

TENNESSEE PUBLIC UTILITY COMMISSION



502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

RECEIVED

FEB 28 2025

By td

February 20, 2025

The Honorable Mayor Bill White
Mount Pleasant Gas
P. O. Box 426
Mt. Pleasant, Tennessee 38474

Re: Natural Gas Safety Inspection Evaluation #25-007OQDU

Dear Mayor White:

A Tennessee Public Utility Commission Gas Pipeline Safety inspector recently conducted an inspection of pipeline facilities operated by your company. The inspection was conducted in accordance with the Tennessee Code Annotated ("Tenn. Code Ann.") § 65-2-102, the Tennessee Comprehensive Rules and Regulations ("Tenn. Comp. R. & Regs.") 1220-4-5 and Title 49 of the Code of Federal Regulations ("CFR") Chapter 1, Subchapter D, Parts 191, 192, 193, 195 and 199, as incorporated in the Tennessee rules by reference. No violations were identified.

The mission of the Gas Pipeline Safety Division is to contribute to the safety and reliability of natural gas distribution and transmission pipeline facilities in Tennessee. We are available to provide assistance should you have any questions or comments regarding this report. I can be reached at 615.969.2042. Travis Aslinger is available to discuss technical assistance at 615.202.9848, or contact your inspector.

Thank you for your efforts in maintaining natural gas pipeline safety.

Sincerely,

A handwritten signature in blue ink, appearing to be "BK", written over a large blue circular stamp.

Bryce Keener, Director
Gas Pipeline Safety Division

Enclosures



Tennessee Public Utility Commission - Gas Pipeline Safety Division
Safety Inspection Evaluation/Exit Interview

Operator: Mt. Pleasant Gas	Inspection Number: 25-007OQDU
Federal ID Number: 25126	Inspection Type: Operator Qualification
Location: Mt. Pleasant, TN	Inspection Date(s): 2/6/24
Contacted: Tom Roberts	TPUC: Darrin Ulmer
Preinspection Date (If Applicable): 1/3/25	Assisting Inspector(s):
Onsite Date(s): 2/6/25	Remote Date(s):
Section 114 Inspection Date:	Report Submittal Date: 2/6/24
	Travel Date (If not w/Onsite Date): 2/5/25

Minimum Federal Safety Standards Alleged Violation(s)

Inspection #	Inspection Type	Date(s)	# Cited This Inspection	# Closed This Inspection	# Previously Cited - Still Open	Total # Open
22-011F1	Non-Compliance Follow-up	3/24/23	0	0	0	0
23-008VCDU	VLP, Corrosion & P9	8/8-10/23	0	0	0	0
24-009PAPDU	Public Awareness	2/15/24	0	0	0	0
25-007OQDU	Operator Qualification	2/6/25	0	0	0	0

Cited/Open/Closed Violations

No violations were cited for Inspection 25-007OQDU.
 No violations open from previous inspections.
 No violations closed from previous inspections.

Inspection Summary

Above listed inspection(s) were performed at Mt. Pleasant Gas on 2/6/25. The attached report is used to document the review of policies, procedures, records, and other documentation maintained to demonstrate compliance with the minimum federal safety standards (MFSS) and State of Tennessee Gas Pipeline Safety Division (GPSD) regulations.

Non-Compliances

Minimum Federal Safety Standards Alleged Non-Compliance(s)
(Non-Compliances Cited or Closed through Follow-Up are Reported Below)

Inspection #	Inspection Type	Date(s)	# Cited This Inspection	# Closed This Inspection	# Previously Cited - Still Open	Total # Open
22-011F1	Non-Compliance Follow-up	3/24/22	0	1	0	0
23-008VCDU	VLP, Corrosion & P9	8/8-10/23	0	0	0	0
24-009PAPDU	Public Awareness	2/15/24	0	0	0	0
25-007OQDU	Operator Qualification	2/6/25	0	0	0	0

1. Non-compliances (Present Inspection):

No non-compliances were observed during this inspection.

2. Non-compliances (Previous Inspections):

No non-compliances from previous inspections remain open or were closed during this inspection.

3. Technical Assistance:

Operator may view the most current regulations at: <http://49cfrpipeline.com/> , was given the website <https://pipelinesms.org> to learn more about Pipeline Safety Management Systems and can review PHMSA Advisory Bulletins at <https://www.phmsa.dot.gov/regulations/federal-register-documents>.

