 4 - Bottom Line Results

A survey, or participation in an industry survey, shall be conducted once every four years and is intended to measure the bottom line results of the Ohio Rural Natural Gas Co-Op's Public Awareness Program.

The survey will consist of question(s) related to stakeholder's perception of the Ohio Rural Natural Gas Co-Op's public awareness program.

Examples are as follows, but are not limited to:

- How well informed would you say you are regarding pipelines in your community?
- On a scale of 1-10, how would you rate the Ohio Rural Natural Gas Co-Op's efforts at educating you about pipeline safety?

Other data points included in measure may include damage trending through damage to ticket ratio.

12. Implement Changes and Continuous Improvement Efforts

Based on the results of program evaluation findings, the Ohio Rural Natural Gas Co-Op will strive to determine the best methods of changing and improving the Public Awareness Program. Changes and/or improvements will be evaluated, planned, and assigned through the Annual Review Process (see §11.4.1).

Appendix A - SIC Codes

Table 1 - Affected Public

SIC Code	SIC Description
8211	Elementary and Secondary Schools
8221	Colleges and Universities
8222	Junior Colleges
09	Fishing, Hunting and Trapping
20	Food and Kindred Products
21	Tobacco Products
22	Textile Mill Products
23	Apparel, Finished Prdcts from Fabrics & Similar Materials
25	Furniture and Fixtures
26	Paper and Allied Products
27	Printing, Publishing and Allied Industries
28	Chemicals and Allied Products
30	Rubber and Miscellaneous Plastic Products
31	Leather and Leather Products
32	Stone, Clay, Glass, and Concrete Products
33	Primary Metal Industries
34	Fabricated Metal Prdcts, Except Machinery & Transport Eqpmnt
35	Industrial and Commercial Machinery and Computer Equipment
36	Electronic, Elctrcal Eqpmnt & Cmpnts, Excpt Computer Eqpmnt
37	Transportation Equipment
38	Mesr/Anlyz/Cntrl Instrmnts; Photo/Med/Opt Gds; Watchs/Clocks
39	Miscellaneous Manufacturing Industries
41	Local, Suburban Transit & Interurbn Hgwy Passenger Transport
42	Motor Freight Transportation
43	United States Postal Service
44	Water Transportation
45	Transportation by Air
47	Transportation Services
48	Communications
50	Wholesale Trade - Durable Goods
51	Wholesale Trade - Nondurable Goods
52	Building Matrials, Hrdwr, Garden Supply & Mobile Home Deals
53	General Merchandise Stores
54	Food Stores
55	Automotive Dealers and Gasoline Service Stations
56	Apparel and Accessory Stores
57	Home Furniture, Furnishings and Equipment Stores
58	Eating and Drinking Places
59	Miscellaneous Retail
60	Depository Institutions
61	Non-depository Credit Institutions
62	Security & Commodity Brokers, Dealers, Exchanges & Services
63	Insurance Carriers

64	Insurance Agents, Brokers and Service
67	Holding and Other Investment Offices
70	Hotels, Rooming Houses, Camps, and Other Lodging Places
72	Personal Services
75	Automotive Repair, Services and Parkinging
76	Miscellaneous Repair Services
78	Motion Pictures
79	Amusement and Recreation Services
80	Health Services
81	Legal Services
83	Social Services
84	Museums, Art Galleries and Botanical and Zoological Gardens
86	Membership Organizations
89	Services Not Elsewhere Classified
93	Public Finance, Taxation and Monetary Policy
94	Administration of Human Resource Programs
99	Nonclassifiable Establishments
0279	Animal Specialties, Nec
0741	Veterinary Services For Livestock
0742	Veterinary Services, Specialties
0752	Animal Specialty Services
1711	Plumbing, Heating, Air-conditioning
1721	Painting and Paper Hanging
1742	Plastering, Drywall, and Insulation
1743	Terrazzo, Tile, Marble, Mosaic Work
1751	Carpentry Work
1752	Floor Laying and Floor Work, Nec
1761	Roofing, Siding, and Sheetmetal Work
1793	Glass and Glazing Work
2421	Sawmills and Planing Mills, General
2426	Hardwood Dimension and Flooring Mills
2429	Special Product Sawmills, Nec
2431	Millwork
2434	Wood Kitchen Cabinets
2435	Hardwood Veneer and Plywood
2436	Softwood Veneer and Plywood
2439	Structural Wood Members, Nec
2441	Nailed Wood Boxes and Shook
2448	Wood Pallets and Skids
2449	Wood Containers, Nec
2451	Mobile Homes
2452	Prefabricated Wood Buildings
2491	Wood Preserving
2493	Reconstituted Wood Products
2499	Wood Products, Nec
2951	Asphalt Paving Mixtures and Blocks
2952	Asphalt Felts and Coatings
2992	Lubricating Oils and Greases
2999	Petroleum and Coal Products, Nec
6512	Nonresidential Building Operators
6513	Apartment Building Operators
6514	Dwelling Operators, Except Apartments

6515	Mobile Home Site Operators
6517	Railroad Property Lessors
6519	Real Property Lessors, Nec
6531	Real Estate Agents and Managers
6541	Title abstract Offices
7311	Advertising Agencies
7313	Radio, Television, Publisher Representatives
7319	Advertising, Nec
7322	Adjustment and Collection Services
7323	Credit Reporting Services
7331	Direct Mail Advertising Services
7334	Photocopying and Duplicating Services
7335	Commercial Photography
7336	Commercial Art and Graphic Design
7338	Secretarial and Court Reporting
7342	Disinfecting and Pest Control Services
7349	Building Maintenance Services, Nec
7352	Medical Equipment Rental
7361	Employment Agencies
7363	Help Supply Services
7371	Custom Computer Programming Services
7372	Prepackaged Software
7373	Computer Integrated Systems Design
7374	Data Processing and Preparation
7375	Information Retrieval Services
7376	Computer Facilities Management
7377	Computer Rental and Leasing
7378	Computer Maintenance and Repair
7379	Computer Related Services, Nec
7381	Detective and Armored Car Services
7382	Security Systems Services
7383	News Syndicates
7384	Photofinish Laboratories
7389	Business Services, Nec
8231	Libraries
8243	Data Processing Schools
8244	Business and Secretarial Schools
8249	Vocational Schools, Nec
8299	Schools and Educational Services
8721	Accounting, Auditing, and Bookkeeping
8731	Commercial Physical Research
8732	Commercial Nonphysical Research
8733	Noncommercial Research Organizations
8734	Testing Laboratories
8741	Management Services
8742	Management Consulting Services
8743	Public Relations Services
8744	Facilities Support Services
8748	Business Consulting, Nec
9211	Courts
9222	Legal Counsel and Prosecution
9223	Correctional Institutions

9721	International Affairs
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Table 2 - Emergency Officials

SIC Code	SIC Description
9221	Police protection
9224	Fire protection
9229	Public order and safety
9711	National Security

Table 3 - Public Officials

SIC Code	SIC Description
91	Executive Offices
95	Administration of Environmental Quality and Housing Programs
96	Administration Of Economic Programs

Table 4 - Excavators

SIC Code	SIC Description
08	Forestry
10	Metal Mining
12	Coal Mining
13	Oil and Gas Extraction
14	Mining and Quarrying of Nonmetallic Minerals, Except Fuels
15	Building Cnstrctn - General Contractors & Operative Builders
16	Heavy Cnstrctn, Except Building Construction – Contractors
40	Railroad Transportation
46	Pipelines, Except Natural Gas
49	Electric, Gas and Sanitary Services
0781	Landscape Counseling and Planning
0782	Lawn and Garden Services
0783	Ornamental Shrub and Tree Services
1731	Electrical Work
1741	Masonry and Other Stonework
1771	Concrete Work
1781	Water Well Drilling
1791	Structural Steel Erection
1794	Excavation Work
1795	Wrecking and Demolition Work
1796	Installing Building Equipment
1799	Special Trade Contractors, Nec
2411	Logging
2911	Petroleum Refining
6552	Subdividers and Developers, Nec
6553	Cemetery Subdividers and Developers
7312	Outdoor Advertising Services
7353	Heavy Construction Equipment Rental
7359	Equipment Rental and Leasing, Nec

8711	Engineering Services
8712	Architectural Services
8713	Surveying Services
01	Agricultural Production – Crops
0211	Beef Cattle Feedlots
0212	Beef Cattle, Except Feedlots
0213	Hogs
0214	Sheep and Goats
0219	General Livestock, Nec
0241	Dairy Farms
0251	Broiler, Fryer, and Roaster Chickens
0252	Chicken Eggs
0253	Turkeys and Turkey Eggs
0254	Poultry Hatcheries
0259	Poultry and Eggs, Nec
0271	Fur-bearing Animals and Rabbits
0272	Horses and Other Equines
0273	Animal Aquaculture
0291	General Farms, Primarily animals
0711	Soil Preparation Services
0721	Crop Planting and Protection
0722	Crop Harvesting
0723	Crop Preparation Services For Market
0724	Cotton Ginning
0751	Livestock Services, Except Veterinary
0761	Farm Labor Contractors
0762	Farm Management Services

Appendix B- Public Awareness Committee Personnel

Name/ Title	Roles & Responsibilities
Darryl Knight/ President	Responsible for executive support and securing funding for the Ohio Rural Natural Gas Co-Op Pipeline Public Awareness Program.
Lauren Tristano/ Compliance Manager	Assist in management and implementation of the Program
Lauren Tristano/ Compliance Manager	Assist in management of the day to day coordination of the program. Assist in coordinating the Annual Review and Effectiveness Measurement. Review any incidents or situational changes that could trigger supplemental public awareness/ damage prevention activities. Summarize and document activities related to the Program and present it to the PAC.
Lauren Tristano/ Compliance Manager	Will manage the development and implementation of the Public Awareness Program to be compliant with RP 1162 and Dot 192 requirements. When the program needs to be modified, they will be responsible for making such modifications. They will, as necessary, review, provide input and communicate identified changes. As changes are made to the program, the latest program version will be made available to employees. They will assist in reviewing and approving vendors, trade associations, and non-profit organizations used in the program. They will also work with various intra-company personnel, vendors, trade associations, and nonprofit organizations to ensure the success of the program, make certain program audits are completed, findings are documented and appropriate implementation occurs. As feedback is provided by the evaluation of the program's effectiveness, this person will document and incorporate needed changes to make the program more effective in accordance with the program's record keeping procedures.

Appendix C- Ohio Rural Natural Gas Co-Op Current System Map

OHIO RURAL TAP
MENTOR, LAKE COUNTY, OHIO



- ★ TAP FOR OHIO RURAL NATURAL GAS
- OHIO RURAL NATURAL GAS
- ORWELL TRUMBULL PIPELINE



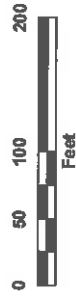
1 inch = 125 feet

Fracci Ct.

