



**REEDY CREEK IMPROVEMENT DISTRICT
NATURAL GAS DEPARTMENT**

**OPERATION AND MAINTENANCE
PROCEDURES MANUAL**

OPERATED BY

REEDY CREEK ENERGY SERVICES

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TABLE OF CONTENTS

TITLE	Page
1.0 SCOPE, AUTHORITY AND PURPOSE	1
1.1 ESSENTIALS OF OPERATING AND MAINTENANCE PLAN (PARAGRAPH 192-605).	1
1.2 EMPLOYEE DRUG TESTING 49 CFR PART 199	1
2.0 CONCEPT OF OPERATION	2
3.0 HOW TO MAINTAIN MANUAL	3
4.0 DISTRIBUTION OF MANUAL AND COMPLIANCE	4
4.1 COMPLIANCE WITH THIS MANUAL	4
5.0 ANNUAL REVIEW OF OPERATING AND MAINTENANCE PROCEDURES	5
6.0 INSPECTION AND MAINTENANCE OF DISTRIBUTION PIPING	6
6.1 MAINTENANCE OF VALVES	6
6.2 LEAK SURVEYS AND RECORDS	7
6.2.1 GENERAL REQUIREMENTS	7
6.2.2 CLASSIFICATION AND REPAIR OF LEAKS FOUND	8
6.2.3 TYPES OF LEAK SURVEYS	8
6.2.4 UTILIZATION OF SURVEYS	9
6.2.5 LEAKS REPORTED BY OTHERS	10
6.2.6 UTILIZATION OF LEAKAGE RECORDS	10

6.2.7	RECORD FILES	10
6.3	PATROLLING AND INSPECTION OF DISTRIBUTION PIPING	10
6.3.1	DAMAGE PREVENTION PLAN	11
6.4	ESTABLISHING MAXIMUM ALLOWABLE OPERATING PRESSURES	14
6.4.1	GENERAL - STEEL AND FIBERGLASS	14
6.4.2	MAXIMUM ALLOWABLE OPERATING PRESSURES ON HIGH-PRESSURE DISTRIBUTION SYSTEMS	15
6.4.3	MAXIMUM AND MINIMUM ALLOWABLE OPERATING PRESSURES ON LOW-PRESSURE SYSTEMS	16
6.5	INCREASING MAXIMUM ALLOWABLE OPERATING PRESSURE ON EXISTING SYSTEMS	16
7.0	MAINTENANCE OF PRESSURE REGULATING STATIONS	18
8.0	OPERATING PROCEDURES	20
8.1	ABANDONMENT OF MAINS, SERVICES AND VAULTS	20
8.2	TERMINATION OF GAS SERVICE	20
8.3	TEMPORARY DISCONNECTION OF A SERVICE	21
8.4	VAULT MAINTENANCE	21
8.5	REACTIVATING ABANDONED OR TEMPORARILY DISCONNECTED SERVICES	21
8.6	PROCEDURES FOR ANALYZING ACCIDENTS AND FAILURES	22
8.6.1	SYSTEM COMPONENT FAILURE INVESTIGATION	22

8.7	ODORIZATION	22
8.8	PREVENTION OF ACCIDENTAL IGNITION	23
8.9	HOT TAPS	24
8.9.1	HOT TAP PROCEDURE FOR STEEL PIPE	24
8.10	PURGING:	25
9.0	REPAIRS	26
9.1	REPAIR OF COATED AND WRAPPED STEEL PIPE	26
9.1.1	REPLACING A SECTION OR SEGMENT OF PIPE	26
9.1.2	BACKFILL	27
9.2	REPAIR OF FIBERGLASS AND POLYETHYLENE PIPE	27
10.0	CATHODIC PROTECTION OPERATION AND MAINTENANCE	28
10.1	GENERAL	28
10.2	LIGHTNING PROTECTION	28
10.3	PIPELINES INSTALLED	28
10.4	GAS PIPE EXAMINATION	29
10.5	PROTECTIVE COATING REQUIREMENTS	29
10.6	MONITORING	29
10.7	INTERFERENCE CURRENT	30
10.8	CRITERIA	30
10.9	ELECTRICAL ISOLATION PROVIDED	31

10.10	ATMOSPHERIC CORROSION CONTROL	31
10.11	PIPING REPLACEMENT DUE TO CORROSION	31
10.12	CORROSION CONTROL RECORDS	32
11.0	EMERGENCY PROCEDURES	33
11.1.1	SCOPE	33
11.1.2	EDUCATIONAL PROGRAM	34
11.1.3	UPDATING PROCEDURE	34
11.2	REPORTING EMERGENCIES	35
11.2.1	HOW TO REPORT	35
11.2.2	RECEIVING REPORT	35
11.2.3	DISPATCHING REPORT	35
11.3	REPORTING TO OTHERS:	35
11.3.1	COMPANY OFFICIALS	35
11.3.2	PUBLIC OFFICIALS	36
11.3.3	NEWS MEDIA	36
11.3.4	STATE OF FLORIDA	36
11.3.5	FEDERAL, U.S. D.O.T., RSPA	36
11.4	EMERGENCY SHUTOFF	37
11.4.1	CUTOFF	37
11.5	EMERGENCY SUPPLIES AND EQUIPMENT	37

11.5.1 VEHICLES	37
11.5.2 ADDITIONAL EQUIPMENT	37
11.6 ORGANIZATION	37
11.7 OUTSIDE ASSISTANCE	38
11.8 HURRICANE PLAN	38
11.9 ADDITIONAL BACKUPS	38
11.10 EMERGENCY VALVES	38
12.0 INITIATION OF A NEW GAS SERVICE	40
12.1 CUSTOMER NOTIFICATION MAINTAINING "BURIED PIPING"	41
13.0 UNAUTHORIZED USE OF GAS FACILITIES	41
14.0 UTILIZATION OF INSPECTION AND MAINTENANCE INFORMATION	41
15.0 DRUG AND ALCOHOL TESTING POLICY & PROCEDURES	42
15.1 POLICY STATEMENT	42
15.2 EMPLOYEE CATEGORIES:	43
15.3 TYPES OF DRUG AND ALCOHOL TESTING	43
15.4 TESTING PROCEDURES	48
15.5 MEDICAL REVIEW OFFICER (MRO)	48
15.6 RETENTION OF SAMPLES AND RETESTING	49
15.7 TESTING LABORATORY	49

15.8	COLLECTION AGENCY	50
15.9	EMPLOYEE ASSISTANCE PROGRAM (EAP)	50
15.10	RECORDKEEPING	50
15.11	CONFIDENTIALITY	51
15.12	TREATMENT REHABILITATION MANDATORY REFERRAL	51
15.13	PRESCRIBED MEDICAL TREATMENT	51
15.14	CONSEQUENCES FOR VIOLATION OF THIS POLICY	52
15.15	ATTACHMENT A EMPLOYEES	52
15.16	ATTACHMENT B SUPERVISORY TRAINING	52
15.17	ATTACHMENT C MRO, TESTING, & COLLECTION AGENCY	53
16.0	FORMS LISTING AND INCLUSION	65
17.0	RCES NATURAL GAS DEPARTMENT ORGANIZATION CHART	85
	FPSC PIPELINE SAFETY-TELEPHONE NOTIFICATION NUMBERS	86
	D.O.T. INCIDENT REPORT FORM F 7100.1 (03-04)	87-89

1.0 SCOPE, AUTHORITY AND PURPOSE

Under the authority of the Natural Gas Pipeline Safety Act of 1968 (49 U.S.C. 1671 etc. Seg.), Part 1 of the Regulations of the Office of the Secretary of Transportation (49 C.F.R. Part 1) and the delegation of authority to the Director, Office of Pipeline Safety, dated November 6, 1968, (33. F.R. 16488) which requires under Subpart L - Operations Paragraph 192.603 - "General Provisions:"

- A. No persons may operate a segment of pipeline unless it is operated in accordance with this subpart.
- B. Each operator shall establish a written operating and maintenance plan meeting the requirements of this part and keep records necessary to administer the plan.

1.1 Essentials of Operating and Maintenance Plan (Paragraph 192-605).

Each operator shall include the following in the operating and maintenance plan:

- 1. Instructions for employees covering operating and maintenance procedures during normal operation.
- 2. Items required to be included by the provisions of Subpart M of 192.605.
- 3. Specific programs relating to facilities presenting the greatest hazard to public safety either in an emergency or because of extraordinary construction or maintenance requirements.
- 4. A program for conversion procedures if conversion of low-pressure distribution system to a higher pressure is contemplated.
- 5. Provisions for periodic inspections to ensure that operating pressures are appropriate for the class location.

Specifically, this document is addressed to compliance with Subpart L, Paragraph 192.605 (a), (c) and (e).

1.2 Employee Drug Testing 49 CFR Part 199

Effective August 21, 1990 all personnel who operate, maintain, and are subject to emergency response of the natural gas system whether directly or indirectly shall be randomly tested for drugs in accordance with D.O.T. Pipeline Safety Regulations Part 199.

2.0 CONCEPT OF OPERATION

Operation, maintenance and repair of Natural Gas Utility Systems throughout the WALT DISNEY WORLD Resort Complex are owned by the Reedy Creek Improvement District, and the operations are the responsibilities of the Natural Gas Department within Reedy Creek Energy Services. All files shall be kept up to date and organized in a neat systematic order. Gas Department vehicles and portable equipment are to be maintained so that they are always available for service. Adequate spare parts and material will be kept on hand at all times.

The Gas Department shall be staffed by personnel with experience and qualifications who meet job requirements. All Federal, State and local regulations shall be complied with and records maintained to show compliance.

Records maintained by the Gas Department shall reflect the identification and location of each device or facility comprising the system. The records shall be maintained in such a manner to show actual work performed, the person doing the work and date on which test was completed.

System maps of each local operating area shall be prepared and on file in the operating company's respective local office. Such maps and related records shall readily identify the location and size of all system facilities and other information pertinent to the safe design of the system. These records shall be kept up-to-date.

The Gas Utility Service Manager shall oversee Gas Department functions insuring that all inspections and maintenance are carried out in a regularly scheduled manner.

Engineering is provided by the Principal Mechanical Engineer of RCES working under the Manager of Planning and Engineering. Other support is provided when necessary by other departments of the Utilities Company.

All employees of the Gas Department shall at all times exercise good judgment and effort to continually forewarn the public and other employees of any hazard or danger. Gas Department personnel shall take expedient action to reduce or correct any condition that results in an unsafe condition, and recognize conditions that potentially may be safety related conditions that are subject to reporting conditions, per 49 CFR 191.23 and 49 CFR. 192.605 (d).

Reedy Creek Energy Services will maintain an active, continuing training program for Gas Department personnel as related to the contents of this document.

Current copies of all applicable Federal and State regulations shall be maintained on file in the Gas Department office.

3.0 HOW TO MAINTAIN MANUAL

This Natural Gas Operations and Maintenance Procedures Manual (NGOMPH) will consist of loose-leaf binder, index and certain numbered sections.

Management shall review each NGOMPM subject and all additions or changes with the employees in their departments.

The Gas Department operating and maintenance procedures are minimum procedures designed to conform to F.P.S.C. (Florida Public Service Commission), and in no way limit the exercise of accepted industry practices in special or other situations not covered by these procedures. Procedures contained in this manual can be changed only through revisions of this manual with the approval of the Reedy Creek Energy Services Director and appropriate filing with the F.P.S.C.

Any questions or apparent discrepancies in this manual, or any suggestions for new subjects to be included in this manual, should be referred to the Gas Utilities Service Manager who will pass it on to the Manager, Energy Plants for evaluation.

The Gas Utilities Service Manager will maintain a book, "Discontinued NGOMPM Pages," for pages which have been discontinued, showing date of discontinuance.

4.0 DISTRIBUTION OF MANUAL AND COMPLIANCE

The index and all sections are prepared for filing with the Florida Public Service Commission. Changes in procedures in sections so filed, or revisions in such sections, may be made only by refiling the sections in accordance with rules expected to be adopted by the F.P.S.C.

The complete manual will be distributed as follows:

Florida Public Service Commission	(2)
Director, Reedy Creek Energy Services	(1)
Manager, Energy Production	(1)
Gas Department (personnel)	(9)
Principal Mechanical Engineer	(1)
RCES Energy Control Center	(1)
Director, Building and Safety, RCID	(1)
Total Copies Required	(16)

4.1 Compliance with this Manual

Section 8 of the Natural Gas Pipeline Safety Act requires Reedy Creek Energy Services to file the Operation and Maintenance Plans with the F.P.S.C., and to comply with the plans so filed. The failure of any person to comply with the manual would be a violation of the Act and could subject that person or the Company to the enforcement provisions of the Act.

5.0 ANNUAL REVIEW OF OPERATING AND MAINTENANCE PROCEDURES

All changes to specific sections of this manual or the inclusion of new sections must be filed with the F.P.S.C. within 30 days of the issuance to personnel operating under the provisions of the manual.

This manual shall be reviewed annually by Management personnel of the Utilities Company to insure compliance.

Periodically Management personnel will review the work done by the Gas Technicians to determine the effectiveness and adequacy of the procedures listed in the manual.

Procedures and policies shall be modified or updated when deficiencies are found as per 49 CFR 192.605 (6)(8).

6.0 INSPECTION AND MAINTENANCE OF DISTRIBUTION PIPING

6.1 Maintenance of Valves

Valve maintenance necessary for the safe operation of RCES gas systems shall be established by one or more of the following criteria:

1. Number of customers controlled by a valve or valves.
2. Pressure classification of system.
3. Size of mains in system.
4. Characteristics of system served (urban, rural, industrial, etc.).
5. Valves at regulator stations.
6. Block valves at bridges, canals, expressways and railroad crossings.
7. Valves which sectionalize portions of a distribution system.
8. Other valves necessary for the safe operation of the system
9. Volume and pressure of gas between valves
10. Size of area and population density between valves required to isolate the area as well as the accessibility of the required valves
11. The minimum number of personnel required to shutdown and restore the area
12. Other means and availability of required equipment to control the flow of gas in the event of an emergency
13. The number and type of customers, such as hospitals, schools, commercial and industrial loads, etc., that will be effect

The position of each valve should be determined before the maintenance begins. No one should work on a valve without the full understanding of the valve's function. The valve should be left in the same position as found, unless otherwise instructed.

The operating pressure on both sides of the valve should be fully known. No valve should be opened where there is a difference in system operating pressures until approved by proper authorities. Permanent gauges, telemetering and/or temporary gauges should be used when there is a danger of losing pressure, over pressuring, or for other safety measures.

Sectionalizing valves necessary for the safe operation of a gas system shall be inspected every calendar year as a minimum. The valve should be partially operated and lubricated where necessary.

All valve boxes shall be left clean and accessible for the valve key or other devices necessary for the safe operation of the valve. All valve boxes shall be checked to insure proper identification tag and color are in accordance with RCES numbering system. Valve box covers should be painted (yellow) and emergency valve covers shall be painted (red and yellow) in areas where required. A listing of sectionalizer valves are in section 11.10 of the manual and denoted on gas utility drawings.

A valve box or valves constituting a tripping, falling, or other hazard reported to the RCES Gas Department shall have corrective action taken at once.

If a valve is of the lubricated type, then only the grease recommended by the manufacturer should be used. Inspection information is to be entered on RCES Form 26.

It will be the responsibility of the RCES Gas Department to perform the above maintenance and complete the appropriate form.

6.2 Leak Surveys and Records

6.2.1 General Requirements

The RCID MPG and HPG Natural Gas Distribution System shall be leak surveyed once a year, not to exceed 15 months, with a gas detector instrument. RCES Form 29 shall be utilized for documentation with a drawing of the system surveyed attached.

A survey of customer owned exterior underground piping systems such as hotels, hospitals, theaters, and attractions that are connected to the system will be conducted once a year.

During openings for gas work, exposed lines will be visually inspected for corrosion and leakage and appropriate repair or maintenance action taken where necessary. All leaks on the RCID owned facilities shall be reported on RCES Form 27. All leaks on customer owned facilities shall be reported on RCES Form 28.

All leaks shall be checked with soapsuds immediately after repair. Underground Grade 1,2 and 3 leaks shall be rechecked within 30 days of repair. All underground leaks shall be rechecked with a gas detector instrument . Information will be recorded on Form RCES 27 or RCES 28.

6.2.2 Classification and Repair of Leaks Found

A. Outside Leaks

The system of classification given by the Federal Department of Transportation and Florida Public Service Commission shall be used in grading leaks:

A "Grade 1" leak means a leakage of gas that could create a hazard to persons or property and that, taking into account the location of the leak, requires immediate repair and continuous action until conditions are no longer hazardous.

A "Grade 2" leak means a leak that is recognized as being non-hazardous at the time of detection, but justifies scheduled repair based on potential future hazard. Repair shall not exceed 90 days from time of detection unless due to re-survey it is determined to be a Grade 3 leak.

A "Grade 3" leak is a leak that is not a threat to persons and property and not expected to become so. Leaks that are above ground shall be scheduled for repair in ninety days from the date detected. Grade 3 underground leaks shall be reevaluated at least once every six months until repaired.

Form RCES 27 shall be completed by field personnel upon completion of repairs.

B. Inside Leaks/Customer Owned

All inside leaks shall be considered to be Grade 1 leaks until investigated. If the gas concentration is hazardous, immediate action shall be taken to shut off the supply of gas, repair the leak, dilute the atmosphere in the building (by venting, opening windows, etc.) or possibly evacuating the building. Other inside leaks shall be made safe and will be immediately reported to the RCES Gas Department. Form RCES 28 shall be completed by field personnel upon completion of repairs.

6.2.3 Types of Leak Surveys

A. Manhole Survey

The atmosphere in manholes, catch basins, curb boxes, cracks in paving of sidewalks and other underground facilities providing an opportunity for finding gas leaks will be checked with a gas indicator. Information shall be entered on Form RCES 29.

B. Basement Survey

The atmosphere in the basement, cracks in the basement wall (especially in the vicinity of the service entrance) and floor outlets, such as drains, shall be checked with a gas indicator. Information will be entered on Form RCES 30.

C. Bar Test Survey

A probe bar shall be used to place holes in the soil over or adjacent to mains and services. The atmosphere in these bar holes shall be tested with the gas indicator.

D. Vegetation Survey

Vegetation Surveys are not allowed. However, in addition to using a gas detector instrument to leak survey a system, the condition of vegetation above or adjacent to mains and services shall be visually observed for possible damage due to gas leakage. Areas noted with arrested growth, such as brown grass, leafless trees and wilted vegetation, shall be further inspected by bar hole testing.

