



Inspection Issues So Far

With about a third of this year's MNOPS inspections done, this seemed like a good time to review some of the common themes that have been coming up during these audits.

One of the first questions that is asked concerns the PHMSA Annual Report (Form 7100). In every case there has been a fairly careful review of this report and sometimes the supporting documentation (leak reports). In cases where there are errors, an amended report must be filed. Accurate Annual Report data is very important. I'm sure everyone has noticed this as we work on DIMP plans, which take a lot of data from past years' annual reports. When preparing for an inspection I would encourage you to take a close look at your 2010 report and make sure you have the leak reports (along with investigations of failure where applicable) that are the source of the numbers you entered under the leak section of the Form 7100.1-1. It is also important that you can explain how you arrive at the number of services reported. Are all new services and abandonments reflected in the current number of services listed?

Emergency valves, both the number of valves present in the system and the inspection records, have also been discussed in most inspections. Topics include do you have an effective shut off guide and are there valves in the system that you don't consider "key" or "emergency" valves, and if there are, why not? Whatever your position, be prepared to field questions about it.

Record keeping is always an issue. There seem to have been two basic issues here recently. The first is not new, and concerns detail and accuracy. If there is one blank spot on an inspection sheet, for example one CP read that was not done or one valve that was not inspected, I can almost guarantee this will trigger further questions. I suggest reviewing your records prior to the inspection to find these issues so you can correct before rather than after the inspection. The second issue is-can you demonstrate that the most recent inspection (for example, leak survey) was completed in compliance with the interval required by Part 192 or your O&M? In order to do this, you have to have the last TWO copies of that inspection. If leak surveys are being done on a four year rotation, and were last complete in July 2010, that means the inspector will likely ask to see the prior leak survey record as well, which would be the 2006 edition. Keep these records in an accessible location so you can produce them quickly when asked. It will make things go smoother.

In some inspections cased crossing CP readings have also been discussed. If you have cased crossings, be prepared to demonstrate that they are not shorted, or explain what actions you are taking if a short is suspected.

These are just a few issues that have been mentioned in multiple inspections; obviously it's not a complete rundown of every audit. Just thought those of you who haven't completed your inspections yet this year would like a partial heads up.

Code Corner

MNOPS has issued a final Alert Notice addressing barricading above ground facilities. After the opportunity to discuss this with a few inspectors the following seems clear:

- It is not MNOPS expectation that all barricades in any location be 4" diameter concrete filled steel pipe. Other barricades are acceptable, and the barricade used should reflect expected type of traffic and anticipated speed.
- It is OK to develop your own barricading standards. Be ready to justify them.
- The expectation is that both new and existing facilities be protected.

This topic is still evolving, so if you have questions please feel free to contact me. My advice is to continue to install barricades, and make sure they are adequate for "anticipated loadings". GPTC Guide Material lists the following as relevant factors when evaluating above ground facilities locations for barricade requirements: type of travel lane (road or driveway?), off-road traffic, speed limit, direction of travel, terrain, natural or other barriers, and weather related conditions.

DIM Plans must be completed by August 2. If you have questions about getting these done, PLEASE call me ASAP! I am working with a number of operators to complete them and am willing to help.

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