



Nebraska State Fire Marshal Pipeline Safety Section Inspection Plan

NEBRASKA STATE FIRE MARSHAL
PIPELINE SAFETY SECTION - INSPECTION PLAN

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Section A – Pipeline Safety Program Purpose

Section A.1 – Purpose

The mission of the Nebraska State Fire Marshal, Fuels Division, Pipeline Safety Section, is to ensure the safe construction, operation, and maintenance of intrastate natural gas pipelines in Nebraska. This is accomplished through education, inspection, enforcement, and investigation of incidents. Our ultimate responsibility is protecting the public and the environment from the dangers of natural gas in transportation.

The effectiveness of the Nebraska Pipeline Safety efforts depends upon information obtained through inspections and evaluation of operator's pipeline operation and maintenance plans, specific programs, field facilities and compliance of the operator with Title 155 Nebraska Administrative Code Chapter 1.001 adopting by reference Pipeline Safety Regulations Title 49, Code of Federal Regulations, Parts 191, 192, 193, 196, 199, & 40.

For the plan to be effective the plan will include pertinent information about the pipeline operator, methodology to determine inspections, processes in dealing with noncompliance issues, monitoring corrective actions and processes for documenting results of inspections, follow-ups, and compliance actions.

Section A.2 – Nebraska Natural Gas Pipeline Safety Act

§81-542. Terms, defined. *For purposes of the Nebraska Natural Gas Pipeline Safety Act of 1969 unless the context otherwise requires:*

- (1) The Natural Gas Pipeline Safety Act of 1968 of the United States shall mean Public Law §90-481, 82 Stat. 720, 90th Congress, S. 1166, enacted August 12, 1968.*
- (2) State Fire Marshal shall mean the officer appointed pursuant to section §81-501.01.*
- (3) Person shall mean any individual, firm, joint venture, partnership, limited liability company, corporation, association, municipality, cooperative association, or joint-stock association, and includes any trustee, receiver, assignee, or personal representative thereof.*
- (4) Gas shall mean natural gas, flammable gas, or gas which is toxic or corrosive and which is transported in a gaseous form and not in a liquid form.*
- (5) Transportation of gas shall mean the gathering, transmission, or distribution of gas by pipeline or its storage, except that it shall not include any such transportation of gas which is subject to the jurisdiction of the Federal Power Commission under the Natural Gas Act of the United States or the Interstate Commerce Commission under the Interstate Commerce Act or the gathering of gas in those rural locations which lie outside the limits of any incorporated or unincorporated city, village, or any other designated residential or commercial area such as a subdivision, a business or shopping center, a community development, or any similar populated area which the State Fire Marshal may define as a non-rural area; and*

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- (6) Pipeline facilities shall include, without limitation, new and existing pipe rights-of-way and any equipment facility or building used in the transportation of gas or the treatment of gas during transportation, but rights-of-way as used in the Nebraska Natural Gas Pipeline Safety Act of 1969 does not authorize the State Fire Marshal to prescribe the location or routing of any pipeline facility. Pipeline facilities shall not include any facilities subject to the jurisdiction of the Federal Power Commission under the Natural Gas Act of the United States or the Interstate Commerce Commission under the Interstate Commerce Act.

Source: Laws 1969, c. 763, ' 1, p. 2884; Laws 1993, LB 121, ' 527. Effective date September 9, 1993.

§81-543. State Fire Marshal; safety standards for transportation of gas and operation of pipeline facilities; adopt.

- (1) After June 12, 1969, and from time to time thereafter, and pursuant to the Administrative Procedure Act, the State Fire Marshal shall, by order, establish minimum safety standards for the transportation of gas and pipeline facilities. Such standards may apply to the design, installation, inspection, testing, construction, extension, operation, replacement, and maintenance of pipeline facilities. Standards affecting the design, installation, construction, initial inspection, and initial testing shall not be applicable to pipeline facilities in existence on the date such standards are adopted. Such safety standards shall be practicable and designed to meet the need for pipeline safety. In prescribing such standards, the State Fire Marshal shall consider:
- Relevant available pipeline safety data.
 - Whether such standards are appropriate for the pipeline transportation.
 - The reasonableness of any proposed standards.
 - The extent to which any such standards will contribute to public safety; and
 - The existing standards established by the United States Secretary of Transportation pursuant to the Natural Gas Pipeline Safety Act of 1968 of the United States and the Interstate Commerce Act.
- (2) Any standards prescribed under this section, and amendments thereto, shall become effective thirty days after the date of issuance of such standards unless the State Fire Marshal, for good cause recited, determines an earlier or later effective date is required as the result of the period reasonably necessary for compliance.
- (3) The State Fire Marshal shall afford interested persons an opportunity to participate fully in the establishment of such safety standards through submission of written data, views, or arguments with opportunity to present oral testimony and argument.
- (4) Whenever the State Fire Marshal shall find a particular facility to be hazardous to life or property, he shall be empowered to require the person operating such facility to take such steps necessary to remove such hazards.
- (5) Upon application by any person engaged in the transportation of gas or the operation of pipeline facilities, the State Fire Marshal may, after notice and opportunity for hearing and under such terms and conditions and to such extent as he deems appropriate, waive in whole or in part compliance with any standards established under this act, if he determines that a

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waiver of compliance with such standard is not inconsistent with gas pipeline safety. The State Fire Marshal shall state his reasons for any such waiver.

Source: *Laws 1969, c. 763, ' 2, p. 2886.*

§81-544. State Fire Marshal; certifications and reports; United States Secretary of Transportation.

The State Fire Marshal is authorized to make such certifications and reports to the United States Secretary of Transportation as may be required from time to time under the Natural Gas Pipeline Safety Act of 1968 of the United States.

Source: *Laws 1969, c. 763, ' 3, p. 2887.*

§81-545. Transportation of gas; operation of pipeline facilities; safety standards; requirements.

- (1) *Each person who engages in the transportation of gas or who owns or operates pipeline facilities shall:*
 - (a) *At all times after the date any applicable safety standard established under this act takes effect comply with the requirements of such standard.*
 - (b) *File and comply with a plan of inspection and maintenance required by section 81-548; and*
 - (c) *Permit access to or copying of records, and make reports or provide information, and permit entry or inspection, as required under section 81-549.*
- (2) *Nothing in this act shall affect the common-law or statutory tort liability of any person.*

Source: *Laws 1969, c. 763, ' 4, p. 2887.*

§81-546. Violations; notice; failure to comply; penalty.