Painesville City
Lake County
Ohio

Ohio Rural Natural Gas
System Name & No.
ORNG T1-001

Lake Geauga
Recovery Center



1 inch = 110 feet



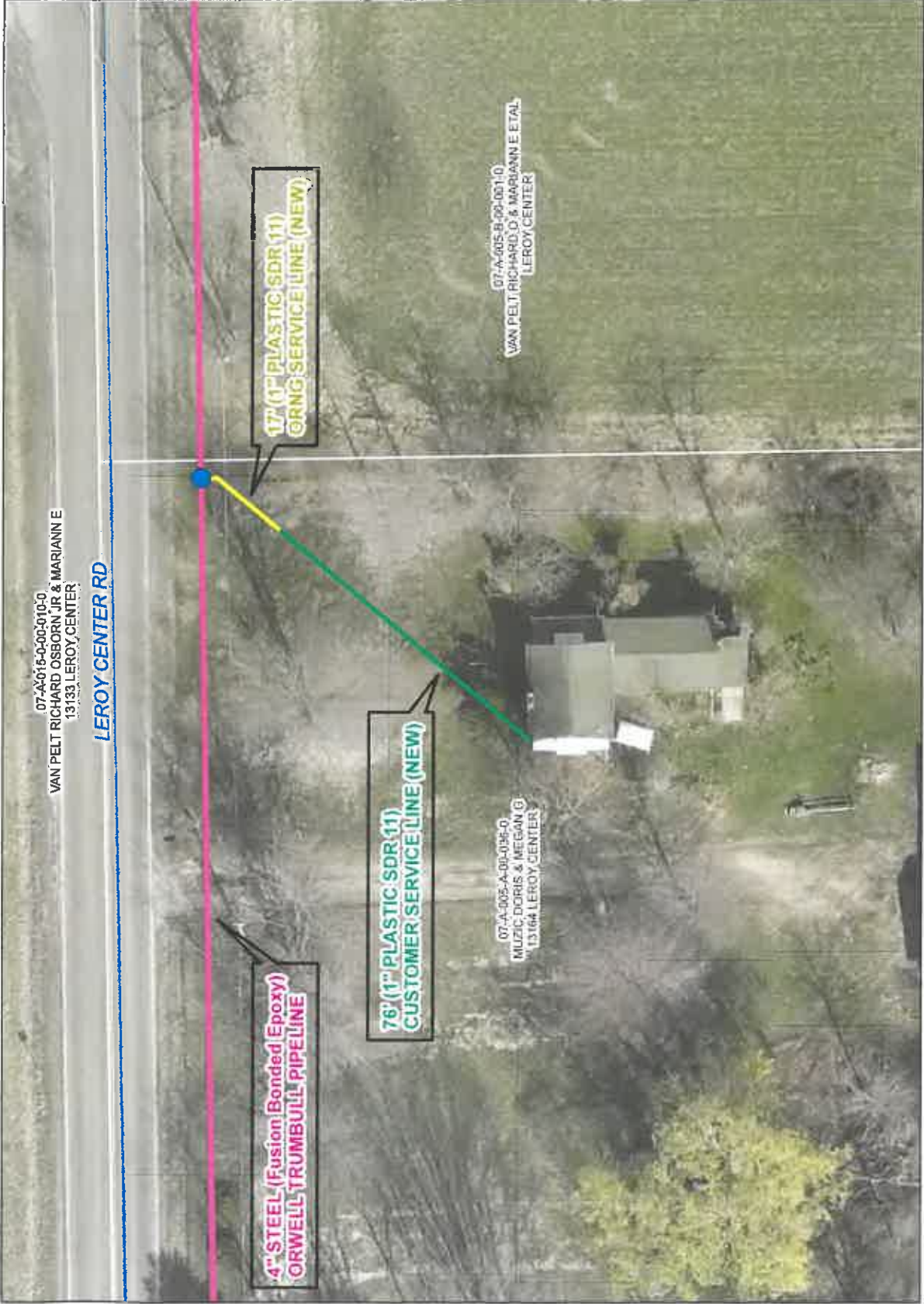
Legend

- ORNG CUSTOMER SERVICE LINE
- ORNG SERVICE LINE
- OHIO RURAL NATURAL GAS MAINLINE
- ORWELL TRUMBULL PIPELINE
- LAKE COUNTY PARCELS

Ohio Rural Natural Gas Service Line Order (SLO)
Drawing No. ORNG SLO-01 Ohio March
2022
Pipeline is approximate and NOT for on-site locating.
ALWAYS call 811 before you dig.



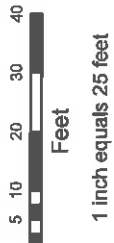
Oak St



Leroy Township
Lake County, Ohio

Ohio Rural
Natural Gas Co-Op
Service Line Order

13164 Leroy Ctr. Rd.



- Legend**
- ORNG TAP
 - ORNG SERVICE LINE
 - CUST. SERVICE LINE
 - ORWELL TRUMBULL
 - ROADS
 - LAKE CTY PARCELS

Datum: NAD83 SPCS Ohio North
Date: 8/12/2016
Pipeline are Approximate and NOT for on-site
locating. ALWAYS call 811 before you dig.

Muzic

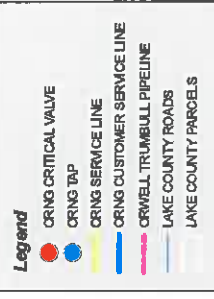
Concord Twp
Lake County
Ohio

Ohio Rural Natural Gas
System Name & No.
ORNG T1-002

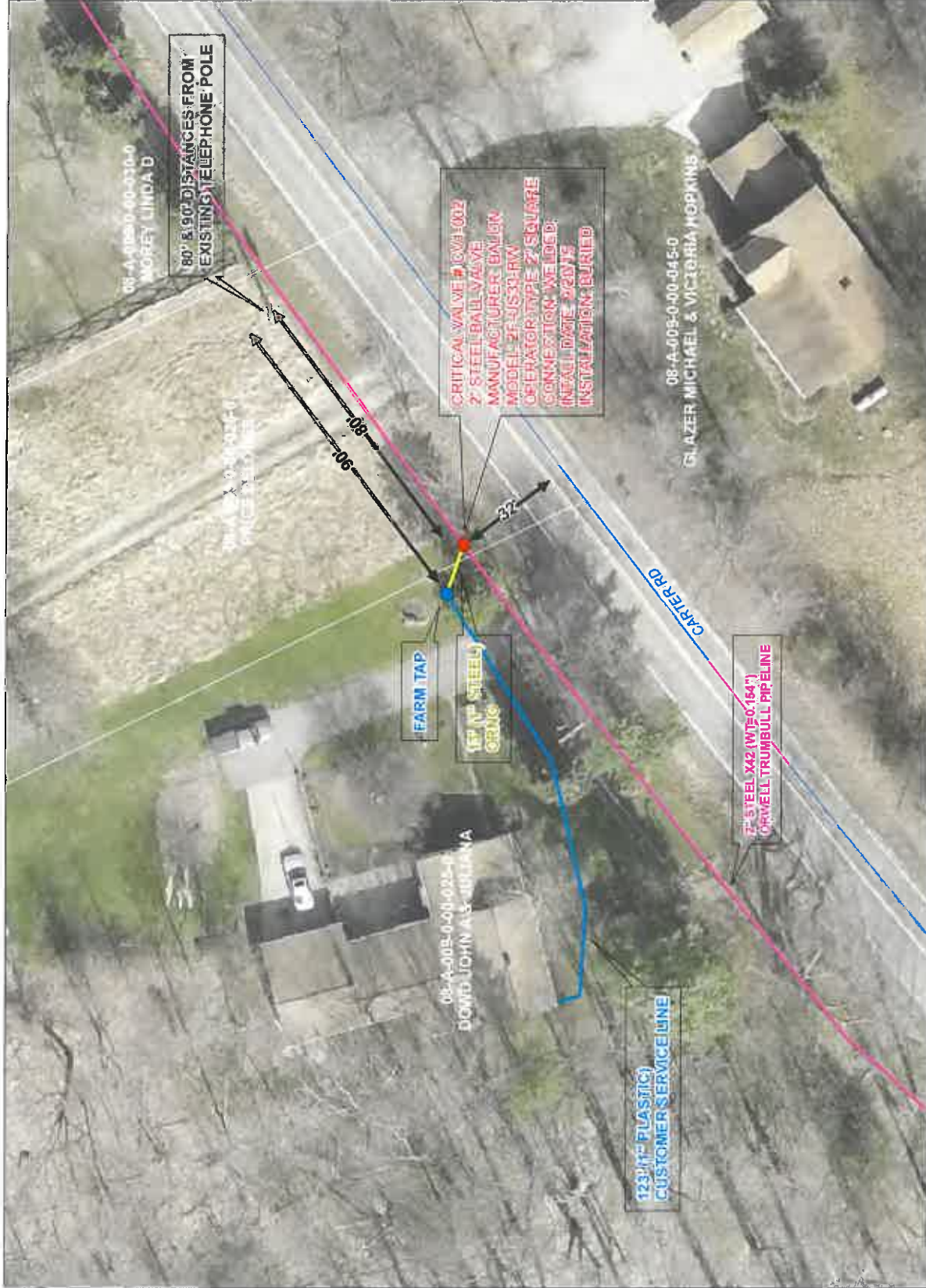
12321 Carter Road



1 inch = 30 feet



Ohio Rural Natural Gas
Datum: NAD83 SPCS Ohio North
Date: 8/10/2016
This drawing is for informational purposes only and NOT for on-site locating.
ALWAYS call 811 before you dig.