E. Flame Ionization or Infrared Surveys

The atmosphere at ground level along the routes of mains and/or services shall be checked. Any leaks indicated shall be pinpointed by the bar test method.

F. Soapsuds Testing

Soapsuds or equivalent leak detecting substances are applied to exposed piping, fittings or components. If a leak is present, bubbles will form on the surface of the item being tested at the point of leakage.

G. Other Survey Methods

Leak survey methods other than those specifically outlined above may be employed when approved by the RCES Gas Department.

6.2.4 Utilization of Surveys

A. Business Areas

Flame ionization surveys will be used in the following areas: Magic Kingdom Sub 1 and Sub 2, Hotel Loops, Lake Buena Vista, EPCOT Center, Studio, Disney Center, Western Development, Animal Kingdom, and outlying areas.

Manhole and basement surveys will also be conducted in the above areas. Other types of surveys shall be utilized (where they are effective) as deemed necessary.

B. Hotels, Hospitals, Theaters and Attractions

A basement survey, where applicable, and a leak survey of the service line from the main to the building, along with mains in close proximity to the building, shall be conducted on all hospitals, theaters and attractions that are connected to the system.

6.2.5 Leaks Reported by Others

All leaks reported by others, whether customers or the general public, will be investigated immediately. If the cause of the leak is not readily apparent, soap testing, Flame Pack, or CGI shall be used to locate the leak. In the event a leak is not found and repaired, the customer or party originally reporting the leak shall be consulted and made aware of what steps have been taken and what conditions exist in the area.

6.2.6 Utilization of Leakage Records

When the condition of a main or service line, as indicated by leak frequency records or visual observation, deteriorates to the point where it is unsafe, it must be replaced or reconditioned.

6.2.7 Record Files

Records shall be filed in the Gas Department at RCES in accordance with good practices and ease of retrieval. They shall be available for inspection by operators and management on a 24-hour basis. The records will not be removed from the Gas Department office at any time, except by Gas Department Management or clerk, for official purposes.

The records may be duplicated for official purposes. Utilities Service Manager of the Gas Department will insure proper procedure for removing records to achieve corrective action and appropriate follow up.

6.3 Patrolling and Inspection of Distribution Piping

Inspection of meter and regulator installations shall be carried out as set forth in Section 7.0 of this document. Inspection of meter and regulator installations plus inspection of distribution piping shall not be concurrent with the leak survey.

All piping spanning canals or ditches, attached to bridge structures or supported on piles, will be inspected quarterly. Inspectors will note the condition of all supporting members, such as pipe clevises, rollers, supporting rods, piles, etc. Any defective material is to be replaced.

Above ground pipelines shall be identified with operator's name and phone number including area code.

Condition of the coating on the main and supports will be thoroughly inspected and scheduled for recoating when necessary. Where applicable on cathodically protected mains, the condition of the insulating material at pipe supports will be inspected to determine that the main is electrically isolated from its supporting

member. At points where piping exists, bridge abutments or ground lines, particular attention will be given for evidence of external corrosion. All inspection and maintenance information for above ground gas lines will be entered on Form RCES 31.

Gas department personnel will be assigned to protect gas mains and service lines when construction by others will be in the vicinity of existing gas facilities and where such facilities could be subject to abnormal external loading or mechanical damage.

Gas department personnel will be assigned to patrol all locations where experience indicates abnormal physical movement or abnormal loading could cause pipe failure or leakage.

Inspection information for below ground gas lines is to be entered on Form RCES 32. It will be the responsibility of the RCES Gas Department to make the above inspections and complete the appropriate forms.

Gas Department shall take appropriate action concerning changes in class location, failures, leakage, history, corrosion, substantial changes in C.P Requirements, and other unusual operations and maintenance conditions.

6.3.1 Damage Prevention Plan

Anyone planning any underground excavation, digging, boring, pile driving, or planting within Reedy Creek Improvement District must first obtain a Utility Line Locate Ticket from Sunshine One.

As well as all requirements of 49 CFR Subpart L 192.605 (b)(9); take adequate precautions in evacuated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas and make available when needed at the evacuation emergency rescue equipment, including a breathing apparatus and a rescue harness and line.

Those responsible for the excavation should have a copy of the Locate Ticket before a Start to Work Order is given. The list of individuals responsible for excavation within the Reedy Creek Improvement District will be reviewed and updated each year, and they will be reminded of the program's existence. RCID Building and Safety and WDW Contract Administration will also be notified annually so they can notify contractors requesting permits.

Please refer to Natural Gas New Construction Standards, Section 405 for detailed Evacuation and Backfilling Requirements.

The procedures for the Damage Prevention Program are as follows:

- A. In accordance with Florida "Underground Damage Prevention and Safety Act" (Chapter 556, Florida Statutes) as administered by Sunshine One Call of Florida, no entity or individual responsible for any project involving excavating, grading, penetration, or disturbance of the earth's surface, inclusive of jack and boring, pile-driving, directional drilling, trenching and

pipe bursting, within the District shall commence such work within the District until the entity/individual has submitted a Locate Ticket request to Sunshine One-Call and received clearance from the affected utilities. Refer to <http://www.callsunshine.com//>

B. There are two types of utility locate requests:

1. Standard Locate requests

- Used when no portion of the excavation will be underwater
 - Must be submitted between 7:00 AM and 4:00 PM, Monday through Friday, excluding weekends and holidays
 - Request must be submitted a minimum of two (2) full business days before excavation. If the excavation site is in an area that is underwater, the request must be submitted 10 full business days before excavation.
- a. Submit request to Sunshine One Call of Florida, Inc notification system
 - i. Call 811 or enter the request via the internet at <http://www2.callsunshine.com/irthisinternet/welcome/asp>
 - ii. Write down the Sunshine One Call locate ticket number
 - b. Call the Reedy Creek Energy Services (RCES) Utility Locate Office at (407)560-6539.
 - i. Provide the Sunshine One Call locate ticket number
 - ii. Mark up the RCES supplied map to show the limits of excavation
 - c. Review the RCES response and notes for utility presence, conflicts or special conditions.
 - d. Check the Sunshine State One Call Positive Response Code to verify that the excavation site is clear or marked of existing utilities by the respective owners prior to beginning excavation.

2. Emergency Locate requests

- An emergency is defined as any condition constituting a clear and present danger to life or property; a situation caused by the escape of any substance transported by means of an underground facility; any interruption of vital public service or communication caused by any break or defect in a member's underground facility; or any impairment of public roads or utilities that requires immediate repair, as determined by FDOT or another affected political subdivision.
- Requests that are submitted where the required response is after 4:00 PM and before 7:00 AM or on a holiday.
- **Work-scheduling problems are not considered an emergency.**
 - a. Call the RCES Control Room Emergency Number at 407-824-4185. Provide the nature of the emergency and the exact location.

- b. Approved excavators can request emergency tickets using Internet Ticket Entry. Excavators not approved for ITE Emergency Ticket Entry must request emergency tickets by calling 811.

C. During Excavation

- Protect exposed underground facilities
- STOP EXCAVATION if an underground facility is contacted (even if there is no noticeable damage) and contact the facility owner directly.
- Understand tolerance zones. Locate marks show the approximate location of underground facilities. The lines can actually be located anywhere within the tolerance zone. Proceed cautiously when digging within 24 inches on either side of the locate marks. If you're using any mechanized equipment within the tolerance zone, supervision is necessary.

D. Issuance of a utility locate ticket does not relieve the excavator of the responsibility of exercising due caution for unknown or mislocated underground facilities.

1. The Utility Locate Ticket shall not be construed as a building permit.
2. When a utility request an area to be "HAND-DUG" it means HAND DIG ONLY.

E. The Owner reserved the right to stop excavation at any time for the following reasons:

1. The Utility Locate Ticket is not present at the work site within the first working day.
2. The excavation is not in compliance with WDW, RCES or RCID rules and regulations
3. The excavation is endangering personnel, equipment or existing utilities.
4. No restitution will be made for work stoppage for violations of the above-mentioned causes.

F. Work is not authorized prior to the issuance of a permit. Locate tickets will be issued as soon as appropriate clearance is obtained.

G. RCES will notify the following organizations of the planned excavations:

1. As-Built
2. Communications Systems
3. Electrical Systems
4. Gas Systems
5. Mechanical Systems
6. Sewer and Water Systems
7. Smart City Telecommunications

8. Irrigation

H. Location of Underground Facilities

RCES and participating organizations will, in accordance with their location policies, provide information about or locate and stake their facilities at your site.

I. Major Construction Projects

It is the obligation of persons responsible for major construction projects to bring plans to the RCES Engineering and Project Management offices for an engineering review prior to project start.

J. The RCES Gas Department will provide inspection of major excavations adjacent to gas distribution lines as frequently as necessary during and after the activities to verify the integrity of the pipeline.

1. Inspection must include leak survey in case of blasting.

K. Emergency Excavation Requests

Excavation requests in emergency situations will be handled immediately and processed as quickly as possible. Emergencies occurring after normal working hours (8:00am - 5:00pm) on weekends or holidays should be called directly to the RCES Energy Control Center Coordinator at 407/824-4185.

L. RCES will notify requesters when line locate tickets have been completed. Completed locate tickets will be emailed or faxed to the requesters, or may be picked up at the RCES Survey and Mapping Department, located at the EPCOT Central Energy Plant, 751 Backstage Lane, Lake Buena Vista, Florida.

6.4 Establishing Maximum Allowable Operating Pressures

6.4.1 General - Steel and Fiberglass

Existing gas lines are steel or fiberglass. New gas lines installed in the future will consist only of steel pipe.

- A. Maximum operating pressure is that allowed by the weakest element of the main subjected to line pressure.
- B. All piping will be tested to one and a half times the maximum allowable operating pressure in accordance with RCID HPG/MPG Natural Gas New Construction Standards.

- C. In instances where the pipe's strength has been reduced, the maximum safe pressure will be determined by the Gas Department considering the previous actual operating pressure, corrosion records, leak records, etc. In case of doubt, the RCES Mechanical Engineer will be asked for an evaluation.

Overpressure protective devices will be installed on the system in a manner that will prevent the maximum allowable operating pressure from being exceeded.

6.4.2 Maximum Allowable Operating Pressures on High-Pressure Distribution Systems

High-pressure distribution systems will not be operated at a pressure that exceeds the lowest of the following:

- A. The design pressure of the weakest element in the system.
- B. Sixty PSIG for systems equipped with service regulators that conform to all of the following:
 - 1. A regulator capable of reducing line pressure to the pressure recommended for each specific installation and capable of regulating the downstream pressure accurately and of limiting the buildup of pressure under no-flow conditions to 50% or less of the following outlet pressure.
 - 2. A single port regulator with an orifice recommended by the manufacturer of the maximum inlet and having a valve seat material capable of withstanding abrasion from debris in the gas and gas impurities. The valve seat material must resist permanent deformation when pressed against the valve port.
 - 3. A self contained service regulator with no external control line and a body size not exceeding two inches in diameter.
 - 4. Fourteen-inch W.C. on systems with service regulators not conforming to No. 6.4.2 (#2), Unless protected by one of the following:
 - Monitoring regulator
 - Relief valve
 - Automatic shutoff device
- C. (Reference 25-12.26 F.P.S.C. Proposed Rules) Any regulating device used as a service regulator must be used in conjunction with a relief valve or other overpressure protection equipment. Any relieving device must be vented to the outside atmosphere with the relief valve set to open to prevent the pressure of gas going to the customer from exceeding a maximum safe value. A relief valve may either be built into the regulator or it may be a separate unit installed downstream.
- D. Sixty PSIG unless suitable methods are used to regulate and safely limit the pressure delivered to the customer by one of the following methods:

1. The combining of a second-stage service regulator conforming to No. 6.4.2 and a first-stage regulator set to limit the inlet to the second stage to a pressure of 60 PSIG or less. A relief valve or automatic shutoff must be installed between the first-hand second-stage regulators, such that the inlet to the second-stage regulator will not exceed 60 PSIG.
2. The maximum safe pressure determined by the Gas Department after considering the history of the system based upon previous actual operating pressures, corrosion records, leak records, etc.

Overpressure protective devices will be installed on the system in a manner that will prevent the maximum allowable operating pressure from being exceeded.

6.4.3 Maximum and Minimum Allowable Operating Pressures on Low-Pressure Systems

Low-pressure distribution systems will not be operated at a pressure that exceeds the following:

1. A pressure that would render unsafe the operation of any connected and properly adjusted low-pressure gas burning equipment.
2. Two PSIG.

Low-pressure systems will be operated at a pressure equal to, or above, the minimum pressure required for the safe and continuing operation of properly adjusted low-pressure gas burning equipment.

6.5 Increasing Maximum Allowable Operating Pressure on Existing Systems

- A. Review the design of the system type materials used, maintenance records and previous leakage surveys.
- B. Verify specifications of pressure regulation equipment, relief valves and instrumentation to insure the adequacy of the equipment to operate at the new and higher maximum allowable operating pressure.
- C. Prior to pressure evaluation, make a leakage survey, repair leaks found and document on Form RCES 27.
- D. Where required, adequately reinforce or anchor offsets, bends and dead-ends in coupled pipe to avoid movement of a pipe exposed in an excavation.
- E. Repair or replace parts of the system which are inadequate for the higher operating pressures.

- F. Where required, install suitable pressure limiting devices and instrumentation. The location of temporary recording gauges or test gauges will be established.
- G. Physically disconnect all deteriorated inactive systems from the line and abandon in accordance with abandonment procedures, prior to pressure increase.
- H. Consider excavating services and mains to determine the physical condition of the pipe, including such items as the type coating, method of jointing, evidence of external corrosion, methods of service tie-ins and service line locations.
- I. Isolate the system from other systems not to be elevated.
- J. Gradually increase the pressure on the system in steps and leak survey after each increase and repair leaks found; or isolate the standup pressure test.
- K. Each building served will be inspected for an accessible shutoff valve located outside of the structure. A shutoff valve will be installed on any building not having such a valve.
- L. All crews participating in the pressure elevation will be thoroughly instructed in the procedures to be followed prior to and during the pressure elevation.
- M. The RCES Gas Department will be responsible for the supervision and implementation of the written plan.
- N. The proposed written plan for pressure elevation is to be submitted to the F.P.S.C. for approval prior to elevating pressure. If no reply is received from the F.P.S.C. within 15 days, it can be assumed that the plan is acceptable as submitted.

7.0 MAINTENANCE OF PRESSURE REGULATING STATIONS

All pressure limiting and regulating equipment shall be inspected annually. Following this inspection, all necessary maintenance, testing or calculations will be made. A report will be made on Form RCES 33.

Inspectors should note the condition of valves, the presence of leaks, any signs of corrosion on pipe, flanges, nuts, bolts, etc.; the effectiveness of insulating flanges, unions, etc., if used, and that valves to relief equipment are open and measures have been taken to prevent accidental closing.

When necessary, regulating and relief equipment shall be completely overhauled and seats, orifices and diaphragms cleaned or replaced. All valves should be checked for positive closing and oiled, greased or packed as required. Condition of paint, fences and other station equipment should be noted and necessary repair work done or scheduled. All equipment shall be checked to assure that it has been properly installed and protected from dirt, liquids or other conditions which may cause a malfunction. Points to be checked are drip legs, filters, scrubbers and other protective devices to ascertain that they are clean and capable of performing their design functions.

Pressure regulating and limiting stations will be reviewed from the standpoint of capacity, reliability and that they are set to function at the correct pressures.

Points to be considered are the number of customers served, area served, and pressures required.

Where practical, relief valves shall be tested in place to determine that they have sufficient capacity to limit pressure to the desired maximum pressure. If such tests are not feasible, calculations shall be made to determine that the capacity of the relief valve is sufficient to protect the system to which it is connected. If any relief valve is found to have insufficient capacity, one of proper size shall be installed.

Inspections shall be made of each vault housing pressure regulating equipment or relief equipment having a volumetric internal content of 200 cubic feet or more. The testing shall include the testing of the atmosphere in the vault for a combustible mixture and to determine that the vault is in good physical condition and adequately ventilated. All vents are to be checked to determine that they are free of obstructions.

Vaults shall be kept locked to prohibit unauthorized entrance.

Each distribution system supplied by more than one regulator station will have permanently installed instrumentation to monitor, and/or record system pressure.

The RCES Gas Department will determine whether or not pressure monitoring/recording instrumentation will be installed on systems supplied by one regulating station, taking into consideration the number of customers supplied, the operating pressures, the capacity of the installation, and other operating conditions.

Data from pressure recording instruments, on each system, will be checked for abnormality high or low pressures and erratic regulation. If a problem is observed, action will be taken immediately to locate and correct the problem. A follow up check will be made to see that the system continues to operate properly.

Each newly installed meter manufactured after November 12, 1970, must have been tested to a minimum of 10 PSIG.

A program will be established to insure that gas meters are checked for accuracy every ten years.

It will be the responsibility of the RCES Gas Department to see that necessary inspections, maintenance, test or calculations for each meter are completed and entered on Form RCES 34.

Weather-proof decals shall be applied to all meter and regulator installations identifying the installation as natural gas and giving a telephone number to call in case of emergency.

At multi-meter/regulator installations, designated valves for isolating each building/or part of a building shall be plainly marked by tagging or other permanent means. However, if marking each meter/regulator assembly will readily identify its isolation valve, each assembly may be marked in lieu of valves.

Natural gas facilities such as gate, district regulator stations, or below ground vaults shall have permanently installed signage indicating a Natural Gas Facility and emergency telephone number. Warning signs may also be posted as deemed necessary by the RCES Gas Dept./RCES Gas Engineer, and in accordance with section 8.8 of the manual.

8.0 OPERATING PROCEDURES

8.1 Abandonment of Mains, Services and Vaults

These procedures apply to service lines, mains, control lines, vaults and appurtenances, including mains and service lines.

1. Facilities abandoned in place shall be physically disconnected from the pipe system, filled with water or inert material and the open ends permanently sealed. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.
2. The abandoned facility must be purged in accordance with Section 8.8 of this manual, if necessary, to prevent the development of a potentially hazardous condition.
3. Service lines connected to an abandoned main shall be permanently sealed at the customer end of the service.
Vaults abandoned in place shall be filled with a suitable compacted material.

8.2 Termination of Gas Service

When a customer's service is terminated, the gas supply shall be turned off at his meter installation. The valve shall be locked in the "closed" position to prevent the flow of gas.

If there is no prospect for reuse the service shall be retired and physically abandoned within three months. Where there is a prospect for reuse, after two years one of the following actions shall be taken within six months.