- (1) *Whenever the State Fire Marshal has reason to believe any person is violating any provision of subsection (1) of section 81-545 or any regulation under the Nebraska Natural Gas Pipeline Safety Act of 1969, the State Fire Marshal shall give notice to such person and permit such person reasonable opportunity to achieve compliance. If compliance has not been achieved in a reasonable time, the State Fire Marshal may request the Attorney General to bring an action under section 81-547 in the district court for the county in which the defendant's principal place of business is located, and the district court may impose a civil penalty of not to exceed ten thousand dollars for each violation for each day that such violation persists, except that the maximum civil penalty shall not exceed five hundred thousand dollars for any related series of violations.*
- (2) *In determining the amount of such penalty, the court shall consider the appropriateness of such penalty to the size of the business of the person charged, the gravity of the violation, and the good faith of the person charged. The amount of such penalty, when finally determined, may be deducted from any sums owing by the State of Nebraska to the person charged.*

Source: *Laws 1969, c. 763, ' 5, p. 2887; Laws 1993, LB 49, ' 1. Effective date September 9, 1993.*

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§81-547. Violations; district court; jurisdiction.

- (1) *The district courts shall have jurisdiction to restrain violations of this act, including the restraint of transportation of gas or the operation of a pipeline facility, or to enforce standards established hereunder upon petition by the Attorney General on behalf of the State of Nebraska. Whenever practicable, the State Fire Marshal shall give notice to any person against whom an action for injunctive relief is contemplated and afford him an opportunity to present his views, and, except in the case of a knowing and willful violation, shall afford him reasonable opportunity to achieve compliance. The failure to give such notice and afford such opportunity shall not preclude the granting of appropriate relief.*
- (2) *Actions under subsection (1) of this section and section 81-546 shall be brought in the county in the State of Nebraska in which the defendant's principal place of business is located, and process in such cases may be served in any other county in the State of Nebraska where the defendant may be found or in which the defendant is an inhabitant or transacts business.*

Source: Laws 1969, c. 763, ' 6, p. 2888.

§81-548. Transportation of gas; operation of pipeline facilities; plan for inspection and maintenance; file with State Fire Marshal; adequacy of plan.

Each person who engages in the transportation of gas or who owns or operates pipeline facilities subject to this act shall file with the State Fire Marshal a plan for inspection and maintenance of each such pipeline facility owned or operated by such person, and any changes in such plan, in accordance with the regulations prescribed by the State Fire Marshal. If at any time the State Fire Marshal finds that such plan is inadequate to achieve safe operation, he shall, after notice and opportunity for a hearing, require such plan to be revised. The plan required by the State Fire Marshal shall be practicable and designed to meet the need for pipeline safety. In determining the adequacy of any such plan, the State Fire Marshal shall consider:

- (1) *Relevant available pipeline safety data.*
- (2) *Whether the plan is appropriate for the pipeline transportation.*
- (3) *The reasonableness of the plan; and*
- (4) *The extent to which such plan will contribute to public safety.*

Source: Laws 1969, c. 763, ' 7, p. 2888.

§81-549. Records; reports; inspection.

- (1) *Each person who engages in the transportation of gas or who owns or operates pipeline facilities shall establish and maintain such records, make such reports, and provide such information as the State Fire Marshal may reasonably require enabling him to determine whether such person has acted or is acting in compliance with this act and the standards established under this act. Each such person shall, upon request of an officer, employee, or agent authorized by the State Fire Marshal, permit such officer, employee, or agent to inspect*

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books, papers, records, and documents relevant to determining whether such person has acted or is acting in compliance with this act and the standards established pursuant to this act. For purposes of enforcement of this act, officers, employees, or agents authorized by the State Fire Marshal, upon presenting appropriate credentials to the individual in charge, are authorized

- (a) to enter upon, at reasonable times, pipeline facilities, and*
 - (b) to inspect, at reasonable times and within reasonable limits and in a reasonable manner, such facilities. Each such inspection shall be commenced and completed with reasonable promptness.*
- (2) In the course of the exercise of his duties and responsibilities under this act, the State Fire Marshal shall wherever practicably employ a practice of spot checking and issuance of certificates of compliance, with respect to persons subject to this act, to limit costs of enforcement of the safety standards established pursuant to section 81-543.*
- (3) All information reported to or otherwise obtained by the State Fire Marshal or his representative pursuant to subsection (1) of this section, which information contains or relates to a trade secret as referred to in 18 U.S.C. 1905, or otherwise constituting a trade secret under law, shall be considered confidential for the purpose of such laws, except that such information may be disclosed to other officers or employees concerned with carrying out this act or when relevant in any proceeding under this act.*

Source: *Laws 1969, c. 763, ' 8, p. 2889; Laws 1992, LB 858, ' 1.*

§81-550. Nebraska Natural Gas Pipeline Safety Cash Fund; created; use; investment; assessments.

- (1) The Nebraska Natural Gas Pipeline Safety Cash Fund is created. The fund shall consist of money received from assessments pursuant to this section which shall be remitted to the State Treasurer for credit to the fund. The fund shall only be used for purposes of administering the Nebraska Natural Gas Pipeline Safety Act of 1969. The fund shall be administered by the State Fire Marshal. Any money in the fund available for investment shall be invested by the state investment officer pursuant to the Nebraska Capital Expansion Act and the Nebraska State Funds Investment Act.*
- (2) To defray the cost of administering the Nebraska Natural Gas Pipeline Safety Act of 1969, the State Fire Marshal shall on March 1 of each year make an assessment against persons having pipeline facilities in this state subject to the act, which assessment shall be paid within thirty days thereafter.*
- (3) The assessment against each such person shall be based on the number of meters such person has in service for the retail sale of gas in this state at the end of the calendar year next preceding such assessment. The amount of such assessment shall be set by the State Fire Marshal in an amount not to exceed twenty cents multiplied by the number of such meters for each such person.*
- (4) It shall be the duty of the State Fire Marshal to make timely application each year to the United States Government for the maximum funds to which this state may be entitled from the United States Government for the administration of the act.*

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Source: Laws 1969, c. 763, § 9, p. 2890; Laws 1977, LB 410, § 1; Laws 1983, LB 383, § 1; Laws 1992, LB 858, § 2; Laws 2004, LB 1091, § 16; Effective date April 14, 2004.