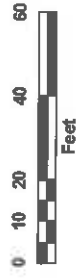


Dowd

Concord Twp
Lake County
Ohio

Ohio Rural Natural Gas
System Name & No.
ORNG T1-005

6970 Williams Rd Barn



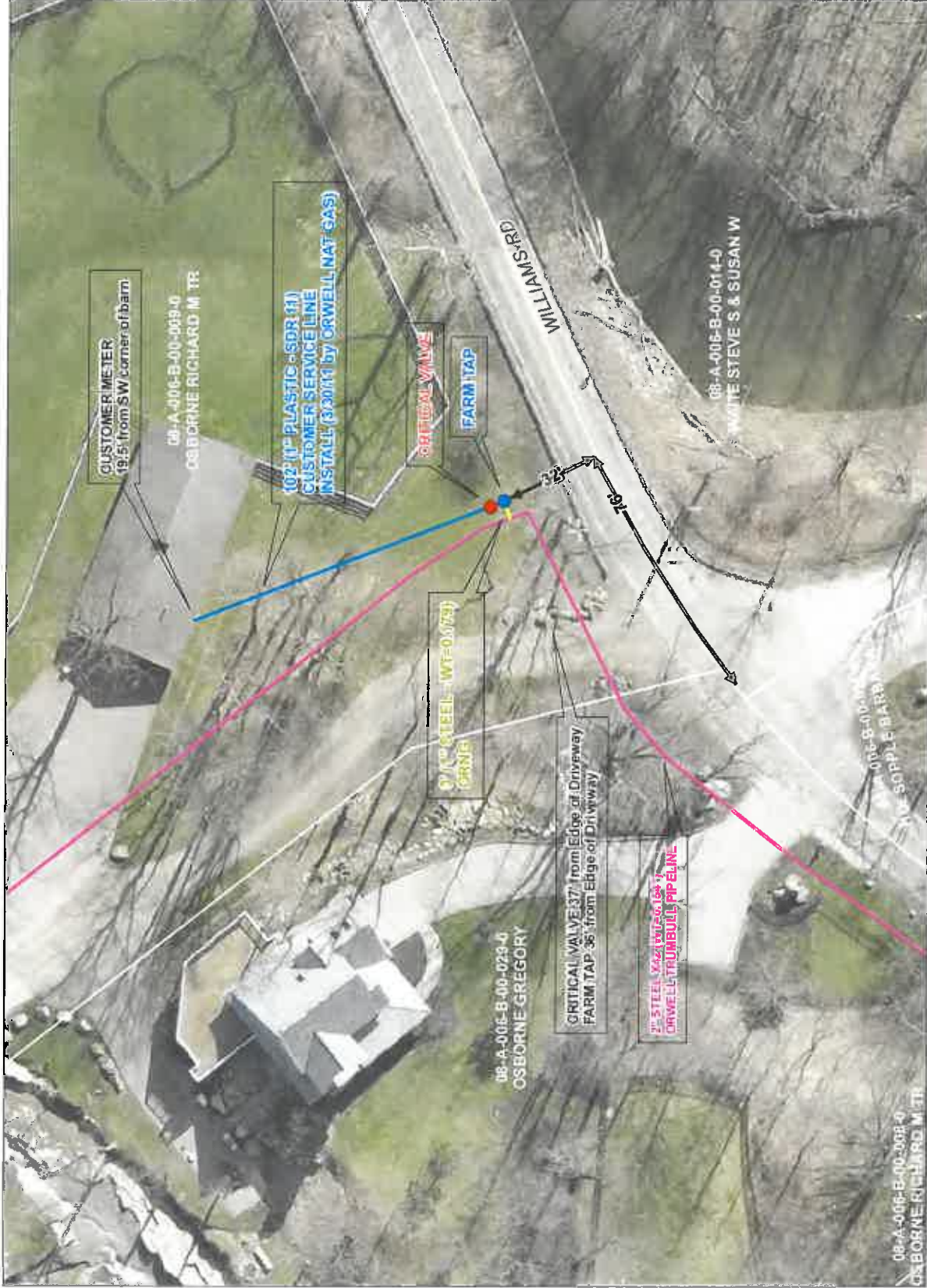
1 inch = 35 feet



Legend

- ORNG CRITICAL VALVE
- ORNG TAP
- ORNG SERVICE LINE
- ORNG CUSTOMER SERVICE LINE
- ORWELL TRUMBULL PIPELINE
- LAKE COUNTY ROADS
- LAKE COUNTY PARCELS

Ohio Rural Natural Gas
Datum: NAD83 SPCS Ohio North
Scale: 1"=35'
Produce in accordance with NO.7 for on-site locating.
ALWAYS call 811 before you dig.

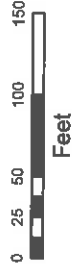


William Rd Barn

Mentor
Lake County, Ohio

Ohio Rural
Natural Gas Co-Op
Residential Services

7317, 7357, 7371
Reynolds Road



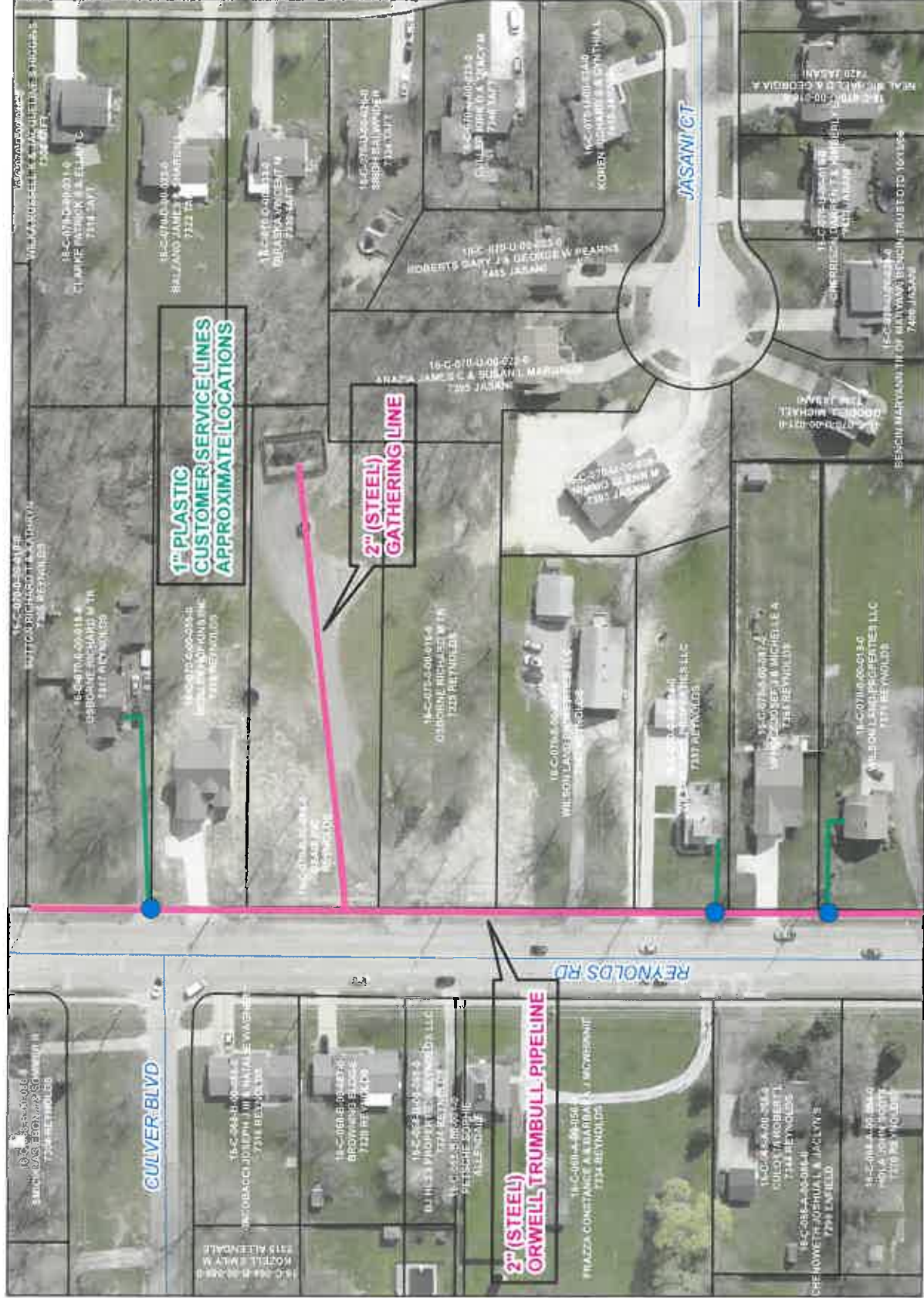
1 inch equals 90 feet



Legend

- ORNG TAP
- CUST. SERVICE LINE
- ORWELL TRUMBULL
- ROADS
- LAKE CITY PARCELS

Datum: NAD83 SPCS Ohio North
Date: 8/22/2016
Pipelines are Approximate and NOT for on-site
locating. ALWAYS call 811 before you dig.



Reynolds Rd.

OHIO RURAL NATURAL GAS CO-OP

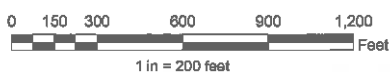


Hallock Young / Lyritz Rd

- OHIO RURAL NATURAL GAS (4" PLASTIC)
- COBRA PIPELINE (1" TPI)
- 4" FUSION COUPLING & MARKER POST
- 2" x 4" REDUCER
- CITY BORDER



TRUMBULL COUNTY, OHIO

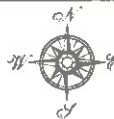


Elsworth Rd / S. Duck Creek Rd.



