



Indiana Utility Regulatory Commission  
Pipeline Safety Division

**2010 Master Meter Operator Compliance Seminar**  
**November 4, 2010**

# O & M

What does O & M Mean

**O & M**

Operations  
and  
Maintenance

# General Requirements

- Annual review – 192.605 (a)

This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year.  
Review procedures to ensure updates and revisions are current

- Document review date

Note revisions on cover sheet or at the bottom of each page where revisions have been made

- This is YOUR Bible

How you operate & maintain your system will be outlined here. Also where incident investigations will occur. Did you follow YOUR procedures

# Supplier Letter (for Odorant)

- Operators of Master Meter systems may comply with this requirement by-
- Receiving written verification from their gas source that the gas has the proper concentration of odorant  
(We expect at least every 3 years)
- AND

# Odorant (cont)

- Operators of Master Meter systems may comply with this requirement by-
- Conducting periodic “Sniff ” tests at the extremities of the system to confirm that the gas contains odorant.
- We expect at least quarterly
- Tests must be documented
  - Date, Location, Observed by, Concentration level
  - Ok, Strong, Weak, or Nil, Barely Detectable, Readily Detectable, Strong

# General Requirements (cont)

- Continuing Surveillance                      What is it?
- Each operator shall have a procedure for continuing surveillance of its facilities to determine ..unusual operating and maintenance conditions

Maintenance staff on the property daily. Observe CP issues, atmospheric conditions, bikes/dogs chained to meter set/risers, air conditioner lines touching, ground/surface pipe degradation. Document findings and address issues as presented. May incorporate with patrols...

# Records Retention

- §192.1011 What records must an operator keep?

An operator must maintain records demonstrating compliance with the requirements of this subpart for at least 10 years. The records must include copies of superseded integrity management plans developed under this subpart.

[Amdt. 192-113, 74 FR 63905, December 4, 2009]

# General Requirements (cont)

- Records Retention

Rule-of-Thumb:

Every time you perform ANY work on your pipeline system, know there is a supporting form to complete in order to document the work.  
Call, Ask, Inquire.....

# General

- No job is done until the paperwork is complete