Cross References: Nebraska Capital Expansion Act, see section 72-1269. Nebraska State Funds Investment Act, see section 72-1260.

§81-551. State Fire Marshal; duties; powers.

The duties and powers of the State Fire Marshal and of his or her deputies and assistants prescribed in sections 81-509 to 81-523, 81-526, 81-527, 81-531 to 81-538, and 81-5,151 to 81-5,157 and the Petroleum Products and Hazardous Substances Storage and Handling Act shall not be applicable to the Nebraska Natural Gas Pipeline Safety Act of 1969.

Source: Laws 1969, c. 763, § 13, p. 2892; Laws 1986, LB 217, § 14; Laws 1988, LB 893, § 17; Laws 1993, LB 348, § 85

Cross References: Petroleum Products and Hazardous Substances Storage and Handling Act, see section 81-15,117.

§81-552. Act, how cited.

Sections 81-542 to 81-550 may be cited as the Nebraska Natural Gas Pipeline Safety Act of 1969.

Source: Laws 1969, c. 763, ' 14, p. 2892.

[Section A.3](#) – Other Terms Defined

Code of Federal Regulations, Title 49 (49 CFR)-Pipeline Safety

Part 40 - Procedures for Transportation Workplace Drug Testing Programs

Part 190 -Pipeline Safety Programs and Rulemaking Procedures

Part 191 -Transportation of Natural and Other Gas by Pipeline: Annual Reports Incident Reports, and Safety-Related Condition Reports

Part 192 -Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards

Part 193 -Liquefied Natural Gas Facilities: Federal Safety Standards

Part 196 -Protection of Underground Pipelines from Excavation Activity

Part 198 -Regulations for Grants to Aid State Pipeline Safety Programs

Part 199 -Drug and Alcohol Testing

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Copper-Copper Sulfate Reference Electrode Cell – reference electrode, based on the Redox Reaction with participation of the metal (copper) and its salt, copper (II) sulfate. It is used for measuring electrode potential and is the most commonly used reference electrode for testing cathodic protection corrosion control systems. Also known as a reference cell or half-cell.

Compliance Action – An action or series of actions taken to enforce Federal pipeline regulations. These actions may take the form of a warning letter, order directing compliance with the regulations, an order directing corrective action under hazardous conditions, a show cause order, a criminal sanction, a court injunction, or a similar formal action.

Damage – Any excavation activity that results in the need to repair or replace a pipeline due to a weakening; or the partial or complete destruction, of the pipeline, including, but not limited to, the pipe, appurtenances to the pipe, protective coatings, support, cathodic protection or the housing for the line device or facility. (49 CFR 196.3)

Excavation Damage – Any impact with partial or complete severance, destruction, impairment, or penetration of, or removal or weakening of support from an underground facility, including its protective coating, housing, or other protective device. (Title 155, Chapter 2, 002.04)

Department of Transportation (DOT) – Reference may include any or all the following: U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, or Office of Pipeline Safety.

Emergency – Emergency condition shall mean any condition which constitutes a clear and present danger to life, health, or property.

Federal State Tracking and Reporting (FedSTAR) – This is the computer application available over the internet which is used by Pipeline Safety program offices to enter the required federal documentation and information.

Half-Cell – see Copper-Copper Sulfate Reference Electrode Cell.

Inspection, Standard – An on-site evaluation of an inspection unit for compliance with all applicable Federal or State standards. This includes a thorough compliance review of the operator's plans, procedures, programs, records, physical plant, and work in progress. This would include inspections on LNG facilities. See Chapter 5 (State Guidelines Final Version) for guidance.

Inspection Person-Day – All or part of a day spent by agency staff/supervisor(s) or inspector(s)/investigator(s) (including travel) in on-site evaluation of an operator's system to determine compliance with federal or state pipeline safety regulations; or in on-site investigation of a pipeline incident; or in job-site training of an operator. Time counted for such activities should be reported as a maximum of one inspection person-day for each day devoted to safety issues, regardless of the number of operators visited during that day. On a limited basis, the inspector may count in-office inspection time to review operator written plans, procedures, programs, and records to effectively use on-site inspection time, as approved by the Fuels Division Chief Deputy, and as noted in the annual progress report. In-office inspection time must be adequately documented and made part of the state program's inspection records.

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Inspection Unit – All or part of an operator’s pipeline facilities under the control of an administrative unit that provides sufficient communication and controls to ensure uniform design, construction, operation, and maintenance procedures for the facilities.

The application of the inspection unit concept will ensure inspection coverage of an operator’s entire system and enhance Federal/State management of workload and program evaluation. Determination of inspections will be based on the following guidelines, but where unique situations exist, good logic and judgment must be exercised when identifying the parameters of the unit.

- **Privately Owned Distribution System** – The inspection unit could be an operating area such as a specific city or metropolitan area, or a group of towns, and may include high pressure, or low-pressure distribution operated and maintained by the operator. The unit selected should be that which provides the desired commonality. However, because of the greater number of pipeline facilities in some large metropolitan distribution areas, multiple units may be appropriate. In selecting the unit, consideration should be given to the size of the area covered, work location, record location, and line of supervision. If the distribution system contains transmission lines where transmission integrity management plans are required, those system(s) should be considered separate intrastate transmission inspection unit(s).
- **Gas Transmission and Hazardous Liquid Pipeline System** – The inspection unit should include up to 500 miles of pipeline right-of-way including any compressor stations or pumping facilities within the designated limits. In some circumstances, such as densely populated areas and/or environmentally sensitive areas, and/or where judged necessary based on local conditions, a separate inspection unit can be established.
- **Liquefied Natural Gas (LNG) Facility** – Each LNG facility should be considered a single inspection unit.
- **Master Meter System** – Each master meter system should be considered a single inspection unit. However, more than one master meter system should be considered a single inspection unit if all facilities involved are owned, operated, and maintained under common supervisory control.
- **Municipality** – Each municipality should be considered a single inspection unit unless its system, like privately owned distribution systems, contains transmission lines where transmission integrity management inspections are done in which case the transmission system should be a separate inspection unit. Also operating conditions/characteristics could suggest additional inspection units be considered.
- **Propane-Air System/Petroleum Gas System** – Propane-Air System/Petroleum Gas System- Each system should be considered a single inspection unit. However, more than one propane-air/petroleum gas system should be considered a single inspection unit if all facilities involved are owned, operated, and maintained under common supervisory control.
- **Regulated Gathering Pipeline System** – Each regulated gathering pipeline system can be considered as a single inspection unit. Circumstances may exist when an operator has more than one regulated gathering system separated into individual inspection units.