**OHIO RURAL NATURAL GAS
MAHONING COUNTY, OHIO**

0 300 600 1,200 1,800 2,400
Feet
1 Inch = 200 feet



OHIO RURAL NATURAL GAS - MAINLINE
COBRA PIPELINE TRANSMISSION

MAHONING COUNTY, OHIO
DATE: 10/10/2011

OHIO RURAL NATURAL GAS - TIN MAN ROAD
MENTOR, LAKE COUNTY, OHIO



- Legend**
- OHIO RURAL TAP
 - OHIO RURAL MAINLINE
 - ORWELL TRUMBULL PIPELINE



1 inch = 125 feet

Tin Man

Mentor
Lake County
Ohio

Ohio Rural
Natural Gas Co-Op

Air Plant
8649, 8643, & 8655
East Avenue



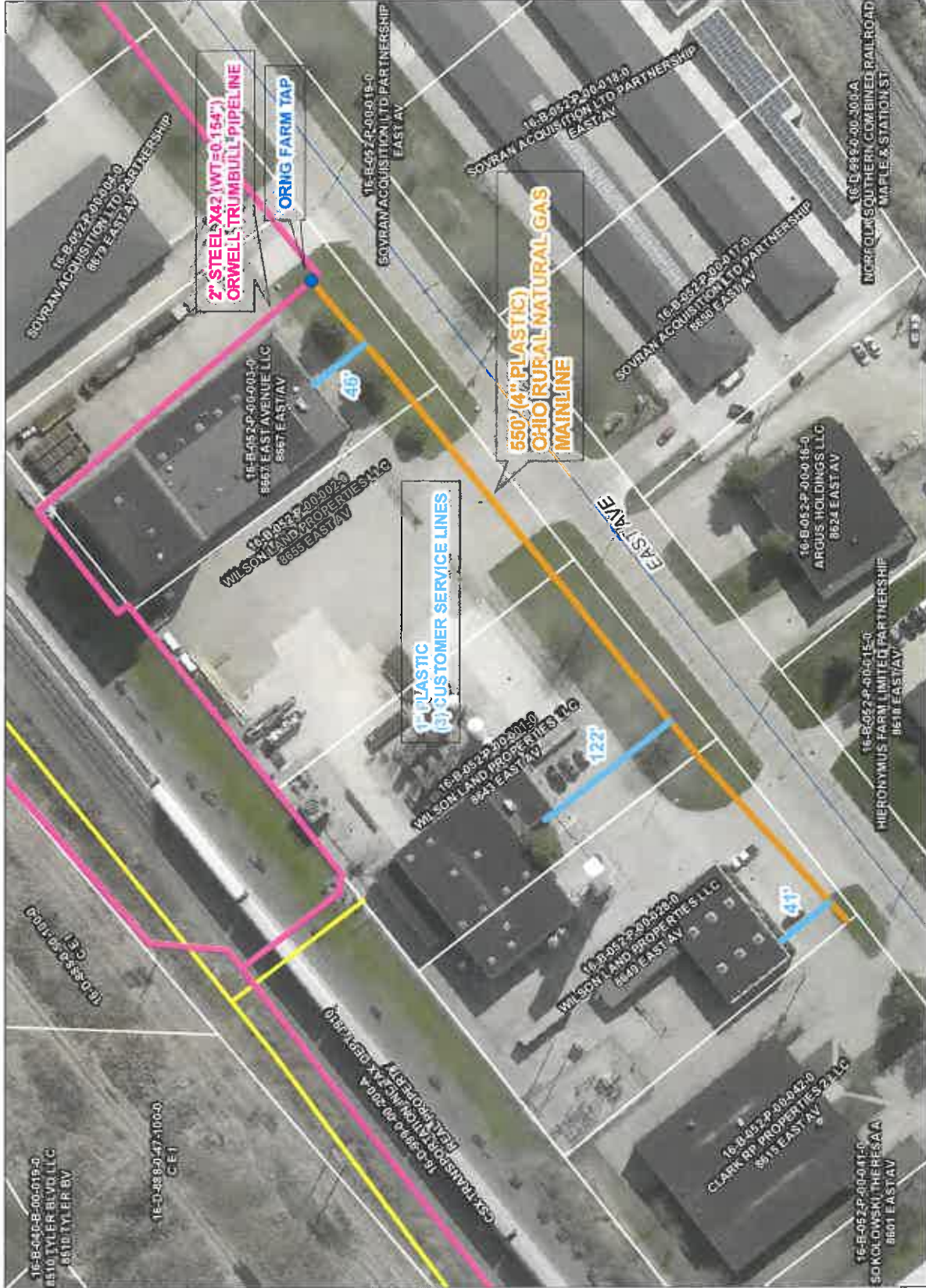
1 inch = 75 feet



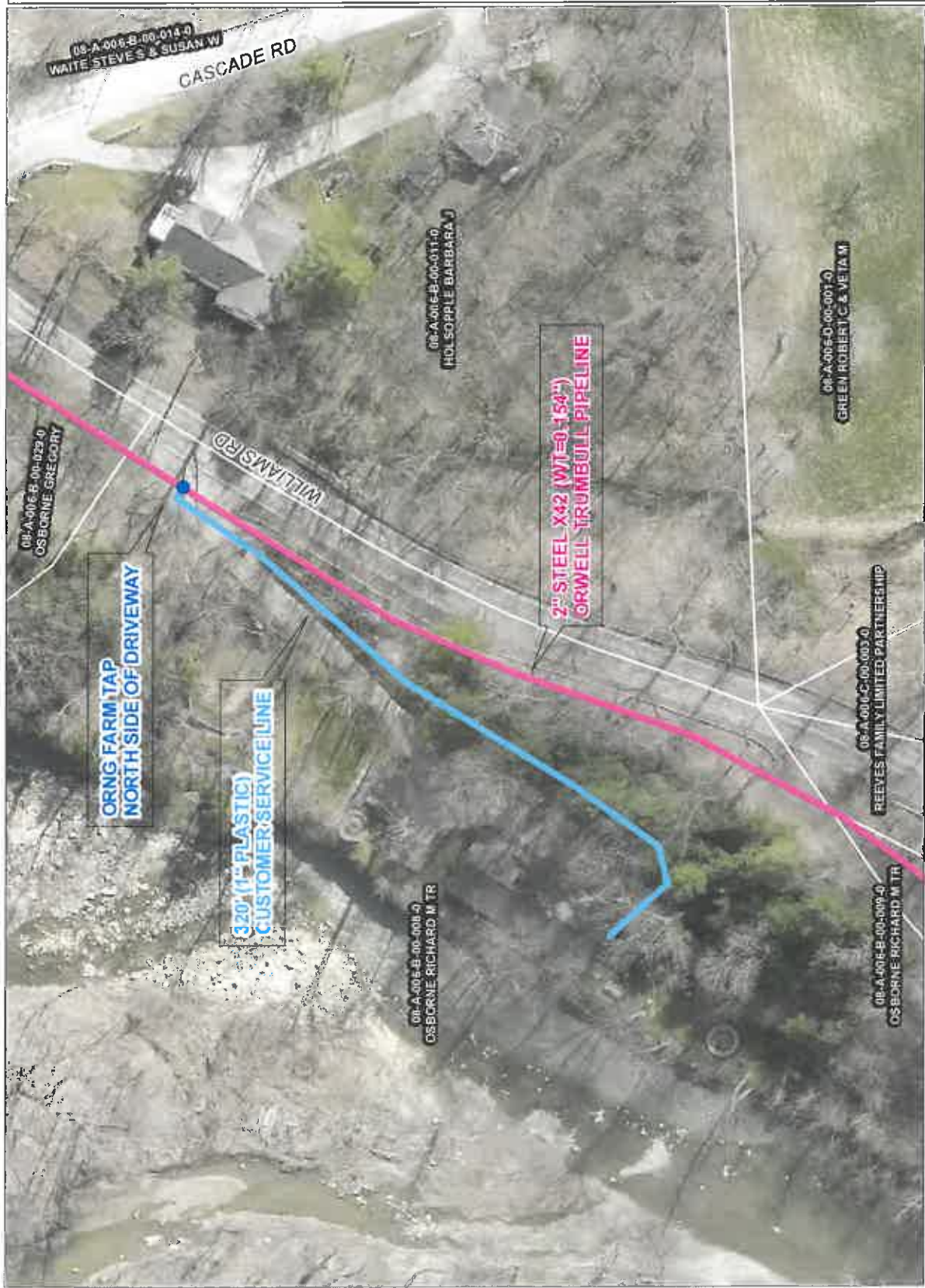
Legend

- ORNG TAP
- ORNG CUSTOMER SERVICE LINE
- OHIO RURAL NATURAL GAS MAINLINE
- ORWELL TRUMBULL PIPELINE
- OSAIR N TROGEN PIPELINE
- LAKE COUNTY ROADS
- LAKE COUNTY PARCELS

Ohio Rural Natural Gas Co-Op
16000 P-05 Ohio North
Date: 8/26/2016
Pipelines are approximate and NOT for on-site locating.
ALWAYS call 811 before you dig.

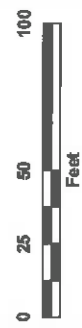


East Ave | Air Plant



Concord Twp
Lake County
Ohio

Ohio Rural Natural Gas
7020 Williams Road
(Steel Head Run)



1 inch = 50 feet



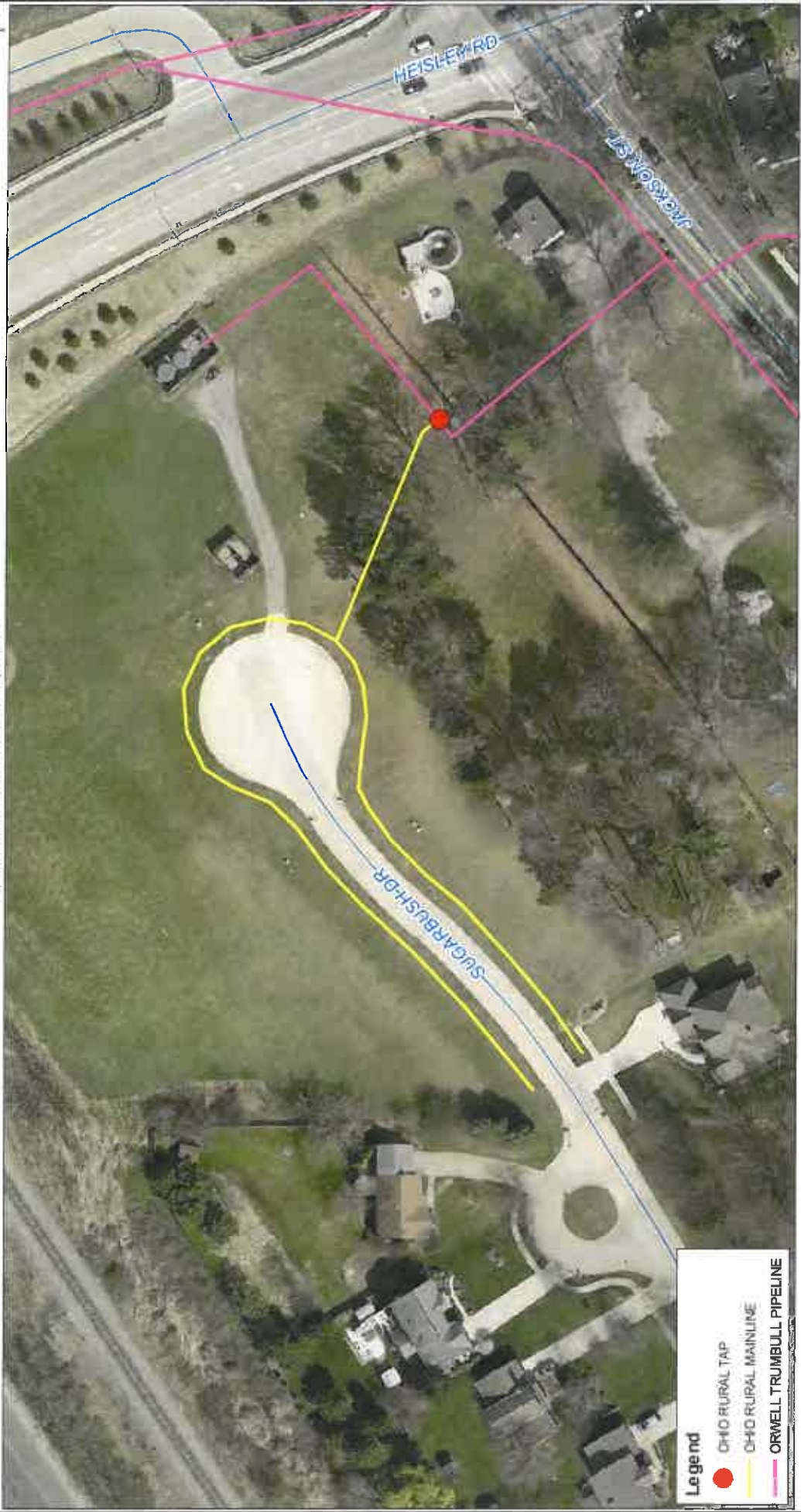
Legend

- ORNG TAP
- ORNG CUSTOMER SERVICE LINE
- ORWELL TRUMBULL PIPELINE
- LAKE COUNTY PARCELS

Ohio Rural Natural Gas
Datum: NAD83, SPCS Ohio North
Date: 8/28/2016
Pipelines are approximate and NOT for on-site locating.
ALWAYS call 811 before you dig

Williams Rd / Steelhead Run

OHIO RURAL NATURAL GAS - SUGARBUSH DRIVE
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GARRY FEDAK, P.E.
DIRECTOR OF OPERATIONS
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DISTRICT
19 N CANAL ST #1
NEWTON FALLS, OH 44444

CONCORD TOWNSHIP FIRE DEPT
FIRE CHIEF- MATT SABO
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PAINESVILLE, OH 44077

