



Mechanical Fitting Failure Reports

The DIMP rule includes section 192.1009, which addresses mechanical fitting failure reports. 2012 is the first year these reports must be completed, and any mechanical fitting failures that occurred in 2011 must be evaluated to determine if a report needs to be filed. There have been a lot of questions about this so I want to explain this regulation as I understand it today.

First, if you have failures that meet the reporting criteria, you will complete a separate report for each failure. This is not a report where you enter the number of failures, rather, it is a report that collects specific information about each individual failure. Multiple leaks mean multiple reports.

Second, if you have not had any mechanical fitting failures that meet the reporting criteria, you do not file any mechanical fitting failure report.

Third, 192.1009 is very specific in defining which failures have to be reported. You “must submit a report for each mechanical fitting failure **excluding those that result only in non-hazardous leaks**”. In order to determine whether a leak is hazardous, my advice would be to look at the class of the leak. Your O&M Manual will define leak classes and should allow you to decide whether the indicated leak class is hazardous or not. Further, the instructions for completing the report define a Hazardous Leak as “a leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous. I believe this means that only failures resulting in Class 1 (or whatever your most serious class of leak is) should be reported on this form.

Finally, the instructions also help to define which fittings must be considered when completing this report. The instructions state the term “mechanical fitting” applies only to stab type fittings (permasert, constab, etc), nut follower type fittings (Dresser Style 90 or Normac fitting), bolted type fitting (maxi-grip or Dresser Style 38 coupling), or other “compression type” fittings. I have included common examples of each type of fitting, there are others I am sure. If the fitting in question doesn't fit one of these categories, I would not do a report.

Basically what I encourage all operators to do is follow the instructions as precisely as possible. Call or email me if you want to discuss specific situations.

Code Corner

Emergency response is an ongoing concern for every operator. Thankfully, actual gas emergencies are less common than they once were due to things like more effective damage prevention efforts and better materials and procedures. However, when emergencies happen less often it can make them more overwhelming to responding employees.

One way to help employees be as prepared as possible is training and review of procedures. People are more likely to make good decisions when they understand exactly what they are trying to accomplish and are aware of what can happen if the proper actions are not taken.

For the last few years we have conducted a lot of emergency plan/procedure reviews and I want to continue that. It seems helpful to include discussion of actual events and reviews of what was done right versus what wasn't done right. The goal is to try and prepare people to respond correctly in stressful situations.

192.612(b)(2) requires operators to “Train appropriate operating personnel...and verify that the training is effective.” This process has started for 2012. Contact me to arrange a date for a session at your location.

Notes

- Thanks to all of you who have started (and a few even completed) the required OQ qualifications for 2012. This is a great time of year to get these out of the way. Call me if you have questions about getting this done.
- A recent email from Elizabeth Skalnek at MNOPS informed me that they are in the process of hiring three new people. It sounds like this will mean most inspections will be later in the year. I'll keep you updated on any developments.

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