



INSPECTION & ENFORCEMENT



TOPICS

- **Current Inspection Intervals**
- **Focus of Inspections**
- **Operator Notifications**
- **Failure to Respond**
- **Reporting**
- **Enhanced Enforcement Practices**



CURRENT INSPECTION CYCLE

- **Comprehensive Inspection – Records & Field**
 - *At intervals not exceeding 3 calendar years*
 - *Will include all records since last inspection*
 - *Various Plans to be reviewed*
 - *Field activity inspections*
 - *Other types of inspections as time allows*



INSPECTION FOCUS

- **Public Awareness Plans**
- **DIMP Plans**
- **Anti-Drug & Alcohol Plans**
- **Non-compliance Follow-up**
- **Record Inspections**
- **Field Audits**
- **Construction**



PUBLIC AWARENESS PLAN REVIEW FOCUS

- **Plan Adequacy**
- **Plan Implementation**
 - **Stakeholder Communications**
 - **Have notifications been provided as required**
 - **Adequacy of Notifications**
 - **Plan Effectiveness Review**
- **Inspection Results uploaded to PHMSA**



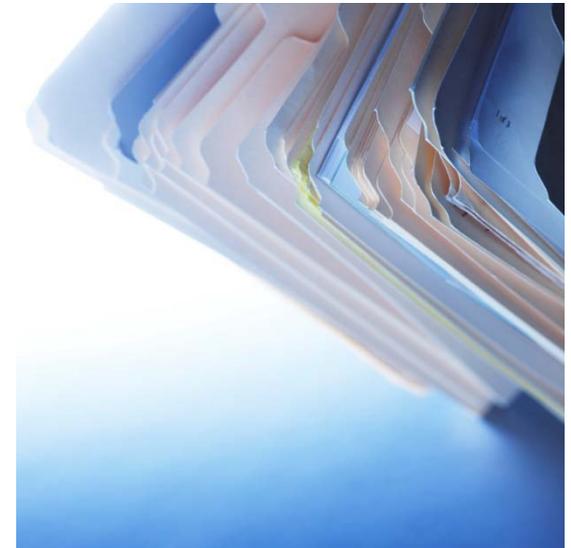
DIMP PLAN REVIEW FOCUS

- **Implementation Date**
- **Identification of Risks**
- **Risk Ranking**
- **Risk Mitigation Methods**
- **Mitigation Method Performance Measurement**
- **Reporting**
- **Operator knowledge of the DIMP Plan requirements**
- **Inspection results provided/uploaded to PHMSA**



ANTI-DRUG & ALCOHOL

- **Is the Plan up to date**
- **Are Plan requirements being implemented**
- **Record keeping**





RECORD INSPECTIONS

- Are records complete and accurate
- Include information required by Code and Plan(s)
- DIMP Plan related records will be reviewed during standard record inspections



FIELD & CONSTRUCTION AUDITS

- Inspection of facilities
- Observation of operator procedure implementation
- Verification of material markings
- Verification of operator qualifications



OPERATOR NOTIFICATIONS

- Notice of Probable Violation
- Notice of Amendment
- Incident related Recommendations
- Operator Response:
 - NOA, NOPV require timely response
 - Response should include documentation demonstrating compliance actions taken



OPERATOR RESPONSE

- NOPV response:
 - 30 day response required
 - Include Reference Number (located below addressee)
 - Follow-up if requesting additional time
- NOA response
 - 30 day and follow-up
 - Include Reference Number



NON-COMPLIANCE FOLLOW-UP

- Quarterly follow-up required of open NOPVs
- Is operator implementing commitments promised in the response letter?
- Actions necessary to close the NOPV





REPORTING

- Annual Reports – PHMSA and ICC
- Incident Reports:
 - Telephonic to NRC and ICC
 - Written to PHMSA and ICC
 - Supplemental to PHMSA and ICC
 - Finals to PHMSA and ICC



ENHANCED ENFORCEMENT

- Citation Orders – Civil Penalties
 - Repeat Violations
 - Violations relating to a reportable incident
 - Failure to respond to NOPV or NOA notifications
 - Failure to take corrective actions
 - Failure to report incidents
 - Failure to file reports with PHMSA or ICC



QUESTIONS?