



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

May 12, 2022

Joel L. Greene
Andrea I. Sarmentero Garzón
Jennings, Strouss & Salmon, PLC
1300 I Street, Suite 1120
Washington, D.C. 20005-3314

Dear Mr. Greene & Ms. Sarmentero Garzón:

In your February 1, 2022, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) you requested on behalf of Philadelphia Gas Works (PGW) an interpretation of the Federal pipeline safety regulations in 49 CFR Part 199 with respect to whether employees in the Planning Utility Drafter I (PUD I) position at PGW are subject to PHMSA/DOT drug and alcohol (D&A) testing.

PHMSA promulgated the first drug testing regulations in 1988 wherein PHMSA required pipeline operators to have an “anti-drug program for employees who perform certain sensitive safety-related functions covered by the pipeline safety regulations.”¹ While the original drug testing rule did not define covered employee or covered function, it was explained in the preamble that the drug testing regulations were limited to “those who perform regulated operation, maintenance, or emergency-response functions...on existing pipelines.”²

In other words, from the onset of the drug testing regulations in 1988, PHMSA has specified that the functions performed by employees subject to the regulations are operations, maintenance, and emergency-response functions subject to Parts 192, 193, and 195 that are performed on a pipeline. Moreover, from the onset PHMSA specifically excluded the design function from DOT drug testing³ and drafters are generally involved in design.

We reviewed the PUD I position description you submitted and did not identify any functions subjecting a PGW PUD I to PHMSA/DOT D&A testing. While the position does perform some maintenance functions, the functions described are not performed on the pipeline, which is the discriminator between maintenance functions that are D&A covered and maintenance functions

¹ 53 FR 47084.

² 53 FR 47089.

³ 53 FR 47088

that are not D&A covered. Additionally, while the PUD I position description mentions “potential emergency situations,” it does not list any specific emergency-response functions regulated by Part 192 that are performed on a pipeline. As with operations and maintenance, only those emergency-response functions performed on the pipeline are D&A covered functions, regardless of whether the functions are listed in § 192.615.

We noted, however, that you added comments regarding PGW’s Winter Emergency Plan in your letter explaining that the PUD I position is a source of personnel for the plan, but the duties stated in that plan are not included in the PUD I position description PGW provided. Nonetheless, you explain that with regards to the Winter Emergency Plan,

“PHMSA has clarified that persons who do a covered function even if infrequently or who have a potential to do a covered function are subject to Part 199 drug testing.”

To support that statement, you referenced a guidance document published by PHMSA’s predecessor agency the Research and Special Programs Administration (RSPA) in March 1994. We must point out that the definition of “covered function” did not appear in the drug testing subpart of Part 199 until March 1998, four years after the guidance document you referenced.⁴ Furthermore, the current definition of “covered function” and the only definition of “performs a covered function” did not appear in Part 199 until Amendment 199-19 (effective September 11, 2001)⁵, which was seven years after the RSPA guidance document. That RSPA guidance is no longer available on PHMSA’s D&A website or through any other PHMSA source.

To clarify, Part 199 defines “performs a covered function” to include actually performing, ready to perform, or immediately available to perform a covered function. While PHMSA has not published guidance on the meaning of “ready to perform, or immediately available to perform” these terms are included in the definition to dispel the notion that an employee has to be actually performing a covered function to be a covered employee. For example, some operators believed that a welder on a coffee break or off-duty was not a covered employee because he/she was not actually welding at those times. The definitions of “performs a covered function” in § 199.3 clarifies that the welder need not necessarily be welding at all times to be a covered employee.

In summation, our review of the PUD I position description provided by PGW did not identify the specific responsibilities necessary for this position to be subject to D&A testing under the PHMSA regulations in Part 199.

⁴ 63 FR 12998-13001

⁵ 66 FR 47114 - 47119

Notwithstanding the above, nothing in Part 199 prohibits an employer from D&A testing any of its employees using non-DOT procedures, including those employees already subject to D&A testing under PHMSA regulations.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

John A. Gale
Director, Office of Standards
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February 1, 2022

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Director, Office of Standards and Rulemaking
Office of Pipeline Safety (PHP-30)
Pipeline and Hazardous Materials Safety Administration (PHMSA)
US Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590-0001
Attn: Interpretations

Re: Request for Official Interpretation

Dear Mr. Gale:

We are writing on behalf of Philadelphia Gas Works (“PGW”) to request an official interpretation, pursuant to 49 C.F.R. § 190.11, of the federal pipeline safety regulations in 49 CFR Part 199 with respect to whether employees in the Planning Utility Drafter I position at PGW are subject to drug and alcohol (“D&A”) testing.

