Drug & Alcohol Plans

If you have not contacted APGA yet about using their program to develop your up to date D&A plan please do so soon. If you feel your plan is OK as is please send me the latest version so I can do a pre-audit inspection to see how it stacks up against the PHMSA inspection form.

THANKS
Please call APGA at 202-464-2742 and ask for Simon Cook to sign up.

Field & Records Inspections

Some common issues continue to show themselves as we progress through the summer F&R inspections. Nothing serious but things we can avoid with some pre-planning.

1. Emergency plans need to trained on and we need to document the effectiveness of the training. MNOPS is looking for a test of some type, of course they give no direction as to how long the test should be or any particulars. We can argue about the validity of the test later but I think 10 questions covering the main points of your plan should suffice. Even if you have not given the test yet if you can show that it is going to be used in the future we should be good to go.

2. Documentation of atmospheric corrosion surveys continues to be incomplete. We must show by address or meter # that we have evaluated each above ground facility and found it acceptable or unacceptable. The unacceptable ones than need to be followed up on and document what you did to mitigate the corrosion.ie paint etc.

3. Relief valve capacity calculations need to be reviewed every year and dated even if there has been no changes. If you do not have them the manufacturer can supply you with them if you supply the pertinent information. Make, model, orifice size, spring rate, inlet pressure etc.

MEA Annual Convention

I will be attending the MEA conference the week of August 10th and hope to see you all there. If you have not gone in recent years I recommend that you attend. It now takes place in Rochester, MN and has many more training options that previous years.

Work safe and document everything!