



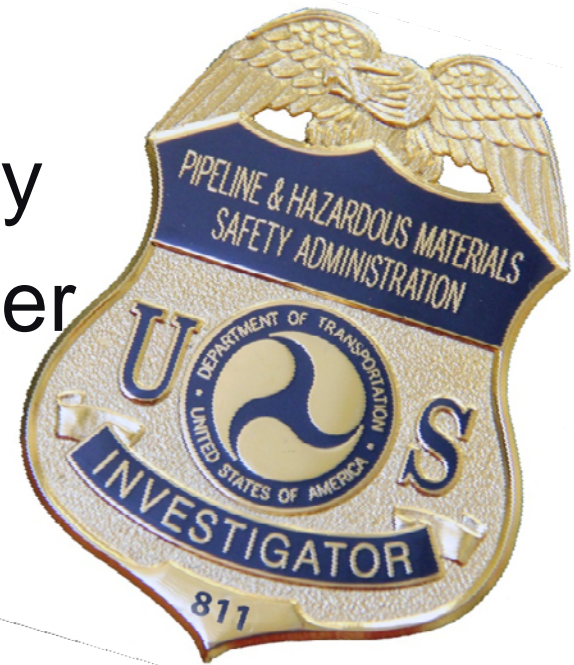
# Compliance Inspections of Natural Gas Systems

# Safety Regulations Applicable to Natural Gas Systems

- Who are these people and why are they calling me?
- Where do they get their authority?

# USC Section 60117

- (c) – Entry and Inspection
  - By displaying proper credentials, inspectors have the right to enter the premises
  - Inspect records and property
  - Reasonable time and manner



# Safety Regulations Applicable to Natural Gas Systems

49 CFR 192 - The Minimum Federal Safety Standards Applicable to the Transportation of Natural Gas and for Pipeline Facilities Used for this Transportation

# Safety Regulations Applicable to Natural Gas Systems

- Authority: Natural Gas Pipeline Act of 1968 (49 U.S.C. sec. 1671 et seq.)
- Re-Authorized by the Pipeline Safety, Regulatory Certainty, and Job Creation Action of 2011



# Part 190 Regulatory Authority

## §190.203 Inspections and Investigations.

Upon presenting appropriate credentials authorized to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties are relevant to determining the compliance of such persons with the requirements of 49 U.S.C. 60101 et seq., or regulations, or orders issued there under.

# Part 190 Regulatory Authority

Inspections are ordinarily conducted

1. Routine scheduling
2. A complaint from a member of the public
3. Information obtained from previous inspection
4. Report from a State agency participating in the Federal Program under 49 U.S.C. 60105
5. Pipeline accident or incident
6. Whenever deemed appropriate



# How Do I Prepare for an Inspection?

What do I do?

Where do I begin?

What do I look for?

What's the inspector going to look at and for?



# What Type of Inspector Will I Get?

What an inspector will focus on may vary depending on their personality, work background, or recent industry events.

Inspector looking at facts to determine compliance

# What Type of Inspection Will I Get?

Clarify the type, dates and  
location of the inspection!

# Where Do I Begin?

- Think like an inspector
  - Code requirements and not just company requirements
  - Current operator name, operator identification number, operator official, address, and contact information

# Where Do I Begin?

- Think like an inspector
  - Current forms
  - Forms available at:  
<http://phmsa.dot.gov/pipeline/library/forms>
  - Standard, OQ, IM, Public Awareness, accident, control room management inspection forms are all available on the website

# Where Do I Begin?

Various enforcement guidance is available at:  
<http://phmsa.dot.gov/foia/e-reading-room>

Includes O&M, OQ,  
Corrosion, Public  
Awareness

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

Careers | Contact Us | FAQs | Site Map  
Go  
Advanced Search

For the Public | Hazmat Safety Community | Pipeline Safety Community | Briefing Room | Doing Business with PHMSA

Home » FOIA » Electronic Reading Room

## Electronic Reading Room

Only Reading Room records created on or after November 1, 1996, are required to be made available electronically.

Other Reading Room records maintained by PHMSA can be accessed from the following conventional (paper) Reading Room(s):

**DOT Dockets Office**  
1200 New Jersey Ave, SE  
Room W12-140  
Washington, D.C. 20590

A computer terminal and printer are available at this location for accessing Electronic Reading Room records.

10:00-17:00 ET  
Monday through Friday,  
except Federal holidays.