I. **Background**

PGW is a natural gas local distribution company (“LDC”) in the city of Philadelphia serving over 500,000 customers. It is also the operator of two (2) LNG facilities within Philadelphia. As an operator of pipeline facilities subject to parts 192, 193 and 195 of Title 49, it tests covered employees pursuant to the requirements of 49 C.F.R §199.1.

PHMSA’s D&A testing regulations, as codified in 49 C.F.R §199.1, provide in part:

§ 199.1 Scope.

This part requires operators of pipeline facilities subject to part 192, 193, or 195 of this chapter to test covered employees for the presence of prohibited drugs and alcohol.

Further, § 199.3 specifies the meaning of “covered employee” and “covered function.”

§ 199.3 Definitions.

As used in this part –

Covered employee, employee, or individual to be tested means a person who performs a covered function, including persons employed by operators, contractors engaged by operators, and persons employed by such contractors.

Covered function means any operations, maintenance, or emergency-response function regulated by part 192, 193, or 195 of this chapter that is performed on a pipeline or on an LNG facility.

Performs a covered function includes actually performing, ready to perform, or immediately available to perform a covered function.

This request for interpretation asks whether the employee position of Planning Utility Drafter I (“PUD I”) at PGW is subject to coverage under Part 199. As demonstrated below, PGW believes that the requirements of the PUD I position satisfy the operations, maintenance, or emergency-response criteria for a “covered function” under §199.

II.

Job Title and Description of Duties – Planning Utility Drafter I

The PUD I is a senior level position in the Distribution Planning section of PGW that requires skills to cover field drafting, estimating projects and senior drafting.¹ The PUD I is responsible for planning main extensions into new areas and new home developments, and the position may involve daily site visits to various locations in all weather and potential emergency situations on a 24 hour, 7 day a week time frame depending upon the schedules of the field crews being covered. This position involves field coverage where mains are being installed by construction crews, and the PUD I makes pencil/future technology based field sketches showing make-up of mains in detail for the purpose of updating all of the PGW detailed and general main pipeline maps. The PUD I’s field sketch is the sole-source document, and the PUD I creates many of PGW’s operational records (e.g., drip cards, valve cards, test station cards) and is responsible for maintaining these files. The PUD I is responsible for creating PA One Call records of PGW’s pipelines associated with construction projects. The PUD I can also act as backup to the Sr. Estimator and is required to perform the duties of a PUD II and PUD III as needed.

Additionally, the PUD I performs other related duties as assigned. Most importantly, this includes the PUD I’s performance of emergency response functions on PGW’s pipelines pursuant to PGW’s Winter Emergency Plan, discussed herein below.

¹ A complete copy of this job description (updated 10/2016 and including all essential functions), is attached hereto as Appendix A.

III.

Request for Interpretation

Since the inception of mandatory drug testing in 1990, PGW, guided directly by the Office of Pipeline Safety at the time, has determined that its PUD I position² should be considered a safety sensitive position and covered under PGW's drug testing program in accordance with the requirements of 49 C.F.R. Part 199.

This designation is based, in part, on PGW's determination, reinforced by a discussion with Mr. Cesar DeLeon, then Assistant Director for Regulation, Office of Pipeline Safety in March, 1990, that because employees in this position develop the original field drawing which is used to perpetuate the gas distribution mapping system, such draftsmen perform a covered operational function and are subject to PHMSA drug testing. The PUD I creates many of PGW's operational records, including the field sketch, which is the sole-source document used for PGW's general and main maps. The PUD I also performs a maintenance function because he/she is responsible for maintaining and updating, among other things, the critical infrastructure and pipeline maps in PGW databases, including but not limited to pipeline running through PGW's LNG facilities. Accurate design and pipeline map maintenance is crucial in order to avoid issues such as over-pressurization, which can lead to fatalities (*e.g.*, the incident in Merrimack Valley).³ Furthermore, the PUD I performs a covered maintenance function through the creation of PA One Call⁴ records of PGW's pipelines, the accuracy of which is important in order to avoid damage to PGW's active pipelines during construction.

Perhaps more critically, the PUD I position is a source of personnel in PGW's Winter Emergency Plan, which is an emergency plan prepared in accordance with 49 C.F.R. § 192.615. The employees holding the position of PUD I have risen through the craft and service ranks and are utilized to perform emergency-response functions on PGW's pipelines and LNG facilities. During various phases of PGW's Winter Emergency Plan, a PUD I may be assigned to a crew in the Distribution Department where the PUD I would be called upon to perform pipeline maintenance functions such as, inter alia, addressing gas/fire emergencies, winter leak survey patrol, performing new leak investigations, addressing underground street issues, performing service restorations, and responding to repair orders. Additionally, a PUD I may be assigned to the Field Services

² The PUD I position at PGW was formally known as the Senior Draftsman position at PGW.