1. Disconnect the service line from all sources of gas and abandon or remove.
2. Valve on the service shall be locked in the closed position and the service line plugged to prevent the flow of gas.
3. Remove the meter and plug service line.

After five years of inactivity, service lines shall be retired and physically abandoned within six months.

The RCES Gas Department shall maintain records of location, size, and material of all abandon pipeline facilities, including service line stub outs. Records shall be readily available to all gas personnel. Upon discovery of any unsafe condition on a customer's premises, such as faulty equipment, damaged piping, inoperative valves, etc., gas service will be disconnected immediately. Service will not be restored until satisfactory repairs have been made. Gas Department personnel will test repaired system in accordance with Section 8.3 of this document.

8.3 Temporary Disconnection of a Service

Upon temporary disconnection of a service, a tamper-proof locking device shall be used to prevent opening of the valve by unauthorized persons.

8.4 Vault Maintenance

Vaults having a volumetric internal content of 200 cubic feet or more will be inspected once every twelve (12) months and a record kept on Form RCES 35.

All equipment contained in the vault is to be inspected for leaks and atmospheric corrosion. Also, check to see that no weight shall be bearing on any of the piping or equipment.

Physical condition of the vault shall be closely inspected. Vault covers are to be checked to see that they do not constitute a public hazard, such as tripping, falling into, partial closing, etc. Vents shall be checked to see that there are no obstructions and that they are ventilating properly.

All vault-venting equipment is to be checked for proper operation.

All of the above is to be checked and repairs made immediately.

8.5 Reactivating Abandoned or Temporarily Disconnected Services

Abandoned service lines shall be tested in the same manner as new service lines before being reactivated. Service lines temporarily disconnected because of main renewals or other planned work shall be tested from the point of disconnection to the service cock at the meter location in the same manner as new service lines, in a safe manner.

If a new bypass is installed to keep a service line active, the portion maintained in continuous service need not be tested.

The service line will be brought up to the proper test pressure and then disconnected from pressure source.

All joints and other potential sources of leakage shall be checked. No service line shall be activated until a satisfactory test has been conducted. Repairs or replacement must be accomplished and re-tested prior to rendering gas service. Information is to be entered on Form RCES 36

No abandoned underground gas facility shall be reactivated until cathodic testing is completed or assurance the system can be cathodically protected. The length of time the system has been abandoned and past corrosion monitoring records should be considered. If found to be unprotected, excavation will be required at various locations to check the integrity of pipe and coating.

8.6 Procedures for Analyzing Incidents and Failures

In any accident involving the Gas Distribution System, the Gas Department Utility Service Manager or his representative, will initiate a thorough investigation and report covering:

1. Location of incident, date and time.
2. Cause of incident.
3. Statements taken from persons involved in the incident, if any.
4. Recommendation of steps for prevention of a similar occurrence.

The Gas Utility Service Manager, will review the report and ensure appropriate action was taken. The report is filed with the Gas Department and a copy forwarded to the RCES Director, and Chief Mechanical Engineer. All information shall be filed on RCES Form 37, per 49 CFR Part 191 and 49 CFR 192.616, if need be reporting should be made to FPSC and National Response Center by telephone at 800-424-8802.

8.6.1 System Component Failure Investigation

1. Remove and replace defective component.
2. Retain sample or samples of defective material or failed equipment for test and for laboratory examination, if necessary, and investigation.
3. Make follow up check of the system to determine possibilities of recurrence and take steps to prevent any recurrence.

8.7 Odorization

All gas supplied to customers shall possess a distinctive and readily detectable odor.

A suitable odorizing agent (Mercaptan) will be added so that all gas distributed will possess a readily detectable and recognizable odor in all gas concentrations of one-fifth the lower explosive limit and above.

Rate of odorization at Gate Stations will be checked every 30 days and entered on Form RCES 39.

Flow rate of the odorizing agent and manufacturer's specifications will be maintained on file in the gas department office.

Odorization check points at various locations in the system will be selected and sampled at least 12 times per calendar year, at intervals not exceeding 45 days. An instrument manufactured specifically for odorant testing will be utilized. RCES Form

40, or other appropriate forms, will be completed to record the results for each location tested.

The following should be considered before establishing test points or assigning inspectors to take odorant tests:

1. The test point should be free from extraneous odors or drafts.
2. The test point should not be on gauge lines or bypasses which contain stagnant gas.
3. It is desirable that connections made to the test point are of a material that will not retain odor from previous tests.
4. The test point should be sufficiently far away from the source of odorization to insure a representative test.
5. The inspector should have average odor perception and not have a cold, allergies or any other physical condition which would affect his sense of smell.
6. Sufficient time should be permitted between test points to insure that the inspector's sense of smell is not deadened by previous tests.

8.8 Prevention of Accidental Ignition

Instruction will be periodically given to appropriate employees as to sources of ignition, theory of combustion, explosive limits, tools, etc.

Generally, smoking, open flames or other sources of ignition will be prohibited in or around regulator vaults, gate stations, large volume metering installations or where volumes of gas may be vented to the atmosphere, or where combustible mixtures may be present.

Readily visible warning signs shall be posted around any area where an accidental ignition could occur.

Only after suitable precautions have been taken to determine that combustible mixtures are not present, will routine maintenance or construction work progress, i.e., welding in regulator vaults, leak repairs, etc. Gas or electric welding or cutting may not be performed on piping containing a mixture of gas and air.

Fire extinguishers will be located at all construction and maintenance work in such a manner that they will be easily accessible in the event they are needed. The size and type of extinguisher will be in accordance with NFPA No. 10 - STANDARD FOR PORTABLE FIRE EXTINGUISHERS.

Crews will be instructed in the proper operation and use of fire extinguishers.

It will be the responsibility of RCES Gas Department to post appropriate warning signs at locations where a hazard of fire or explosion may be present due to leakage or the presence of combustible mixtures.

RCID Fire Department and Fire Prevention will be notified of any and all leaks, repairs and any other pertinent situations that could possibly be or create a fire hazard in respect to the Gas System and component segments.

8.9 Hot Taps

All hot taps on distribution piping will be made by experienced crews which have been specifically trained and qualified in the procedures to be employed during such operations.

This requirement will apply to all new hot tap connections which establish a point of supply, and to hot tap fittings installed for the purpose of pressure control.

The Gas Department maintains a manufacturers operating instruction manual for each type of department hot tapping and line stopper equipment.

It will be the responsibility of the RCES Gas Department Service Utility Manager to insure this procedure is implemented and to provide training for hot tap crews.

8.9.1 Hot Tap Procedure for Steel Pipe

The pipe area will be cleaned and checked for corrosion or damage that may weaken the pipe.

An appropriate tapping connection approved by the RCES Principal Mechanical Engineer will be used.

Gas Department personnel trained in tapping procedures and use of tapping equipment will use appropriate tapping valve, flanges, or threaded adapter required for tapping machine used.

The Gas Department maintains several adapters for various size taps and compatible adapters for several approved valves.

Piping will be cleaned thoroughly and checked for corrosion or weak areas and tapping connection clamped or welded in place. Welding will be in compliance with RCID HPG/MPG Natural Gas New Construction Standards.

Tapping connections will be pressured tested before hot tapping, to ensure the integrity of the fittings and welds.

During the tapping operation care will be taken to insure against any spark from equipment being used. Procedures will be followed as specified in section 8.8 of the this manual

No electric equipment will be used to power-drive tapping machines. Only air-operated equipment will be used.

After completion of the tapping operation, the new connection may be tie-in into the new system. If the new system is not ready to receive gas, the connection will

remain separated. Under all conditions, a final soap bubble check for leakage will be conducted.

All re-covered tapping coupons will be visually inspected for internal corrosion. Defects will be reported immediately to the RCES Mechanical Engineer. Condition of the coupon will be recorded on RCES Form 44, or other appropriate documentation as specified in section 10.4 of this manual.

A record of each main tie-in shall be kept for the life of the system, when any one pipeline is greater than two inches in diameter. RCES Form 44 will be used for documentation.

Hot taps are not permitted on fiberglass pipe.

8.10 Purging

When distribution piping is being purged of air by the use of gas, the gas must be released into one end of the line in a moderately rapid and continuous flow. This operation will continue until the piping being purged is free of air.

If distribution piping is being purged of gas by the use of air, the air must be released into one end of the line in a moderately rapid and continuous flow. If air cannot be supplied in sufficient quantity to prevent the formation of an explosive mixture, a slug of inert gas must be released into the line before the air.

A CGI instrument shall be used to determine that no explosive mixture remains in the purged lines.

When gas is being vented into the open air, each potential source of ignition must be removed from the area as outlined in Section 8.8 of this manual and all applicable requirements of Section 8.8 will be implemented.

The RCES Energy Control Center shall be notified when venting gas into the atmosphere. The Reedy Creek Fire Department shall be notified as deemed necessary.

It will be the responsibility of the RCES Gas Department to see that proper purging practices are followed or to detail specific purging practices not covered by this Section.

9.0 REPAIRS

9.1 Repair of Coated and Wrapped Steel Pipe

Emergency repair will consist of emergency repair clamp to be used for immediate repair with scheduled permanent repair to follow as soon as practical. Excavation will be in a manner to provide safe working area per OSHA standards.

A plug of steel or wood can be used also for immediate measures only on low-pressure system. An immediate emergency situation with proper evaluation of same will dictate use of any means available to temporarily stop the flow of gas. This will be done only by personnel acquainted with gas operation and segments of the system. All personnel involved will consider all safety measures.

Specifications for all items of material and equipment used on Gas Department systems shall be kept on file in the Gas Department office.

Where underground piping is concerned with repair, excavation will be done consistent with OSHA standards. Care will be taken in locating the pipe and protecting the coating and pipe while excavating.

Probing measures and check of prints and elevations, and location of other utilities adjacent to or in the area of excavation, will be taken in order to protect all underground utilities from unnecessary damage.

After locating damaged area of piping, an investigation as to the extent of damage and necessary repairs will be evaluated. Coating will be cut away and pipe thoroughly cleaned at least six inches away from the area to be repaired.

Any corrosion that reduces the wall thickness to less than that required for the m.a.o.p. or a reduction of 30% of the original wall thickness resulting from such action as corrosion, pitting, or abrasion shall justify replacement of a pipe segment. Wall thickness shall be measured with a suitable instrument such as a micrometer or pit gauge.

The extent of damage and condition of pipe shall determine replacement. Permanent repairs shall be in accordance with section 9.1.1 of the manual.

9.1.1 Replacing a Section or Segment of Pipe

Coating will be removed at least 12" from the area to be welded, and the segment cut from the system. Edges to be welded will be cut or ground to 30 to 35 degrees. The replacement segment will be properly aligned and proper spacing will be maintained between butt ends that are to be welded. Welding will be completed in accordance with the RCID HPG/MPG New Natural Gas Construction Standards.

Upon completion of all repairs, whether temporary or permanent, and after pressurization, a soap bubble check of the repaired area will follow. Completed repaired area will be cleaned and coated with 15 mils of mastic primer and wrapped with 40 mils wrapping tape. Taping will be overlapped at least one third of the width of the tape being used. Joining of other coating will be three inches overlapped.

Where a large section of three feet or more is replaced, a jeep check of insulation will be made and coating repaired as necessary.

9.1.2 Backfill

Backfill will be consistent with the RCID HPG/MPG New Natural Gas Construction Standards. Material used for backfill will be free from foreign objects that could cause damage to insulation.

Fill will be compacted for support both under and around the piping. All repairs concerning coated and wrapped pipe, both underground or above ground, will be consistent with the RCID HPG/MPG New Natural Gas Construction Standards.

9.2 Repair of Fiberglass Pipe

RCID HPG/MPG New Natural Gas Construction Standards prohibit new installations of fiberglass or polyethylene pipe. A small portion of MPG Fiberglass piping remains in service in the Magic Kingdom Hotel Loop MPG System. No portion of the RCID Natural Gas Distribution System contains polyethylene piping.

In addition to repair and maintenance of the RCID MPG Gas System, the RCES Gas Department will repair customer owned fiberglass piping, at their request. The owner may also obtain qualified outside services to perform repairs if they desire.

RCES Gas Department has accepted Smith Fiberglass Products Company joining methods and repair procedures of fiberglass piping. Only, Smith Fiberglass Products will be used for repairs. RCES maintains a necessary inventory of Smith Fiberglass Products to facilitate emergency repairs on RCID MPG and customer owned fiberglass piping systems. As a minimum the inventory will include various diameter's of pipe, fittings, and adhesives kits for bonding.

RCES Gas Department Personnel will review joining and repair methods of fiberglass piping yearly. In addition, personnel will be required to demonstrate their ability by making a sample joint, qualifying them to perform repairs. Test samples shall be retained for a period of one year. Permanent documentation of the testing shall be filed in the gas dept. office.

A conventional repair clamp is acceptable as a temporary repair; on fiberglass pipe, on a buried line, a permanent repair will be made before line is covered.

Only trained and experience personnel shall be allowed to perform repairs on fiberglass piping systems.

10.0 CATHODIC PROTECTION OPERATION AND MAINTENANCE

10.1 General

All natural gas buried/underground steel piping shall be monitored for external corrosion. Monitoring shall be primarily by electrical survey. See Section 10.8 for adequate protection criteria. Where electrical survey is not possible, then leak history records shall be studied for determining any active corrosion. Cathodic protection can be obtained by the use of galvanic (sacrificial) anodes, impressed current type systems, or both.

After the installation of a cathodic protection system, routine readings will be conducted to ensure that the distribution system is up to potential and that suitable measures are taken to eliminate shorts, deteriorated anodes or other sources of low potential. This information shall be recorded on RCES Form 41.

Design and installation of cathodic protection system(s) will be carried out by, or under the direction of RCES Mechanical Engineering Department.

Personnel trained through N.A.C.E., or other credited training courses, and practical experience in the field are qualified to perform this work.

All work in this section to be in compliance with 49 CFR Part 192 Subpart I, included by reference.

10.2 Lightning Protection

Lightning protection shall be applied as indicated by engineering.

10.3 Pipelines Installed

All new gas piping will have an external cathodic protection coating applied before being placed in the ground. All new gas piping will be cathodically protected when placed in service. No bare steel pipe shall be buried underground.

Test stations shall be installed at all underground insulating joints and sacrificial anode installation points in accordance with RCID HPG/MPG New Natural Gas Construction Standards Section 1000.

All steel gas piping installed in the RCID Natural Gas System (underground) will be coated and wrapped, meeting the requirements set forth in RCID HPG/MPG New Natural Gas Construction Standards.

All pipelines under C.P. shall have sufficient test stations or other contact points for electrical measurement.

10.4 Gas Pipe Examination

All buried gas piping exposed for any reason will be examined for evidence of corrosion.

Pipe coating will be inspected for defects, bonding, deterioration, blister, and stresses from other sources adjacent to the piping.

Piping will be inspected for external corrosion

Remedial action will be taken immediately upon discovery of any corrosion or deficiency of coating.

When external corrosion is discovered on a exposed pipeline, a voltage (pipe to soil) potential test will immediately be conducted. The minimum acceptable voltage reading on the pipeline will be as specified in section 10.8 of this manual. The type of soil and soil condition will be checked. When adjacent piping is in the immediate area of excavation it will also be checked, as to the possible cause of the corrosion.

Whenever pipe is removed from the system, the internal wall surface will be visually inspected for corrosion. When evidence of internal corrosion is found, the piping in each direction will also be inspected, to determine the extent of the corrosion problem.

When evidence external or internal corrosion is found, the RCES Mechanical Engineer will be notified to determine if further examination and/or excavation is deemed necessary.

All piping and coating repairs will be consistent with the RCID HPG/MPG New Construction Standards and contents of this manual, as they apply.

Information regarding the excavation, findings, and repairs will be recorded on RCES Form 32.

10.5 Protective Coating Requirements

Reference: RCID HPG/MPG New Natural Gas Construction Standards Sections 1500 through 2100.

10.6 Monitoring

Gas lines subjected to stray currents external to gas line shall be tested at pre-determined test points every 90 days. All test point readings will be monitored for a period not less than 15 minutes and recorded. All operating insulation fittings shall be tested every 60 days.

Gas lines that are not affected by stray currents are to be tested not less than 12-month intervals.

On impressed current systems, rectifiers are to be inspected every 60 days. The rectifier will be checked for proper voltage and amperage outputs. A instant current "off " pipe to soil potential reading will be taken over the pipeline in the immediate vicinity of the rectifier. Remote pipe to soil potential and shunt readings will be taken at designated test points throughout the system, controlled by the rectifier. Minimum acceptable readings will be as specified in Section 10.8 of this manual.

Reference readings will be recorded on Form RCES 42, or other appropriate forms for documentation.

Reverse current switches, diodes, and interference bonds, including steel casing isolation, will be electrically tested to ensure proper performance at intervals not to exceed 60 days.

Tests shall be performed annually to insure that the cathodic protection system is not adversely affecting adjacent underground structures.

Action shall be taken to correct any differences found by monitoring within 90 days or make substantial progress to correct.

Appropriate forms and records are to be filled out completely and maintained by the RCES Gas Department.

Placement of Reference Half Cell in the immediate vicinity of Galvanic Anodes shall not be acceptable for Electrical Measurement used to determine the adequacy of Cathodic Protection.

10.7 Interference Current

In monitoring the system, if an interference current problem is encountered, the RCES Mechanical Engineer is to be notified for corrective action. A record of maintenance on all action taken is to be kept.

10.8 Criteria

Purpose involved in protection of a coated and wrapped buried steel line:

A negative (cathodic) voltage of at least -0.85 volt is to be achieved. This reading is in reference to a saturated copper- copper sulfate half cell.

Determination of a minimum -0.85 voltage will be with protective current applied.

This current will be applied either by use of sacrificial anodes or rectifier (impressed current).

All readings are to be entered on appropriate form and maintained in the RCES Gas Department files.

A negative (cathodic) polarization potential of -1.2 volts as read within the first two (2) seconds after removal of all current sources shall not be exceeded to insure coating integrity.

10.9 Electrical Isolation Provided

Reference: RCID HPG/MPG New Natural Gas Construction Standard 1004

10.10 Atmospheric Corrosion Control

Above-ground pipe lines must be cleaned and either coated or jacketed in accordance with Section 1500 of the RCID HPG/MPG New Natural Gas Construction Standards.

All above-ground piping is to be closely checked 3 years and documented using RCES Form 31.