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Intrastate Agent – The Nebraska State Fire Marshal Agency assumes inspection responsibility for interstate facilities and reports probable violations to the Nebraska Attorney General’s Office for compliance action, while we can ask for PHMSA to intervene, if necessary.

Jurisdictional – That portion of an entity's activities or facilities which is subject to the rules and regulations of the government entity that regulates it. See Non-Jurisdictional.

Multi Gas Detector – a device that detects the presence of gases in an area, often as part of a safety system. This type of equipment is used to detect a gas leak or presence of gas in a confined area.

Multi-Meter – an instrument designed to measure electric current, voltage, and usually resistance, typically over several ranges of value.

National Response Center (NRC) – (1-800-424-8802) – The federal government’s national communications center, which is staffed 24 hours a day by U.S. Coast Guard officers and marine science technicians. The NRC receives all reports of releases involving hazardous substances and oil that trigger the federal notification requirements under several laws. This “telephonic” report data is shared with PHMSA via an information system.

National Transportation Safety Board (NTSB) – This Federal agency was created by Congress in the Department of Transportation Act of 1966. Although NTSB’s authority is limited to transportation failure investigations, its mission relating to pipeline safety is to:

- 1) Investigate significant failures and report the circumstances relating to each failure and its probable cause.
- 2) Make recommendations to the Secretary, the pipeline operators, manufacturers, associations, and interested parties in order to minimize the possibility of recurrence of similar failures.
- 3) Release reports deemed to be in the public interest.
- 4) Conduct special studies and investigations on matters regarding safety in pipeline transportation and failure prevention.

Non-Compliance – A violation or probable violation of any section or any subsection of Federal or State pipeline safety regulations.

Non-Jurisdictional – A term used to describe sales or transportation of natural gas which are subject to the jurisdiction of the Federal Energy Regulatory Commission under the Natural Gas Act, or for which the Nebraska State Fire Marshal has not been given regulatory authority under State Law.

Office of Pipeline Safety (OPS) – For the purpose of this manual, OPS is the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration’s Office of Pipeline Safety.

Pipeline and Hazardous Materials Safety Administration (PHMSA) – Pipeline and Hazardous Materials Safety Administration is the agency under the U.S. Department of Transportation responsible for pipeline safety oversight.

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PHMSA Inspector Training and Qualifications Division (TQ) – The safety training organization operated by PHMSA in Oklahoma City, OK.

Probable Violation – A probable violation is a noncompliance with any section or subsection of federal or state pipeline regulations. (i.e., during a unit inspection it was discovered that an operator failed to check and service six distribution valves, in reference to §192.747 Valve maintenance: Distribution systems, this is one probable violation of section 192.747(a) with six pieces of evidence and not six probable violations).

Program – The planned undertaking of the State agency’s pipeline safety activities as stated in the application for Federal assistance.

Fuels Division Chief Deputy – The person designated by the Nebraska State Fire Marshal Agency as responsible for all activities of the pipeline safety program.

Reference Cell – See Copper-Copper Sulfate Reference Electrode Cell.

Regulated Facility – Pipeline or pipeline facilities that are to be compliant with rules and regulation adopted by State of Nebraska within the Nebraska Natural Gas Pipeline Safety Act of 1969.

Special Initiatives – Initiatives occasionally issued by PHMSA for a limited purpose.

State Agency – The division of each State, including the District of Columbia and Puerto Rico, authorized through a certification or agreement with the Department of Transportation (DOT) to administer a pipeline safety program. Also referred to as “grantee” or “recipient.”

State Program Personnel – The PHMSA headquarters staff person (i.e., State Liaison) who provides technical assistance, support and evaluates State agency programs.

Supervisor – Individual in a State Agency supervising pipeline safety inspectors/investigators and so designated in Attachment 7 of the annual Progress Report. This does not include individual’s solely supervising damage prevention/technical staff.

ACRONYMS

CFR - Code of Federal Regulations

DOT - U.S. Department of Transportation

FedSTAR - Federal State Tracking and Reporting

LNG - Liquefied Natural Gas

LPG - Liquefied Petroleum Gas

MOU – Memorandum of Understanding

NAPSR – National Association of Pipeline Safety Representatives

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NARUC – National Association of Regulatory Utility Commissioners

NRC – National Response Center

NTSB – National Transportation Safety Board

O&M – Operation and Maintenance

PHMSA – Pipeline and Hazardous Materials Safety Administration

PSP – PHMSA State Programs

SUDS – State Uploaded Document System (within FedSTAR)

TQ – PHMSA Inspector Training and Qualifications Division

USC – United States Code

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Section B – Jurisdiction and Reporting

Section B.1 – State operators under Jurisdiction of the State of Nebraska

- 1) A person, who engages in the transportation of gas, operating within the State borders, will be defined as an operator by the State Fire Marshal – Pipeline Safety Section when the following conditions are met:
 - a) The gathering, transmission, or distribution of gas by pipeline, or the storage of gas in or affecting intrastate commerce.

- 2) A system can be defined as but is not limited to all parts of those physical facilities through which gas is stored or moves in transportation, including but not limited to, pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery station, holders, fabricated assemblies, and storage containers.
 - a) With respect to operational differences a system may be:
 - i) A natural gas distribution system privately owned or operated.
 - ii) A natural gas distribution system owned/operated by a municipality (City, County, or any other political subdivision of a State).
 - b) A distribution system may be further defined as a petroleum gas (LPG) system with 10 or more services from a single source of supply.
 - i) Petroleum gas (LPG) systems with services to public facilities.
 - ii) Petroleum gas storage and facilities associated with supplementing a natural gas distribution system.
 - c) Master meter.
 - d) Intrastate transmission pipeline.
 - e) Liquefied natural gas facility as defined in §193.2007.
 - f) Gathering facilities.