For access, call 202-366-9322, 202-366-9826, or 800-647-5527

**This Electronic Reading Room notes four categories of records under the Freedom of Information Act (FOIA):**

### I. Final Opinions and Orders

- ▶ [Hazmat Decisions on Appeal](#)
- ▶ [Hazmat Orders of the Chief Counsel](#)
- ▶ [Pipeline Final Orders \(2002-Present\)](#)
- ▶ [Pipeline Corrective Action Orders \(2002-Present\)](#)
- ▶ [Pipeline Closed Notices of Amendment \(2002-Present\)](#)
- ▶ [Pipeline Compliance Documents \(pre-2002\)](#)

### II. Policy Statements

- ▶ [Hazmat Interpretations](#)
- ▶ [Pipeline Interpretations](#)
- ▶ [Unsolicited Proposal Policy](#)
- ▶ [SBREFA Policy](#)
- ▶ [Hazmat Systems Integrity Safety Program Policy](#)
- ▶ [Web Policies](#)

### III. Staff Manuals and Instructions

**Mini-Menu**

- ▶ [FOIA home](#)
- ▶ [Electronic Reading Room](#)
- ▶ [How to Make a FOIA Request](#)
- ▶ [Make a FOIA Payment](#)
- ▶ [FOIA Contacts](#)
- ▶ [PHMSA Library](#)
- ▶ [DOT FOIA](#)

**PHMSA Resources**

- ▶ [Data & Statistics](#)
- ▶ [eForms](#)
- ▶ [ePayments](#)
- ▶ [Glossary](#)

**Promoting Safety & Security**

- ▶ [Regulations](#)
- ▶ [Special Permits & Approvals](#)
- ▶ [International Standards](#)
- ▶ [Security](#)
- ▶ [Initiatives](#)

**Encouraging Compliance**

- ▶ [Training Resources](#)
- ▶ [Outreach](#)
- ▶ [Inspections & Enforcement](#)
- ▶ [Drug & Alcohol Testing](#)

**About PHMSA**

- ▶ [Mission and Goals](#)
- ▶ [About the Agency](#)
- ▶ [Key Officials](#)
- ▶ [Organization](#)
- ▶ [Calendar](#)

**Home**

# Where Do I Begin?

- Think like an inspector
  - Topics covered
  - Who do I need to be there
  - Who is available to attend

# Where Do I Begin?

- A complete, up-to-date operations and maintenance manual
  - Right company information
  - Most recent and same version
  - Procedures and processes for safely performing operations and maintenance tasks your system
  - Employee access

# Where Do I Begin?

- A complete, up-to-date emergency manual
  - Emergency response procedures.
  - Actions directed toward people first
  - Personnel and phone numbers current
  - Other information updated
  - Reviews
  - Training



# Where Do I Begin?

- Complete and up-to-date damage prevention plan
- Complete and up-to-date public awareness plan
- Up-to-date operator qualification plan
  - Employee qualifications
- Up-to-date drug and alcohol plan
- Control room management
- Integrity management plans
- OQ and Training records

# Where Do I Begin?

- Recent incidents or safety related conditions
- Abnormal operations for transmission pipelines
- One call notices – involved and not involved
- Annual report

# Where Do I Begin?

- All of the records required by the code for your system.
- Company records contain all code required information for your system

## Where Do I Begin?

- Clarify what records to be reviewed
- Life of facility versus other records
- Clarify time period for inspection
- Know where the records are located

If you didn't document it,  
then you didn't do it!

# Where Do I Begin?

- Make sure records are complete and up-to-date.
  - What work was performed? (New Const., Repair, O&M Task)
  - Who performed the work? (Company or Contractor) (OQ)
  - When was the work performed? (Date & Time)
  - Where was the work performed? (System, Line Segment, Station)

# Where Do I Begin?

- Make sure records are complete and up-to-date.
  - Maps, red lines of recent work
  - Check dates, versions
  - Revision history if looking at procedures

# Where Do I Begin?

- Use the tools and inspector will use.
  - Use a current and up-to-date code book.
  - Download the most current code book from the PHMSA website
- Use a federal inspection report sheet.

# Where Do I Begin?

For standard inspection

- Corrosion records
- Compressor stations
- Regulator stations
- Damage prevention and one call
- Patrolling and leakage surveys
- Valve inspections



# Things to Remember when being inspected

- Have your records available
- Know who to call if additional information is needed
- Recognize that the inspector is there to do a job

# Things to Remember when being inspected

- The inspection is a legal proceeding
  - Answer the questions to the best of your ability
  - If you do not know the answer to a question – tell them that you don't know
- Be prepared to disagree
- Inspector has a right to documents to prove non-compliance

# What Happens When the Inspection is Over?

- The inspector will generally have a meeting with the operator to close out the inspection.
- The inspector will go over their findings with the operator, and describe what is out of compliance with the code (if anything) and why.

# What Happens When the Inspection is Over?

- What the inspector lists as issues found in the audit may or may not be found in the final letter from the state program manager or PHMSA regional director.
- The inspector is a fact finder and will make recommendations to their directors.
- The enforcement authority lies with the state program manager or PHMSA regional director, and that is who will send the letter.

# Other Forms

- Operator Annual Report Forms
- Operator Incident Report Forms
- Incident Investigation Inspection Forms
- Operator Qualification Inspection Forms
- Drug and Alcohol Program Inspection Forms
- Integrity Management Inspection Forms
- Construction Inspection Forms

# Information Websites

PHMSA Training and Qualification

<http://www.phmsa.dot.gov/pipeline/tq>

PHMSA Pipeline Safety Regulations

<http://www.phmsa.dot.gov/pipeline/tq/regs>

PHMSA Pipeline Safety Forms

<http://www.phmsa.dot.gov/pipeline/library/forms>



Mary Friend

405-686-2332

Mary.friend@dot.gov