



# Federal Expectations of State GPS Audits of Operators



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## The Federal/State Partnership

- Pipeline and Hazardous Materials Administration (PHMSA) develops, issues and enforces the Pipeline Safety Regulations
- PHMSA has delegated responsibility for pipeline safety to PUCO for regulated gas pipelines in Ohio.
- PUCO also performs pipeline safety inspections on interstate pipelines within Ohio as part of a cooperative agreement.





# State Duties and Obligations as part of the partnership

- Operator inspections
- Compliance and enforcement
- Incident investigations
- Pipeline construction inspections
- Record maintenance and reporting





# Federal Requirements for State Inspection Programs

- PHMSA issues “Guidelines for States Participating in the Pipeline Safety Program” detailing requirements.
- Inspections of pipeline operators must be made in “a positive, constructive, and comprehensive manner”
- Each State agency must have a written inspection plan with 6 elements





## Element 1 – Operator Data

- GPS must maintain a list of the name and mailing address of each jurisdictional operator.
- PHMSA relies on us to ensure annual reporting is submitted and correct.





## Element 2 – Procedures for determining inspection priorities

- Each state must develop a “risk based procedure” for scheduling inspections.





## Element 3 – Written procedures for conducting inspections

- Standard inspections (general code compliance)
- Construction
- IMP
- DIMP
- Operator Qualifications
- Incident Investigations
- Compliance follow-up





# Ohio Inspection Organization



- Standard “Intrastate Inspection Form” and OQ Field audit forms for all compliance audits.
- “Headquarters” audits on a bi-annual basis consist of O&M Plan, OQ Plan, and Drug & Alcohol Plan audit forms
- These forms are all available for review at the GPS web site.







## Element 4 – Procedures for notifying operators when noncompliance is identified

- Exit interview
- Notice of Probable Noncompliance if appropriate
- Follow-up Inspections
- Closure letter (or Commission case)





## Element 5 – Procedures for monitoring corrective action

- Corrective action plan required in PNC response
- Follow-up Inspections by GPS
- Closure letter when corrective action is complete
- Some noncompliance may result in a Commission case





## Element 6 – Recordkeeping and documentation

- GPS keeps inspection and corrective action tracking records
- We are audited every year by PHMSA for compliance with guidance and GPS written plan





# Contact the PUCO

(800) 686-PUCO (7826)



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