



## Drug & Alcohol Plans

If you have not contacted APGA yet about using there 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

The following utilities are on MNOPS's list to complete Drug & Alcohol inspections yet this year:

- |              |                     |
|--------------|---------------------|
| Battle Lake  | Tyler               |
| Hawley       | Fairfax             |
| Fosston      | Two Harbors         |
| Henning      | Round lake          |
| Owatonna     | Randall             |
| Westbrook    | Perham              |
| Virginia     | New York Mills      |
| New Ulm      | Morgan              |
| Lake Park    | Hibbing             |
| Clearbrook   | Clarissa/Eagle Bend |
| Circle Pines | Bagley              |
| Austin       |                     |

## PHMSA Delays Construction Inspection Rule Indefinitely

It's official. On September 30 the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a notice in the Federal Register indefinitely delaying the October 1 effective date of its construction inspection rule. The rule published March 11, made many rule changes including modifying 49 CFR 192.305 to prohibit individuals who performed any task during the construction of a new main or transmission line from performing post-construction inspection of their own work. The final rule included contradictory statements that it was not PHMSA's intent to force operators to hire outside contractors to perform these inspections, yet provided no alternative to outside inspection in cases where there were no other operator employees qualified to do the inspections who were not involved in the construction project. On April 10 APGA filed a petition for clarification and reconsideration of the rule.

PHMSA has formed a working to advise it on how to fix the rule. APGA Vice President, Operations represents public gas on the working group. It is anticipated the working group will



complete its work and PHMSA will take action in early 2016.

All the other changes made except the construction inspection rule made in the so-called “miscellaneous rule” will take effect today, October 1. These include changes to qualification requirements for plastic pipe joiners. Beginning October 1 a person must be re-qualified under an applicable plastic pipe joining procedure once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under §192.513. Previously operators only needed to retest plastic pipe joiners if that person does not make any joints under that procedure or else 3 joints or 3 percent of the joints made by that person, whichever is greater, had been found unacceptable.

## Damage Prevention Programs

Some of you have already completed the DP inspections and others will before the end of the year. The inspections have gone well thus far and are typically a half day in length.

Some of the issues that have commonly come up are as follows:

1. Do you track missed locates (not required but they still ask, after all how would we know unless you get hit because of it!)
2. Do you have procedures in the O&M on how to locate?

3. Do you include missed locates as one of the failures you will investigate? (192.617)

4. Is 3<sup>rd</sup> party excavation listed as a threat in your DIMP plan even if you have no hits in previous 3 years?

5. What issues do you have with GSOC? Have a list and be specific, now's the time to give feedback!

6. Also have copies of all your bill stuffers, advertisement text from newspapers or cable TV and dates it ran etc.

*Drive Safe Winter is  
Coming Soon!*