



## Inspection Priorities

MNOPS inspections continue at a hectic pace. I want to review some of the issues and emphasis points that have been popping up so all of you are aware of them.

One item that has been discussed extensively is the sewer cross bore issue. I believe everyone is aware of the Alert Notice that MNOPS issues on May 10 requiring pipeline operators to document the measures they take to verify that gas lines are not installed inside sewer laterals. From an inspection perspective, this means a couple of things. First, how are you documenting the steps taken to comply with this notice? Second, have you added language to your O&M Manual or Construction Standards detailing what steps you will take to comply? This issue comes up in every inspection so if you still have an inspection you can expect questions on this topic. The questions on the inspection form have been re-written to emphasize this.

During field inspections, there have been quite a few visits to mobile home parks. Inspectors are looking for things such as inactive risers that don't have a plug in them and/or are not locked, meter sets that don't have adequate support, and paint condition (of course).

Last year's emphasis on drug and alcohol plans has carried over. Do you have Employee Assistance Plan posters displayed? Are random tests being done? Is there documentation of reasonable suspicion training for supervisory personnel?

Another issue is investigation of failures. Do you have documentation of follow up investigations of failures, whether they are line hits or leaks due to other causes? Remember that there is a requirement in code that failures have to be investigated "with the intent of preventing recurrence". Investigating failures will also become more important as DIMP plans are developed and implemented.

It's not possible to predict exactly what questions will come up during inspections but the things discussed above have been quite common this year.

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## Code Corner

LEL, or lower explosive limit, is a term that we use all the time in the gas industry. I think most of us know that a gas/air mix does not become flammable or explosive until the level of gas in air reaches the LEL. Also, LEL varies depending on what gas we are discussing. The LEL of natural gas is normally between 4% and 5% gas in air. You can determine the LEL of the gas you distribute by asking your pipeline supplier what the LEL is-in many cases, it will be available on their website in the MSDS for natural gas.

This value is important because we need to know the LEL to classify leaks and to monitor odorization level. Most operators use a leak classification system that relies on an LEL reading and location of the gas to determine the hazard level of leaks. As an example, one operator classifies any reading of 60% LEL or more in a confined space a Grade 1 leak. In this case, you need to know the LEL so you determine what a gas reading of 60% LEL is.

192.625 requires that gas in a distribution system is odorized so the odor is readily detectable at 1/5<sup>th</sup> of the LEL to a person with a normal sense of smell. Again, if you don't know the LEL, you can't calculate what 1/5<sup>th</sup> of that level is. If you are taking an odorant level test, you have to know at what level you must take action to correct low odorant levels. It's very likely that you will be asked what that level is sometime. Know the answer. Know what to do to correct the problem. It's vital for public safety that the odorant level in gas is correct.

## Flashlight

Many operators have a requirement that first responders use intrinsically safe (or explosion proof) flashlights when investigating reports of gas leaks. Some of you have asked for a source for these lights. I found one product that is not too expensive and though I would include a link to the product page of the [Energizer MS2DLED D cell flashlight](#). You can find a number of vendors by searching for this on the internet.