4. Recommendations/Best Practices:

The Recommendations/Best Practices listed below is/are not required by code, but would demonstrate compliance:

No recommendations or best practices were given during this inspection.

5. Operator Comments:

No operator comments provided during inspection.

6. Inspection Notes:

Operator Qualification plan and program were reviewed. All elements of operator qualification plan requirements per 192.805 were in place and deemed compliant. No issues were noted concerning valid operator qualification or performing covered tasks under a lapsed operator qualification.

7. Excavation Damage/Damage Prevention:

Operator excavation damage statistics was discussed along with prevention. Operator is encouraged to follow Tenn. Code Ann. § 65-31-111(e), when operators whose utility facilities have been damaged, which states reporting the incident using the Damage Information Reporting Tool (DIRT) utilized by the Common Ground Alliance.

The following link will provide more information regarding the DIRT tool and the Excavation Damage Enforcement:

<https://www.tn.gov/tpuc/divisions/uudp-underground-utility-damage-prevention.html>

As a reminder, anyone who has experienced or witnessed a probable violation of Tenn. Code Ann. §65-31-101 et al. may file a complaint with the Tennessee Public Utility Commission or by calling 615-741-2904. In order to ensure timely investigations, complaints must be filed within ninety (90) days of being made aware of an alleged violation of the Underground Utility Damage Prevention Act.

8. Photo Documentation:

No photos taken during this inspection.

9. Advisory Notes:

Failure to address any cited violations/non-compliance within the timeframe mandated may result in cited violation(s) to include an assessment of a civil penalty of up to \$100,000 per day up to a maximum of \$1,000,000 per each violation.

Exit Interview Documentation:

Date of Exit Interview: 2/6/25

Listed above is a summary of **all** potential violations and recommendations observed by GPSD during the inspection. Operator signature & inspector signature acknowledges understanding of the potential violations and recommendations. Technical guidance and action plans will be noted as applicable.

Operator Signature: Tom Roberts

Inspector Signature: Darrin Ulmer Date: 2/6/25

If you need further assistance or have questions, please contact Darrin Ulmer via email at Darrin.Ulmer@tn.gov or by phone at (615) 483-7071, or Travis Aslinger via email at travis.aslinger@tn.gov or by phone at (615) 202-9848.

Signature: Victoria Smith
Victoria Smith (Feb 6, 2025 09:56 CST)

Email: vsmith@mtpleasant-tn.gov



**Tennessee Public Utility Commission
Gas Pipeline Safety Division
2025 Inspection (Onsite Days only) Affidavit**

I acknowledge that an inspection of _____ Mount Pleasant Gas _____
(Operator)

on the following date(s): _____ February 6 _____, 2025,

was performed and that the completed inspection form was available for review during the exit interview and the information provided for purposes of this inspection is true, accurate, and complete to the best of my knowledge and belief.

Contact Personnel: _____ Tom Roberts _____ Title: _____ Gas Manager _____

Office #: _____ 931-379-7717 _____ Cell#: _____ 931-446-2626 _____ Email: _____ dmarshall@mtpleasant-tn.gov _____

Mailing Address, City State Zip: _____ P.O. Box 426, Mt. Pleasant, TN 38474 _____

Company Street Address: _____ 203 Appletree St., Mt. Pleasant, TN 38474 _____

Responsible Company Official: _____ Bill White _____ Title: _____ Mayor _____

Mailing Address: _____ Same as above _____

- A GPSD exit interview summary will be attached to this affidavit listing all potential violations and recommendations as observed during the inspection. All guidance, action plans, and technical assistance pertaining to this inspection will be documented on the exit interview summary along with the acknowledgement signatures of the operator and inspector.