³ It is PGW's understanding that on September 13, 2018, excessive pressure in natural gas lines owned by Columbia Gas of Massachusetts caused a series of explosions and fires to occur in as many as 40 homes, with over 80 individual fires, in the towns of Lawrence, Andover, and North Andover, all within the Merrimack Valley, in Massachusetts. One person was killed and 30,000 were forced to evacuate their homes immediately. It is PGW's understanding that the National Transportation Safety Board ultimately determined that the probable cause of the incident was weak engineering management that did not adequately plan, review, sequence, and oversee the construction project that led to the abandonment of a cast iron main without first relocating regulator sensing lines to the new polyethylene main.

⁴ Pennsylvania One Call System is a non-profit corporation created to protect underground facilities before anyone begins to disturb the earth. PA One Call receives requests from excavators, contractors, plumbers, builders, designers, and the general public to find out where underground lines are located. Pennsylvania One Call notifies member underground facility owners of the intent to excavate. The facility owner then marks where their lines are located. Act 50 of 2017 authorizes the Pennsylvania Public Utility Commission to enforce provisions of the state's Underground Utility Line Protection Law, Act 287, also known as the "One Call Law."

Department where the PUD I may be called upon to conduct street leak relief, which includes using a combustible gas instrument to constantly monitor gas readings on active pipelines and report any change to the leak readings to Field Operations for disposition and/or reclassification. PHMSA has clarified that persons who do a covered function even if infrequently or who have a potential to do a covered function are subject to Part 199 drug testing.⁵ Similarly, it is PGW's understanding that persons whose positions require them to potentially perform a covered function, are subject to drug testing, even if the individual employee has not yet done a covered function. Indeed, PHMSA has clarified that:

If an operator determines that an employee, who performs design or construction functions, has other responsibilities which clearly relate to covered functions under Part 192, 193, or 195, then that employee may be subject to drug testing. The covered functions (operation, maintenance, or emergency-response) must take place on the pipeline or at any LNG facility and the functions must be performed by that individual in order to subject them to testing under Part 199.⁶

The example given by PHMSA is of a person an operator employs in a position responsible for an emergency-response function who may not have to do the function until sometime in the future; that person is nevertheless subject to each type of drug testing to assure that prohibited drugs do not impair the person's capacity to do the function should an emergency occur.⁷ Because of their critical role that may affect the safety of the public or pipeline personnel, PGW determined, after a careful review of 49 C.F.R Part 192, that the PUD I position is covered. *See*, 49 C.F.R. §192.615 (b).

Based on these facts, PGW respectfully requests that PHMSA provide an official interpretation of its D&A testing regulations codified in 49 C.F.R Part 199, finding that PUD I employees working at PGW are a "covered employee" subject to D&A testing because they perform functions that are: (1) performed on a pipeline or LNG facility, (2) concerned with operations, maintenance or emergency-response activities, and (3) regulated by Part 192, 193, or 195.

⁵ *Guidelines for Implementing an Anti-Drug Program for Pipeline Personnel*, Department of Transportation Research and Special Programs Administration, at pp. 23-24 of *Most Frequently Asked Drug Questions*, issued March 4, 1994.

⁶ *Id.* at pp. 17-18.

⁷ *Id.* at pp. 23-24.

Should you have any questions, or require any clarification, please contact the undersigned.

Very truly yours,

By: /s/

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Enclosure

Cc: John Gale (John.Gale@dot.gov) and Tewabe Asebe (Tewabe.Asebe@dot.gov)

APPENDIX A

JOB DESCRIPTION

JOB TITLE	JOB CODE	UNIT	WORK STATUS
Planning Utility Drafter I	61A-09	Distribution	x Shift Work <input type="checkbox"/> On-Call x Overtime
REPORTS TO	JOB CODE	PAY SCALE	HR REVIEWER
Supervisor Drafting Services	3A060	\$983.00-\$1,541.40	

SUMMARY

A senior level position in the Distribution Planning section that requires skills to cover field drafting, estimating projects and senior drafting. It could involve daily site visits to various locations in all weather and potential emergency situations on a 24 hour, 7 day a week timeframe depending upon the schedules of the field crews being covered. This position involves coverage where mains are being installed by construction crews and the Planning Utility Drafter I makes pencil/future technology based field sketches showing make-up of mains in detail for presentation to higher level employees for the purpose of entering and updating all of the PGW detailed and general main maps.