Section B.2 – Certifications and Reporting

§81-544. State Fire Marshal; certifications and reports; United States Secretary of Transportation.

The State Fire Marshal is authorized to make such certifications and reports to the United States Secretary of Transportation as may be required from time to time under the Natural Gas Pipeline Safety Act of 1968 of the United States.

Source: Laws 1969, c. 763, ' 3, p. 2887.

Section B.3 – Nebraska Natural Gas Pipeline Safety Cash Fund

§81-550. Nebraska Natural Gas Pipeline Safety Cash Fund; created; use; investment; assessments.

(1) The Nebraska Natural Gas Pipeline Safety Cash Fund is created. The fund shall consist of money received from assessments pursuant to this section which shall be remitted to the State Treasurer for credit to the fund. The fund shall only be used for purposes of administering the Nebraska Natural Gas Pipeline Safety Act of 1969. The fund shall be administered by the State Fire Marshal. Any money in the fund available for investment shall be invested by the state investment officer pursuant to the Nebraska Capital Expansion Act and the Nebraska State Funds Investment Act.

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- (2) *To defray the cost of administering the Nebraska Natural Gas Pipeline Safety Act of 1969, the State Fire Marshal shall on March 1 of each year make an assessment against persons having pipeline facilities in this state subject to the act, which assessment shall be paid within thirty days thereafter.*
- (3) *The assessment against each such person shall be based on the number of meters such person has in service for the retail sale of gas in this state at the end of the calendar year next preceding such assessment. The amount of such assessment shall be set by the State Fire Marshal in an amount not to exceed twenty cents multiplied by the number of such meters for each such person.*
- (4) *It shall be the duty of the State Fire Marshal to make timely application each year to the United States Government for the maximum funds to which this state may be entitled from the United States Government for the administration of the act.*

Source: *Laws 1969, c. 763, § 9, p. 2890; Laws 1977, LB 410, § 1; Laws 1983, LB 383, § 1; Laws 1992, LB 858, § 2; Laws 2004, LB 1091, § 16; Effective date April 14, 2004.*

Cross References: *Nebraska Capital Expansion Act, see section 72-1269. Nebraska State Funds Investment Act, see section 72-1260.*

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Section C – Pipeline Safety Program Database

Section C.1 – Design

APX data will be used

Section C.2 – Authorized Users

The following identified groups will be the only authorized individuals to access the Pipeline Safety Database. These access levels and permissions will be defined.

Fuels Division Chief Deputy – Read, write, and delete data authorization.

Pipeline Safety Deputies – Read, write.

Administrative Assistant / Fuels Division – Read, write.

Section C.3 – Backup and Data Security

All data from the Pipeline Safety database will be saved on APX servers. All reports will also be saved on the Nebraska secure server under the appropriate operator.

Section C.4 – Terms Defined

Read – System authorization to access and display stored information from the database in the form of database forms and reports

Write – System authorization to input data into the database by forms.

Modify – APX will be the only user that can update the question sets.

Delete – System authorization will come from the Chief to delete saved records or files associated to the database.

Section C.5 – Information Gathered

- 1) Primary contact information of an authorized agent for the Pipeline operator will be maintained and will include:
 - a) Company name
 - b) Contact person name
 - c) Mailing address
 - d) City
 - e) State
 - f) Zip code
 - g) Primary contact phone number

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C.5-2 – Operator Units

- 1) An inspection unit is all or part of an operator’s facilities that are under the control of an administrative unit that provides sufficient communication and control to ensure uniform design, construction, operation, and maintenance of the facilities. These will be given assigned names to break up the geographic areas.
- 2) Inspection units may be established which pertain to Pipeline Safety Regulations part 191, part 192, part 193, & part 199 within State of Nebraska jurisdiction.

C.5-3 – Inspections

- 1) For each inspection by the pipeline inspector, a data entry is made to allow tracking of inspection.
- 2) Specific sites may be inspected at a frequency not directly related to another site within that specific unit or company.
- 3) The following information is entered into APX:
 - a) OPID#
 - b) Company
 - c) Unit
 - d) Site
 - e) Type of inspection
 - f) Date(s) of inspection
 - g) Individuals involved in the inspection.

C.5-4 –Reserved

C.5-5 – Reserved

C.5-6 – Reserved

C.5-7 – Reserved

C.5-8 – Reserved

C.5-9 – Reserved

C.5-10 – Reserved

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Section D – Pipeline Safety Program Agreements

The Pipeline Safety Section is a program for the inspection of the pipeline facilities throughout the state to ensure codes are being followed. The program is up to 80 percent federally funded.

Section D.1 – Application and Agreement

- 1) A gas base grant progress report is completed and sent to the Pipeline and Hazardous Materials Safety Administration (PHMSA) annually. This form is provided to our office electronically by PHMSA through the FedSTAR website. This form states we will support the natural gas pipeline safety programs in return for federal funds. We are certified under section 5(a) of the Act.
- 2) Upon notification from PHMSA that it is available online, the Fuels Division Chief Deputy completes the progress report with assistance from the Fuels Division Administrative Assistant.
- 3) The Fuels Division Chief Deputy certifies the completed application online, prints and signs it, and gives it the Administrative Assistant.
- 4) The Administrative Assistant makes copies for State Fire Marshal Business Manager and file.
- 5) The progress report is submitted to PHMSA per the instructions provided.

Section D.2 – Pipeline Safety Grants

- 1) Grant forms are received in our office electronically from PHMSA at different times during the year and are used for requesting federal money.
- 2) Upon notification from PHMSA that a form is available online the Fuels Division Chief Deputy completes the form with assistance from the Fuels Division Administrative Assistant.
- 3) The Fuels Division Chief Deputy certifies the completed form online, prints and signs it, and gives it to the Administrative Assistant.
- 4) The Administrative Assistant makes copies for State Fire Marshal Business Manager and file.
- 5) The form is then submitted to PHMSA per the instructions provided.

