FCX-HS01 Variance Request Form

Complete this form with a detailed description of the area and reason for the variance request. A task review by an engineer or other qualified individual to consider other controls must be completed prior to submitting for approval. The approval authority for either long-term or temporary variance request is specified at the bottom of the form.

Site / Operation: Morenci	Variance Duration: From Date/Time 7/18/2024 To Date/Time 7/18/2025
Type of Variance (Check Only One) Long-term ☑ Temporary ☐	
Location of Activity: Morenci Townsite Homes	Policy: Blue Stake
Purpose of Activity: Residential Construction, Remodel & Maintenance	Division Manager: Robert Pollock

Description of Request:

Maintenance and construction workers often have to break into walls or flooring inside residential homes in the townsite. AZ811 requests stop at the foundation of the property and FMI blue stake requests only cover inside commercial buildings. FMI blue stake reps have no materials to reference for utility locations in homes and would have to defer to experts in the construction of the homes to verify location of many utilities and those experts are the ones requesting the blue stakes. The request is to not require blue stake permitting inside of residential homes for construction and maintenance workers.

Justification for Variance:

Utility locations in the home are verified and locked out prior to penetrations being made during demolition or repair, eliminating the potential for uncontrolled release of hazardous energy during work. There are no utility location drawings for blue stake reps to refer to for individual homes in Morenci. Homes with concrete floors in Morenci do not contain electrical or gas. Those utilities run through the walls and attic.

Additional Control Measures:

Townsite blue stake procedures will be followed outside the homes and in commercial buildings to identify utilities. When working inside homes, workers will use a locating tool to identify utilities where they cannot visually verify exact location at the site of a wall penetration. Workers will use hand tools to expose identified utilities in the walls, where penetration is necessary. Power tools will not be used to expose potentially energized utilities in the wall.

Action Plan to Comply with Policy:

During the annual review of this variance, the department will evaluate need for additional control measures based on feedback and implementation of the variance in the field. There are currently no plans for the engineering department to supply Blue Stake permits for inside residential homes in the town site.

Responsible Party: Luis Bayardo Expected Date of Completion: 7/18/2025