1 INTRODUCTION

The private locate industry operates without specific regulations, guidelines, standards, or best practices for locating and marking privately-owned buried facilities before excavation. This guideline is for anyone who has hired a private utility locator (referred to as a **Private Locate Contractor**) and wondered about the service provided or the accountability if a buried facility is struck.

While the technical process of locating public and private buried facilities is similar—using the same equipment and procedures—the processes diverge significantly in terms of access to information and support. Public locators receive drawings and support from utility owners, while **Private Locate Technicians** often lack access to accurate drawings, utility records, or site-specific information from private landowners. This gap increases the risk of errors.

This guideline aims to clarify the roles, responsibilities, and best practices for private locates, helping excavators, landowners, and contractors understand the process and mitigate risks.

2 UTILITY STRUCTURES – KNOW YOUR WORK AREA

Taking ownership of your safety when excavating includes understanding what can potentially be buried beneath the ground before calling for locates and excavating. This involves identifying utility structures in the work area, knowing the facilities entering and exiting these structures, and using the **Site Utility Infrastructure Checklist** to take inventory of utility infrastructure features.

Prior to excavating, the excavator must be aware that privately-owned buried facilities (aka utility infrastructure) may exist within the work area and should have these facilities located and marked prior to any ground disturbance activity.

Privately-owned buried facilities will not be marked by representatives of the public utility owners beyond the demarcation point of each facility on private property. The excavator should work with a private locate contractor and the private landowner to ensure privately-owned buried infrastructure is located and marked prior to excavation.

2.1 WHY DO WE NEED TO UNDERSTAND UTILITY STRUCTURES?

Understanding above-ground utility structures and the buried facilities servicing them is vital to:

- Interpret public and private locate reports effectively.
- Identify if a buried facility has been missed.
- Take ownership of safety before excavation begins.

The five main types of buried facilities servicing properties include:

1. **Oil and Gas Pipelines and Pipes**: Transport fuel products across rural and urban properties.
2. **Electric Cables**: Provide energy transfer for powering buildings and equipment.
3. **Telecommunication Lines**: Transmit information through twisted pair, coaxial cables, and fiber optics.

4. **Water Pipelines**: Carry pressurized water for potable use and fire suppression.
5. **Sanitary and Storm Sewers**: Transport sewage and rainwater through on-site or off-site systems.

Recognizing these structures and their associated buried facilities helps ensure that nothing is overlooked during the locate process. This also helps the private locate technician determine between the public utility owned and privately owned buried facilities.

2.2 Site Utility Infrastructure Checklist

The **Site Utility Infrastructure Checklist** is a critical tool for taking inventory of utility infrastructure during the planning stage. It ensures that all above-ground features and their associated buried facilities are accounted for when reviewing public and private utility reports. Excavators should use the checklist to verify that private locators have not missed any buried facilities.

3 PRIVATE LOCATE

A **Private Locate** involves identifying and marking privately-owned buried facilities on private or public property if the property owner has buried facilities that connect two properties. These facilities, typically located beyond the public utility demarcation point, are the responsibility of the private landowner.

There are two types of Private Locates:

3.1 Private Locate with Support

When the landowner provides utility records, site access, and operational support, the **Private Locate Technician** can use this information to enhance locate accuracy.

3.2 Private Locate Without Support (Blind Locate)

In a **blind locate**, the technician works without support or information from the landowner, relying on investigative techniques. This increases the risk of missing buried facilities and highlights the importance of the **Site Utility Infrastructure Checklist** as a verification tool for excavators.

4 Requirements to Perform an Accurate Private Locate

A **Private Locate Technician** requires the following information to ensure accuracy:

1. Public locates for the work area.
2. Private utility records.
3. Access to above-ground utility infrastructure.
4. Site operation personnel assistance.

If this information is incomplete, the **Site Utility Infrastructure Checklist** should be used to identify gaps and ensure no buried facilities are missed.

5 Private Locate Methodology

To ensure accuracy, **Private Locate Technicians** should follow this methodology:

1. **Review Records**: Analyze public locates, as-built drawings, and property surveys.
2. **Interview Personnel**: Consult site operations staff for utility information.
3. **Visual Inspection**: Examine all above-ground structures, buildings and mechanical rooms.
4. **Active and Passive Locating**:
    - Trace known facilities using electromagnetic cable and pipe locate equipment.
    - Conduct passive sweeps and inductive scans for unknowns.
    - Use alternative locate methods when warranted if having trouble with traditional locate methods.
5. **Mark Facilities**: Use paint, flags, or chalk.
6. **Prepare a Report**: Document findings, limitations, and recommendations.

6 Excavator's Role

The excavator acts as a liaison between the **Private Locate Contractor** and the landowner, ensuring:

- Public locates, utility records, and site access are provided.
- The **Site Utility Infrastructure Checklist** is used to verify that all facilities are accounted for in locate reports.

7 Private Landowner's Role

The landowner must provide:

- Utility records.
- Site access and operational support.
- Public locate information.
- Direction on how to break ground near their privately-owned buried facilities if they cannot be located.

Collaboration ensures accuracy and minimizes excavation risks.

8 Private Locate Report

The **Private Locate Technician** must prepare a detailed report that includes:

- Site drawings with utility structures and marks.
- Limitations encountered.
- Inventory verification using the **Site Utility Infrastructure Checklist**.

9 Documenting Utility Locate Limitations

Limitations increase the risk of missed facilities. These include:

Unavoidable Limitations:

- non-tonable facilities
- non-locatable facilities due to depth or angled facilities
- fixes or repairs with non-conductive materials
- non-functioning tracer wires
- no tracer wires on non-tonable facilities
- no records exist

Avoidable Limitations:

- utility records are not available or provided
- no access to buildings and mechanical rooms
- no direct access to connection points for facilities
- no access to site operations personnel that have knowledge of the property's utility infrastructure and mechanical systems

Excavators should use the **Site Utility Infrastructure Checklist** to address avoidable limitations proactively.

10 Managing Limitations and Special Instructions

When limitations are identified or special instructions are given, they must be addressed before excavation proceeds. Excavators should escalate unresolved issues to their supervisor and the property owner and take steps to mitigate risks.

It is critical to emphasize that whoever the limitation stops with assumes responsibility for the associated risk. If a buried facility cannot be located, this responsibility ultimately lies with the utility owner, who is the property owner.

If the utility owner is not made aware of the limitation or given the opportunity to decide how to proceed, then the party making the decision on their behalf without informing them assumes the risk. This principle must be stressed and clearly understood by all parties involved.

To ensure accountability:

- Escalate all unresolved limitations to the utility owner/property owner.
- Document any decisions made regarding limitations in the private locate report.
- Clearly outline the responsibilities of each party, ensuring that no decisions are made without consulting the utility owner.

11 REFERENCES

This guideline was created from the following *Own Your Safety Inc. training documents*

- **Utility Infrastructure Awareness Manual – A Comprehensive Guide,** Own Your Safety Inc., 2025
- **Private Locate Best Practice**, Own Your Safety Inc., 2017