

### **O&M** and Records Presentation



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### **SUBPART L - OPERATIONS**

### **O&M and EMERGENCY PLANS**





### § 192.603 General provisions

(a) No person may operate a segment of pipeline unless it is operated in accordance with this subpart.

Each operator shall keep records necessary to administer the procedures established under § 192.605.

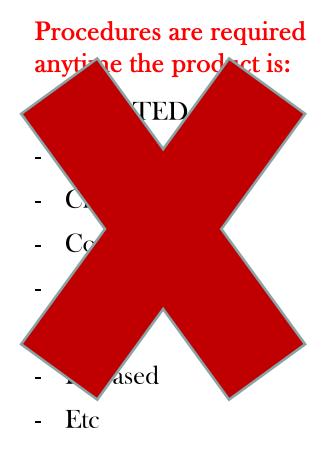
The Associate Administrator or the State Agency that has submitted a current certification under the pipeline safety laws, (49 U.S.C. 60101 *et seq.*) with respect to the pipeline facility governed by an operator's plans and procedures may, after notice and opportunity for hearing as provided in 49 CFR 190.206 or the relevant State procedures, require the operator to amend its plans and procedures as necessary to provide a reasonable level of safety





### Procedures are required anytime a pipeline is:

- OPERATED
- Replaced
- Changed
- Extended
- Located
- Inspected
- Evaluated
- Removed
- Etc...







#### SPECIFICITY!

- WHO
- WHAT
- WHEN
- WHERE
- WHY
- HOW
- Other Information to Provide Clarity

#### **CLARITY!**

- CORROSION REFERENCES
- CORPORATE SAFETY DOCS
- EMERGENCY PLANS
- MEASUREMENT DOCS
- DESIGN DOCUMENTS
- COMPONENT MANUALS





# § 192.605 Procedural manual for O&M/E (b)(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M

The plans should be an outline for compliance.

- They should either say what you do
   OR
- You should do what they say

Either way will be in compliance following your own procedures.

The right combination of specificity and detail is needed to achieve O&M goals and accomplish compliance.





### **Procedures: Active Voice**

Use an Active Voice vs a Passive Voice

#### Example:

"The incident needs to be reported to the gas controller"

#### Active Voice:

"The supervisor or the first employee on the scene will report the incident within 15 minutes of arriving at the site and report the incident to the gas control center by telephone or company radio."





# § 192.605 Procedural manual for O&M/E (a) General

An Operator must have a written manual for conducting Operations, Maintenance activities and for Emergency response.

- Must be reviewed and updated (if needed) each calendar year, not to exceed 15 months
- Must be prepared before pipeline operation
- Must be available to operations and maintenance personnel





### § 192.605 Procedural manual for O&M/E (a) General

#### Short list of things looked at during Inspections

- O&M Revision History
- Management of Change Documentation
- Procedure Availability
- Emergency Manual Availability







The O&M manual must include procedures for the following, if applicable, to provide safety during operations and maintenance



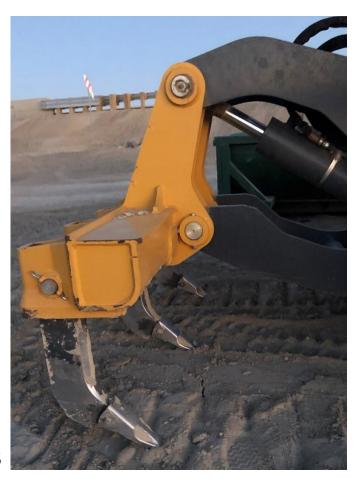




- Operating, maintaining, and repairing the pipeline
- 2) Controlling corrosion (ref.Subpart I)
- 3) Making construction records, maps, and operating history available to personnel







- 4) Gathering data for reporting incidents under Part 191
- 5) Safely g up butting down a
- 6) Purging, d maintaining comp.



#### Supporting Documentation:

- Pressure Charts
- SCADA Data
- Maintenance Documents
- Work Orders
- Corrosion Readings
- Corrosion Inspections (Atmospheric)

- Construction As-Builts
- Service Drawings
- Leak Surveys
- Maps
- Incident Reports
- Safety Related and AOC Reports
- Vault Inspections







- 7) Starting, operating, and shutting down compressors
- 8) Periodic review of work and the effectiveness of existing procedures
- 9) Precautions and equipment need to ensure safety in a gaseous atmosphere



- 11) Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under § 192.615(a)(3) specifically apply to these reports.
- 12) Implementing the applicable control room management procedures required by § 192.631.







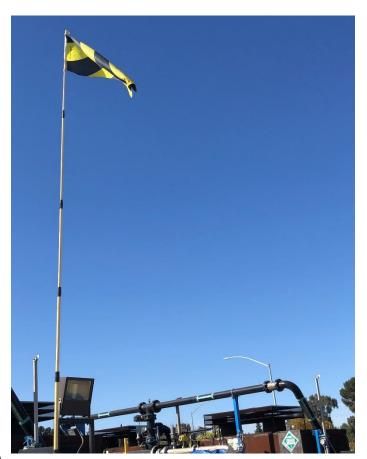
#### **Support Documentation**

- Leak Reports
- Field Survey Reports
- Emergency Repair Documents
- Incident/Accident Logs





# § 192.605 Procedural manual for O&M/E (d) Safety-Related Condition Reports



Instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safetyrelated conditions that are subject to the reporting requirements of § 191.23 of this subchapter.





# § 192.605 Procedural manual for O&M/E (e) Surveillance, emergency response, and accident investigation.



The procedures required by §§ 192.613(a), 192.615, and 192.617 must be included in the manual required by paragraph (a) of this section.



### **Record Retention**

#### Life of Facility

- Includes construction, materials, repairs, MAOP information, and most corrosion records
- Retained for active life of facility

#### Other Records

- Include tests, inspections, patrols, surveys, and procedure reviews which prove compliance with 49 CFR 192
- Retained for at least 5 years





### **QUESTIONS?**





Thank you!
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