Appropriate action will be immediately taken on any above-ground piping requiring attention in respect to corrosion. The following preservation plan shall be followed to aid minimize atmospheric corrosion:

-A paint deficiency list will be maintained and updated utilizing the inspection comments noted from the following forms:

- Above Piping Inspection Record RCUC 31
- Cathodic Protection Record RCUC 43
- Odorization Field Sampling Report RCUC 40
- Service Reports indicating follow-up preservation is needed.

-Prioritization for correcting the deficiency will be based on the following criteria:

- Critical nature of the equipment (i.e. impact caused by poor preservation)
- Magnitude of deficiency (i.e. paint chipped on an aluminum regulator body vs deep rust on a carbon steel flange)
- Other work being planned for the same location (i.e. project/planned improvements that would include the deficiency)

-Temporary remediation of a deficiency will take the form of wire brushing the affected area and applying a spray on coat of primer that is compatible with the finished 2-part epoxy coating. This will serve to protect the area until permanent preservation is affected.

10.11 Piping Replacement Due to Corrosion

Any segment of pipe line, upon examination by the RCES Mechanical Engineer, found to contain localized corrosion pitting where leakage may result, will be cut from the system and replaced in accordance with Section 9.1.1 of this manual. A visual inspection by the RCES Mechanical Engineer will be made to determine extent of damage and need of replacement.

Maps or records shall show location of:

1. Cathodically protected piping.

2. All cathodic protection facilities (i.e. anodes, rectifiers, ground beds, test stations, isolation/bond points).
3. Any neighboring structures bonded to the cathodic protection system.

Records shall be maintained for the life of the appropriate segment. Records of each test, survey or inspection required by Subpart I, CFR Part 192, shall have sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist.

10.12 Corrosion Control Records

Maps and records concerning all aspects, whether new construction or maintenance, replacement of a section, extension, etc., will be maintained by the RCES Gas Department for the life of the system.

11.0 EMERGENCY PROCEDURES

General

11.1.1 Scope

The scope of this procedure is to outline the reporting, organization and procedures to be followed during any emergency involving the Reedy Creek Energy Services Gas Department, in compliance with 49 CFR 192.615.

Normally, emergencies are first reported to Gas Department or the RCES Energy Control Center Coordinator (407/824-4185). The (ECC) Coordinator will immediately notify the Natural Gas Department Service Utility Manager or dispatch Gas Department personnel who are on duty or on-call twenty-four hours a day.

Notice need not be given if gas ignited only, if it occurred solely as a result of, or in conjunction with, planned or routine maintenance or construction.

The Gas Department Service Manager will review all cast member activities to determine whether the procedures were effectively followed in each emergency.

The office of RCES Gas Department will make available all pertinent information for possible news release to RCES Director, who will in turn forward the information to WALT DISNEY WORLD Public Relations Department for review before being released to the news media.

A Gas Department employee arriving at the scene of an emergency should do whatever he can, with respect to personal safety, to provide for the safety of the public. If gas is escaping, he should not attempt to control the gas at the point of discharge without help, unless the following conditions are met:

1. The gas is blowing freely into the atmosphere and the work can be performed safely and without breathing oxygen-deficient air.
2. The escape of gas can be safely controlled by a method such as closing a valve, installing a repair clamp, or the use of no-blow stopping equipment.

If both of these conditions are not met, a restricted zone should be established around the area of escaping gas.

1. Sources of ignition should be removed or contained
2. All persons within this zone should be removed
3. Gas meters to all buildings in the restricted area should be shut off
4. All buildings in the immediate area should be checked for a concentration of gas and the possibility of multiple leaks and underground migration of gas into buildings.

5. Request additional manpower assistance, through the RCES Energy Control Center Coordinator.
6. Reduce system pressure, depending on the location of the emergency

In emergency situations, a number of factors, such as public safety, employee safety, potential property damage, inconvenience to customers, public relations, cost, and availability of material and equipment should be considered in determining appropriate action.

Gas Department personnel are equipped with radios which may be used for the notification of proper authorities such as: Fire Department, Safety and Management. Additionally, the RCES Energy Control Center Coordinator shall notify all interested parties of the correct status of the emergency.

As soon as reasonably possible, after taking charge of the Company's work, the gas department representative in charge should make themselves known to any security and/or Fire Department representatives, or other appropriate individuals. The representative should relay how the gas department plans to control the emergency incident and discuss any assistance needed or action which might be taken to protect the public.

In the absence of Management, the first employee should act as the Company representative for the contacts outlined in the previous paragraph.

All Gas Department personnel shall be prepared to remain on duty for the duration of the emergency.

All Gas Department operating and maintenance personnel shall remain acquainted with the portion of the emergency, that applies to them.

The following telephones may be used during the emergency:
SEE APPENDIX IN BACK:

Radio communications will be:
RCES, Gas Department
RCID, Fire Department
RCES, Energy Control Center

11.1.2 Educational Program

A Pipeline Public Awareness Program will be maintained to enable customers and the general public to recognize and report gas emergencies.

11.1.3 Updating Procedure

This information shall be reviewed annually and revised as necessary.

11.2 Reporting Emergencies

11.2.1 How to Report

All gas emergencies shall be reported immediately to the RCES Energy Control Center at 824-4185.

Other areas which also may be notified are:
See Organizational Chart in back of Manual

Give as complete information as possible regarding the emergency, including the following:

1. Type of emergency
2. Location
3. Injuries
4. Fire
5. Possible hazards
6. Name and telephone number of someone who can be contacted.

11.2.2 Receiving Report

The person receiving the emergency shall obtain as much information as possible concerning the emergency to include:

1. Time of emergency
2. Type of emergency
3. Location
4. Injuries
5. Fire
6. Possible hazards
7. Name and telephone number where reporting party can be contacted for additional information

11.2.3 Dispatching Report

The person receiving the emergency report shall immediately contact Gas Department field personnel by radio and/or phone to pass on the necessary information. Gas Department personnel upon arrival shall evaluate the situation and report back to the RCES Energy Control Center and Gas Department Service Utility Manager.

11.3 Reporting to others:

11.3.1 Company Officials

See Organizational Chart in back of Manual

11.3.2 Public Officials

See Organizational Chart in back of Manual

11.3.3 News Media

All news reports will be made available by the RCES Director through the WALT DISNEY WORLD Public Relations Department.

11.3.4 State of Florida

FLORIDA PUBLIC SERVICE COMMISSION

Commission Rule 25-12.084 Gas Accidents and Outages. Telephonic reporting is required in any incident related to the gas system which:

1. Caused death
2. Caused personal injury requiring hospitalization
3. Caused \$10,000 or more damage to property, or others, or both.
4. Accidental igniting of gas
5. Caused service interruption:
 - a) To 10% or more of the meters
 - b) To 500 or more meters
6. Was significant but does not meet requirements of above

See back of manual – Memorandum PGs 83 and 84, Commission telephone notification numbers

11.3.5 Federal, U.S. D.O.T., PHMSA

Code of Federal Regulations Part 49 191.5. Telephonic reporting is required of any incident related to the gas system which:

- A. Death, or personal injury requiring hospitalization or
- B. Estimated property damage excluding cost of gas lost of \$50,000 or more

- C. Was significant but does not meet requirements of above
- D. Unintentional estimated gas loss of three million cubic feet or more

At the earliest practicable moment following a reportable incident, notice shall be provided by telephone 1-800-424-8802 (Washington, DC, 267-2675).

Code of Federal Regulations Part 49 191.9 Distribution System: Incident Report

As soon as practicable but no more than 30 days after a reportable incident a written report must be submitted to the D.O.T., PHMSA

When additional relevant information is obtained after the initial report is submitted, then supplementary reports shall be submitted as deemed necessary with clear reference by date and subject to the original report

See back of manual: D.O.T. Incident report form, PHMSA F 7100.1 (03-04)

11.4 Emergency Shutoff

11.4.1 Cutoff

11.5 Emergency Supplies and Equipment

The Gas Department is completely equipped as follows for emergency:

11.5.1 Vehicles

Vehicles are equipped with all tools, equipment, maps of distribution system and valve location field books.

11.5.2 Additional Equipment

Portable welder, Oxy/Acetylene welding torches, Portable compressor, Portable generator, Safety equipment, Chain/Cut off saws, and Line stopping equipment (up to 8").

11.6 Organization

1. Chain of Command - See Appendix in Back
2. List of Personnel - See Appendix in Back

11.7 Outside Assistance

The following departments can be used as backup in an emergency:

Dept. 318 - Drainage - Equipped with heavy excavation equipment and laborers

Dept. 324 - Material Control Warehouse (Tool Crib) - Major inventory of tools & supplies.

Dept. 321, 323-331 - RCES - Pipefitters

Reedy Creek Fire Dept.

WDW Security Dept. - Area and Traffic control

Qualified Contractors - With Drug Testing Part 199

Florida Natural Gas Municipal Association Mutual Aid Agreement

11.8 Hurricane Plan

The Gas Department Hurricane Plan is designed with emphasis on protecting personal life and property, and preservation of the Natural Gas System. The plan calls for the interruption of natural gas service in areas where the Gas Department determines a potential exists for immediate danger to life and property.

The hurricane plan will be updated each year and submitted to the Utility Company Director for approval.

A current plan will remain on file in the Gas Department Service Utility Managers office. A copy of the plan will also be staged and maintained in a loose-leaf binder in the gas shop and on each field vehicle. Gas Department personnel shall be adept to the plan as it applies to them.

11.9 Additional Backups

The Gas Department has its own warehouse for material and is backed up by the RCES Material Control Warehouse and RCES Purchasing.

11.10 Sectionalizing Valves

The valve box lids for the valves listed below will be painted yellow and red and numbered accordingly.

Sub District I

A. NSA Service Area

Z-14 - Facilities Way and Cast Drive.

B. Theme Park

- F-1 - Upstream North East Meter
- M-7 - Upstream South East Meter
- M-5 - South of M.K Southeast Meter Service to Jungle Cruise Compressor

C. Hotel Loop

- J-1 - World Drive at Fort Wilderness Main
- P-2 - Floridian Way & Bear Island Road Mainline

D. Sub District II (LBV)

- E2 - Buena Vista Drive @ Saratoga Springs Resort
- E-14 - Buena Vista Drive North Feed to EPCOT
- K-1 - Buena Vista Drive South Feed to EPCOT

E. EPCOT (Area)

- MPG 43 - North side of ECEP Building
- MPG 66 - East of Germany Station
- MPG 67 - East of ECEP Districk Station

F. STUDIO

- M-1 - East (Downstream) of Master Meter

G. LBV/EPCOT Interconnect

- K-14 - Buena Vista Drive @ Typhoon Lagoon
- E-22 - Buena Vista Drive East of Bonnet Creek
- E-23 - Buena Vista Drive West of 536 Interchange

H. WESTERN DEVELOPMENT

- M-2 - Buena Vista Drive @ World Drive (to Coronado Springs)
- M-6 - World Drive @ Buena Vista Drive (to Western Development)
- M-11 - Osceola Parkway East of Buena Vista Drive
- M-16 - Buena Vista Drive @ Osceola Parkway (to All Star Resorts)
- SE-9 - Osceola Gate Station

I. ANIMAL KINGDOM PARK

- M-2 - Osceola Parkway @ Animal Kingdom Master Meter

12.0 INITIATION OF A NEW GAS SERVICE

Prior to initiating gas into a new distribution system, the Gas Dept. will insure the system is ready to receive gas (Standard 100 4.3 RCID Natural Gas Construction Std.). Gas Dept. personnel will be familiar with the system being placed in service.

A walk through of the system will be completed with a project management representative, their contractor, and RCES Field Engineer. Major hard-scaping and excavation in excess of twenty-four inches should be completed adjacent to the underground gas system that is being placed in service. The RCES Gas Engineer will make the final decision if a safety issue exists.

RCID Bldg. and Safety, enforce code compliance under the provisions of the EPCOT Gas Code. The Gas Dept. coordinates with this group during construction and initiation of gas to customer facilities. Installation of the utility company gas meter and regulator assembly will be coordinated with the owner/or his representative. However, final approval in connecting to customer downstream house-piping will not be made until the RCID Bldg. and Safety Inspector gives the authority to do so (typically after accepting a pressure test of customer piping).

Prior to turn-on and initiating gas inside a building, Gas Dept. personnel will complete a walk through of the facility. Preferably the walk through should include the owner/or his representative, and RCID Bldg. and Safety Inspector. Building house-piping and equipment installations will be inspected for code compliance. Upon final approval from RCID Bldg. and Safety, the Gas Dept. may initiate gas into a building. The house-piping will be purged of air and a manometer pressure test performed for a minimum of five minutes. The pressure test will be from the outside meter/regulator assembly, and include all downstream house-piping and equipment. On large systems, the pressure testing may be performed in stages. If a pressure test fails, the gas leakage will be identified, isolated, and red tagged. Once the leakage is repaired, the pressure test will be repeated.

Extreme care will be used when initiating gas to only a section of a building. Typically, this would be on the larger gas systems where house-piping and equipment are spread widely throughout a structure. Under these conditions, the Gas Dept. and the RCID Bldg. and Safety Inspector will work closely with project management and their contractors. At a minimum building sectionalizing valves will be red tagged and locked. RCID Bldg. and Safety and/or the Gas Dept. may also require a in-line pancake (isolation device) installed.

Lock out/Tag out (LOTO) devices will remain in place until the system and equipment are ready to be placed in service. The owner or a authorized factory equipment representative will complete start-up of equipment. Gas equipment will be lit and checked for proper operation. The Gas Dept. will be present to insure gas delivery pressure to the equipment is correct, inspect for gas leakage, and address any other safety concerns.

Supply gas will only be left in service to a building after approval from RCID Bldg. & Safety and Reedy Creek Emergency Services (RCFD)

A record of all new gas services will be maintained in the RCES Gas Department files.

12.1 Customer Notification, Maintaining "Buried Piping"

The RCID Finance Customer Service Department will maintain written notification records to all customers, informing them of the need to inspect and maintain their "buried" piping, downstream of the utility company interface point.

Written notification to new customers will not exceed 90 days from the date of initiation of gas service.

Records will be maintained to show evidence that notices were sent to customers within the previous three years.

13.0 UNAUTHORIZED USE OF GAS FACILITIES

All Gas Department personnel shall continually be on the alert for any unauthorized use of RCID's facilities or equipment. Particular attention will be given to all gas company systems while conducting leak survey, patrolling, and maintenance. Any violations will be called immediately to the attention of Management.

If an unauthorized service is discovered, it will be disconnected at once. An investigation will be conducted to determine who made the installation, how long it has existed, and what effect it has had on the system. Before service can be restored, proper steps and procedures covered by this manual, must be complied with. RCES Gas Department personnel shall have the sole responsibility for determining when the violating system is properly installed and safe for return of gas service.

If unauthorized use or operation of gas department facilities or equipment is discovered, it shall be reported to Management immediately. Steps will be taken to stop all such action at once. An investigation will be conducted to determine the effect on the gas system. Particular attention will be given to any violation which may be a safety hazard to the customer or general public. Appropriate action shall be taken by Management to insure that such violations do not re-occur.

14.0 UTILIZATION OF INSPECTION AND MAINTENANCE INFORMATION

The inspection and maintenance information required by this manual shall be reviewed, to the extent necessary, to insure that all gas mains, systems, equipment and facilities falling under the provisions of this manual are being safely operated, repaired or replaced in a manner consistent with the intent and specific provisions of this manual.

It will be the responsibility of the RCES Gas Department to review the inspection and maintenance information accumulated in conformance with this manual and insure compliance.

15.0 DRUG AND ALCOHOL TESTING POLICY AND PROCEDURES

15.1 Policy Statement

Reedy Creek Energy Services must endeavor to provide safe and efficient operations for the protection and benefit of the general public, its customers and its employees. As part of its effort to achieve that goal, it must require that its work be performed by employees who do not use illegal drugs or misuse controlled substances and/or alcohol.

Reedy Creek Energy Services recognizes that employees have a right to privacy and that any adverse action taken against any employee for off-duty conduct shall take into account the employee's right to privacy and the impact of the employee's conduct on his job performance, the Company's reputation, or the public's perception of the Company's contract performance.

It is the policy of Reedy Creek Energy Services that the use, sale, purchase, transfer, possession, or presence in one's system of any controlled substance (except medically prescribed drugs) by any employee while on the company premises, engaged in company business, operating company equipment, or while under the authority of Reedy Creek Energy Services is strictly prohibited. Appropriate disciplinary action will be taken as necessary.

The purpose of this policy is to establish procedures for the administration of the Department of Transportation and Pipeline Hazardous Material Safety Administration (DOT/PHMSA anti-drug program pursuant to the Pipeline Safety Regulations, Code of Federal Regulations, Title 49 (49 CFR), Part 199. Part 199 requires operators of gas systems to have an anti-drug program for persons involved in operating, maintaining, or emergency-response functions of these facilities covered by DOT pipeline safety standards in 49 CFR Part 192, 193 or 195.

This policy applies to all existing covered positions at Reedy Creek Energy Services effective immediately as well as all future applicants, transferees, and employees of RCES.

Any job applicant applying for a position covered in this policy that refuses or fails a pre-employment drug test will not be hired. Applicant must show proof of completing a DOT approved rehabilitation program and follow-up program which will be reviewed by our MRO before they can apply for employment. Any employee covered by this policy who refuses or fails a drug test will immediately be removed from a safety sensitive position, and or from the operating, maintenance, or emergency-response functions covered by the DOT pipeline safety standards in 49 CFR Part 192, 193, or 195. Any employee covered by this policy that refuses or fails a drug test may receive disciplinary action, up to and including termination.

Failure of the Company to comply with and/or enforce any portion of this policy does not limit, restrict or restrain Company's right to enforce the terms, conditions, and disciplinary measures herein prescribed.

It is the company's responsibility to provide testing for the employee that is in compliance with all federal and state laws and regulations, and within the provisions of this guideline. The company will retain all records related to testing and the testing process in a secure and confidential matter.

Walt Disney World Co. DOT Compliance Department is designated to monitor, facilitate, and answer questions pertaining to these procedures, the contact is as follows:

- * Walt Disney World Co.
- * D.O.T. Compliance Department
- * Maingate Office Complex
- * 407-390-5080

The employee is responsible for complying with the requirements set forth in this guideline. The employee will not use, have possession of, abuse, or have the presence of alcohol or any controlled substance in excess of regulation established threshold levels while on duty. The employee will not use alcohol within 4 hours of performing a 'safety-sensitive' function, while performing a 'safety-sensitive' function, or immediately after performing a 'safety-sensitive' function. All supervisors must make every effort to be aware of an employee's condition at all times the employee is in service of the company. The supervisor must be able to make reasonable suspicion observations to determine if the employee is impaired in some way, and be prepared to implement the requirements of this guideline if necessary.

