Operation & Maintenance Plan

The "Backbone" of any Gas System.

Operation & Maintenance (O&M) Plan

- Why do you need an O&M Plan?
- What needs to be in the O&M plan?
- What maintenance activities need to be addressed by the plan?
- How do you know if your plan meets the requirements?
- What records are required and how should you keep them?



The two main reasons you need a written O&M Plan

- First:
 - An Operation and Maintenance Plan is required for all Gas Systems by state and federal law.
 (Codes of Federal Regulation, Title 49, Part 192.605.)
- Second:
 - An O&M Plan will help employees of the gas system become familiar with the system, those activities that are required, and how often those activities need to be done.

What needs to be in the O&M plan?

- A list of all employee(s) which shows tasks for which the employees are qualified (Part of Operator Qualification Plan)
- Procedures related to Public Awareness Program (PAP) plan
- Procedures for safety activities, including:
 - Discontinued Service (192.727d)
 - Prevention of Accidental Ignition (192.747)
 - Line Markers* (192.707)
 - An Emergency Plan (not being covered today) is part of an O&M Plan
- A Description of all maintenance activities performed on the system, including
 - What is performed
 - How often it is performed
 - Who performs it



What maintenance activities need to be addressed by the plan?

- There are maintenance activities that need to be performed on all Gas System.
- There may be maintenance activities that need to be performed on your particular gas system.



What maintenance activities need to be performed on my system?

- Maintenance activities that need to be performed on all gas systems:
 - Leak Surveys
 - Patrolling
 - Leak Repairs
 - Key Valve Maintenance
 - Odorant Checks
 - Annual Review of O&M plan
 - Atmospheric Corrosion Monitoring
 - Examination of Exposed Buried Pipes

- Maintenance activities that may need to be performed on your particular system:
 - Regulator Stations
 Inspections
 - Corrosion Control Monitoring
 - Pipe to Soil Readings
 - Rectifier Readings
 - Cathodic Protection Evaluation

Leak Surveys (192.723)

- Leak surveys are required to be done with leak detection equipment at intervals not exceeding 5 years (63 months). Except:
 - If leak surveys are performed in lieu of an electrical survey for steel systems without CP, the intervals must not exceed 3 years (39 months).
 - In some cases it is highly recommended that a yearly leak survey be conducted.



Patrolling (192.721)

- A routine inspection of the distribution system. It is done by walking along the pipelines and observing factors affecting safety of operation.
- Minimally, should be done at least twice each calendar year at intervals not to exceed 7 ¹/₂ months.

- Things to look for:
 - Meter supports
 - Regulators installed properly (vents)
 - Service valve on risers accessible?
 - Metallic items shorting the CP system
 - Smell of leaking gas
 - Atmospheric Corrosion
 - Flex lines (damaged/buried)

Leak Repairs (192.703)

- Operators must keep records for:
 - All leaks found
 - All repair records
- The repair records need to show the following:
 - Probable cause of damage
 - Date and method of Repair
 - Material used in repair
 - Name of person(s) making the repair





Key Valve (192.747)

- A key valve is a valve that could shut down the entire system or sectionalize a portion of the system.
- The operator must
 - Determine the Key Valve(s)
 - Mark and identify it / them on the map
 - Check the operation of the value at least each calendar year at intervals not to exceed 15 months.
 - Timely repair or replace inoperable valves.

Odorant Checks (192.625)

• The operator must conduct a periodic sampling of the gas to assure the proper concentration of odorant.



- Usually done at the extremities of the system.
- If you can not smell the gas, call your supplier immediately.

Annual Review of O&M plan (192.605a)



The O&M Plan must be reviewed at least once each calendar year at intervals not to exceed 15 months.
The Emergency Plan also needs to be reviewed annually when the O&M plan is reviewed.

- Things to check for:
 - Still using the same contractors
 - Managers/Owner still the same
 - Any changes to the system

Atmospheric Corrosion (192.481)

- All aboveground piping must be inspected for atmospheric corrosion once every three years but with intervals not exceeding 39 months.
- Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.



Examination of Exposed Buried Pipes (192.459)

 Whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipeline is bare, or if the coating is deteriorated.



Regulator Stations Inspections (192.739)

- Regulator Stations cut the pressure of the gas in your system.
- The stations need to be inspected once each calendar year at intervals not to exceed 15 months to determine:
 - Equipment is in good mechanical condition, reliable, and set to function at the correct pressure
 - Properly Installed and protected from:
 - Dirt
 - Liquids
 - Or other Conditions that might prevent the proper operation



Corrosion Control Monitoring

- Corrosion Control Monitoring:
 - The annual evaluation of the Cathodic Protection (CP) system (Galvanic or Impressed Current) on the pipeline system.
- When is CP required?
 - On all metal pipes installed after July 31, 1971.
 - On pipes installed prior to August 1, 1971, a cathodic protection evaluation must be performed every 3 years per 192.457. (For small operators this generally means a review of leak history and repair records to determine active corrosion.)

How do you know if your plan meets the requirements?

- Annually check to see if all information in the manual is current and applicable;
- Check to see if all maintenance activities included in your plans are being performed and records maintained per those plans;
- A CPUC inspection will find out if your plan meets all the requirements



What records are required and how should you keep them?

- Records are required to prove that all maintenance activities were done in accordance with the law and the O&M plan.
- Records can be kept in any way, but must include at least the following:
 - The Date performed

- R Star
- Name of Individual who performed the activity
- Findings
- Initials (signature is even better) of the individual who performed the activity

Make Everything Official



Any Questions?