Executed and sworn on this _____ 6th _____ day of _____ February _____, 2025

Operator Signature	Operator Printed
<i>Tom Roberts</i>	Tom Roberts

Inspector Signature	Date(s) of Attendance	Inspector Printed
<i>Darrin Ulmer</i>	2/6/25	Darrin Ulmer

Signature: Victoria Smith
Victoria Smith (Feb 6, 2025 09:55 CST)

Email: vsmith@mtpleasant-tn.gov



TPUC - GAS PIPELINE SAFETY DIVISION

Operator Qualification Protocol 1-8 Inspection Report

Name of Operator: Mount Pleasant Gas		OPID #: 25126
Name of Unit(s):		
Records Location: 203 Appletree St., Mount Pleasant, TN 38474		
Inspection Type: Operator Qualification Protocol 1-8		Inspection Date(s): 2/6/25
Commission Representative(s): Darrin Ulmer		

Company System Maps (copies for Region Files):

<p>Summary: An Operator Qualification (OQ) Program – Protocols 1-8 inspection was performed. The inspection consisted of a comprehensive review of the operator’s OQ Plan and associated records as appropriate.</p> <p>In general, the operator’s OQ Program is in compliance with code requirements as related to qualification of its personnel and contractors to perform covered tasks. Any deficiencies or issues noted during the inspection are documented on the attached report.</p>

<p>Findings: Inspection findings and observations are summarized separately on the Safety Inspection Evaluation form.</p>
--



Name of Operator: Mount Pleasant Gas		Unit Name & Address:	
HQ Address: 203 Appletree St. Mount Pleasant, TN 38474			
Company Official: Tom Roberts		Unit Official:	
Phone #: (931) 446-2626		Phone #:	
Fax #:		Fax #:	
Emergency Phone #: (931) 379-7717		Emergency Phone #:	
Persons Interviewed	Title	Phone #	
Thomas Roberts	Gas Manager	(931) 446-2626	
Victoria Smith	Executive Assistant	(931) 774-6180	

Operator Qualification Protocol 1-8

1. Management of Other Entities Performing Covered Tasks *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified? (TQ.OQ.OQCONTRACTOR.P) 192.805(b) (192.805(c);192.805(d);192.805(e);192.805(f))*

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 1.0 Introduction; Section 11.0 Mutual Aid



2. Operator Qualification Plan and Covered Tasks *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* (TQ.OQ.OQPLAN.P) 192.805(a) (192.801(b))

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 4.0 Covered Tasks, Appendix C-Comprehensive List of Covered Tasks; Appendix E Covered Task Evaluation Forms

3. Notification of Significant Plan Changes *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) 192.805(i) (192.18)

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 6.0 New or Non-Qualified Personnel; Section 14.0 Notification of Significant Change & Control Change

4. Records of OQ Program Changes *Are records maintained for changes that affect covered tasks and significant OQ plan changes?* (TQ.OQ.CHANGERECORD.R) 192.805(l) (192.805(f);192.18)

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 9.0 Changes Impacting Covered Tasks; Section 13.0 Record Keeping; Appendix H Outline of Record Keeping Plan

5. Evaluation Methods *Are evaluation methods established and documented appropriate to each covered task?* (TQ.OQ.EVALMETHOD.P) 192.805(b) (192.803;192.809(d);192.809(e))

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 5.0 Evaluations; Appendix E Covered Task Evaluation

6. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task?* (TQ.OQ.REEVALINTERVAL.P) (detail)

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 5.2 Evaluation/Re-evaluation; Section 10.0 Subsequent Qualification

7. Covered Task Performed by Non-Qualified Individual *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?* (TQ.OQ.NONQUALIFIED.P) 192.805(c)

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 6.0 New or Non-Qualified Personnel



8. Contractor Qualification Documentation Meets Operator Requirements *Does the OQ plan document that the operator has assured that the procedures on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field? (TQ.OQ.OQCONTRACTOREQUIV.P)*

192.805(h)

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 1.0 Introduction

9. Operator Qualification Plan and Covered Tasks *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability? (TQ.OQ.OQPLAN.O) 192.805(h)*

Sat	Concern	Unsat	NA	NC
X				

Notes:
Review of records demonstrated compliance with knowledge, skills, and ability. Written and field examinations.

10. Contractors Adhering to OQ Plan *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it? (TQ.OQ.OQPLANCONTRACTOR.P) 192.805(b) (192.805(f);192.805(c))*

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 9.0 Changes Impacting Covered Tasks

11. Personnel Performance Monitoring *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence? (TQ.OQ.PERFMONITOR.R) 192.805(d) (192.805(e))*

Sat	Concern	Unsat	NA	NC
			X	

Notes:
No incidents have occurred. OQ Section 7.0 Evaluation Following an Incident

12. Qualification Records for Personnel Performing Covered Tasks *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) 192.807*

Sat	Concern	Unsat	NA	NC
X				

Notes:
Qualification records were reviewed. No issues noted during inspection.