Requires the preparation of estimates and design for the installation of mains and services, including meters, regulators and related equipment for customers requesting gas service up to 20,000 CFH through single service. Can also act as backup to the Sr. Estimator if needed and if the work load permits. Develops a previously selected main route; chooses the locations for proposed large mains, valves and pressure regulating stations within this route; and prepares the construction drawings for such installations. These customers may be in any classification including commercial, industrial major and residential. Estimates and designs these installations in an economical manner taking into consideration safety, efficient delivery of the product and the present and potential use of the installation. Estimates and Designs installation considering the minimizing of future maintenance problems. These installations may be required to supply new customers, provide for the increased demands of existing customers, relocation of facilities of existing customers.

Set up construction drawings for drafters, send and receive PA 1 Call tickets, handle file exchange from ftp and other internet web sites, maintain various databases, maintain drawing archives, ensure updated maps are current in Dispatch Area, provide printing and scanning, maintain printer/scanning equipment and software at multiple locations, and handle printing and scanning requests from various internal departments and outside agencies.

Responsible to enter construction drawing information into GPIS, apply for Highway Openings, Lane Closures and ADA Ramp permits in GPIS, as well as apply for PennDOT permits. Responsible for the creation of AIMS orders and preparing AIMS orders to be dispatched to Construction. Assists in requesting police and documenting the applications. Assist in documenting and processing invoices.

This position requires senior drafting skills and the ability to complete all drawings assigned as well as Planner Utility Drafter II and III requirements, if and when needed.

Works in all inclement weather and construction hazard conditions.

ESSENTIAL FUNCTIONS

- Must have a thorough knowledge of PGW policies in regard to main, service, regulator, meter, metering related equipment and other system installations as these matters must be discussed with the customer so that designs and subsequent installation are compliant with PGW, City, State and Federal regulations.
- Must have the ability to complete all required PGW drafting needs.
- Locates the main and its various fittings to reference points
- Ability to make clear, free-hand sketches using approved symbols and lettering, and also ability to use ingenuity and good judgment in the selection of reference points.

- Draws permanent main records electronically from field sketches using various drawing programs.
- Originates various reports covering assigned territories such as the main work daily progress report, and other record cards used in operation and maintenance of drips, valves, corrosion control installations, bridge mains and large (3" and over) services.
- Plans, organizes and assigns work to all other Planning Utility Drafter levels.
- Obtains Planning Utility II and III daily work from Distribution Supervisor and Foreman in order to have "as laid" piping field sketched so that departmental mapping records maintain their integrity.
- Prepares a listing of all new construction jobs and informs Corrosion Supervisor as to jobs requiring corrosion inspection.
- Substantiates and verifies "as laid" quantities of piping laid on final contract reports against the Field Draftsman, Planning Utility Drafters report and reviews the same with the Area Supervisor.
- Interprets contour and survey maps in order to plan for main extensions into new areas. Must have an understanding of building plans in order to discuss details of service installation with architects, engineers or builders. Observes and considers surface conditions, such as, manholes, vent boxes, utility markings or pavement disturbance that could influence choice of locations for the proposed main or service.
- Develops drawings for special supports for gas mains, brackets for mains crossing bridges, and retaining clamps for joints and drips.
- Selection of route and location of mains, valves, pressure regulating stations and manholes.
- Must have a working knowledge of street main instructions, contract instructions, work order authorizations, job numbers, service and special job instructions and departmental account numbers.
- Makes preliminary sketch and bills of material with specifications.
- Estimates and designs mains for new home developments as may be required from trunk mains developed by Network Analysis group. Prepares sketches electronically so that it may be presented on existing plans created by others or generated on detail main maps or general main maps. Creates Main and Service Estimates of cost of installations using PGW provided PC software.
- Designs special shapes and structures for supporting or carrying gas mains.
- Designs and draws more complicated section of large main jobs, regulating and metering stations, valves and manholes.
- Checks the following Planning Utility Drafters reports and records for accuracy and completeness: final sketch records, daily progress report, daily progress report check sheet, valve records, drip records, corrosion control records, bridge inspection records and miscellaneous records and submits to the Supervisor of Drafting to maintain monthly report.
- Locates the main and its various fittings to reference points
- Ability to make clear, free-hand sketches using approved symbols and lettering, and also ability to use ingenuity and good judgment in the selection of reference points.
- Draws permanent main records electronically from field sketches using various drawing programs.
- Originates various reports covering assigned territories such as the main work daily progress report, and other record cards used in operation and maintenance of drips, valves, corrosion control installations, bridge mains and large (3" and over) services.
- Assembles and verifies field sketches made out of hours by Distribution street personnel.
- Responsible to lay out special construction work in the field, as well as the normal duties of a draftsman.
- Directs, advises and trains Planning Utility Drafter II and III on construction drawings, maps, main records and estimates up to 8" and smaller mains and services, including meters, regulators and related equipment for customers requesting gas service up to 20,000 CFH through single service
- Checks final drawings and makes final bill of materials.
- Directs the transfer work involved from field sketch to finished map
- Revises and draws new maps as needed in the distribution system and keeps the records of their distribution.
- Meets contractors to settle construction problems, such as gas mains on bridges, highways and sewer