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Section E – Pipeline Safety Inspection Methodology

Section E.1 – Inspection Methodology

- 1) The effectiveness of the Nebraska pipeline safety efforts depends upon information obtained through review of operator’s annual reports, inspections and evaluation of operator’s pipeline Operation and Maintenance plans, review of specific programs, inspection of field facilities and compliance of the operator with Title 155 Nebraska Administrative Code Chapter 1.001 adopting by reference Pipeline Safety Regulations Title 49, Code of Federal Regulations, Part 191, 192, 193, 196, 199, & 40.
- 2) The Pipeline Safety Section may visit every operator unit on a yearly basis to conduct varying types of inspections, based on the inspection priorities and/or risks.
- 3) Inspections of pipeline operators must be made in a positive, constructive, comprehensive, and consistent manner.
- 4) Upon completion of an inspection, the operator must be notified of the results of the inspection.
- 5) Inspection Reports will be completed and filed for all inspections. See [Section F.6](#) for further information.

Section E.2 – Inspection Priority

In accordance with the PHMSA State Guidelines, section 5.1.2, each State agency must establish Inspection priorities. Inspection priorities are determined in accordance with the following process and procedure. The State uses the SICT tool provided by PHMSA to determine year to year risks and five-year inspection criteria. The State’s process for prioritizing inspections or inspection activities addresses the following:

1. Inspector input/knowledge obtained from prior inspections.
2. Prior compliance performance of operators (both the number and severity of prior non-compliances)
3. Data from annual reports or other sources indicative of inherent pipeline system risk such as, but not limited to.
 - a) Prior incident history
 - b) Prior leak history
 - c) Mileage and HCA mileage
 - d) Pipe diameter
 - e) Age of pipe
 - f) Coating and Cathodic Protection
 - g) Type of pipe (especially vintage pipe of problematic design such as LF-ERW pipe, cast iron pipe, etc.)
4. Time since previous inspection

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5. Number, nature, and age of outstanding compliance issues that remain open
6. Pipeline system expansion (e.g., new construction, acquisitions, etc.)
7. The Pipeline Safety Deputy should strive to schedule inspections based upon the following criteria:
 - a) A risk-based analysis will be established and utilized to prioritize inspections based upon the information received through annual reports, incidents, accidents, or evaluation of plans of the operator and other considerations such as:
 - i) The length of time since last inspection.
 - ii) The history of the inspection unit, including leak history, noncompliance, accident/incident history.
 - iii) Internal or external events affecting the unit (construction, uprate activities, corrosion issues, changes in operating personnel, changes in operating procedures or change in ownership).
 - iv) For large operators, rotation of locations inspected.

Section E.3 – Inspection Frequency and Considerations

- 1) An inspection of each operator shall be conducted at intervals not exceeding five years, although an inspection of any operator may be performed more frequently if resources permit.
- 2) Inspections may be conducted more frequently than once a year:
 - a) When construction or specific operator activity are deemed appropriate.
 - b) When necessary because of a specific safety problem or probable violation.
 - c) When necessary to verify action taken by an operator to correct a safety problem, probable violation, concern or requested amendment.
- 3) The Following Inspections will occur at least every five (5) years, unless otherwise stated below.
 - a) Operators' Operation & Maintenance Plans (O&M).
 - b) Operators' Drug and Alcohol Program.
 - c) Operators' Emergency Response Plans.
 - d) Operators' Annual Report including leak histories will be reviewed on an annual basis with regard to Part 191.
 - e) Liquefied Natural Gas (LNG) plants will be inspected at least every three years, with more frequent inspections desirable.
 - f) Operators' Operator Qualification Program, in accordance with [Section F.5-6](#).
 - g) Operators' Integrity Management Programs. (Transmission and/or Distribution Integrity Management Programs)
 - h) Operators' Public Awareness Plan, which will include the operator's Public Awareness Plan Effectiveness Evaluation.
 - i) Operators' Damage Prevention Program and procedures or Third-Party Damage activities will be inspected, or as appropriate.
 - j) Operators' Physical System Field Inspections.
 - k) Design, testing, and construction activities will be conducted where appropriate.

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Section E.4 – Annual Report Review

Annual Reports will be inspected annually. Information gained from the Annual Reports will be entered into the operator Risk Analysis excel sheet.

Section E.5 – Periodic Review of Report

- 1) A review of reports, required of the operator by 49 CFR 191, shall be conducted periodically for:
 - a) Annual Reports; PHMSA

Section E.6 – Inspection Criteria

§81-548. Transportation of gas; operation of pipeline facilities; plan for inspection and maintenance; file with State Fire Marshal; adequacy of plan.

Each person who engages in the transportation of gas or who owns or operates pipeline facilities subject to this act shall file with the State Fire Marshal a plan for inspection and maintenance of each such pipeline facility owned or operated by such person, and any changes in such plan, in accordance with the regulations prescribed by the State Fire Marshal. If at any time the State Fire Marshal finds that such plan is inadequate to achieve safe operation, he shall, after notice and opportunity for a hearing, require such plan to be revised. The plan required by the State Fire Marshal shall be practicable and designed to meet the need for pipeline safety. In determining the adequacy of any such plan, the State Fire Marshal shall consider:

- 1) *Relevant available pipeline safety data.*
- 2) *Whether the plan is appropriate for the particular type of pipeline transportation.*
- 3) *The reasonableness of the plan; and*
- 4) *The extent to which such plan will contribute to public safety.*

Source: Laws 1969, c. 763, ' 7, p. 2888.

§81-549. Records; reports; inspection.

- 1) *Each person who engages in the transportation of gas or who owns or operates pipeline facilities shall establish and maintain such records, make such reports, and provide such information as the State Fire Marshal may reasonably require to enable him to determine whether such person has acted or is acting in compliance with this act and the standards established under this act. Each such person shall, upon request of an officer, employee, or agent authorized by the State Fire Marshal, permit such officer, employee, or agent to inspect books, papers, records, and documents relevant to determining whether such person has acted or is acting in compliance with this act and the standards established pursuant to this act. For purposes of enforcement of this act, officers, employees, or agents authorized by the State Fire Marshal, upon presenting appropriate credentials to the individual in charge, are authorized*
 - a) *to enter upon, at reasonable times, pipeline facilities, and*

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- b) *to inspect, at reasonable times and within reasonable limits and in a reasonable manner, such facilities. Each such inspection shall be commenced and completed with reasonable promptness.*
- 2) *In the course of the exercise of his duties and responsibilities under this act, the State Fire Marshal shall wherever practicable employ a practice of spot checking and issuance of certificates of compliance, with respect to persons subject to this act, to limit costs of enforcement of the safety standards established pursuant to section 81-543.*
- 3) *All information reported to or otherwise obtained by the State Fire Marshal or his representative pursuant to subsection (1) of this section, which information contains or relates to a trade secret as referred to in 18 U.S.C. 1905, or otherwise constituting a trade secret under law, shall be considered confidential for the purpose of such laws, except that such information may be disclosed to other officers or employees concerned with carrying out this act or when relevant in any proceeding under this act.*

Source: Laws 1969, c. 763, ' 8, p. 2889; Laws 1992, LB 858, ' 1.