13. Reevaluation Intervals for Covered Tasks *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task? (TQ.OQ.REEVALINTERVAL.P) 192.805(g)*

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 5.2 Evaluation/Re-evaluation; Section 10.0 Subsequent Qualification



14. Training Requirements (Initial, Retraining, and Reevaluation) *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.P) 192.805(h)*

Sat	Concern	Unsat	NA	NC
X				

Notes:

OQ Section 5.0 Evaluations

15. Training Requirements (Initial, Retraining, and Reevaluation) *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.R) 192.807(a) (192.807(b))*

Sat	Concern	Unsat	NA	NC
X				

Notes:

Records were retained. No issues noted

16. Contractor Qualification *Are adequate records containing the required elements maintained for contractor personnel? (TQ.OQ.OQCONTRACTOR.R) 192.807(a) (192.807(b))*

Sat	Concern	Unsat	NA	NC
X				

Notes:

Neals Measurement-All possessed valid OQ for covered tasks performed

17. Management of Other Entities Performing Covered Tasks *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained? (TQ.OQ.OTHERENTITY.R) 192.805(b) (192.805(c);192.803)*

Sat	Concern	Unsat	NA	NC
X				

Notes:

OQ Section 1.0 Introduction; Section 11.0 Mutual Aid; Records of contractors are maintained.

18. Abnormal Operating Conditions *Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)? (TQ.OQ.ABNORMAL.P) 192.803*

Sat	Concern	Unsat	NA	NC
X				

Notes:

OQ Section 1.3 Purpose; Section 5.2 Evaluation/Re-evaluation Methods

19. Abnormal Operating Conditions *Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) 192.807(a) (192.807(b);192.803)*

Sat	Concern	Unsat	NA	NC
X				

Notes:

OQ Appendix E Covered Task Evaluation Forms; Section 13.0 Record Keeping



20. Abnormal Operating Conditions *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions? (TQ.OQ.ABNORMAL.O) 192.803*

Sat	Concern	Unsat	NA	NC
X				

Notes:
Observed during field inspection. No issues noted.

21. Personnel Performance Monitoring *Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task? (TQ.OQ.PERFMONITOR.P) 192.805(d) (192.805(e))*

Sat	Concern	Unsat	NA	NC
X				

Notes:
OQ Section 7.0 Evaluation Following an Incident; Section 8.0 Evaluation following poor performance or impairment

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.



Tennessee Public Utility Commission
- Gas Pipeline Safety Division -
2025 OQ Protocol 1-8 Pre-Inspection Check List

Operator:	Mount Pleasant Gas	Scheduled Date:	02/06/25
Contacted:	Tom Roberts	Phone #:	(931) 446-2626
Type(s) of Inspection:	OQ Protocol 1-8	Follow Up	X Forms Prepared

-Gas Pipeline Safety Division Risk Management Model Review-

Level of Risk:	<input type="checkbox"/> High	<input type="checkbox"/> Medium	<input checked="" type="checkbox"/> Low	Cause:
-----------------------	-------------------------------	---------------------------------	---	---------------

-Review of Previous Inspection Reports-

Open Violations/Non-Compliances concerning OQ Program:	None
Previous OQ Non-Compliances (Cited and Open):	None
Recent Incidents/Penalties related to OQ:	None
OQ Protocol 9 Inspection Review:	No issues
Review of Past Inspection OQ related information	OQ written program needed.
Is OQ Plan/Program considered to be "off the shelf"?	Yes, partially
Does operator use contractors?	Yes
Drug/Alcohol Testing- Are contractors and operator personnel tested at the required 50% rate?	Yes
What year was the last OQ Protocol 1-8 performed?	2021

-PHMSA Data Base Search-

Annual Report Review	Date of Report: 02/27/24
Incident Report Review	N/A
NPMS Miles vs. Annual Report Miles	Not transmission
Other Dashboard:	21.77 miles of steel main; 38.85 miles of plastic; 1,863 services

Inspector: Darrin Ulmer 01/03/25