excavations.

- Develops the details of regulating and metering stations
- Requires a high degree of proficiency in associating and interpreting Main Sketch Recordings; must be able to recognize and adjust discrepancies in these records.
- Directs crews making test openings in the street and gathers data pertaining to the exposed underground structure.
- Daily updating of Detail Main maps, which includes but is not limited to: field sketches, emails and phone calls from Distribution Supervisors and Planning Utility Drafters. Changes to maps include all main work, all high pressure services, all intermediate and low pressure services 2" and larger, survey changes, and building additions and removals.
- Updates the 6X107 map through sketches and emails from Pressure Force Personnel and Field Drafters and other Planning Utility Drafters. Updating the general main maps, which include additions and removals of mains and services, and updating the corrosion C.P. systems.
- Responsible for researching and correcting all discrepancies found on all of the above maps, all changes done out of hours or unreported through Field Drafting.
- Researches field sketches for previously installed main and service of any age, and abandoned structures for Planning section, Distribution Department and outside contractors when conflicts occur.
- Creates a pdf of all updated Detail Main maps twice a month; which are then forwarded to appropriate personnel.
- Must have thorough knowledge of the supporting records such as Service Records, Main Repair Records, Broken Main Records, and Drip Records.
- Must be completely familiar with the interpretation of survey and contour maps, and develop maps used in the operation of the distribution system, also known as 6X drawings.
- Directs the operation of reproduction machines; has a working knowledge of the pipe locator and is proficient in the use of the transit and level.
- Makes sketches and prepares cost estimates for such work, working from standard costs but allowing for variations in underground structures, soil conditions, traffic, etc. Prepares these documents using CAD and other company supplied computer software programs. Designs services using PGW approved gas flow equations software, which may reside on various media including PC's to determine what size service pipe is needed. Required to input all job related data into an Excel based or AIMS program to electronically generate an estimate.
- Plans mains for new home developments as may be required from trunk mains developed by Network Analysis group. Prepares sketches electronically so that it may be presented on existing plans created by others or generated on detail main maps or general main maps. Creates Main and Service Estimates of cost of installations using PGW provided PC software.
- Estimates and designs 8" or smaller "ahead of paving" mains and assists in planning other 'ahead of paving' mains. This at times requires contacts with PGW Sales personnel, engineers, architects, developers, builders and their agents, survey office personnel and others to develop information. Write statement supporting need for the work. Attends pre-design, design and/or site meetings with developers, builders, Marketing, FSD, Collections and other utility representatives to determine main and service locations, outdoor meter set locations and to solve issues associated with supplying gas to one or several facilities up to 20,000 CFH through a single service.
- Develops and prepares detailed, to scale sketches of mains and services using any and all PGW supplied computer aided drafting (CAD) programs for new and existing facilities as required to complete for the creation of construction work orders. Results of the flow computations must be included as required by PGW policy to enable decisions to be made on proposed designs.
- Requires having sufficient knowledge and aptitude to associate conditions with possible corrosion problems to enable corrosion protection precautions to be devised if necessary.
- Assists Senior Estimators and other Planning Utility Drafters in the processing of estimates.
- Studies and makes recommendations on mains proposed for abandonment.
- Plans and carries out special assignments, some of which are non-repetitive in character.
- If previously titled, or after being trained, performs Field Drafting duties as assigned. Demonstrate

competence, aptitude and/or course completion in Blue Print Reading, CAD, drafting, estimating.