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Section F – Pipeline Safety Inspection Procedures

Section F.1 – Inspection Definition

- 1) An inspection can be, but is not limited to: all procedures and records used to document operational maintenance, operational procedures for design, construction, maintenance and repair of all parts of those physical facilities through which gas is stored or moves in transportation, including but not limited to, pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, over pressurization/regulator stations, delivery station, holders, fabricated assemblies, LNG facilities, petroleum gas plants, corrosion control facilities or odorization equipment.
- 2) An inspection may include any/or all but not limited to the following items:
 - a) Review of Operation & Procedures manual(s).
 - b) Review of Procedures for Identifying and Reporting Safety Related Conditions.
 - c) Review of operators' Accident/ Incident Investigation.
 - d) Inspect the design, construction, operation, and maintenance of pipeline facilities.
 - e) Review the records on cathodic protection.
 - f) Review the operator's Emergency Plan.
 - g) Review the operator's Damage Prevention Program.
 - h) Review of underground directional drilling/boring procedures to determine effective measures taken protect underground facilities.
 - i) Review procedures on cast iron and plan for replacement program of cast iron.
 - j) Review the records for internal and external corrosion on all exposed pipelines.
 - k) Review report on leak calls, classified leaks, and cause.
 - l) Review of operator Qualification program and/or records.
 - m) Review of the Integrity Management Program and/or records utilizing PHMSA protocols.
 - n) Review of the Public Awareness Program and/or records.
 - o) Inquiries into specific types of material, products or processes that show a history of defect, leak history or failure.
 - p) Review of Drug and Alcohol Plans

Section F.2 – Inspection Units

- 1) An inspection unit is all or part of an operator's facilities that are under the control of an administrative unit that provides sufficient communication and control to ensure uniform design, construction, operation, and maintenance of the facilities.

Section F.3 – Inspection Day

An Inspection Day shall consist of time spent reviewing an operator's procedures, records, programs, or system operations, to ensure compliance with Federal and State regulations. Inspection days include inspections, investigation of pipeline related incidents or damages, and on-site operator training. Inspection days can be performed on-site with the operator, or off-site, as long off-site activity meets the requirements previously stated. Inspection days shall be documented

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on the deputy's report, for each day devoted to pipeline safety issues, regardless of the number of operators visited during the working day.

Section F.4 – Inspection Documentation / Records

All inspection day activities will require a report to document the inspection and the results. Inspection questions should be reviewed annually to ensure they are up to date with the most current requirements from 49 CFR.

- 1) The Pipeline Safety Deputy will utilize PHMSA question sets that are made available to states not using IA.

Section F.5 – Inspection Types

Section F.5-1 – Standard Field Inspection

Overview

Standard Field Inspections are physical inspections of a Transmission System, Town Distribution System, Rural Distribution System, Project Line, or other facilities that include, but are not limited to; Mainline Border Station(s), Town Border Station(s), District Regulator Station(s), Valve Station(s), Meter Sets (Large Volume and Customer), Corrosion Control, Gas Odorization, Line Markers and Warning Signs, and Damage Activities and Prevention. These inspections will be performed so that the entire system (Town, Rural Distribution System, or Transmission Line Section) has been visited to the extent possible to ensure safe operation of the system, as well as compliance has been maintained. The Standard Field Inspection does not resolve the operator of any future safety concerns or potential violations. The Standard Field Inspection can be completed as an entire or separate Unit, Town, or Section. When possible, the Standard Field Inspection should be performed after the Standard Procedures Inspection for that operator.

Forms Used

Field Inspections

Pre-Inspection Procedures

Prior to the inspection, the Pipeline Safety Deputy should prepare a Standard Field Inspection form above for the current Unit, Town, or Section(s) to be inspected, as well as review the form to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy may arrange a time with the operator to provide staff for assistance with pressure readings, access to secured facilities, and provide historical information as well as locating pipeline structures or facilities, if necessary. The Pipeline Safety Deputy may also review the Operators procedures as well as the following reports, for the area.

- From operator
 - Current activities in inspection area (Construction, Repairs, etc.)
 - TBS Capacity Calculation reviews
 - DRS Inspection Records
 - Cathodic protection reports

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- Current isolated services list
- Current leaks list, and
- Other reports or information as needed
- Nebraska One-Call Locate Requests for inspection area
 - <http://ne.itic.occinc.com/search>
- Unit, Town, or Section Pipeline Maps
- Previous inspection reports
- Other

On-Site Inspection

The Pipeline Safety Deputy may perform multiple inspections and verification tests at the current Unit or Town under inspection. The following list does not cover all the options for inspection activities.

- Observe System Pressures (digital readouts, charts, or gauges)
- Observe that required signage is posted as required in §192.707 or the operators O&M (operator Name, Emergency Telephone #, “WARNING”, “GAS”, etc.).
- The Pipeline Deputy may call the Emergency Number to verify it is active, and that they can reach the operator.
- Observe current repairs, replacements, or construction activity,
- Observe locate markings in proposed or current excavation areas,
- Document cathodic protection readings, as well as any isolated services found
- Inspect meters for proper support, clearance, and maintenance issues
- Inspect above-ground facilities for corrosion control, damage, repairs, or violations
- Ensure over-pressure protection devices are set for proper operation
- Document comments in the inspection form as needed.

The Pipeline Safety Deputy will complete the appropriate form, utilizing Field Reviews, Procedures, Records, and Interviews to ensure that all criteria for the regulations are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, or completed the fill-in information lines, to document the results, as follows.