Drug Prohibitions:

1. No employees shall report for duty or remain on duty requiring the performance of safety-sensitive functions when the employee uses any controlled substance, except when the use is pursuant to the instructions of a physician who has advised the employee that the substance does not adversely affect the employee's ability to safely operate a commercial motor vehicle or be in a safety sensitive function. In this case, the physician's written instructions must be included in the employee's medical record with the Company.
2. No employee may report for duty or stay on safety-sensitive duty if they have tested positive for a controlled substance.
3. Employers who know about either of the above acts cannot permit the employee to perform a safety-sensitive function.

15.2 Employee Categories:

- A. **Testing Program** - The employee job classifications subject to drug testing as outlined in this policy are set forth in Attachment A.
- B. **DOT Substance Abuse/Alcohol Misuse Training**
The management positions listed on 15.16 attachment B shall receive DOT Substance Abuse/Alcohol Misuse training for detecting symptoms.

15.3 Types of Drug and Alcohol Testing

Employees subject to this drug/alcohol testing program are required to be tested under the following five types of tests.

A. Pre-employment Testing

1. A pre-employment drug test will be conducted when an individual is offered employment in a job classification covered by this policy.
2. A pre-employment drug test will be conducted when a current employee transfers from a job classification not covered by this policy. An employee, who previously is separated from

Part 199 anti-drug program job classification, will be pre-employment tested prior to performing a function covered by the above referenced regulations.

3. Only applicants who are offered employment in a job classification covered by this policy will be tested prior to employment. Pre-employment job applicants who test positive will not be hired and do not have the right to have their split sample tested. Employees transferring (transferees) into a job classification covered by this policy whom test positive have the right to have their split sample tested. Transferees who fail a drug test will not be hired for any position requiring drug testing and will be subject to mandatory referral to the Company's EAP for evaluation. All drug test results (positive and negative) will be reported to the Medical Review Officer (MRO). If the transferee/ applicant's drug test is positive then the Company will refer to the MRO review and interpretation (see Section 4 - Medical Review Officer).
4. An employee who transfers from one job classification covered by this policy to another job classification covered by this policy does not require pre- employment testing.

B. Random Testing

1. Reedy Creek Energy Services will conduct random testing for all employees as follows: The random testing will be spread reasonably throughout the calendar year. All random alcohol and drug tests will be unannounced, with each employee having an equal chance of being tested each time selections are made. An employee may only be tested for alcohol while he/she is performing a safety-sensitive function, just before performing a safety-sensitive function, or just after completing a safety-sensitive function. Once notified that he/she has been randomly selected for testing, the employee must proceed immediately to the assigned collection site.
2. All employees working in a job classification covered by this policy are subject to drug testing without prior notification. Temporary employees performing work in a job classification covered by this policy will be included in all testing processes.
3. RCES will test at least fifty percent (50%) or other appropriate percentage as specified by the U.S. D.O.T., PHMSA, of covered employees every twelve (12) months. All employees will be subject to random selection for drug testing on each random testing date. It is possible that an employee may be randomly selected more than once or not selected at all during the annual period.
4. To assure that the selection process is random; all employees covered by this policy will be placed in a common pool. Covered employees will be in this pool.
5. The random selection procedure will be a statistically valid, computer-generated randomization of all covered employees. A sufficient number of individuals will be selected each time so as to assure that random testing is maintained at the required rate.
6. Random testing will be conducted on a monthly basis.

C. Post-accident Testing

1. Employees working in job classifications covered by this policy whose performance either contributed to an accident or cannot be completely discounted, as a contributing factor to the accident will be tested for drugs and alcohol.

3. An "accident" on a gas pipeline or LNG facility is defined as an "incident" in 49 CFR, Section 191.3.
4. An "accident" on a hazardous liquid pipeline is defined as an "accident" in 49 CFR, Section 195.50.
5. All reasonable steps will be taken to obtain a urine and alcohol sample from an employee after an accident. In case of a conscious but hospitalized employee, the hospital or medical facility will be requested to obtain a sample; and, if necessary, reference will be made to the DOT drug testing requirements. If an employee is unconscious or otherwise unable to evidence consent to the procedure, hospital or medical facility will be requested to obtain a sample.
7. If an employee who is subject to post-accident testing is conscious, able to urinate normally and able to provide adequate breath samples and refuses to be tested, that employee will be removed from duty as an employee covered by this policy.
8. The employee will be tested for drugs and alcohol as soon as possible following the accident. The employee must remain readily available for testing. If the employee isn't readily available for alcohol and drug testing, he/she may be deemed as refusing to submit to testing. An employee involved in an accident may not consume alcohol for 8 hours or until testing is completed.
9. If the alcohol test is not administered within 2 hours following the accident, management will prepare a report and maintain a record stating why the test was not administered within two hours. If the alcohol test is not administered within 8 hours following the accident, all attempts to administer the test will cease. A report and record of why the test was not administered will be prepared and maintained. The drug test must be administered within 32 hours of the accident. If the test could not be administered within 32 hours, all attempts to test the employee will cease. Management will prepare and maintain a record stating the reasons why the test was not administered within the allotted time frame.

D. Reasonable Cause Testing

1. If the employee's supervisor and/or another company official designated to supervise employees believes an employee is under the influence of alcohol or drugs, the employee will be required to undergo a drug and/or alcohol test. The basis for this decision will be specific, contemporaneous, particularly observations concerning the appearance, behavior, speech, or body odors of the employee. The employee's supervisor or another company official will immediately remove the employee from any and all safety-sensitive functions and take the employee or make arrangements for the employee to be taken to a testing facility. The person who makes the determination that reasonable suspicion exists to conduct an alcohol test may not administer the alcohol test.
2. Reasonable suspicion alcohol testing is only authorized if the observations are made during, just preceding, or after the employee is performing a safety sensitive function. If the employee tests 0.02 or greater, but less than 0.04, for alcohol the employee will be removed from all safety-sensitive functions for 24 hours.
3. If an alcohol test is not administered within two hours following a reasonable suspicion determination, the program administrator will prepare and maintain a record stating the reasons why the test was not administered within 2 hours. If the test was not administered

within 8 hours after a reasonable suspicion determination, all attempts to administer the test shall cease. A record of why the test was not administered must be prepared and maintained. A written record of the observations leading to an alcohol or controlled substance reasonable suspicion test, signed by the supervisor or company official who made the observation, will be completed within 24 hours of the observed behavior or before the results of the alcohol or controlled substances test are released, whichever is first. An employee awaiting the results of a reasonable suspicion drug test will be placed on suspension pending the test results.

4. An employee will not be tested under Reasonable Suspicion testing above unless his actions and/or conduct or other related circumstances provide an objective reasonable basis to believe that the employee may have ingested drugs or alcohol and/or is suffering from impairment that will in some way adversely affect his alertness, coordination, reaction, response, safety, or the safety of others, while on duty or on Company property. Such observation will be confirmed by another member of management wherever possible and will be documented. Employees will not be subject to such testing without the express written consent of a senior member of management different from the observation manager, and prior notification to Labor Relations.
5. Any employee who tests negative to any drug test (other than random tests as a follow-up to rehabilitation) shall be compensated for all lost time, at the appropriate wage rate. Time lost under such circumstances shall be treated as time worked for purposes of overtime premium eligibility.

E. Return to Duty Testing

1. After failing an alcohol test, an employee must undergo a return-to-duty test prior to performing a safety-sensitive function. The test result must indicate a breath alcohol concentration of less than 0.02. After testing positive for a controlled substance, an employee must undergo a return-to-duty test prior to performing a safety-sensitive function. The test must indicate a verified negative result for drug use.
2. An employee, who returns to work at the recommendation of the Medical Review Officer (MRO) and following negative "return to duty" testing, will be given random follow-up drug and alcohol tests without prior notification as scheduled by the MRO. These tests are in addition to the other types of tests stated in this policy.
3. All Return-to Duty drug testing will be performed under direct observation. Direct observation procedures require the observer to check for devices used to tamper with the collection process when an employee is subject to an observed collection. The Guidelines state that employees having observed collections must be instructed to raise clothing, just above the navel; lower clothing, to mid-thigh; then turn around to show the same gender observers they do not have prosthetic devices for beating the tests. If no device is detected, the employee is permitted to return clothing to its proper observed-collection position. Then the observed collection will take place. Failure to comply with the collection procedures will result in a refusal to test which equals a positive test.

F. Follow-Up Testing

1. The time period for the follow-up program will be up to and not to exceed maximum sixty (60) months. The actual period of time will be determined by the Substance Abuse Professional (SAP)
2. All Follow-Up drug testing will be performed under direct observation. Direct observation procedures require the observer to check for devices used to tamper with the collection process when an employee is subject to an observed collection. The Guidelines state that employees having observed collections must be instructed to raise clothing, just above the navel; lower clothing, to mid-thigh; then turn around to show the same gender observers they do not have prosthetic devices for beating the tests. If no device is detected, the employee is permitted to return clothing to its proper observed-collection position. Then the observed collection will take place. Failure to comply with the collection procedures will result in a refusal to test which equals a positive test.

G. Refusal to Submit

An employee may not refuse to submit to a post-accident, random, reasonable suspicion, or follow-up alcohol or controlled substances test required by the regulations. An employee who refuses to submit to such tests may not perform or continue to perform safety-sensitive functions and must be evaluated by a substance abuse professional as if the employee tested positive for drugs or failed an alcohol test. Refusal to submit includes failing to provide adequate breath or urine sample for alcohol or drug testing and any conduct that obstructs the testing process. This includes adulteration or substitution of a urine sample.

H. Dilute Specimens

If the MRO informs the company that a positive drug test was dilute, Walt Disney World Co will simply treat the test as a verified positive test. The company will not direct the employee to take another test based on the fact that the specimen was dilute. If the MRO directs the company to conduct a recollection under direct observation (i.e., because the creatinine concentration of the specimen was equal to or greater than 2mg/dL, but less than or equal to 5 mg/dL, Reedy Creek Energy Services will do so *immediately*.

- the employee is given the minimum possible advance notice that he or she must go to the collection site;
- the result of the retest taken under §40.197(b), and not a prior test, is accepted as the test result of record;
- if the result of the retest taken under §40.197(b) is also negative and dilute, Reedy Creek Energy Services will not make the employee take an additional test because the result was dilute.

Provided, however, that if the MRO directs;

- Reedy Creek Energy Services to conduct a recollection under direct observation under §40.197(b) (1), the company must immediately do so.
- If the employee declines to take a test as directed in accordance with §40.197(b), the employee has refused the test for purposes of this part and DOT agency regulations.
- if the creatinine concentration of the dilute specimen is greater than 5 mg/dL, Reedy Creek Energy Services will direct the employee to take another test immediately under company policy in accordance with §40.197.

15.4 Testing Procedures

- A. Drug testing will be performed utilizing urine samples. Alcohol testing will be performed using breath samples.
- B. Drug testing will be for marijuana, cocaine, opiates, amphetamines and phencyclidine (PCP).
- C. An Pre-Employment applicant who is offered employment in a job classification covered by this policy will be required to report to the drug testing collection site specified in Section 6 of this policy within 24 hours of notification and provide a specimen of his/her urine.
- D. An employee will report to the drug collection site upon notification that a drug test is required and provide a specimen of his/her urine. If an alcohol test is required employee will be subject to a breath test. The testing will occur on paid time and will be scheduled by the DOT Compliance office.
- E. The collection agency shall adhere to all requirements outlined in 49 CFR 40, Procedures for Transportation Workplace Drug Testing Program.

15.5 Medical Review Officer (MRO)

- A. The MRO for this policy is listed in Attachment C. The Company may designate other MRO's from time to time.
- B. The following is a listing of the MRO's specific responsibilities:
 - 1. Receive positive, confirmed results from laboratory.
 - 2. Request, if needed, a quantitative description of test results.
 - 3. Receive a certified copy of the original chain of custody.
 - 4. Review and interpret positive test results.
 - 5. Inform the tested individual and provide test results.
 - 6. Conduct a medical interview with the tested individual.
 - 7. Review the individual's medical history or any other relevant biomedical factors.
 - 8. Give the individual an opportunity to discuss test results.
 - 9. Order the split sample to be tested by a certified laboratory, if necessary.
 - 10. Consult with others if question of accuracy arises, consistent with Part 9 - Confidentiality.

11. Consult with laboratory officials.
12. Receive only urinalysis results that comply with the Mandatory Guidelines.
13. Declare an opiate-positive urine only with "clinical evidence."
14. Determine whether a result is scientifically sufficient.
15. Determine whether an employee who did not pass a drug and/or alcohol test administered under DOT procedures may be returned to duty.
16. Determine whether a result is consistent with legal drug use.
17. Forward results of verified positive test to WDW CO. Labor Relations and DOT Compliance.
18. Maintain the required records to administer this program.

15.6 Retention of Samples and Retesting

- A. Samples that yield positive results on confirmation must be retained by the laboratory in properly secured, long-term frozen storage for at least one (1) year. Within this one (1) year period, the employee or his representative, the Administrator, or the State Agency may request that the laboratory retain the sample for an additional period. If, within the one (1) year-period, the laboratory has not received a proper written request to retain the sample for a further reasonable period specified in the request, the sample may be discarded following the end of the one (1) year period.
- B. If the Medical Review Officer (MRO) determines there is no legitimate medical explanation for a confirmed positive test result other than the unauthorized use of a prohibited drug, the split sample must be tested if the employee makes a written request for the retesting within 72 hours of receipt of the final test result from the MRO. The employee may specify retesting by the original laboratory or by a second laboratory that is NIDA certified. The Company will require the employee to pay in advance the cost of the split sample testing but the employee will be reimbursed for such expense if the retest is negative.

15.7 Testing Laboratory

- A. The testing laboratory for this policy is listed in Attachment C. The Medical Review Officer (MRO) may designate other testing laboratories from time to time
- B. The testing laboratory will comply with all methods and procedures of 49 CFR Part 40 and will provide annual reports to the Company documenting compliance.

15.8 Collection Agency

- A. The collection agent for this policy is listed in Attachment C. The Company may designate other collection agencies from time to time
- B. The collection agency will comply with all methods and procedures of 49 CFR Part 40 and will provide annual reports to the Company documenting compliance.
- C. The Federal Drug Testing Collection Procedure Part 40 is as shown in Attachment D.

15.9 Employee Assistance Program (EAP)

- A. Education - The following drug-use education will be provided for employees covered by this policy:
 - 1. Drug information will be periodically distributed and posted in the work areas.
 - 2. A copy of this policy will be given to each employee and posted in the work area.
 - 3. The hot-line telephone number for employee assistance will be given to each employee and posted in the work area.
- B. Training - All supervision covered by this policy (see Attachment B) shall receive the following drug and alcohol misuse training. A training period of no less than two (2) hours will be conducted on the specific, contemporaneous physical, behavioral, and performance indicators of probable drug and alcohol use.

15.10 Record keeping

- A. Records will be maintained in the WDW Co. DOT Compliance Office under the control of the DOT Compliance Team. The Company will keep the following records for the periods specified:
 - 1. Collection process records that conform to Part 199 will be kept for a minimum of 3 years.
 - 2. Records of employee drug test results that show the employee failed a drug test, the type of test failed, and records that demonstrate rehabilitation, if any, will be kept for a minimum of five (5) years and will include the following information.
 - a. The job requirement performed by each employee who fails the drug test;
 - b. The prohibited drugs which were used by each employee who fails the drug test;
 - c. The disposition of each employee who fails the drug test (e.g., termination, rehabilitation, etc.); and,
 - 3. Records regarding negative drug test will be kept for a minimum of one (1) year.

4. Employee records categorized by the number of employees tested and the type of test utilized will be kept for a minimum period of five (5) years.
10. Records documenting that supervisors and employees have been trained will be kept for a minimum of three (3) years.

15.11 Confidentiality

- A. Each individual's record of testing and results under this policy will be maintained on a private and confidential basis. With the exception of the testing laboratory, MRO, Company-designated employee representative, DOT Compliance team and, if so requested, Pipeline Hazardous Material Safety Administration (PHMSA) or State Agency Officials as part of an accident investigation, the results of individual drug tests will not be released to anyone without the express written authorization of the individual tested.
- B. All written records will be stored in a secure location with access available only by the individuals listed above in 15.11 A.
- C. Unless an employee gives his or her written consent, the employee's drug testing and/or rehabilitation records will not be released to a subsequent employer.

15.12 Treatment Rehabilitation Mandatory Referral

If any employee tests positive, the employee may be placed on leave according to Company policies and may be required to seek a confidential assessment through the Company's Employee Assistance Program. The employee must follow the recommendations of the Employee Assistance Program. The SAP will report to the WDW Co. Labor Relations Representative weekly whether the employee is complying with his/her recommended counseling and/or treatment program.

15.13 Prescribed Medical Treatment

Employees undergoing prescribed medical treatment with a drug or controlled substance, which may alter their physical or mental ability, must provide a physician's statement, which details the prescribed medication, dosage, and duration of use to Health Services. Job assignments may be changed at the Company's discretion while the employee is undergoing treatment.

15.14 Consequences for Violation of This Policy

Disciplinary action will be taken for non-compliance with any and all conditions of this policy, up to and including termination. For example

- A. Continued substandard job performance.
- B. Failure to submit to a physical examination and/or drug or alcohol test.
- C. Once enrolled, failure to successfully complete the rehabilitation program.
- D. Testing positive after completion of a rehabilitation program.
- E. Any violation as outlined in Section 2, PROHIBITIONS, of the Walt Disney World Substance Abuse Policy.