- Performs detail main map perpetuation
- Sets up construction drawings which includes managing and assigning new drawing numbers and other information in the drawing database, processing and tracking all Design PA 1 Call requests, creating electronic folders and placing plans from other utilities in associated folders, accessing and downloading PWD, City Survey, Highway Supervisor's maps etc. from various source and interacting with other utilities and city agencies to ensure all necessary plans are received.
- Establish proficiency with the following software products or their equivalent for printing tit, jpg, pdf, dwg and various other file types: E-Quorum Software for printing maps and drawings, Adobe Acrobat, Oce Publisher Express and OCE Controller for plotting/scanning, Auto CAD to create PDFs to send with PA 1 Call to other utilities and outside vendors as well as to update various title blocks in construction drawings
- Perform printing and scanning using the Oce 300, 600 and 2236: ScanPro 1000 and other various printing equipment. This task includes maintaining and troubleshooting the equipment, ordering supplies, (paper and ink) using Oracle, verifying printer usage monthly by checking meter reads, ensuring backup paper copies of DMM and GMM are updated monthly with the latest changes (dispatch/planning areas) and Utilizing ScanPro 1000 for microfilm and aperture cards to scan and save as PDFs in associated job folders
- Maintain FTP site and exchange files with vendors for various departments
- Assist other departments with printing and archive retrieval of old drawings, work orders, job numbers, bill of materials, sketches and account numbers.
- Archives drawings and sketches and researches previous archives (as needed)
- Blue maps updates at Dispatching map table {bi-monthly}
- GMM Books (as needed)
- Inspector Area Maps (as needed)
- Creates CD's for various bid contracts (as needed)
- Train Personnel on setting up electronic folders and ERV (PWD Website)
- Use ERV for Sewer Water Plans and Highway Plans
- Maintain Engineering Key Library
- Enter construction drawing information into GPIS – including application of Highway Opening, Lane Closures and ADA Ramp permits which includes creating new applications if there is no existing project application in GPIS, entering GPIS application names, project information and estimated phase dates, adding and deleting street location/intersections, updating start and end dates for each phase, adding PA One Call Design number into each street location, referencing drawing details to add footway/roadway locations, segments and offsets, requesting permit approval from other utilities and the city of Philadelphia Streets Department and receiving and reviewing external GPIS clearance requests, applications/plans, and entering comments as outlined in the Company policies and procedures.
- Applying for PennDOT permits which includes creating new application, adding attachments, adding work summary and locations, completing application identification, adding fee information, reviewing application summary, submitting applications, saving a copy of the application to the permit drawing folder, updating the tracking spreadsheet, PennDOT notification and issuing of the permit
- Responsible for the creation of AIMS orders and preparing AIMS orders to be dispatched to Construction. Assists in requesting police and documenting the applications
- Request police, document application and assist in billing.
- Assist in documenting and processing various invoice types
- Performs other related duties as assigned.
- Must have regular and acceptable attendance

EDUCATION & EXPERIENCE QUALIFICATIONS

- HS Education

- Must have a valid Driver's License
- Must be proficient in AutoCAD

ORGANIZATIONAL SCOPE

REVIEWING SUPERVISOR

Manager, Capital Projects, Field Operations

IMMEDIATE SUPERVISOR

Supervisor Drafting Services

OTHER DIRECT REPORTS OF SUPERVISOR

Planning Utility Drafters I, II, II, Senior Estimators and Senior Field Drafters

THIS JOB

POSITIONS REPORTING TO THIS POSITION

None

ADA PHYSICAL & MENTAL REQUIREMENTS

Following is a list of specific physical and mental requirements necessary to complete the Essential Functions of the job successfully. All requirements are subject to possible modification to reasonably accommodate individuals with disabilities. Individuals who pose a direct threat or significant risk to the health and safety of themselves or others in the workplace, because physical requirements cannot be eliminated or reduced by reasonable accommodation, will not be considered qualified for this position. The activities and metrics identified in this document represent what the Company anticipates are required under normal operating circumstances. However, due to the nature of PGW's work, normal circumstances may not always apply.

GENERAL WORK CLASSIFICATION: Check One Only

- ☐ **Sedentary work** - Exerting up to 10 pounds of force occasionally, and/or a negligible amount of force frequently or constantly to lift, carry, push, pull or otherwise move objects, including the human body. Sedentary work involves sitting most of the time. Jobs are sedentary if walking and standing are required only occasionally, and all other sedentary criteria are met.
- ☐ **Light work** - Exerting up to 20 pounds of force frequently, and/or a negligible amount of force constantly to move objects. If the use of arm and/or leg control requires exertion of forces greater than that of sedentary work and if the worker sits most of the time, the job is considered light work.
- ☒ **Medium work** - Exerting up to 50 pounds of force occasionally, and/or up to 20 pounds of force frequently, and/or up to 10 pounds of force constantly to move objects.
- ☐ **Heavy work** - Exerting up to 100 pounds of force occasionally, and/or up to 50 pounds of force frequently, and/or up to 20 pounds of force constantly to move objects.
- ☐ **Very heavy work** - Exerting in excess of 100 pounds of force occasionally, and/or in excess of 50 pounds of force constantly to move objects.

