MMUA Gas Circuit Rider Newsletter
Minnesota Municipal Utilities Association
September 2011

Documentation Matters

While many of you have already completed your MNOPS inspections for this year, there are still about a dozen towns to go. This information should be useful for all of you as you document the operation of your systems on an ongoing basis. The things you do every day, and how you document those actions, will have a direct impact on the results of your inspection in 2012.

Documentation is more important than ever. When a pipeline safety inspector conducts a "Field and Records" inspection of your system, they have a limited number of reference points to use. One, they can use their eyes and ears (and sense of smell) to detect problems that are occurring today. Of course this matters, and is one reason to make sure your system is maintained according to code and O&M requirements. Second, they can and will look at records. These records are seen as an illustration of the level of detail you use in operating a pipeline system along with a record of actions taken to comply with applicable requirements. I believe that when an inspector sees incomplete or sloppy records, it casts a shadow over everything else you do. This is not necessarily right or wrong, but it is a fact. Accurate records, records that are complete and on the proper forms with no omissions, and that document how any problems found were resolved, communicate that you are taking good care of your systems.

Here are some examples of the kind of deficiencies that can create problems:

- Leak reports where the leak is not properly classified, or is not classified at all. All leaks on utility owned piping must be classified.
- Annual Reports where the data is not accurate-for instance, the number of leaks shown should be equal to the number of leak reports for the reporting year. Use the definition of a leak in the annual report instructions.
- Another Annual Report issue can be the number of services or miles of main-do your construction records for the report year match up to the number of services installed and/or abandoned, for example?
- Construction records that do not show the test pressure and/or time-or that lack other required information. If there is a spot on a form that isn't filled in, you need to be able to explain why it doesn't need to be filled in.
- Have the required annual reviews of the O&M, Emergency Plan, and Public Awareness Plan been performed and documented? Are titles and contact information in the EP correct and up to date?
- CP monitoring records should be consistent in how the readings are shown. If some readings are negative and some are positive, that is not consistent. Also, it is a good idea to decide if you will use DC volts or DC millivolts and stick to that.
- Is everyone who does odorant level tests recording the results in the same format? Are the readings being converted to actual gas-in-air percentages from the machine reading? Is this done consistently?
- It is surprising how often an inspector starts paging through valve maintenance records and comes across one valve that has not been inspected.
- Document pressure tests for service lines that have been disconnected. Whether the reason is a line hit, reroute, or installation of a tee to feed another line, anytime a service line is disconnected it must be pressure tested from the riser to the point of disconnect just like new construction.

These are some actual examples of inspection issues. I could go on, but what I am trying to do is help you avoid this type of problem. Here is one way to do that.

EVERY TIME work that requires documentation is done on your system, someone should review that documentation and make sure any deficiencies are corrected before it is filed away to wait for the next MNOPS inspection. In some very small operations, this review will have to be done by the person who completes the documentation in the first place, but if possible it should be by someone else. The goal of this review is to find documentation problems quickly, and correct the issue. For instance, if a construction record doesn't show that the work was tested according to the O&M (include test time and pressure), find out immediately if the work was not done. If it wasn't, get it done. If it was, get the person who did it to document it. Doing this isn't the answer to all your problems, but it removes incomplete documentation from the list. And that is a great help.

There is no question that documentation is more closely scrutinized that it has been in the past. You have a choice to make-either ensure the work done on your system is documented completely and accurately, or deal with the consequences after an inspection, or even worse, an incident on your system. In the long run, doing it right the first time is much easier.

If you would like to talk about how to develop a system to review the work done on your system, contact me. I don't believe that one method will work for every operator, but I would be happy to help you come up with a way that will work for you. And one final note: you are not alone. When I was a supervisor, this exact issue (complete and accurate documentation) was one of my greatest challenges. There are no simple answers, but hard work can achieve a lot.

Contact information:
Jim Ramnes (jramnes@mmua.org)
MMUA Gas Circuit Rider
612-801-1768