



Inspection Issues

Over the last few months I've tried to standardize my note taking at inspections. One of the benefits of this is it makes it easier to look back and see what issues have been commonly discussed at inspections. Here are the top five items that have generated extended discussion during inspections:

1. Public Awareness Compliance-most often, this was something that was complimented. In general, most of you are doing well at fulfilling the requirements of your 1162 plans.
2. Customer Buried Piping notification-not a real trouble spot, but a lot of different approaches. Have a policy, and follow it. Often confused with 1162 requirements, but it is a separate code item.
3. Complete and accurate documentation of leaks, including classification-make sure the paperwork documenting leak investigation and repair is being filled out completely, including classification of the leak according to your O&M standards.
4. What is your LEL, and how does it affect your sniff tests? Can you explain how you arrived at whatever number you use for an LEL? At what level does an odor test require corrective action to be taken? OQ covered task observations are being done by MNOPS. Qualified persons should be able to explain the relationship between LEL and the sniff test.
5. Documentation of abandoned facilities, and procedures for providing this information to locators. Can you explain how your locating personnel know when abandoned facilities exist in an area where a locate has been requested?

These are 5 of the issues that frequently develop into extended discussions at inspections. I don't see any of them indicating a big problem, and take that to mean you are doing a good job of operating gas distribution systems.

If you have questions about any of these issues, or anything else that has been an inspection topic, please let me know.

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Code Corner

As noted in the list of inspection topics, the relationship between LEL and odorization is a common discussion item. It's important that the people performing odorant sniff tests understand this relationship. First, you need to know what your LEL is. It should be in your manual, and is often obtained from the gas supplier. LEL's for Minnesota utilities range from 4% to 5% gas-in-air.

Second, calculate one fifth of that number. Part 192.625 requires that gas in a distribution system be readily detectable by a person with a normal sense of smell at 1/5 of the LEL. For example, if your LEL is 5% gas-in-air, this means the odorant must be readily detectable at 1% gas-in-air. One fifth of 5% is 1% gas in air. If your readily detectable odor testing instrument reading is LOWER than 1% gas in air, you are in compliance. If the reading is HIGHER than 1%, the odorant level is too weak and action must be taken to correct the condition, like checking the odorizer for proper operation.

Persons who are qualified to perform odorant concentration testing need to understand the relationship between the LEL of natural gas and required odorization levels. One of the most common questions when determining if a person understands how to recognize and react to abnormal operating conditions is to ask what odorometer reading requires action to be taken to correct a situation where the gas is being under-odorized. Everyone who is taking odor tests needs to be able to answer this question.

After-Hours Locates

One thing you may want to check on is how are your after-hours emergency locates getting communicated? I have heard of a couple of locations where an after-hours emergency was found on the fax machine on Monday morning.

I called the GSOC Help Desk to ask about this. They were very helpful. GSOC has good, easily accessible records of where your emergency locates are being transmitted, both during the day and after work hours. They make a phone call at no charge after hours, and will call and report an emergency locate during business hours for a fee.

You can contact the help desk to learn where your emergency calls are going and start the process to correct any problems you find by calling them at 800-245-5852.