15.15 Attachment A Employees

GME-RCES Coordinators
GME-RCES Gas Utilities Admin
GME-RCES Drainage (DT)
GME-RCES Gas (DT)
GME-RCES Low Voltage (DT)
GME-RCES Mech Sys & Busn Coord
GME-RCES Mechanical Engineering
GME-RCES MK Computer & Instrument (DT)
GME-RCES Power Distribution
GME-RCES Project Mgmt Electrical
GME-RCES SS Mechanical (DT)
GME-RCES Surveys 1 (DT)

15.16 Attachment B Management Training

Director
Field Engineer
Field Engineer-Senior
Manager Energy Plants
Manager Electrical Operations
Manager Planning and Engineering
Manager Water and Waste Resources
Mechanical Engineer – Chief
Mechanical Engineer – Senior
Program Manager
Project Manager
Regulatory Compliance Salaried

Service Manager Drainage and Roadway Maintenance
Service Manager Power Distribution
Service Manager-Support Maintenance
Service Manager Water/Waste Water
Service Manager-ECEP Operations
Service Manager-Gas Utilities
Service Manager-Low Voltage
Service Manager-Maintenance Planning
Service Manager-Power Systems

15.17 Attachment C MRO, Testing, and Collection Agency

Medical Review Officer

Dr. Thomas Thames, M.D.
Florida Hospital-Centra Care
12500 South Apopka Vineland Road
Orlando, FL 32836
(407) 934-2273

Testing Laboratory

Quest Diagnostics
1777 Montreal Circle
Tucker, GA 30084
1-866-697-8378

Collection Agency

Florida Hospital
Centra Care
12500 South Apopka Vineland Road
Orlando, Florida 32836
(407) 934-2273

After Hours Testing

12pm – 8am – On-Site Medical Services, Inc.
813 East Michigan Avenue
Orlando, FL 32806
(407) 893-7055

Designated Employee Representative

John Gould
D.O.T. Compliance Manager
Walt Disney World Co.
PO Box 10000
Lake Buena Vista, FL 32830
407-390-5031

Orlando Behavioral Healthcare (SAP)
260 Lookout Place, Suite 202
Maitland, FL 32751
407-647-1781

Definitions

When implementing and interpreting the drug and alcohol guidelines and procedures required by the Department of Transportation (DOT/ RSPA anti-drug program pursuant to the Pipeline Safety Regulations, Code of Federal Regulations, Title 49 (49 CFR), Part 199., the following definitions apply:

Actual knowledge means actual knowledge by an employer that a employee has used alcohol or controlled substances based on the employer's direct observation of the employee, information provided by the employee's previous employer(s), a traffic citation for driving a CMV while under the influence of alcohol or a controlled substance, or a employee's admission of alcohol or controlled substance use under the provisions of Sec. 382.121. Direct observation as used in this definition means observation of alcohol or controlled substance use and does not include observation of employee behavior or physical characteristics sufficient to warrant reasonable suspicion testing under Sec. 382.307

Alcohol means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols including methyl and isopropyl alcohol.

Alcohol concentration (or content) means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath as indicated by an evidential breath test.

Alcohol screening device (ASD). A breath or saliva device, other than an evidential breath-testing device (EBT) that is approved by the National Highway Traffic Safety Administration (NHTSA) and placed on a conforming products list (CPL) for such devices.

Alcohol use means the consumption of any beverage, liquid mixture, or preparation, including any medication, containing alcohol.

Blind Sample or Blind Performance Test Specimen

A urine specimen submitted to a laboratory for quality control testing purposes, with fictitious identifier, so that the laboratory cannot distinguish it from employee specimens, and which is spiked with known quantities of specific drugs or which is blank, containing no drugs.

Breath Alcohol Technician (or BAT). An individual who instructs and assists individuals in the alcohol testing process, and operates an evidential breath tests device (EBT).

Chain of Custody

The Custody and Control Form which tracks the specimen. This document is initiated at the time the collection is scheduled and continued throughout the complete testing process until final disposition of the specimen. Because multiple copies are required, this form must be completed on a hard clean surface for writing.

CFR means Code of Federal Regulations.

Collection site. A place designated by the company, where individuals present themselves for the purpose of providing a urine specimen for a drug test.

Confirmation (or confirmatory) drug test means a second analytical procedure performed on a urine specimen to identify and quantify the presence of a specific drug or drug metabolite.

Confirmation (or confirmatory) validity test means a second test performed on a urine specimen to further support a validity test result.

Confirmed drug test means a confirmation test result received by an MRO from a laboratory.

Consortium/Third-party administrator (C/TPA) is a service agent that provides or coordinates the provision of a variety of drug and alcohol testing services for the company. C/TPAs typically perform administrative tasks concerning the operation of the company's drug and alcohol testing programs. This term includes, but is not limited to, groups of employers who join together to administer, as a single entity, the DOT drug and alcohol testing programs of its members. C/TPAs are not "employers."

Controlled substances mean those substances identified in 49 CFR, Section 40.85.

In accordance with drug testing rules, urinalyses will be conducted to detect the presence of the following substances:

- * Marijuana
- * Cocaine
- * Opiates
- * Amphetamines
- * Phencyclidine (PCP).

Collector The individual conducting the collection and shipping. This individual shall be a licensed medical professional, technician or a person successfully completing collection training, who is proficient in collection procedures. This individual must be the same gender as the donor in situations where the collector must accompany the donor into the restroom or when the collection must be observed.

Collection Kit This kit contains the material needed for the collection of urine. These materials should be secured in clean individually wrapped packages.

COLLECTION KITS CONTENTS:

- **Collection Cup** The cup into which the donor urinates. There should be a temperature strip attached to the side of the cup.
- **Urine Transport Bottle** The urine will be poured from the Collection Cup into two of these bottles, being a clean, single use, secured specimen bottle. The second bottle is to be discarded unless the split sample method is performed.

Collection Site The facility where the urine specimen will be collected. This facility shall have the appropriate personnel, supervisor and equipment to conduct collections according to

Detection levels requiring a determination of a positive result shall be in accordance with the guidelines adopted by the FMCSA in accordance with the requirements established in 49 CFR, Section 40.87.

The standard drug test thresholds for positive screen and GC/MS confirmation tests shall be as follows:

<u>Drug</u>	<u>Emit Screen Cut-Off</u>	<u>Confirmation Cut-Off</u>
Amphetamines	1000ng/ml	500mg/ml
Cocaine	300ng/ml	150ng/ml
Marijuana	50ng/ml	15ng/ml
Opiates	2000ng/ml	
Phencyclidine	25ng/ml	25ng/ml

Designated employer representative (DER) is an individual identified by the employer as able to receive communications and test results from service agents and who is authorized to take immediate actions to remove employees from safety-sensitive duties and to make required decisions in the testing and evaluation processes. The individual must be an employee of the company. Service agents cannot serve as DER's.

DOT regulations and these procedures The facility will use proper collection kits to accomplish this procedure.

Donor The individual being tested.

DOT Department of Transportation, governmental agency that mandates drug testing. Also refers to type of collection and testing procedures to be used.

Drug means any substance (other than alcohol) that is a controlled substance as defined in this policy and 49 CFR Part 40.

Employee This includes, but is not limited to: full time, regularly employed employees; casual, intermittent or occasional employees; leased employees and independent, owner-operator contractors who are either directly employed by or under lease to an employer.

Employer or Employer Representative The person responsible for authorizing the drug screen of the donor.

Evidential breath testing device (EBT). A device approved by the National Highway Traffic Safety Administration (NHTSA) for the evidential testing of breath at the 0.02 and 0.04 alcohol concentrations, placed on NHTSA's Conforming Products List (CPL) for "Evidential Breath Measurement Devices" and identified on the CPL as conforming with the model specifications available from NHTSA's Traffic Safety Program.

Licensed Medical Practitioner means a person who is licensed, certified, and/or registered, in accordance with applicable federal, state, local, or foreign laws and regulations, to prescribe controlled substances and other drugs.

Medical Review Officer (MRO). A person who is a licensed physician (Doctor of Medicine or Osteopathy) and who is responsible for receiving and reviewing laboratory results generated by the company's drug testing program and evaluating medical explanations for certain drug test results.

Performing (a safety-sensitive function) means a employee is considered to be performing a safety-sensitive function during any period in which he or she is actually performing, ready to perform, or immediately available to perform any safety-sensitive functions.

Prescription Medications means the use (by an employee) of legally prescribed medications issued by a licensed health care professional familiar with the employee's work related responsibilities

Medical Review Officer The MRO is a physician with knowledge of drug abuse and the effects of a donor's medical history on drug screen results. The government requires an MRO to review all test results on DOT donors. The MRO is required to contact all donors whose specimens test positive.

Refuse to submit (to an alcohol or controlled substances test) means that an employee:

- fails to appear for any test (except pre-employment) within a reasonable time, as determined by the company, consistent with applicable DOT regulations, after being directed to do so by the company. This includes the failure of a employee (including an owner-operator) to appear for a test when called by a C/TPA
- fails to remain at the testing site until the testing is complete (except pre-employment if the employee leaves before the testing process begins)
- fails to provide a urine specimen for any DOT required drug test (except pre-employment if the employee leaves before the testing process begins);
- in the case of a directly observed or monitored collection in a drug test, fails to permit the observation or monitoring of the employee's provision of the specimen;
- fails to provide a sufficient amount of urine when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure;
- fails or declines to take a second test the employer or collector has directed the employee to take;
- fails to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER (In the case of a pre-employment drug test, the employee is deemed to have refused to test on this basis only if the pre-employment test is conducted following a contingent offer of employment);
- fails to cooperate with any part of the testing process; or
- is reported by the MRO as having a verified adulterated or substituted test result.

Safety-sensitive function means all time from the time an employee begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work.

Screening test technician (STT). A person who instructs and assists employees in the alcohol testing process and operates an alcohol screening device (ASD).

Shipping Material A cardboard box or leak proof bag used by collection site personnel for transporting the urine specimen(s) to the laboratory.

Substance abuse professional (SAP). A person who evaluates employees who have violated a DOT drug and alcohol regulation and makes recommendations concerning education, treatment, follow-up testing, and aftercare. A SAP must be:

- a licensed physician (Doctor of Medicine or Osteopathy);
- a licensed or certified social worker;
- a licensed or certified psychologist;
- a licensed or certified employee assistance professional; or
- a drug and alcohol counselor certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission (NAADAC) or by the International Certification Reciprocity Consortium/Alcohol and Other Drug Abuse (ICRC), or by the National Board for Certified Counselors, Inc and Affiliates/Master Addictions Counselor (NBCC)..

Alcohol Prohibitions Part 382, Subpart B, prohibits any alcohol misuse that could affect performance of safety-sensitive functions.

This alcohol prohibition includes:

- use while performing safety-sensitive functions;
- use during the 4 hours before performing safety-sensitive functions;
- reporting for duty or remaining on duty to perform safety-sensitive functions with an alcohol concentration of 0.04 or greater;
- use of alcohol for up to 8 hours following an accident or until the employee undergoes a post-accident test; or
- refusal to take a required test.

NOTE: Per FMCSA regulation (Sec. 382.505), an employee found to have an alcohol concentration of 0.02 or greater but less than 0.04 shall not perform, nor be permitted to perform, safety-sensitive functions for 24 hours.

Drug Prohibitions Part 382, Subpart B, prohibits any drug use that could affect the performance of safety-sensitive functions.

This drug prohibition includes:

- use of any drug, except when administered to a employee by, or under the instructions of, a licensed medical practitioner, who has advised the employee that the substance will not affect the employee's ability to safely operate a commercial motor vehicle. Under federal law, the use of marijuana or any Schedule I drug does not have a legitimate medical use in the United States.);
- testing positive for drugs; or
- refusing to take a required test.

All employees will inform WDW Health Services of any therapeutic drug use prior to performing a safety-sensitive function. He/she may be required to present written evidence from a health care professional which describes the effects such medications may have on the employee's ability to perform his/her tasks.

Condition for Employment — Refusal

An applicant who has refused a drug or alcohol test, failed a random, reasonable suspicion, post accident, return to duty, follow up alcohol test, or tested positive for controlled substances will be considered for employment if the following conditions are met: He/she must have completed a return to duty and follow-up program as prescribed by an authorized Substance Abuse Professional. Applicant will have to submit program outline and all information pertaining to follow-up testing to the MRO that oversees the WDW Co. drug and alcohol testing program for final review.

Condition for Employment — Positive Test

An applicant who has tested positive for drugs during a pre-employment test will be considered for employment if the following conditions are met: he/she must have completed a return to duty and follow-up program as prescribed by an authorized Substance Abuse Professional. Applicant will have to submit program outline and all information pertaining to follow-up testing to the MRO that oversees the WDW Co. drug and alcohol testing program for final review.

DOT COLLECTION PROCEDURE

Overview

At all times, donors will be treated with respect, insuring the modesty and privacy, as much as practicable, of the donor. Collection site personnel will avoid conduct or remarks that might be construed as accusatorial or otherwise offensive or inappropriate.

Drug Testing Procedures

Drug testing will be conducted at a company designated location. Specimen collection will be conducted in accordance with 49 CFR Part 40 and any applicable state law. The collection procedures have been designed to ensure the security and integrity of the specimen provided by each employee. The procedures will strictly follow federal chain of custody guidelines. A drug testing custody and control form (CCF) will be used to document the chain of custody from the time the specimen is collected at the testing facility until it is tested at the laboratory. A collection kit meeting the requirements of Part 40, Appendix A must be used for the drug test. The collection of specimen must be conducted in a suitable location and must contain all necessary personnel, materials, equipment, facilities, and supervision to provide for collection, security, and temporary storage and transportation of the specimen to a certified laboratory.

When the employee arrives at the collection site, the collection site employee will ask for identification. The employee may ask the collection site person for identification. The employee will be asked to remove all unnecessary outer garments (coat, jacket) and secure all personal belongings. The employee may keep his/her wallet. The employees will then wash and dry his/her hands. After washing hands, the employee must remain in the presence of the collection site person and may not have access to fountains, faucets, soap dispensers, or other materials that could adulterate the specimen.

The collection site person will select, or allow the employee to select, an individually wrapped or sealed container from the collection kit materials. Either the collection site person or the employee, with both individuals present, must unwrap or break the seal of the collection container. The seal on the specimen bottle may not be broken at this time. Only the collection container may be taken into the room used for urination.

The employee is then instructed to provide his/her specimen in a room that allows for privacy. The specimen must consist of at least 45 ml of urine. Within 4 minutes after obtaining the specimen, the collection site person will measure its temperature. The acceptable temperature range is 90 to 100 degrees Fahrenheit. If the specimen temperature is outside the acceptable range, the collector must note this on the CCF and must immediately conduct a new collection using direct observation procedures outlined in Sec. 40.67. Both specimens must be sent to the lab for testing. The collector must notify both the DER and collection site supervisor that the collection took place under direct observation and the reason for doing so.

The collection site person will also inspect the specimen for color and look for signs of contamination or tampering. If there are signs of contamination or tampering, the collector must immediately conduct a new collection using direct observation procedures outlined in Sec. 40.67. Both specimens must be sent to the lab for testing. The collector must notify both the DER and collection site supervisor that the collection took place under direct observation and the reason for doing so.

The 45mL sample provided must be split into a primary specimen of 30 ml and a second specimen (used as the split) of 15 ml. The collection site person must place and secure the lids on the bottles, place tamper-evident bottle seals over the lids and down the sides of the bottles, and write the date on the tamper-evident seals. The employee then initials the tamper-evident bottle seals to certify that the bottles contain specimens he/she provided. All of this must be done in front of the employee. All identifying information must be entered on the CCF by the collection site person. The CCF must be signed by the collection site person, certifying collection was accomplished in accordance with the instructions provided. The employee must also sign this form indicating the specimen was his/hers.

The collector is responsible for placing and securing the specimen bottles and a copy of the CCF into an appropriate pouch or plastic bag. At this point, the employee may leave the collection site. The collection site must forward the specimens to the lab as quickly as possible, within 24 hours or during the next business day.

Initial tests and re-analysis requested by the Company will be paid by the Company; costs of re-analysis for reconciliation will be split between the employee and the Company. In the event the initial test is proven to be a false positive the employee shall be reimbursed for cost of test procedures paid for by the employee..

If an employee refuses to be tested or refuses to sign the testing form, the technician will immediately notify the MRO and the DER.

Alcohol Testing Procedures

Alcohol testing will be conducted at a company designated location by a qualified breath alcohol technician (BAT) or screening test technician (STT), according to 49 CFR Part 40 procedures. Only products on the conforming products list (approved by the National Highway Traffic Safety Administration (NHTSA)) and Part 40 requirements will be utilized for testing under this policy. The testing will be performed in a private setting. Only authorized personnel will have access, and are the only individuals who can see or hear the test results. When the employee arrives at the testing site, the BAT or STT will ask for identification. The employee may ask the BAT or STT for identification. The BAT or STT will then explain the testing procedure to the employee. The BAT or STT may only supervise one test at a time, and may not leave the testing site while the test is in progress. A screening test is performed first. When a breath testing device is used, the mouthpiece of the breath testing device must be sealed before use, and opened in the employee's presence. Then the mouthpiece is inserted into the breath testing device.

The employee must blow forcefully into the mouthpiece of the testing device for at least 6 seconds or until an adequate amount of breath has been obtained. Once the test is completed, the BAT must show the

employee the results. The results may be printed on a form generated by the breath testing device or may be displayed on the breath testing device. If the breath testing device does not print results and test information, the BAT is to record the displayed result, test number, testing device, serial number of the testing device, and time on the alcohol testing form. If the breath testing device prints results, but not directly onto the form, the BAT must affix the printout to the alcohol testing form in the designated space.

When an alcohol screening device (ASD) is used, the screening test technician (STT) must check the device's expiration date and show it to the employee. A device may not be used after its expiration date.

The STT will open an individually wrapped or sealed package containing the device in front of the employee and he/she will be asked to place the device in his/her mouth and use it in the manner described by the device's manufacturer. If the employee declines to use the device, or in a case where the device doesn't activate, the STT must insert the device in the employee's mouth and use it in the manner described by the device's manufacturer. The STT must wear single-use examination gloves and must change the gloves following each test.

When the device is removed from the employee's mouth, the STT must follow the manufacturer's instructions to ensure the device is activated. If the procedures listed above can't be successfully completed, the device must be discarded and new test must be conducted using a new device. Again, the employee will be offered the choice of using the new device or having the STT use the device for the test. If the new test can't be successfully completed, the employee will be directed to immediately take a screening test using an evidential breath testing device (EBT). The result displayed on the device must be read within 15 minutes of the test. The STT must show the employee the device and the reading and enter the result on the ATF. If the reading on the EBT or ASD is less than 0.02, both the employee and the BAT or STT must sign and date the result form. The form will then be confidentially forwarded to the company's designated employer representative (DER).

If the reading on the EBT or ASD is 0.02 or more, a confirmation test must be performed. An EBT must be used for all confirmation tests. The test must be performed after 15 minutes have elapsed, but within 30 minutes of the first test. The BAT will ask the employee not to eat, drink, belch, or put anything into his/her mouth. These steps are intended to prevent the buildup of mouth alcohol, which could lead to an artificially high result. A new, sealed mouthpiece must be used for the new test. The calibration of the EBT must be checked. All of this must be done in the employee's presence. If the results of the confirmation test and screening test are not the same the confirmation test will be used. Refusal to complete and sign the alcohol testing form or refusal to provide breath or saliva will be considered a failed test, and the employee will be removed from all safety-sensitive functions until the matter is resolved.