VILLAGE OF WEST FARMINGTON
CHIEF OF POLICE- ROBERT KOEHLER
P.O. BOX 215
W. FARMINGTON, OH 44491

MAHONING COUNTY SHERIFF
SHERIFF JERRY GREENE
110 FIFTH AVE
YOUNGSTOWN, OH 44503

Fil LORDSTOWN VILLAGE
CHIEF BRENT B MILHORN
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WARREN, OH 44481

COUNTY ENGINEER
PATRICK T GINETTI P.E. PA.
940 BEARS DEN RD
YOUNGSTOWN, OH 44511

MENTOR FIRE CHIEF
ROBERT SEARLES
8467 CIVIC CENTER BLVD.
MENTOR, OH 44060

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MARK MIACHAK
28 MENTOR AVE
PAINESVILLE, OH 44077

Name

Billing Address

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				Gates Mills	OH
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				Mentor	OH
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				Willowick	OH
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	Painesville	OH
	leroy	OH
	Concord	OH
	Painesville	OH
	Painesville	OH
	Fairport	OH
	Painesville	OH
	Fairport Harbor	OH
	Concord	OH
	Painesville	OH
	Concord	OH
	Concord	OH
	Painesville	OH
	Wickliffe	OH
	Wickliffe	OH
	Kirtland	OH
	willoughby	OH
	Wickliffe	OH
	Kirtland Hills	OH
	Kirtland Hills	OH
	willoughby	OH
	willoughby	OH
	Eastlake	OH
	Eastlake	OH
	Burton	OH
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	N Jackson	OH
	Southington	OH
	Warren	OH
	Warren	OH
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Mentor, Ohio 44060

JTO INC.
6011 Heisley Road
Mentor, Ohio 44060

PRO BUILT HOMES
8638 Twinbrook Rd.
Mentor, Ohio 44060

Ohio Rural Natural Gas Co-Op

Emergency Procedures

For Natural Gas System Operations

Version 18.00
Updated 5/5/2015



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Groveport, Ohio 43125
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Emergency Response Plan

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Emergency Response Plan

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Ms. A. 1. 1. 1. 1. 1. 1.

1. EMERGENCY PLAN

EMERGENCY PROCEDURES

This book has been prepared to provide data essential in an emergency situation. The pipeline safety requirements for emergency plans are contained in 49 CFR 192.615, included at the end of this section.

No emergency plan can cover all situations. There is no substitution for the sound judgment of the situation by the person or persons involved. In any emergency, the safety of the public must always be given first priority.

Before any emergency you have a responsibility to develop your emergency plan to meet your unique system. Supervisors who are responsible for emergency action shall be furnished a copy of this plan. In addition, everyone who will have the responsibility of handling an emergency situation must be familiar with the contents of this plan. It is your responsibility, as an operator, to provide and verify the effectiveness of this training.

The persons responsible for natural gas operations, DARRYL KNIGHT AND LAUREN TRISTANO, or their designate are responsible for this manual's implementation, maintenance and training of the employees on its contents.

Ohio Rural Natural Gas Co-Op employees and supervisors must take necessary precautions to protect personnel from hazards of unsafe accumulations of vapor or gas in excavated trenches. The operator is responsible for ensuring that the following is secured and provided when needed at an excavation: fire extinguishers, gas monitoring equipment, protective clothing, and emergency rescue equipment, including a breathing apparatus and a rescue harness and line if monitoring indicated low oxygen levels or high concentrations of gas. If the latter equipment is required, the task must be performed by either company or contractor qualified personnel who are trained, fit-tested and medically approved to use the breathing and rescue equipment.

This manual includes specific procedures, which must be followed to ensure the greatest public safety, during an emergency, or because of extraordinary construction or maintenance requirements (49 CFR 192.605). This includes procedures for emergency shutdown and pressure reduction in any section of Ohio Rural Natural Gas Co-Op's pipeline system necessary to minimize hazards to life or property, and making safe any actual or potential hazard to life or property.

CONTROL ROOM EMERGENCY PROCEDURES

An operator of a pipeline facility with a controller working in a control room who monitors and controls part of a pipeline through a SCADA system must have and follow written control room emergency procedures that implement the requirements of 49 CFR 192.631. These procedures must be developed by 8/1/11 and implemented by 2/1/12.

This does not apply if OHIO RURAL NATURAL GAS CO-OP:

1. Does not have a controller meeting the above definition, or
2. Is a distribution company or master meter operator with less than 250,000 services, or
3. Is a transmission company with no compressor stations.

Section 4 of the manual covers the requirements for Public Awareness.

Section 5 of the manual covers investigation of failures and has been rewritten to take into consideration issues that may need to be addressed if operators have facilities under an integrity management plan.

§ 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

- (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.
- (2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.
- (3) Making construction records, maps, and operating history available to appropriate operating personnel.
- (4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.
- (5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices.
- (6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service.
- (7) Starting, operating and shutting down gas compressor units.
- (8) Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.
- (9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.
- (10) Systematic and routine testing and inspection of pipe-type or bottle-type holders including—

- (i) Provision for detecting external corrosion before the strength of the container has been impaired;
 - (ii) Periodic sampling and testing of gas in storage to determine the dew point of vapors contained in the stored gas which, if condensed, might cause internal corrosion or interfere with the safe operation of the storage plant; and
 - (iii) Periodic inspection and testing of pressure limiting equipment to determine that it is in safe operating condition and has adequate capacity.
- (11) Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under §192.615(a)(3) specifically apply to these reports.
- (12) Implementing the applicable control room management procedures required by §192.631.

(c) *Abnormal operation.* For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

- (1) Responding to, investigating, and correcting the cause of:
 - (i) Unintended closure of valves or shutdowns;
 - (ii) Increase or decrease in pressure or flow rate outside normal operating limits;
 - (iii) Loss of communications;
 - (iv) Operation of any safety device; and
 - (v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error, which may result in a hazard to persons or property.
 - (2) Checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.
 - (3) Notifying responsible operator personnel when notice of an abnormal operation is received.
 - (4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.
 - (5) The requirements of this paragraph (c) do not apply to natural gas distribution operators that are operating transmission lines in connection with their distribution system.
- (d) *Safety-related condition reports.* The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.
- (e) *Surveillance, emergency response, and accident investigation.* The procedures required by §§192.613(a), 192.615, and 192.617 must be included in the manual required by paragraph (a) of this section.

[Amdt. 192-71, 59 FR 6584, Feb. 11, 1994, as amended by Amdt. 192-71A, 60 FR 14381, Mar. 17, 1995; Amdt. 192-93, 68 FR 53901, Sept. 15, 2003; Amdt. 192-112, 74 FR 63327, Dec. 3, 2009]

§ 192.615 Emergency plans.

- (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
- (1) Receiving, identifying, and classifying notices of events which require immediate response by the operator.
 - (2) Establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials.
 - (3) Prompt and effective response to a notice of each type of emergency, including the following:

- (i) Gas detected inside or near a building.
- (ii) Fire located near or directly involving a pipeline facility.
- (iii) Explosion occurring near or directly involving a pipeline facility.
- (iv) Natural disaster.
- (4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.
- (5) Actions directed toward protecting people first and then property.
- (6) Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.
- (7) Making safe any actual or potential hazard to life or property.
- (8) Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.
- (9) Safely restoring any service outage.
- (10) Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.
- (11) Actions required to be taken by a controller during an emergency in accordance with §192.631.
- (b) Each operator shall:
 - (1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.
 - (2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.
 - (3) Review employee activities to determine whether the procedures were effectively followed in each emergency.
- (c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:
 - (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
 - (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
 - (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and
 - (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

[Amdt. 192-24, 41 FR 13587, Mar. 31, 1976, as amended by Amdt. 192-71, 59 FR 6585, Feb. 11, 1994; Amdt. 192-112, 74 FR 63327, Dec. 3, 2009]

§ 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of:

- (i) Distribution with less than 250,000 services, or

(ii) Transmission without a compressor station, the operator must have and follow written procedures that implement only paragraphs (d) (regarding fatigue), (i) (regarding compliance validation), and (j) (regarding compliance and deviations) of this section.

(2) The procedures required by this section must be integrated, as appropriate, with operating and emergency procedures required by §§192.605 and 192.615. An operator must develop the procedures no later than August 1, 2011 and implement the procedures no later than February 1, 2013.

(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1) A controller's authority and responsibility to make decisions and take actions during normal operations;

(2) A controller's role when an abnormal operating condition is detected, even if the controller is not the first to detect the condition, including the controller's responsibility to take specific actions and to communicate with others;

(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others; and

(4) A method of recording controller shift-changes and any hand-over of responsibility between controllers.

(c) *Provide adequate information.* Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1) Implement sections 1, 4, 8, 9, 11.1, and 11.3 of API RP 1165 (incorporated by reference, see §192.7) whenever a SCADA system is added, expanded or replaced, unless the operator demonstrates that certain provisions of sections 1, 4, 8, 9, 11.1, and 11.3 of API RP 1165 are not practical for the SCADA system used;

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays;

(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;

(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months; and

(5) Establish and implement procedures for when a different controller assumes responsibility, including the content of information to be exchanged.

(d) *Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:

(1) Establish shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep;

(2) Educate controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue;

(3) Train controllers and supervisors to recognize the effects of fatigue; and

(4) Establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility.

(e) *Alarm management.* Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations;

(2) Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities;

(3) Verify the correct safety-related alarm set-point values and alarm descriptions at least once each calendar year, but at intervals not to exceed 15 months;

(4) Review the alarm management plan required by this paragraph at least once each calendar year, but at intervals not exceeding 15 months, to determine the effectiveness of the plan;

(5) Monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not to exceed 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms; and

(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.

(f) *Change management.* Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:

(1) Establish communications between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration;

(2) Require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations; and

(3) Seek control room or control room management participation in planning prior to implementation of significant pipeline hydraulic or configuration changes.

(g) *Operating experience.* Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:

(1) Review incidents that must be reported pursuant to 49 CFR part 191 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to:

(i) Controller fatigue;

(ii) Field equipment;

(iii) The operation of any relief device;

(iv) Procedures;

(v) SCADA system configuration; and

(vi) SCADA system performance.

(2) Include lessons learned from the operator's experience in the training program required by this section.

(h) *Training.* Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

(1) Responding to abnormal operating conditions likely to occur simultaneously or in sequence;

(2) Use of a computerized simulator or non-computerized (tabletop) method for training controllers to recognize abnormal operating conditions;

(3) Training controllers on their responsibilities for communication under the operator's emergency response procedures;

(4) Training that will provide a controller a working knowledge of the pipeline system, especially during the development of abnormal operating conditions; and

(5) For pipeline operating setups that are periodically, but infrequently used, providing an opportunity for controllers to review relevant procedures in advance of their application.

(i) *Compliance validation.* Upon request, operators must submit their procedures to PHMSA or, in the case of an intrastate pipeline facility regulated by a State, to the appropriate State agency.

(j) *Compliance and deviations.* An operator must maintain for review during inspection:

(1) Records that demonstrate compliance with the requirements of this section; and

(2) Documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of a pipeline facility.

