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**Investigation  
Of  
Failures**

## Pipeline and Hazardous Materials Safety Administration

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**Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.**

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# Pipeline and Hazardous Materials Safety Administration

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## Investigate

1. Accidents
2. Failures

This is NOT limited to incidents as reported under 191.5

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**Each leak is a failure**

**Have you analyzed and determined what caused the leak?**

**Have you documented your analysis and made a recommendation to prevent recurrence?**

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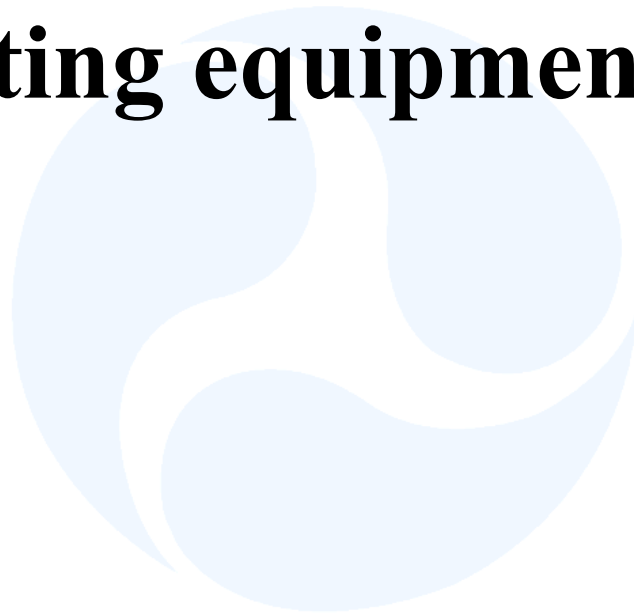
If you have a leak, and you can not find the source, have you made the conclusion the gas is not yours?

May be sewer gas?

May be residue in the soil?

May be land fill gas?

**Do you have immediate access to testing equipment?**





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How does an inspector know when an operator isn't doing the requirements of 192.617?

Does the operator have a high percentage of “Other/Unknown” leaks in part C of the Annual Report?

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In Conclusion:

Ensure procedures required under 192.617

Document replaced and repaired components

Have list of people and companies to assist

Analyze your data

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The inspector looks at work orders.

Does he see repairs and replacement of pipe and components?

Is there an explanation why that component was replaced?

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Questions?

Comments?

Thank you