If an employee refuses to be tested or refuses to sign the testing form, the BAT will immediately notify the MRO and the DER

Upon notification of a positive drug test result, the employer should immediately remove the employee from a safety sensitive duty.

Laboratory analysis: As required by Federal regulations, only a laboratory certified by the Department of Health and Human Services (DHSS) to perform urinalysis for the presence of controlled substances will be retained by Reedy Creek Energy Services. The laboratory will be required to maintain strict compliance with federally approved chain-of-custody procedures, quality control, maintenance, and scientific analytical methodologies. All specimens are required to undergo an initial screen followed by confirmation of all positive screen results.

Results: According to Federal regulation, the laboratory must report all test results directly to Reedy Creek Energy Services 's medical review officer (MRO). All test results must be transmitted to the MRO in a timely

manner, preferably the same day that the review by the certifying scientist is completed. All results must be reported.

The MRO is responsible for reviewing and interpreting all confirmed positive, adulterated, substituted, or invalid drug test results. The MRO must determine whether alternate medical explanations could account for the test results. The MRO must also give the employee who has a positive, adulterated, substituted, or invalid drug test an opportunity to discuss the results prior to making a final determination. After the decision is made, the MRO must notify the DER. If the MRO, after making and documenting all reasonable efforts, is unable to contact a tested employee, the MRO shall contact the DER instructing him/her to contact the employee. The DER will arrange for the employee to contact the MRO before going on duty.

The MRO may verify a positive, adulterated, substituted, or invalid drug test without having communicated with the employee about the test results if:

- the employee expressly declines the opportunity to discuss the results of the test;
- neither the MRO or DER has been able to make contact with the employee for 10 days; or
- within 72 hours after a documented contact by the DER instructing the employee to contact the MRO, the employee has not done so.

Split Sample: As required by FMCSA regulations, the MRO must notify each employee who has a positive, adulterated, substituted, or invalid drug test result that he/she has 72 hours to request the test of the split specimen. If the employee requests the testing of the split, the MRO must direct (in writing) the lab to provide the split specimen to another certified laboratory for analysis. The employee will pay for the testing of the split specimen. If the analysis of the split specimen fails to reconfirm the results of the primary specimen, or if the split specimen is unavailable, inadequate for testing, or unstable, the MRO must cancel the test and report the cancellation and the reasons for it to the DER and the employee.

Specimen Retention: Long term frozen storage will ensure that positive urine specimens will be available for any necessary retest. Reedy Creek Energy Services 's designated drug testing laboratory will retain all confirmed positive specimens for at least 1 year in the original labeled specimen bottle.

Confidentiality/Recordkeeping

All employee alcohol and controlled substance test records are considered confidential (Sec. 382.401). For the purpose of this policy/procedure, confidential recordkeeping is defined as records maintained in a secure manner, under lock and key, accessible only to the program administrator and the D.O.T. Compliance team.

Employee alcohol and controlled substance test records will only be released in the following situations:

- to the employee, upon his/her written request;
- upon request of a DOT agency with regulatory authority over Reedy Creek Energy Services;
- upon request of state or local officials with regulatory authority over Reedy Creek Energy Services;
- upon request by the United States Secretary of Transportation;
- Upon request by the National Transportation Safety Board (NTSB) as part of an accident investigation;
- upon request by subsequent employers upon receipt of a written request by a covered employee;
- in a lawsuit, grievance, or other proceeding if it was initiated by or on behalf of the complainant and
- arising from results of the tests; or
- upon written consent by the employee authorizing the release to a specified individual.

All records will be retained for the time period required in Sec. 382.401.

Employee Assistance

Employee Education and Training (Sec. 382.601): All employees will be given information regarding the requirements of Part 382 and this guideline by their supervisor. All employees will be given a copy of this guideline.

Management Training: According to FMCSA regulation, all employees of Reedy Creek Energy Services designated to supervise employees will receive training on this program. The training will include at least 60 minutes on alcohol misuse and 60 minutes on drug use. The training content will include the physical, behavioral, speech, and performance indicators of probable alcohol misuse and drug use. The training allows supervisors to determine reasonable suspicion that an employee is under the influence of alcohol or drugs. The availability and desirability of the Employee Assistance Programs and the need for observing strict confidentiality will be adhered to. Management will be provided guidelines for maintaining confidentiality of all drug-related information and referring employees who may have a problem to appropriate counseling.

Referral, Evaluation, and Treatment (Sec. 382.605): According to FMCSA regulation, a list of substance abuse professionals will be provided to all employees who fail an alcohol test or test positive for drugs. WDW Labor Relations will be responsible for designating the appropriate substance abuse professional (SAP) who will diagnose the problem and recommend treatment. The employee will be responsible for payment for the evaluation by the SAP and any treatment required. According to FMCSA regulations, prior to returning to duty for Reedy Creek Energy Services an employee must be evaluated by a SAP and must complete the treatment recommended by the SAP. Successful completion of a return to duty test and all follow-up tests is mandatory.

Any employee who has a confirmed positive test will be required to participate in the Employee Assistance Program (EAP). Failure to seek and receive EAP assistance or failure to abide by the terms and conditions or prescribed treatment will be grounds for discharge. If an employee is subject to disciplinary action under existing practices, the use of substances shall not be a defense to circumvent existing practices or to avoid disciplinary action. Participation in the EAP shall be taken into account in considering appropriate disciplinary action. No employee shall be discharged as a result of a positive drug or alcohol test so long as he/she agrees to participate in an EAP, the cost of which will be covered by Company-provided health insurance. In instances where it is necessary, a leave of absence may be granted for treatment or rehabilitation through the EAP for substances on the same basis as it is granted for other medical conditions.

An employee who fails to complete an evaluation by the SAP, treatment recommended by the SAP, a return to duty test, a follow-up test or any drug/alcohol test after completion of a treatment program will be terminated .

Self-Identification Program

There will be no disciplinary action against an employee who makes a voluntary admission of alcohol misuse or controlled substance use if:

- the admission is in accordance with the company's voluntary self-identification program;
- the employee does not self-identify in order to avoid Part 382 testing;
- the employee makes the admission of alcohol misuse or controlled substances use prior to performing a safety-sensitive function; and
- the employee does not perform a safety-sensitive function until the company is satisfied that the employee has been evaluated and has successfully completed education or treatment requirements in accordance with the self-identification program guidelines.

The employee will be allowed to return to safety-sensitive duties upon successful completion of an education or treatment program, as determined by a drug and alcohol abuse evaluation expert. Also, the employee must undergo:

- a return-to-duty test with a result indicating an alcohol concentration of less than 0.02; and/or

- a return-to-duty controlled substances test with a verified negative test result.

Discipline

The company **may not** stand-down an employee before the MRO has completed his/her verification process unless the company has applied for and has received an FMCSA issued waiver.

According to FMCSA regulation, no person who has failed an alcohol or drug test, or refused to test, will be allowed to perform safety-sensitive functions until the referral, evaluation, and treatment requirements have been complied with. The following company disciplinary measures apply to all reasonable suspicion, post-accident, and random tests.

Controlled Substance Positive Test Result: Upon notification that a employee has a drug test result of positive, adulterated, substituted, or invalid, the employee will be given the option of requesting a test of the split sample within 72 hours. If the employee has requested a test of the split sample, the employee will be on suspension until the results of a split sample test are obtained.

If the employee doesn't request a split sample test or the split sample test confirms the initial positive, adulterated, substituted, or invalid drug test result, the employee will be offered help through the EAP Process or terminated. If the split sample testing disputed the initial test results or if the initial test results are designated invalid, the employee will be reinstated.

Refusal to Test: An employee's refusal to test for alcohol or controlled substances will be considered a positive test result. Adulteration or tampering with a urine or breath sample is considered conduct that obstructs the testing process and is considered a refusal to test. An employee whose conduct is considered a refusal to test will be subject to disciplinary action, not excluding termination.

The Consequences of Violating the Alcohol or Drug Prohibitions

Alcohol:

- removal from safety-sensitive functions.
- following a violation, an employee cannot return to a safety-sensitive function until an evaluation has been done and any recommended treatment has been completed.
- upon notification that a employee tested 0.02% BAC or greater, but less than 0.04% BAC in initial and confirmatory tests for alcohol, the employee will be relieved from any safety sensitive function, without pay, for at least 24 hours.
- termination

Drug:

- removal from safety-sensitive functions.
- employee cannot return to a safety-sensitive function until an evaluation has been done, recommended therapy is complete, and a verified negative drug test is produced.
- termination

If the employee has not violated alcohol or drug prohibitions but would like information or assistance on alcohol or drug issues, they can do so-on a confidential basis-through the Employee Assistance Program.

16.0 FORMS LISTING AND INCLUSION

<u>DESCRIPTION</u>	<u>FORM NO.</u>
Valve Maintenance Record	RCES 26
RCID Owned Gas Leak and Repair Report	RCES 27
Customer Owned/Inside Gas Leak and Repair Report	RCES 28
Manhole and Catch Basin Survey	RCES 29
Basement and Building Survey Record	RCES 30
Above Ground Piping Patrol and Inspection Form	RCES 31
Below Ground Pipeline Inspection Report	RCES 32
Pressure Regulating Installation	RCES 33
Ten-Year Meter Calibration and Inspection	RCES 34
Vault Maintenance	RCES 35
Reactivating Services	RCES 36
Accident Investigation	RCES 37
Component Failure Investigation	RCES 38
Gate Station Odorization Record Report of Odorization	RCES 39
Odor Level Test Report	RCES 40
Galvanic Anode Data Sheet and Record	RCES 41
Field Rectifier Data Sheet	RCES 42
Cathodic Protection Record	RCES 43
Main/Service Connection Record	RCES 44

REEDY CREEK ENERGY SERVICES

CUSTOMER OWNED/INSIDE GAS LEAK AND REPAIR REPORT

NAME OF BUILDING OR RESIDENT: _____

ADDRESS (Location): _____ CITY: _____

LEAK DETECTED BY: Combustible Gas Indicator _____ Odor _____ Other _____

LEAK REPORTED BY: Full Name: _____ Time _____ AM/PM _____ Date: _____

Address (Location): _____

TIME DISPATCHED _____ AM/PM TIME ARRIVED _____ AM/PM TIME MADE SAFE _____ AM/PM

LEAK FOUND DURING SURVEY: Yes _____ No _____

LEAK REPORTED TO DISPATCHER: _____ AM _____ PM DATE: _____

REMARKS: (Note Nature of Leak and Hazard Potential):

REPAIRED BY: _____ at _____ AM _____ PM DATE: _____

DESCRIPTION OF LEAK REPAIRS:

CHECKED BY: _____

REVIEWED BY: _____

RETURN TO: RCES NATURAL GAS OPERATIONS

SUPERVISOR: _____

ADDRESS: _____

PHONE: _____

REEDY CREEK ENERGY SERVICES
MANHOLE AND CATCH BASIN SURVEY

MAP NUMBER: _____ SURVEY SCHEDULE: _____

DATE: _____

NOTE: Place percentage reading on this sheet beside correct manhole. It is not necessary to place zero reading beside uncontaminated manholes.

CHECKED BY: _____

REEDY CREEK ENERGY SERVICES

ABOVE GROUND PIPING PATROL AND INSPECTION

LOCATION: _____

DATE: _____ MAP NO.# _____

CANAL CROSSING [_____] BRIDGE ATTACHMENT [_____]

OTHER: _____

PIPE CONDITION

Good [_____]

Fair [_____]

Poor [_____]

Existing Paint or Coating Satisfactory [_____]

Piping Needs Painting or Recoating [_____]

Existing Piping Needs Replacing [_____]

Condition of Casting or Sleeves at Abutments: _____

Remarks: _____

CONDITION OF HANGERS OR SUPPORTS

Condition of Insert, Expansion Case, Bracket or Hanger: _____

Condition of Pipe Clevis and Supporting Rod: _____

Condition of Roller(s) or Fixed Supports: _____

Remarks: _____

Pipe Size: _____ Approx. Length Exposed: _____

C/P: Yes _____ No _____ Line Markers: Yes _____ No _____

Remarks: _____

CHECKED BY: _____

ABOVEGROUND PIPING MAINTENANCE

MAP NO.: _____

GIVE COMPLETE DESCRIPTION OF WORK TO BE PERFORMED: _____

DATE COMPLETED: _____ COMPLETED BY: _____

REEDY CREEK ENERGY SERVICES

BELOW GROUND PIPELINE INSPECTION REPORT

PIPELINE NO. OR NAME: _____

EXPOSED AT COORDINATES: _____

PURPOSE OF EXCAVATION: _____

TYPE OF PIPE (Metallic/Other): _____ PIPE SIZE: _____

EXTERNAL PIPE INSPECTION

COATING TYPE: _____

COATING CONDITION (Describe): _____

WAS PIPE PITTED? Yes _____ No _____

DEPTH OF DEEPEST PIT (Use Pit Gauge): _____

INTERNAL PIPE INSPECTION

INTERIOR CONDITION (Describe, i.e. clean, debris, scale, rust, corrosion, pitting, liquids) _____

ADDITIONAL REMARKS AND RECOMMENDATIONS CONCERNING PIPE CONDITION:

Date: _____

(Signed)

REEDY CREEK ENERGY SERVICES

PRESSURE REGULATING INSTALLATION

LOCATION: _____

Pressure to Meter Set: _____ Outlet: _____ MAOP: _____

Is system being supplied by other station(s)? Yes _____ No _____

Station Number(s) of Other Station(s) Supplying System: _____

Size of Supply Main: _____ Size of Discharge Main: _____

Location of Isolation Valve for Station: _____

Supply Valves Condition _____

Discharge Valve Condition _____

Atmospheric Corrosion Condition _____

Any Leaks Noticed? _____

STATION EQUIPMENT

TYPE OF EQUIPMENT	MANUFACTURER	SIZE	SERIAL NO.	DATE INSTALLED	DATE REMOVED

INSPECTION MAINTENANCE

	FLAME PACK		PRIMARY	RELIEF	CHECK	
DATE	READING	VENTING	SETTING	SETTING	LIST	REMARKS

Reviewed by: _____

REEDY CREEK ENERGY SERVICES

VAULT MAINTENANCE

DATE: _____

LOCATION: _____

CONDITION: _____

TYPE OF VAULT: _____
 TYPE OF COVER: _____
 TYPE OF VENTING: _____
 TYPE OF DRAINAGE: _____

TYPE OF EQUIP. CONTAINED IN VAULT	MANUFACTURER	SERIAL NO.	CONDITION OF EQUIPMENT	DESCRIPTION OF WORK PERFORMED

COMMENTS: _____

Work Performed By: _____ Reviewed By: _____

REEDY CREEK ENERGY SERVICES

REACTIVATING SERVICES (Abandoned or Temporarily Disconnected)

PRESSURE TEST RECORD

Total Job _____ FT

Location: _____

Maximum Actual Operating Pressure: _____ PSIG

M.A.O.P.: _____ PSIG

Pipe: Diameter: _____ In.

Wall Thickness: _____ In.

Length Tested: _____ In.

Required Test: _____ Hours _____ Minutes @ Minimum of _____ PSIG

<u>TEST PRESSURE</u>	<u>TIME</u>	<u>DATE</u>	<u>WITNESSED BY</u>
Start _____ PSIG	_____ AM _____ PM	_____	_____
End _____ PSIG	_____ AM _____ PM	_____	_____

Type of Gauge Used: Recorder: _____ ; Indicating _____

Test Medium: Air: _____ Gas: _____ Water _____

Approved By: _____

REEDY CREEK ENERGY SERVICES

INCIDENT INVESTIGATION

DATE: _____ TIME: _____ AM
PM

LOCATION: _____

REPORTING PARTY: _____

NATURE OF INCIDENT: _____

FATALITIES OR PERSONAL INJURIES: _____

STATEMENT(S) TAKEN FROM: _____

TYPE OF INCIDENT: _____

SYSTEM COMPONENTS AFFECTED

Meter: _____ Valves: _____

Regulator: _____ Pipe or Piping: _____

Was system or portion of system shut down for repair? ___ Yes ___ No

Customers Affected: _____

Gas Utility Service Manager

RCES FORM 37
© The Walt Disney Company

REEDY CREEK ENERGY SERVICES
COMPONENT FAILURE INVESTIGATION

DATE: _____ TIME: _____ AM
PM

LOCATION: _____

HOW DISCOVERED: _____

FAILED COMPONENT

Valve: ___ Regulator: ___ Meter: ___ Filter: ___ Pipe: ___

Tee: ___ Elbow: ___ Weld: ___ Other: _____

Remarks or Description of Repair: _____

Repairs Made By: _____

Test or Lab Examination By: _____

Follow Up Steps: _____

Customers Affected: _____

Gas Utility Service Manager

REEDY CREEK ENERGY SERVICES

GATE STATION ODORIZATION RECORD REPORT OF ODORIZATION

_____ Period From: _____
Gate Station To: _____

ODORANT CONSUMPTION

A. Previous Readings:
Storage Tank _____ Gal.
Calibration Tank _____ Gal.
Total Odorant _____ Gal.

B. Current Readings:
Storage Tank _____ Gal.
Calibration Tank _____ Gal.
Total Odorant _____ Gal.

C. Odorant Used This Period (A minus B) _____ Gal.
(C) Times 6.8 lbs./gal. = _____ Lbs.

D. Odorant Added (if any):
(E-B) _____ Gal.

E. New Readings:
Storage Tank _____ Gal.
Calibration Tank _____ Gal.
Total Odorant _____ Gal.

F. Odorant on Hand in Drums:
_____ Gal.

G. Gas Consumption this Period: _____ MMCF
(source of information) _____

H. ODORIZATION RATE
(C) in lbs./ (G) in MMCF = _____ Lbs./MMCF

REMARKS: _____

Prepared By: _____ Date: _____

Approved By: _____
Gas Utility Service Manager

REEDY CREEK ENERGY SERVICES

ODOR LEVEL TEST REPORT

(Field Sampling)

LOCATION OF TEST: _____

DATE: _____ TIME: _____ AM
 _____ PM

TYPE OF TEST EQUIPMENT: _____ SERIAL #: _____

THRESHOLD LEVEL TEST:

TESTOR NO. 1				TESTOR NO. 2			TESTOR NO. 3		
TEST NO.	ROTOMETER READING	FLOAT	% GAS	ROTOMETER READING	FLOAT	% GAS	ROTOMETER READING	FLOAT	% GAS
1		Blue Silver			Blue Silver			Blue Silver	
2		Blue Silver			Blue Silver			Blue Silver	
3		Blue Silver			Blue Silver			Blue Silver	