[Amdt. 192-112, 74 FR 63327, Dec. 3, 2009, as amended at 75 FR 5537, Feb. 3, 2010]

§ 192.616 Public awareness.

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, *see* §192.7).

(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

(d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:

(1) Use of a one-call notification system prior to excavation and other damage prevention activities;

(2) Possible hazards associated with unintended releases from a gas pipeline facility;

(3) Physical indications that such a release may have occurred;

(4) Steps that should be taken for public safety in the event of a gas pipeline release; and

(5) Procedures for reporting such an event.

(e) The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.

(f) The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.

(g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

(h) Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. The operator of a master meter or petroleum gas system covered under paragraph (j) of this section must complete development of its written procedure by June 13, 2008. Upon request, operators must submit their completed programs to PHMSA or, in the case of an intrastate pipeline facility operator, the appropriate State agency.

(i) The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.

(j) Unless the operator transports gas as a primary activity, the operator of a master meter or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of this section. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually. If the master

meter or petroleum gas system is located on property the operator does not control, the operator must provide similar messages twice annually to persons controlling the property. The public awareness message must include:

- (1) A description of the purpose and reliability of the pipeline;
- (2) An overview of the hazards of the pipeline and prevention measures used;
- (3) Information about damage prevention;
- (4) How to recognize and respond to a leak; and
- (5) How to get additional information.

[Amdt. 192-100, 70 FR 28842, May 19, 2005; 70 FR 35041, June 16, 2005; 72 FR 70810, Dec. 13, 2007]

§ 192.617 Investigation of failures.

Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.



LIBRARY

1.1 HANDLING EMERGENCY NOTICES

How to receive, identify, and classify notices of events which require immediate attention.

WHAT IS AN EMERGENCY CONDITION?

An emergency condition exists when YOU, (OR YOUR REPRESENTATIVE), DETERMINE THAT EXTRAORDINARY PROCEDURES, EQUIPMENT, MANPOWER, AND/OR SUPPLIES MUST BE USED TO PROTECT THE PUBLIC FROM EXISTING OR POTENTIAL HAZARDS.

These hazards may include, but are not limited to facility failures in:

- Under pressure in the system
- Overpressure in the system
- Large amounts of escaping gas.
- Fire or explosion near or directly involving a pipeline facility
- Any leak considered hazardous
- Danger to major segment(s) of the system

The hazards also include:

- Natural disasters (floods, tornadoes, hurricanes, earthquakes, etc.)
- Civil disturbances (riots, etc.)
- Load reduction conditions (result in voluntary or mandatory reduction of gas usage)

RESPONDING, TO EMERGENCY CONDITION REPORTS

Whenever a report is received of natural gas related situation from any location, the person receiving the call should get as much information as possible to start filling out the "PRELIMINARY REPORT OF EMERGENCY CONDITION", see FORM NO. 2 (See following page). This must be immediately communicated to the person on duty.

The person receiving a potential call will immediately contact Ohio Rural Natural Gas CO-OP Emergency number at 1-866-797-6286. (See section 1.2 COMMUNICATIONS), for phone numbers of those to be contacted.

The responding employee will begin taking action as outlined in this emergency plan and filling out their own copy of "PRELIMINARY REPORT OF EMERGENCY CONDITION".

Use common sense: saving human life and then property is the first consideration.

PRELIMINARY REPORT OF EMERGENCY CONDITION

DATE OF OCCURRENCE	TIME OF OCCURRENCE	NOTIFIED BY: (CUSTOMER, FIRE DEPT. POLICE DEPT., INCLUDE NAME OF INDIVIDUAL REPORTING)	
REPORT TAKEN BY: (INCLUDE NAME AND TITLE OF PERSON TAKING THIS REPORT)		DATE	TIME AM PM
REPORTED TO: (INCLUDE NAME AND TITLE OF PERSON THIS REPORT WAS TELEPHONED OR GIVEN TO:		DATE	TIME AM PM
LOCATION OF OCCURRENCE			
SUBJECT: (EXPLANATION OF WHAT HAPPENED)			
CAUSE:			
WHAT HAS BEEN DONE AND ESTIMATED TIME FOR RESTORING SERVICE:			
EXTENT OF INJURIES:			
EXTENT OF DAMAGE AND APPROXIMATE COST:			
EXECUTIVE DIRECTOR	NOTIFIED BY:	DATE:	TIME:
SUPPLYING DISTRIBUTION COMPANY	NOTIFIED BY:	DATE:	TIME:
P.U.C.O PIPELINE SAFETY SECTION	NOTIFIED BY:	DATE:	TIME:
FIRE, POLICE ETC. AS APPROPRIATE	NOTIFIED BY:	DATE:	TIME:

FORM NO. 2

PRELIMINARY REPORT OF EMERGENCY CONDITION

DATE OF OCCURRENCE	TIME OF OCCURRENCE	NOTIFIED BY: (CUSTOMER, FIRE DEPT. POLICE DEPT., INCLUDE NAME OF INDIVIDUAL REPORTING)	
REPORT TAKEN BY: (INCLUDE NAME AND TITLE OF PERSON TAKING THIS REPORT)		DATE	TIME AM PM
REPORTED TO: (INCLUDE NAME AND TITLE OF PERSON THIS REPORT WAS TELEPHONED OR GIVEN TO:		DATE	TIME AM PM
LOCATION OF OCCURRENCE			
SUBJECT: (EXPLANATION OF WHAT HAPPENED)			
CAUSE:			
WHAT HAS BEEN DONE AND ESTIMATED TIME FOR RESTORING SERVICE:			
EXTENT OF INJURIES:			
EXTENT OF DAMAGE AND APPROXIMATE COST:			
EXECUTIVE DIRECTOR	NOTIFIED BY:	DATE:	TIME:
SUPPLYING DISTRIBUTION COMPANY	NOTIFIED BY:	DATE:	TIME:
P.U.C.O PIPELINE SAFETY SECTION	NOTIFIED BY:	DATE:	TIME:
FIRE, POLICE ETC. AS APPROPRIATE	NOTIFIED BY:	DATE:	TIME:

FORM NO. 2

1. If the report turns out to be a gas leak, a "GAS LEAK AND REPAIR REPORT", FORM NO. 1 (See following page) should also be filled out. The sections identified as REPORT ORIGIN and REPORT DISPATCHED are to be filled out by the person responding.
2. All reports of leaks on customer premises get priority. LEAKS INSIDE A BUILDING GET TOP PRIORITY.
3. After getting the information, and determining that a hazardous leak exists inside a building, remind the customer of all the following information:
 - Eliminate all possible sources of ignition.
 - No one is to turn ON or OFF any electrical switches.
 - No one is to ring doorbells, use the phone or use the garage door opener.
 - Extinguish all open flames. DO NOT LIGHT MATCHES, CIGARETTES, etc.
 - Turn off gas supply, if feasible.
 - Everyone in the building is to leave the building and go a safe distance (about a block) away. GO ON FOOT -- no engines or sparks.
 - Careful consideration should be given before attempting to ventilate the building because of potentially creating an explosive level of gas, which did not previously exist, and also by creating a potential source of ignition by the ventilating process.
4. Dispatch necessary personnel to the location of the reported leak.

It is the responsibility of the operator of the gas distribution system to make sure the proper employees are familiar with procedures concerning gas leak calls and reports.

(REMEMBER: It is your responsibility to have taught customers in advance.)

See section 4 PUBLIC AWARENESS PROGRAM.

GAS LEAK AND REPAIR REPORT

REPORT NO.	ANNUAL SURVEY	SPECIAL SURVEY	REPORTED LEAK	DATE:	TIME:	AM/PM
Location of leak and/or survey (Address, intersection, etc.).						
Description of leak: (Inside, Outside)						
Leak detected by:		Odor	Noise	CGI	HFI	
Leak reported by:		Customer	Public	Survey Crew	Other	
Reported by: (name, address, phone #)						
Report received by: (Include date and time above)						

REPORT DISPATCHED

Investigation Assigned To: (name)			Phone #
Date:	Time	AM/PM	Assigned as immediate action required (Yes/No)

REPORT INVESTIGATION

Date:	Time:	AM/PM	Investigation By: (Name)		Leak Found? YES/NO
Instrument Used: HFI and/or CGI		Leak Grade:	____ Grade One	____ Grade Two	____ Grade Three
CGI Test Results	GAS %	Lower Explosive Limit %	Negative		
Description and Location of Leak:					
Condition Made Safe:	DATE:	TIME:	AM/PM		

REINSPECTIONS

Date:	Investigation By: (Name)	Instrument Used: HFI and/or CGI	Leak Same	Leak Cleared	Leak Regraded
Date:	Investigation By: (Name)	Instrument Used: HFI and/or CGI	Leak Same	Leak Cleared	Leak Regraded
Date:	Investigation By: (Name)	Instrument Used: HFI and/or CGI	Leak Same	Leak Cleared	Leak Regraded

REPAIR REPORT

Leak at—	Threads:	Coupling:	Weld: (Give Type)	Valve:	Other:	Depth: (inches)
Cause of Leak:						
Pipe—	Length Exposed (feet)	Size: (Inches)	Steel:	Plastic:	Cast Iron:	Other:
Coating—	Epoxy:	Extruded Poly:	Coal tar Wrap:	Galv.:	Other:	Bare:
Pipe Condition—	Excellent:	Good:	Fair:	Poor:		
Internal Pipe Exam.	Yes _____ No _____	Internal Surface Condition	Excellent:	Good:	Fair:	Poor:
Soil Type—	Sand:	Clay:	Loam:	Other: (describe)		
Moisture—	Dry:	Damp:	Wet:			
How repairs made:						
Repair Coating Type—	Mastic:	Hot Applied Tape:	Other:			
Anodes Installed—	How Many:	Anode Wt. lbs.	Depth Installed:			
Repairs Made by:			DATE:	TIME:	AM/PM	
Foreman:		DATE:	Supervisor:		DATE:	
REMARKS Draw sketch of leak location on separate sheet. Show relationship to addressed structures, streets, sidewalks etc.			Date Rechecked and by:			



1.2 COMMUNICATIONS, PERSONNEL, EQUIPMENT, TOOLS, & MATERIALS

Persons and authorities to be notified in case of an EMERGENCY.