SPECIFIC WORK REQUIREMENTS:

Utilizing the "Key" below, check appropriate boxes for each requirement category as it pertains to performing the essential functions of the attached position.

Key: **C** = Constantly 75% or more of an average workday
 F = Frequently 50% to 75% of an average workday
 O = Occasionally 25% to 50% of an average workday
 R = Rarely less than 25% of an average workday

C	F	O	R	WORKING ENVIRONMENT DESCRIPTIONS
		X		Indoor Work: Performs duties subject to inside environmental conditions protected from weather but not necessarily from temperature changes.
	X			Outdoor Work: Performs duties subject to outside environmental conditions with no effective protection from weather.
	X			Extreme Temperatures: Performs work activities at temperatures below 32 degrees or above 100 degrees for periods of more than one hour, this includes such factors as the affects of wind and humidity
	X			Noise: There is sufficient noise to cause the worker to shout in order to be heard above the noise level and/or affect hearing ability.
	X			Vibration: There is sufficient exposure to oscillating movements of the extremities or whole body.
	X			Hazards: Exposed to one or more hazards such as moving mechanical parts, moving vehicles, electrical current, high places, high heat, chemicals, etc.
	X			Atmospheric Conditions: Exposed to one or more conditions that affect the respiratory system such as fumes, odors, dusts, mists, gases, poor ventilation, etc

C	F	O	R	PHYSICAL REQUIREMENT DESCRIPTION
		X		Balancing: Maintaining body equilibrium to prevent falling when walking, standing, or crouching on narrow, slippery, or erratically moving surfaces
		X		Bending and Stooping: Bending body downward and forward by bending spine at the waist.
			X	Climbing: Ascending or descending ladders, scaffolding, ramps, poles, and other devices using feet and legs and/or hands and arms. Body agility is emphasized
		X		Climbing Stairs: Ascending or descending stairs to gain access to a building or to move from one floor to another
			X	Crawling: Moving about on hands and knees or hands and feet.
		X		Light Carrying/Lifting: Physically transporting items weighing less than 15 pounds from one location to another
		X		Moderate Carrying/Lifting: Items weighing 15 to 44 pounds
			X	Heavy Carrying/Lifting: Items weighing 45 pounds and over
		X		Fingering: Picking, pinching, typing, or otherwise working primarily with fingers rather than with the whole hand or arm
	X			Grasping: Applying pressure to an object with fingers (including thumb) and palm
		X		Kneeling: Bending legs at knees to come to rest on one or both knees
		X		Light Lifting: Raising objects under 15 pounds from a lower to a higher position or moving objects horizontally from one position to another
		X		Moderate Lifting: Objects 15 – 44 pounds
			X	Heavy Lifting: Objects 45 pounds and over
			X	Pulling Hand over Hand: Using upper extremities to exert force in order to draw, drag, haul, or tug objects in a sustained motion
			X	Pushing: Using upper extremities to press against something with steady force in order to thrust forward, downward, or upward
			X	Reaching above shoulder: Extending hand(s) and arm(s) in any direction
		X		Repetitive motion: Substantial movements of the wrists, hands, and/or fingers for sustained periods of time
	X			Sitting: Particularly for sustained periods of time
		X		Standing: Particularly for sustained periods of time
		X		Walking: Moving about on foot, particularly for long distances.
		X		Hearing: Utilizes hearing to perform one or more of the following: use communication equipment, detect specific noises, proper equipment operation, understand what clients are saying in normal conversation