Average of ALL Testors: _____ % Gas _____

ODOR INTENSITY TEST(1/5 OF LEL):

TESTOR NO. 1				TESTOR NO. 2			TESTOR NO. 3		
TEST NO.	ROTOMETER READING	FLOAT	% GAS	ROTOMETER READING	FLOAT	% GAS	ROTOMETER READING	FLOAT	% GAS
1	64	Blue Silver		64	Blue Silver		64	Blue Silver	
2	64	Blue Silver		64	Blue Silver		64	Blue Silver	
3	64	Blue Silver		64	Blue Silver		64	Blue Silver	

Indicate Intensity by No.: 1-No Odor 2-Faint 3-Readily Detectable 4-Strong 5-Very Strong

REMARKS:

TESTOR NO. 1 _____

TESTOR NO. 2 _____

TESTOR NO. 3 _____

Gas Utility Service Manager _____

REEDY CREEK ENERGY SERVICES
MAIN / SERVICE CONNECTION REPORT

DATE: _____

LOCATION: _____

TYPE OF CONNECTION: _____
(Explain in detail)

SIZE OF TAPPING HOLE: _____

PIPE SIZE(S): MAIN: _____ SERVICE: _____

WALL THICKNESS(S): MAIN: _____ SERVICE: _____

TYPE OF MATERIAL: MAIN _____ SERVICE: _____

TEST PROCEDURE AND RESULTS: _____

PERSON(S) PERFORMING JOINING:

Welder(s): _____

Mechanic(s): _____

TESTOR: _____

INSPECTOR: _____

INTERNAL INSPECTION OF COUPON/OR SECTION OF PIPE REMOVED:
(Describe, i.e. clean, debris, scale, rust, corrosion, pitting, liquids) _____

ADDITIONAL COMMENTS: _____

PREPARED BY: _____ DATE: _____

17.0 ORGANIZATION CHART, RCES NATURAL GAS DEPARTMENT

Chris E. Ogozaly

Director, Reedy Creek Energy Services
Wk: 407/824 4026 Hm: 407/701-8954

Eric Welch

Manager, Energy Production
Wk: 407/824-7584 C: 407/761-2680

Ed Godwin

Principal Mechanical Engineer
Wk: 824-4943 Hm: 407/847-8008

Carlos Martinez

Gas Utilities Service Manager
Wk: 407/560-6050 Hm: 321-689-3538

EMERGENCY (24hr.):

RCES Control Center 407/824-4185

OTHER EMERGENCY NUMBERS:

Reedy Creek Fire Dept. 407/560-1977
 911
 Animal Kingdom Central 407/938-2101
 DACS-MK Central 407/824-6670
 EPCOT Central 407/560-7101
 MGM Studio Central 407/560-5101
 WDW Security 407/560-1990

FLORIDA GAS TRANSMISSION:

Gas Control (Houston, Tx.) 713/654-7836
 1/800-238-5066
 Orlando, Station 18 407/838-7375

QUALIFIED GAS SYSTEM OPERATORS:

ROSTER: RCES Control Center 407/824-4185

PUBLIC OFFICIALS:

Chris E. Ogozaly, Director Reedy Creek Energy Services
 Wk: 407/824-4026
 Hm: 407/701-8954
 Doug Wagner, V.P. Utilities, Transportation Services,
 Wk: 407/824-5847
 Hm: 407/448-4907
 Jeff Vahle, EVP Segment Facilities & Opns Svcs
 Wk: 407/939-7302
 Hm: 407/876-0644
 Richard LePere, Chief Reedy Creek Fire Dept.
 Wk: 407/560-1964
 Melissa Merklinger, Director Security
 Wk: 407/827-5521

Gas Accident / Incident reporting requirements to State and Federal Agencies.

State of Florida: Public Service Commission Rule 25-12.084 800/342-3552

Reporting Requirements: See 11.3.4 of Manual, Gas Accidents & Outages
 See FPSC Memorandum (Back of Manual)

Federal, Dept. of Transportation (RSPA) Title 49 CFR 191.5 and 191.9 800/368-4200

Reporting Requirements: See 11.3.5 of Manual, Gas Incidents
 1-800-424-8802 (in Washington, DC, 267-2675)
 D.O.T. Incident Report 7100 (Back of Manual)

State of Florida



Public Service Commission
 CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
 TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: January 27, 2016
TO: Natural Gas Pipeline Systems under the Jurisdiction of the Florida Public Service Commission
FROM: Rick Moses, Chief of Safety
RE: 2017 Natural Gas Pipeline Safety - Required Telephone Notification - Contact Numbers

One of the following contacts listed below must be promptly notified by telephone of reportable incidents, accidents and service outages involving natural gas. Contact efforts are to begin at the top of the list and continue down the list until contact is made. Commission Rule 25-12.084, Notice of Accidents and Outages, Florida Administrative Code, requires this notification to Commission staff. Recorded messages are not acceptable for official notices.

	<u>Office Hours</u>	<u>After Hours</u>
Rick Moses	850.413.6582	850.879.8665

Additionally, the Safety Engineer assigned to the gas utility should be directly informed of any safety related incident, accident, or reportable outage.

Natural Gas Pipeline Safety Engineers

<u>Miami</u>	Office Phone	Cell Phone
Karl Chen (Supv.)	305.513.7827	786.897.5674
Norman Witman	305.513.7824	305.299.1624
Marcelina Alvarez	305.513.7817	786.457.8287
Moise Degand	305.513.7820	786.514.5826
<u>Tallahassee</u>	Office Phone	Cell Phone
James McRoy	850.413.6934	850.688.3167
Robert Simpson	850.413.7001	850.688.3292
Kadmiel Beauvais	850.413.6970	850.661.1402
<u>Tampa</u>		
Tony Velazquez (Supv.)	813.637.8664	813.344.6365
Farhan Alnajar	813.637.8662	813.422.2808
Hassan Badran	813.637.8674	813.455.4247

PART C - ORIGIN OF THE INCIDENT	
1. Incident occurred on <input type="radio"/> Main <input type="radio"/> Meter Set <input type="radio"/> Service Line <input type="radio"/> Other: _____ <input type="radio"/> Pressure Limiting and Regulating Facility	3. Material involved (<i>pipe, fitting, or other component</i>) <input type="radio"/> Steel <input type="radio"/> Cast/Wrought Iron <input type="radio"/> Polyethelene Plastic (complete all items that apply in a-c) <input type="radio"/> Other Plastic (complete all items that apply in a-c) Plastic failure was: <input type="checkbox"/> a. ductile <input type="checkbox"/> b. brittle <input type="checkbox"/> c. joint failure <input type="radio"/> Other material: _____
2. Failure occurred on <input type="radio"/> Body of pipe <input type="radio"/> Pipe Seam <input type="radio"/> Joint <input type="radio"/> Component <input type="radio"/> Other: _____	4. Year the pipe or component which failed was installed: <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u>

PART D – MATERIAL SPECIFICATION (if applicable)	PART E – ENVIRONMENT
1. Nominal pipe size (NPS) <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> in. 2. Wall thickness <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> in. 3. Specification _____ SMYS <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> 4. Seam type _____ 5. Valve type _____ 6. Pipe or valve manufactured by _____ in year <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u>	1. Area of incident <input type="radio"/> Under pavement <input type="radio"/> In open ditch <input type="radio"/> Under ground <input type="radio"/> Above ground <input type="radio"/> Inside/under building <input type="radio"/> Under water Other: _____ 2. Depth of cover: _____ inches

PART F – APPARENT CAUSE	Important: There are 25 numbered causes in this section. Check the box to the left of the primary cause of the incident. Check one circle in each of the supplemental items to the right of or below the cause you indicate. See the instructions for this form for guidance.
-------------------------	--

F1 – CORROSION 1. <input type="checkbox"/> External Corrosion 2. <input type="checkbox"/> Internal Corrosion		<p style="font-size: small; text-align: center;"><i>If either F1 (1) External Corrosion, or F1 (2) Internal Corrosion is checked, complete all subparts a – e.</i></p> <table style="width:100%; border: none;"> <tr> <td style="width: 33%; vertical-align: top;"> a. Pipe Coating <input type="radio"/> Bare <input type="radio"/> Coated <input type="radio"/> Unknown </td> <td style="width: 33%; vertical-align: top;"> b. Visual Examination <input type="radio"/> Localized Pitting <input type="radio"/> General Corrosion <input type="radio"/> Other: _____ </td> <td style="width: 33%; vertical-align: top;"> c. Cause of Corrosion <input type="radio"/> Galvanic <input type="radio"/> Stray Current <input type="radio"/> Improper Cathodic Protection <input type="radio"/> Microbiological <input type="radio"/> Other: _____ </td> </tr> </table> <p>d. Was corroded part of pipeline considered to be under cathodic protection prior to discovering incident? <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> Unknown Year Protection Started: <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u></p> <p>e. Was pipe previously damaged in the area of corrosion? <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> Unknown How long prior to incident: <u> </u> / <u> </u> / <u> </u> / <u> </u> years <u> </u> / <u> </u> / <u> </u> months</p>	a. Pipe Coating <input type="radio"/> Bare <input type="radio"/> Coated <input type="radio"/> Unknown	b. Visual Examination <input type="radio"/> Localized Pitting <input type="radio"/> General Corrosion <input type="radio"/> Other: _____	c. Cause of Corrosion <input type="radio"/> Galvanic <input type="radio"/> Stray Current <input type="radio"/> Improper Cathodic Protection <input type="radio"/> Microbiological <input type="radio"/> Other: _____
a. Pipe Coating <input type="radio"/> Bare <input type="radio"/> Coated <input type="radio"/> Unknown	b. Visual Examination <input type="radio"/> Localized Pitting <input type="radio"/> General Corrosion <input type="radio"/> Other: _____	c. Cause of Corrosion <input type="radio"/> Galvanic <input type="radio"/> Stray Current <input type="radio"/> Improper Cathodic Protection <input type="radio"/> Microbiological <input type="radio"/> Other: _____			

F2 – NATURAL FORCES 3. <input type="checkbox"/> Earth Movement 4. <input type="checkbox"/> Lightning 5. <input type="checkbox"/> Heavy Rains/Floods 6. <input type="checkbox"/> Temperature 7. <input type="checkbox"/> High Winds	<table style="width:100%; border: none;"> <tr> <td style="width: 25%;">⇒ <input type="radio"/> Earthquake</td> <td style="width: 25%;">⇒ <input type="radio"/> Subsidence</td> <td style="width: 25%;">⇒ <input type="radio"/> Landslide</td> <td style="width: 25%;">⇒ <input type="radio"/> Other: _____</td> </tr> <tr> <td>⇒ <input type="radio"/> Washouts</td> <td>⇒ <input type="radio"/> Flotation</td> <td>⇒ <input type="radio"/> Mudslide</td> <td>⇒ <input type="radio"/> Scouring <input type="radio"/> Other: _____</td> </tr> <tr> <td>⇒ <input type="radio"/> Thermal stress</td> <td>⇒ <input type="radio"/> Frost heave</td> <td>⇒ <input type="radio"/> Frozen components</td> <td>⇒ <input type="radio"/> Other: _____</td> </tr> </table>	⇒ <input type="radio"/> Earthquake	⇒ <input type="radio"/> Subsidence	⇒ <input type="radio"/> Landslide	⇒ <input type="radio"/> Other: _____	⇒ <input type="radio"/> Washouts	⇒ <input type="radio"/> Flotation	⇒ <input type="radio"/> Mudslide	⇒ <input type="radio"/> Scouring <input type="radio"/> Other: _____	⇒ <input type="radio"/> Thermal stress	⇒ <input type="radio"/> Frost heave	⇒ <input type="radio"/> Frozen components	⇒ <input type="radio"/> Other: _____
⇒ <input type="radio"/> Earthquake	⇒ <input type="radio"/> Subsidence	⇒ <input type="radio"/> Landslide	⇒ <input type="radio"/> Other: _____										
⇒ <input type="radio"/> Washouts	⇒ <input type="radio"/> Flotation	⇒ <input type="radio"/> Mudslide	⇒ <input type="radio"/> Scouring <input type="radio"/> Other: _____										
⇒ <input type="radio"/> Thermal stress	⇒ <input type="radio"/> Frost heave	⇒ <input type="radio"/> Frozen components	⇒ <input type="radio"/> Other: _____										
F3 - EXCAVATION 8. <input type="checkbox"/> Operator Excavation Damage (<i>including their contractors</i>) / Not Third Party 9. <input type="checkbox"/> Third Party Excavation Damage (<i>complete a-d</i>)	a. Excavator group <input type="radio"/> General Public <input type="radio"/> Government <input type="radio"/> Excavator other than Operator/subcontractor b. Type: <input type="radio"/> Road Work <input type="radio"/> Pipeline <input type="radio"/> Water <input type="radio"/> Electric <input type="radio"/> Sewer <input type="radio"/> Phone/Cable/Fiber <input type="radio"/> Landowner <input type="radio"/> Railroad <input type="radio"/> Building Construction <input type="radio"/> Other: _____ c. Did operator get prior notification of excavation activity? <input type="radio"/> No <input type="radio"/> Yes: Date received: <u> </u> / <u> </u> / <u> </u> mo. <u> </u> / <u> </u> / <u> </u> day <u> </u> / <u> </u> / <u> </u> yr. Notification received from: <input type="radio"/> One Call System <input type="radio"/> Excavator <input type="radio"/> General Contractor <input type="radio"/> Landowner d. Was pipeline marked? <input type="radio"/> No <input type="radio"/> Yes (<i>If Yes, check applicable items i – iv</i>) i. Temporary markings: <input type="radio"/> Flags <input type="radio"/> Stakes <input type="radio"/> Paint ii. Permanent markings: <input type="radio"/> Yes <input type="radio"/> No iii. Marks were (<i>check one</i>) <input type="radio"/> Accurate <input type="radio"/> Not Accurate iv. Were marks made within required time? <input type="radio"/> Yes <input type="radio"/> No												
F4 – OTHER OUTSIDE FORCE DAMAGE 10. <input type="checkbox"/> Fire/Explosion as primary cause of failure ⇒ Fire/Explosion cause: <input type="radio"/> Man made <input type="radio"/> Natural Describe in Part G 11. <input type="checkbox"/> Car, truck or other vehicle not relating to excavation activity damaging pipe 12. <input type="checkbox"/> Rupture of Previously Damaged Pipe 13. <input type="checkbox"/> Vandalism													

F5 – MATERIAL OR WELDS

Material

- | | | | | | | |
|---|---|---------------------------------|----------------------------------|---------------------------------------|--|---------------------------------------|
| 14. <input type="checkbox"/> Body of Pipe | ⇒ | <input type="checkbox"/> Dent | <input type="checkbox"/> Gouge | <input type="checkbox"/> Wrinkle Bend | <input type="checkbox"/> Arc Burn | <input type="checkbox"/> Other: _____ |
| 15. <input type="checkbox"/> Component | ⇒ | <input type="checkbox"/> Valve | <input type="checkbox"/> Fitting | <input type="checkbox"/> Vessel | <input type="checkbox"/> Extruded Outlet | <input type="checkbox"/> Other: _____ |
| 16. <input type="checkbox"/> Joint | ⇒ | <input type="checkbox"/> Gasket | <input type="checkbox"/> O-Ring | <input type="checkbox"/> Threads | <input type="checkbox"/> Fusion | <input type="checkbox"/> Other: _____ |

Weld

- | | | | | | | |
|--|---|---------------------------------|--------------------------------------|-----------------------------------|--|---------------------------------------|
| 17. <input type="checkbox"/> Butt | ⇒ | <input type="checkbox"/> Pipe | <input type="checkbox"/> Fabrication | | | <input type="checkbox"/> Other: _____ |
| 18. <input type="checkbox"/> Fillet | ⇒ | <input type="checkbox"/> Branch | <input type="checkbox"/> Hot Tap | <input type="checkbox"/> Fitting | <input type="checkbox"/> Repair Sleeve | <input type="checkbox"/> Other: _____ |
| 19. <input type="checkbox"/> Pipe Seam | ⇒ | <input type="checkbox"/> LF ERW | <input type="checkbox"/> DSAW | <input type="checkbox"/> Seamless | <input type="checkbox"/> Flash Weld | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> | | <input type="checkbox"/> HF ERW | <input type="checkbox"/> SAW | <input type="checkbox"/> Spiral | | <input type="checkbox"/> Other: _____ |

Complete a-f if you indicate **any** cause in part F5.



- a. Type of failure:
- | | | | |
|--|---|---|---|
| <input type="checkbox"/> Construction Defect ⇒ | <input type="checkbox"/> Poor Workmanship | <input type="checkbox"/> Procedure not followed | <input type="checkbox"/> Poor Construction Procedures |
| <input type="checkbox"/> Material Defect | | | |
- b. Was failure due to pipe damage sustained in transportation to the construction or fabrication site? Yes No
- c. Was part which leaked pressure tested before incident occurred? Yes, **complete d-f, if known** No
- d. Date of test: ___/___/___ mo. ___/___/___ day ___/___/___ yr.
- e. Time held at test pressure: ___/___/___ hr.
- f. Estimated test pressure at point of incident: _____ PSIG

F6 – EQUIPMENT OR OPERATIONS

- | | | | | | |
|--|---|----------------------------------|--|---|---------------------------------------|
| 20. <input type="checkbox"/> Malfunction of Control/Relief Equipment | ⇒ | <input type="checkbox"/> Valve | <input type="checkbox"/> Instrumentation | <input type="checkbox"/> Pressure Regulator | <input type="checkbox"/> Other: _____ |
| 21. <input type="checkbox"/> Threads Stripped, Broken Pipe Coupling | ⇒ | <input type="checkbox"/> Nipples | <input type="checkbox"/> Valve Threads | <input type="checkbox"/> Mechanical Couplings | <input type="checkbox"/> Other: _____ |
| 22. <input type="checkbox"/> Leaking Seals | | | | | |

23. Incorrect Operation
- a. Type: Inadequate Procedures Inadequate Safety Practices Failure to Follow Procedures Other: _____
- b. Number of employees involved in incident who failed post-incident drug test: ___/___/___ Alcohol test: ___/___/___
- c. Was person involved in incident qualified per OQ rule? Yes No
- d. Hours on duty for person involved: ___/___/___

F7 – OTHER

24. Miscellaneous, describe: _____
25. Unknown
- Investigation Complete Still Under Investigation (submit a supplemental report when investigation is complete)

PART G – NARRATIVE DESCRIPTION OF FACTORS CONTRIBUTING TO THE EVENT

(Attach additional sheets as necessary)