Name	Title	Day Phone #	Night Phone #	Cell Phone #
Darryl Knight	President	440-255-5198	216-346-0704	216-346-0707
Dave Stanish	Field Technician	332-221-3181	332-221-3181	332-221-3181
Ryan McCormick	Field Technician	330-221-0992	330-221-0992	330-221-0992
Emergency Numbers		Non-Emergency #	Emergency #	
Gas Company	Ohio Rural Co-Op	440-255-5198	1-866-797-6286	
Sheriff				
	Lake County	440-350-5500	911	
	Trumbull County	330-675-2508	911	
	Mahoning County	330-480-5000	911	
	Geauga County	440-635-1234	911	
	Crawford County	419-562-7906	911	
	Holmes County	330-674-1936	911	
Highway Patrol				
	Lake County	440-564-5477	911	
	Trumbull County	330-898-2311	911	
	Mahoning County	330-533-6866	911	
	Geauga County	440-286-6612	911	
	Crawford County	419-562-8040	911	
	Holmes County	330-264-0575	911	
Police Dept.				
	Mentor	440-255-1234	911	
	Concord/Painesville/Leroy	440-392-5840	911	
	Newton Falls	330-872-5757	911	
	Lordstown	330-824-2545	911	
	Warren	330-841-2512	911	
	Millersburg	330-674-5931		
	Burton	440-834-1234		
Fire Dept.				
	Mentor	440-255-1212	911	
	Concord/Painesville/Leroy	440-354-7508	911	
	Newton Falls	330-358-2222	911	
	Lordstown	330-824-2321	911	
	Warren	330-841-2548	911	
	Millersburg	440-243-1212	911	
	Burton	440-632-1907	911	
Radio	WMJI 105.7	216-520-2600		
Newspaper	Plain Dealer	216-999-6000		
TV	WJW TV8	216-432-4240		

List of employees that may be notified:

Name	Title	Day Phone#	Night Phone#	Cell Phone#
Daryl Knight	President	216-346-0704	216-346-0704	216-346-0704
Jack McCormick	Field Technician	330-978-3235	330-978-3235	330-978-3235
Ryan McCormick	Field Technician	330-221-0992	330-221-0992	330-221-0992
Dave Stanish	Field Technician	330-221-3181	330-221-3181	330-221-3181
Robert Courtney	Field Technician	440-813-0352	440-813-0352	440-813-0352

How will repairs get made?

Name	Title	Day Phone#	Night Phone#	Cell Phone#
Ohio Rural Employees				
Jack McCormick	Field Technician	330-978-3235	330-978-3235	330-978-3235
Ryan McCormick	Field Technician	330-221-0992	330-221-0992	330-221-0992
Dave Stanish	Field Technician	330-221-3181	330-221-3181	330-221-3181
Robert Courtney	Field Technician	440-813-0352	440-813-0352	440-813-0352
Contractors				
Dale Strickland	Field Operator	216-406-7005	216-406-7005	216-406-7005
Tyler Lette	Field Technician	440-622-7299	440-622-7299	440-622-7299
John Cessna	Field Operator	440-567-1170	440-567-1170	440-567-1170
George Papp	Field Technician	440-231-9730	440-231-9730	440-231-9730

LOCATIONS OF EQUIPMENT NEEDED IN AN EMERGENCY

The operator, or his designate, is responsible for the adequacy, availability and condition of emergency equipment. State here the location of such equipment necessary to meet emergency conditions. Periodic checks of emergency equipment should be taken and records of these inspections should be kept on file.

Equipment	Location	Person Responsible	Day/Night Phone #'s
Valve Keys	-7800 Ravenna Rd Painesville, OH 44077	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Maps	-7001 Center St Mentor, Ohio 4460	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Valve Maps	-7001 Center St Mentor, Ohio 4460	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Rd Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Shut off Tools	-7800 Ravenna Rd Painesville, OH 44077	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Rd Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Backhoe	-7800 Ravenna Rd Painesville, OH 44077	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Rd Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Shovels Etc.	-7800 Ravenna Rd Painesville, OH 44077	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Rd Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Leak Repair Equipment	-7800 Ravenna Rd Painesville, OH 44077	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Rd Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Air Compressor	-38700 Pelton Rd Willoughby, OH 44094	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Rd Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235
Jack Hammer	N/A		
Combustible Gas Indicator	-7800 Ravenna Rd Painesville, OH 44077	- Daryl Knight	- 216.346.0704
	-2412 Newton Falls Rd Newton Falls, OH 44444	-Jack McCormick	- 330.221.1235

In addition to the equipment available as identified here, resources are available according to the listings provided in the Ohio Gas Association's Emergency Equipment and Material Manual. Contact information for Ohio Gas Association is included in Section 6.

Note: Many of the tasks dealt with during an emergency are covered tasks as defined by subpart N. If Ohio Rural Natural Gas Co-Op is going to rely on mutual assistance from another company, a method to review their qualification in advance or to qualify personnel prior to performance of the covered task will be implemented.

Subpart N—Qualification of Pipeline Personnel

Source: Amdt. 192–86, 64 FR 46865, Aug. 27, 1999, unless otherwise noted.

§ 192.801 Scope.

(a) This subpart prescribes the minimum requirements for operator qualification of individuals performing covered tasks on a pipeline facility.

(b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that:

- (1) Is performed on a pipeline facility;
- (2) Is an operations or maintenance task;
- (3) Is performed as a requirement of this part; and
- (4) Affects the operation or integrity of the pipeline.

§ 192.803 Definitions.

Abnormal operating condition means a condition identified by the operator that may indicate a malfunction of a component or deviation from normal operations that may:

- (a) Indicate a condition exceeding design limits; or
- (b) Result in a hazard(s) to persons, property, or the environment.

Evaluation means a process, established and documented by the operator, to determine an individual's ability to perform a covered task by any of the following:

- (a) Written examination;
- (b) Oral examination;
- (c) Work performance history review;
- (d) Observation during:
 - (1) Performance on the job,
 - (2) On the job training, or
 - (3) Simulations;
- (e) Other forms of assessment.

Qualified means that an individual has been evaluated and can:

- (a) Perform assigned covered tasks; and
- (b) Recognize and react to abnormal operating conditions.

[Amdt. 192–86, 64 FR 46865, Aug. 27, 1999, as amended by Amdt. 192–90, 66 FR 43523, Aug. 20, 2001]

§ 192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks;
- (b) Ensure through evaluation that individuals performing covered tasks are qualified;
- (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;
- (d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191;
- (e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;
- (f) Communicate changes that affect covered tasks to individuals performing those covered tasks;
- (g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed;
- (h) After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities; and
- (i) After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the Administrator or state agency has verified that it complies with this section.

[Amdt. 192–86, 64 FR 46865, Aug. 27, 1999, as amended by Amdt. 192–100, 70 FR 10335, Mar. 3, 2005]

§ 192.807 Recordkeeping.

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

- (1) Identification of qualified individual(s);
- (2) Identification of the covered tasks the individual is qualified to perform;
- (3) Date(s) of current qualification; and
- (4) Qualification method(s).

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

§ 192.809 General.

- (a) Operators must have a written qualification program by April 27, 2001. The program must be available for review by the Administrator or by a state agency participating under 49 U.S.C. Chapter 601 if the program is under the authority of that state agency.
- (b) Operators must complete the qualification of individuals performing covered tasks by October 28, 2002.
- (c) Work performance history review may be used as a sole evaluation method for individuals who were performing a covered task prior to October 26, 1999.
- (d) After October 28, 2002, work performance history may not be used as a sole evaluation method.
- (e) After December 16, 2004, observation of on-the-job performance may not be used as the sole method of evaluation.

[Amdt. 192–86, 64 FR 46865, Aug. 27, 1999, as amended by Amdt. 192–90, 66 FR 43524, Aug. 20, 2001; Amdt. 192–100, 70 FR 10335, Mar. 3, 2005]



1.3 RESPONSE

DUTIES OF FIRST COMPANY EMPLOYEE ON THE SCENE:

TAKE EVERY CORRECTIVE ACTION NECESSARY TO PROTECT LIFE AND PROPERTY FROM DANGER (IN THAT ORDER.)

IT IS THE RESPONSIBILITY OF THE PERSON IN CHARGE TO:

- Set up communication.
- Coordinate the operation.
- Make all decisions concerning emergency valves isolating areas and the use of emergency equipment.
- Implement the checklist for a major emergency covered in this plan (See Section 1.9).

MINIMUM OPERATOR RESPONSE ACTIONS FOR:

A. LEAKS OUTSIDE BUILDING

- Assess danger to public surrounding building, occupants, and property.
- Extinguish all open flames. No Smoking.
- If necessary, notify fire, police and supplying natural gas utility.
- Block Street.
- Notify Supervisor or other responsible persons.
- Bar hole next to foundation of building.
- Check neighboring buildings for gas (Particularly important for leaks caused by excavation damage that might have resulted in multiple leaks that could migrate underground into nearby buildings).
- Implement Check List
- Repair leak.
- If you are positively sure it is safe, return occupants to buildings.

B. LEAK INSIDE BUILDING

- Evaluate house immediately to determine concentration of gas and source of leak. Evacuate if necessary.
- DO NOT operate any electrical switches.
- DO NOT use the phone.
- DO NOT use the garage door opener.
- Careful consideration should be given before attempting to ventilate the building because of potentially creating an explosive level of gas, which did not previously exist, and also by creating a potential source of ignition by the ventilating process.
- Shut off gas meter valve.
- Bar hole area especially around foundation. Check water meter, floor drains, and other openings.
- If ground is gas free and if house is gas free, turn on meter valve. CHECK ALL GAS PIPING AND APPLIANCES FOR LEAKS. (Is meter hand turning normally or spinning? Conduct soap bubble test.)
- Implement Check List
- Repair leak.
- If leak cannot be repaired, notify customer. Turn off meter, lock it, tag it, and leave.

Leak classification and repair should be done according to state required regulations and/or the ASME - GUIDE MATERIAL FOR "LEAK CLASSIFICATION AND ACTION CRITERIA" found on the following pages. If state required regulations are more stringent than the ASME guidelines, state regulations shall be used.

OHIO REGULATIONS FOR GRADING AND REPAIR OF LEAKS

All leaks on piping systems within the state of Ohio must be graded and repaired as follows:

(A) Classify all leaks utilizing leak detection equipment. Leak detection equipment means any device capable of detecting and measuring the concentration of natural gas in the atmosphere.

Classify all hazardous leaks immediately and classify all other leaks within two business days of discovery.

Classify leaks utilizing the following:

- (1) A grade-one classification represents an indication of leakage presenting an existing or probable hazard to persons or property, and requires immediate repair or continuous action until the conditions are no longer hazardous.
- (2) A grade-two classification represents an indication of leakage recognized as being nonhazardous at the time of detection, but requires scheduled repair based upon the severity and/or location of the leak.
- (3) A grade-three classification represents an indication of leakage recognized as being nonhazardous at the time of detection and can be reasonably expected to remain nonhazardous.

(B) Upon discovery of the corresponding leak(s) from above, take the following actions:

(1) Take immediate and continuous action on leaks classified as grade one to protect life and property until the condition is no longer hazardous. Continuous action is defined as having personnel at the scene of the leak with leak detection equipment attempting to locate the source of the leak and taking action to prevent migration into structures, sewers, etc. If the hazardous condition associated with the leaks classified as grade one is eliminated, such as by venting, temporary repair, etc., but the possibility of the hazardous condition returning exists, the condition must be monitored as frequently as necessary, but at least once every eight hours, to protect life and property until the possibility of the hazardous condition returning no longer exists.