C	F	O	R	VISUAL ACUITY REQUIREMENT DESCRIPTION (with or without corrective eyewear)
	X			Typical Office Work: Performs activities such as: preparing & analyzing data; transcribing; extensive reading; viewing PC screens; inspecting small parts; using measurement devices; operating machines
			X	Typical Trade Work: Performs activities utilizing mechanical equipment such as: lathes, drill presses, power saws, C screens; inspecting small parts; using measurement devices; operating machines
		X		Typical Vehicle Work: Performs activities which require visual acuity to operate motor vehicles or heavy equipment
	X			Typical Service Work: Performs activities determining the accuracy, neatness, and thoroughness of work assignment or general observations of facilities/structures (i.e. custodial, inspection, security guard, laborer)
C	F	O	R	COMPREHENSION
	X			Ability to understand, remember, and apply oral and/or written instructions or other information
	X			Ability to understand, remember, and communicate routine, factual information
		X		Ability to understand complex problems and to collaborate and explore alternative solutions
		X		Ability to understand opposing viewpoints highly complex issues and to negotiate/integrate different viewpoints
C	F	O	R	ORGANIZATION
	X			Ability to organize thoughts and ideas into understandable terminology
		X		Ability to organize and prioritize own work schedule on short-term basis (longer than one month)
		X		Ability to organize and prioritize work schedules of others on short-term basis
			X	Ability to organize and prioritize work schedules of others on long-term basis
C	F	O	R	REASONING and DECISION MAKING
	X			Ability to apply common sense in performing job
	X			Ability to make decisions which have moderate impact on immediate work unit
		X		Ability to make decisions of significant impact on the immediate work unit & moderate impact outside work unit
		X		Ability to make decisions which have significant impact on the department's credibility, operations, and services
C	F	O	R	COMMUNICATION
	X			Ability to understand and follow basic instructions and guidelines
	X			Ability to complete routine forms, use existing form letters and/or conduct routine oral communication
		X		Ability to compose letters, outlines, memos, basic reports and/or to orally communicate technical information
	X			Ability to communicate with individuals utilizing a telephone; requires ability to hear & speak effectively on phone
		X		Ability to express or exchange ideas by means of the spoken word, communicating orally with others accurately, loudly, and quickly
			X	Ability to make informal presentations speaking before groups inside and/or outside the organization
	X			Ability to compose materials such as detailed reports, work-related manuals, publications of limited scope or impact, etc., and/or to make presentations outside the immediate work area
			X	Ability to formulate complex and comprehensive materials such as legal documents, authoritative reports, official publications of major scope and impact, etc., and/or to make formal presentations

C	F	O	R	MATHEMATICS
		X		No mathematical ability is required
		X		Ability to count accurately
		X		Ability to add, subtract, multiply, divide and to record, balance, and check results for accuracy
			X	Ability to compute, analyze, and interpret numerical data for reporting purposes
			X	Ability to compute, analyze, and interpret complex statistical data and/or to develop forecasts and computer models

EQUIPMENT / DEVICE OPERATION: Check All that Apply

COMPUTER SOFTWARE	VEHICLES	HEAVY EQUIPMENT/TOOLS
<input type="checkbox"/> Microsoft Office <input checked="" type="checkbox"/> Outlook <input type="checkbox"/> ADP <input type="checkbox"/> Oracle <input type="checkbox"/> Visio <input type="checkbox"/> BCCS <input checked="" type="checkbox"/> AIMS <input type="checkbox"/> Goldmine <input type="checkbox"/> Other, (describe below) Gas Calc AutoCAD Google Earth Adobe PRO	<input type="checkbox"/> Bicycle <input checked="" type="checkbox"/> Standard Passenger Vehicle (Coupe, Sedan, Light SUV, Minivan, etc.) <input type="checkbox"/> Trucks/Vans (Pick-up, CDL, Cargo Van, etc.) <input type="checkbox"/> Skilled Trade Vehicles (Excavator, Front End Loader, Crane, Towed Compressor, Forklift, etc.) <input type="checkbox"/> Other, (describe below) 	<input type="checkbox"/> Construction Equipment (Jackhammers, excavation hand tools, shovels, bars, rakes, levels, etc.) <input type="checkbox"/> Welding Tools (AC/DC welders, Arc welders, Welding machines) <input checked="" type="checkbox"/> Drafting Tools (CAD, drafting machines, hand compass, dividers, protractors, etc.) <input type="checkbox"/> Natural Gas Equipment (compressors, scrubbers, evaporators, refrigeration equipment, etc.) <input type="checkbox"/> Other, (describe below)

APPROVALS:

Joseph Hawkinson, V.P. Field Ops.
PGW Department Vice President's Printed Name & Title

Joseph Hawkinson 8/31/18
PGW Department Vice President's Signature Date

Vanessa McDonald, Director, Corp Labor
PGW Labor Director's Printed Name & Title

Vanessa McDonald 9/11/18
PGW Labor Director's Signature Date

Union Representative Printed Name & Title

Union Representative's Signature

Date

Michael DiDonato Union Rep
Union Representative Printed Name & Title

Michael DiDonato
Union Representative's Signature

8/29/18
Date