Leaks classified as grade one may be reclassified by performing a physical action to the pipeline (clamp, replacement, tape wrap, etc.) or pipeline facility. Reclassification must be in accordance with the criteria in paragraph (A) above and by an individual who is qualified to classify leaks under the company's operator qualification plan. Venting, holes, aerators, or soil purging of a leak are not considered physical actions to the pipeline. If a leak is reclassified after performing a physical action, the timeframe for any required repair(s) and/or reevaluation(s) at the resulting classification will be calculated from the date the leak was reclassified. All grade one leaks repaired or reclassified, other than by the replacement of the affected section of pipe, must be reevaluated after allowing the soil to vent and stabilize but not more than 30 calendar days after such physical action.

(2) Repair or clear leaks classified as grade two no later than fifteen months from the date the leak is discovered, unless the pipeline containing the leak is replaced within twenty-four months from the date the leak is discovered. If a replacement project that will clear a leak classified as grade two is cancelled after the fifteenth month after classification of the leak(s), the associated leak(s) must be cleared within forty-five days of the cancellation of the project, not to exceed twenty-four months from the date of the leak classification. Leaks classified as grade two shall be reevaluated at least once every six months until cleared.

(3) Reevaluate leaks classified as grade three during the next scheduled survey or within fifteen months from the date of the last inspection, whichever is sooner, and continue to reevaluate such leaks on that same frequency until there is no longer any indication of leakage, the leak is reclassified, or the pipeline is replaced.

Records of each leak must be retained for five years, ten years if part of a Distribution Integrity Management Plan.

ASME - GUIDE MATERIAL FOR "LEAK CLASSIFICATION AND ACTION CRITERIA"

TABLE 3a - LEAK CLASSIFICATION AND ACTION CRITERIA - GRADE 1

GRADE	DEFINITION	ACTION CRITERIA	EXAMPLES
1	A leak that represents an existing or probable hazard to persons or property, and requires immediate repair or continuous action until the conditions are no longer hazardous.	<p>Requires prompt action* to protect life and property, and continuous action until the conditions are no longer hazardous.</p> <p>* The prompt action in some instances may require one or more of the following.</p> <ul style="list-style-type: none"> a. Implementation of the company Emergency Plan (192.615) b. Evacuating the premises. c. Blocking off an area. d. Rerouting traffic. e. Eliminating sources of ignition. f. Venting the area. g. Stopping the flow of gas by closing valves or other means. h. Notifying police and fire departments. 	<ul style="list-style-type: none"> 1. Any leak which, in the judgment of operating personnel at the scene, is regarded as an immediate hazard. 2. Escaping gas that has ignited. 3. Any indication of gas that has migrated into or under a building or into a tunnel. 4. Any reading at the outside wall of a building, or where gas would likely migrate to an outside wall of a building. 5. Any reading of 80% LEL, or greater in a confined space. 6. Any reading of 80% LEL, or greater in small substructures (other than gas associated substructures) from which gas would likely migrate to the outside wall of a building. 7. Any leak that can be seen, heard, felt, and which is in a location that may endanger the general public or property.

TABLE 3b - LEAK CLASSIFICATION AND ACTION CRITERIA - GRADE 2

GRADE	DEFINITION	ACTION CRITERIA	EXAMPLES
2	A leak that is recognized as being nonhazardous at the time of detection, but justifies scheduled repair based on probable future hazard.	<p>Leak should be repaired or cleared within one calendar year, but no later than one calendar year from when the leak was reported. In determining the repair priority criteria such as the following should be considered.</p> <ul style="list-style-type: none"> a. Amount of migration of gas b. Proximity of gas to buildings and subsurface structures. c. Extent of pavement. d. Soil type, and soil conditions (such as frost cap, moisture and natural venting.) <p>Grade 2 leaks should be reevaluated at least once every six months until cleared. The frequency of reevaluation should be determined by the location and magnitude of the leakage condition.</p> <p>Grade 2 leaks may vary greatly in degree of potential hazard. Some grade 2 leaks, when evaluated by the above criteria, may justify scheduled repair within the next 5 working days. Others will justify repair within 30 days. During the working day on which the leak was discovered, these situations should be brought to the attention of the individual responsible for scheduling leak repair.</p> <p>On the other hand, many Grade 2 leaks, because of their location and magnitude can be scheduled for repair on a normal routine basis with periodic reinspection as necessary.</p>	<p>A. Leaks Requiring Action Ahead of Ground Freezing or Other Adverse Changes in Venting Conditions.</p> <p>Any leak which, under frozen or other adverse soil conditions, would likely migrate to the outside wall of a building.</p> <p>B. Leaks Requiring Action Within Six Months</p> <ul style="list-style-type: none"> 1. Any reading of 40% LEL, or greater, under a sidewalk, in a wall-to-wall paved area that does not classify as a Grade 1 leak. 2. Any reading of 100% LEL, or greater, under a street in a wall-to-wall paved area that has significant gas migration and that does not classify as a Grade 1 leak. 3. Any reading that is less than 80% LEL in small substructures (other than gas associated substructures) from which gas could migrate creating a probable future hazard. 4. Any reading between 20% and 80% LEL in a confined space. 5. Any reading on a pipeline operating at 30% SMYS, or greater, in a class 3 or 4 location, which does not qualify as a Grade 1 leak. 6. Any reading of 80% LEL, or greater in gas associated substructures. 7. Any leak which, in the judgment of the operating personnel at the scene, is of sufficient magnitude to justify scheduled repair.

TABLE 3c - LEAK CLASSIFICATION AND ACTION CRITERIA - GRADE 3

GRADE	DEFINITION	ACTION CRITERIA	EXAMPLES
3	A leak that is nonhazardous at the time of detection and can be reasonably expected to remain nonhazardous.	These leaks should be reevaluated during the next scheduled survey, or within 15 months of the date reported, whichever occurs first, until the leak is regraded or no longer results in a reading.	<p>Leaks Requiring Reevaluation at periodic intervals.</p> <ul style="list-style-type: none"> 1. Any reading of less than 80% LEL in small gas associated substructures. 2. Any reading under a street in areas without wall-to-wall paving where it is unlikely the gas could migrate to the outside wall of a building. 3. Any reading of less than 20% LEL in a confined space.

C. GAS BURNING INSIDE BUILDING

- Call fire department.
- If fire is at an appliance, shut gas off at appliance valve.
- If not possible to shut gas off at appliance valve, shut gas off at meter or curb valve.
- If fire continues, bar hole area with CGI to locate source of gas.
- Implement Check List

D. EXPLOSION

- Call fire department.
- Shut gas off at nearest valve.
- If fire continues, bar hole area with CGI to locate source of gas.
- Implement Check List.

E. INTERRUPTION IN GAS SUPPLY, SHUTDOWNS OR PRESSURE REDUCTIONS

An interruption to a gas supply line could be due to freezing of the regulators, break in line, sabotage, or supplier cut off.

- Call your supplier.
- Locate leak. Inform supplier of the location of leak, if possible.
- Close appropriate valve in your system to isolate the break (if necessary.)
- Implement Check List.

It may be necessary to shut off all services and invoke procedures contained under PART 1.7, Restoring Service.

F. NATURAL DISASTER

Floods, Tornadoes and other violent acts of nature can provide a variety of complications to emergency response. Common sense and sound judgment are needed to provide for the safety of the public. Implementation of the appropriate portions of the emergency checklist and communications with civil authorities should be implemented as needed.

G. ACTS OF VANDALISM/TERRORISM

The time to effectively deal with possible acts of terrorism to utility facilities is prior to the commission of such deeds.

Note: OHIO RURAL NATURAL GAS CO-OP may have a separate security manual. If so, please refer to it. DARRYL KNIGHT is responsible for notifying other company personnel of its contents.

1. Develop a list of potential targets. Generally speaking susceptible locations are facilities that are visible such as: above ground piping, valves, measurement and regulation stations, tanks and holding devices.
 - a. Major points of supply.
 - b. Supply points to key locations.
 - i. Military Locations
 - ii. Defense Contractors
 - iii. Points of significant national interest
 - Historic buildings
 - National monuments
 - c. Government buildings
 - i. Federal
 - ii. State
 - iii. Local
 - d. Important gathering points for large numbers of people.

i. Stadiums	v. Shopping centers
ii. Arenas	vi. Office buildings
iii. Theaters	vii. Amusement Parks
iv. Concert pavilions	vii. Fairs
2. Review passive security measures at these locations, such as: locking devices, fences, enclosures and buildings. Make sure they are intact and that they are operable.

3. Review active security measures such as employees, supervisors, etc. Consider assistance from outside law enforcement officials: police, sheriff, and highway patrol. In times of extreme emergency, it may be appropriate to ask for assistance from National Guard.
4. Meet with appropriate emergency planning agencies such as: fire, police, county disaster coordinators etc. Review locations, resources and how agencies can work together to minimize threats. One of the most important items is how to communicate during emergencies.
5. Communicate with the neighbors of your facilities to report any suspicious activities by unmarked vehicles or unidentified personnel. Remind all employees to be cognizant of possible tampering and report it immediately. Be diligent concerning requests for maps and records of facilities. Provide information to others on a need-to-know basis.
6. Document these processes and keep all appropriate employees informed as to results of the meeting and communications with outside agencies.

Major points of supply.

Location	Type of Facility	Area Responsible

Supply points to key locations.

- i. Military Locations
- ii. Defense Contractors
- iii. Points of significant national interest
 - Historic buildings
 - National monuments

Location	Type of Facility	Area Responsible

Government buildings:

- Federal
- State
- Local

Location	Type of Facility	Area Responsible

Important gathering points for large numbers of people.

- Stadiums
- Arenas
- Theaters
- Concert pavilions
- Shopping centers
- Office buildings
- Fairs, Amusement Parks

Location	Type of Facility	Area Responsible





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1.4 SYSTEM MAPS AND SHUTDOWN PROCEDURES

MAP OF VALVE LOCATIONS AND SCHEMATICS

Remember: A gas system may be a complex network of interconnected piping. It could be fed by regulators and have valves throughout for shutting off or diverting the flow of gas. Pressure in the mains may vary from less than a pound to hundreds of pounds. Improper operation of a valve may create a hazardous condition, or make a hazardous condition worse.

RECORD	LOCATION	PERSON RESPONSIBLE
MAP RECORDS	-7001 Center Street Mentor, Ohio 44060 -2412 Newton Falls Rd. Newton Falls, Ohio 44444	- Darryl Knight -Jack McCormick
VALVE RECORDS	-7001 Center Street Mentor, Ohio 44060 -2412 Newton Falls Rd. Newton Falls, Ohio 44444	- Darryl Knight -Jack McCormick

Teach your personnel, because ONLY properly authorized personnel should operate valves. Fire, Police, other officials, or other outside individuals ARE NOT AUTHORIZED to operate OR TO INSTRUCT OTHERS, including gas company personnel, to operate valves. (Except residential "end-use" valves, commonly called the meter shut-offs.)

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Case No(s). 16-1578-GA-COI

Summary: Testimony of Darryl Knight on behalf of Ohio Rural Natural Gas Co-op (Part 7-Exhibits Continued) electronically filed by Mr. Richard R Parsons on behalf of Ohio Rural Natural Gas Co-op