- 1) Sat – Satisfactory, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat – Unsatisfactory, indicates that current procedure(s) or practice DOES NOT meet compliance with the specific Part referenced.
- 3) N/A – Not Applicable, indicates that the specific Part referenced does not apply to this operator.

If the Pipeline Safety Deputy notices any concerns or potential violations, the Pipeline Safety Deputy should contact the operator to initiate any corrective action as needed.

When a condition or specific operation or maintenance procedure is not in compliance with the regulations, or specific procedures may lead to non-compliance, the Unsat box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator will be advised of the issue involved.

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Records

The Pipeline Safety Deputy may request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection.
- 2) Records may be combined with other topics and records may be maintained in various forms
- 3) Records should thoroughly disclose who, what, when and where.
- 4) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired.
- 5) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken.
- 6) In most cases there should be supplemental information to help determine the accuracy of the records.
- 7) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues.

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. This failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation

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of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.

- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the lead Pipeline Safety Deputy will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed. After the inspection is complete, the Pipeline Safety Deputy will follow [Section F.6](#) for Post-Inspection Procedures.

Section F.5-2 – Standard Records Inspection

Overview

Each Record Inspection could include a review of the operator's records concerning the construction, inspection, operation, and maintenance of the operator's pipeline, including pipeline facilities. If problems are found during the review, additional review will be necessary to accurately determine the scope of any deficiency found. Inspection forms should be used by the Inspector during each inspection. The inspector may spot check certain records from the file. If a spot check reveals something that is questionable, a more in-depth study of that record should be conducted.

System records will generally indicate the condition of the system. Any questionable records should be verified with a corresponding field inspection of any facilities in question. The records reviewed for compliance should include, but are not limited to the following examples:

1. Leak Survey (Part 192 only) – Determine Residential (3 or 5 years) and Business District (each calendar year, but at intervals not exceeding 15 months) survey dates, number of leaks found and classified, and if proper repairs were made (leak repair work orders). Refer to Sections 192.706 and 192.723.
 - Ask operator if any sections were missed or if any known compliance issues?
 - Appropriate documentation (maps) should be reviewed to determine compliance.

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- Are leak survey locations documented appropriately?
 - Comprehensive review should be conducted every 3-5 years where ALL leak survey maps are reviewed to determine no geographic areas are missed.
 - Are locations of leaks found documented?
 - Review leak repair records of any leaks noted on survey.
 - Are all leaks reported on annual report?
2. Corrosion Control – Determine if system is cathodically protected and type of protection used, anodes, rectifiers, isolation, interference bonds, etc. Determine if proper monitoring is maintained. Refer to Part 192 – Subpart I-Requirements for Corrosion Control. Take pipe-to-soil readings, when possible, to determine compliance.
- Ask operator if any sections were missed or if any known compliance issues.
 - Has operator provided you with all records?
 - Utilize other locations in addition to the operators test points used in various systems to verify overall corrosion control.
 - Ask if any test points were added or removed during last inspection cycle.
 - Compare readings and look for signs of corrosion.
 - Are readings within acceptable range from last reading?
 - Do readings coincidentally read minimum (-850mV)?
3. Odorization – Determine type of equipment if annual maintenance is performed and tested to determine if proper odorant level is maintained. Refer to Section 192.625.
- Have odor injection levels been reviewed
4. Patrolling – Determine if proper patrolling is done on transmission and gas distribution facilities.
- Patrolling maps – what are source documents
 - Dates performed, locations/Facilities and signatures of person conducting patrol
5. Valves – Determine if annual maintenance is performed on designated key valves on transmission and gas distribution mains. Also, refer to the O&M Plan for designated emergency valves.
- It is vital to get counts where you can compare from year to year
 - Dates of records – Weekends? Holidays? April 31st?
6. Maximum Allowable Operating Pressure (MAOP)
- The MAOP of the facilities must be determined.
7. Regulator Stations – Verify annual inspection for regulator stations are conducted to determine mechanical condition, correct pressure, adequate capacity, and operation. If more than one regulator station is used to supply gas to any single system, telemeter or recording pressure gauges are required. Refer to Sections 192.739, 192.741 and MAOP under 192.619.
8. Relief Devices – Determine if relief devices are tested and if capacities are adequate and set to function at the proper pressures.

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9. Vaults (If Any) – Vaults having volumetric internal content of 200 cubic feet or more require ventilation ducts and other features and are required to be inspected annually.
10. Customer Leak Complaints – Determine if the operator has recorded all necessary leak information, (e.g., time received, time dispatched, time arrived, time completed and disposition).
11. Farm Taps – Determine if proper odorization, regulation, and adequate overpressure protection is provided.
12. Special Considerations for Master Meters – Master meter system O&M Plans should consist of a brief description of the gas facilities, and procedures for leak surveys and repairs, cathodic protection monitor, system pressure, customer leak complaints, system valve maintenance, new construction procedures when applicable and procedures for personnel training.

Review of operator records should not be limited to the above list and should include all their specific required operation and maintenance activities. Based on records reviewed, the Inspector should select future locations for physical on-site facility inspection of Regulator Stations, System Valves, C-P Test Stations, Rectifiers, Odorizers, Line Markers, Leak Repairs, and Customer Meters and Regulators, etc.

It may not be necessary to obtain copies of records during routine inspections, unless a non-compliance issue is found, and records may be needed to support a compliance action. If any request for a copy of any record is refused, immediately telephone the Fuels Division Chief Deputy for guidance. Include a reference to the refusal in your report.

Standard Records Inspections include a comprehensive and thorough review of an operator's compliance and Operation & Maintenance records. This would include, at a minimum, an evaluation of such items as corrosion control, leakage surveys, overpressure protection and pressure regulating equipment, odorization levels and equipment, repaired and/or active leaks, emergency valves, emergency response, etc. This inspection can be completed as an entire inspection of the operators Records, or can be broken down into smaller sections, as long as the entire Standard Records Inspection is completed within the five-year time frame.

Forms Used

Records Inspection Form

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of the Standard Records Inspection, with the operator in advance of the inspection. The Pipeline Safety Deputy can perform a Standard Records Inspection at any time, as necessary. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operators Office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection in APX for the

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current inspection, as well as review the question sets to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous Standard Records Inspection to have a better insight of previous issues identified, if any, as well as unique aspects of the operator's pipeline system and operations. The Pipeline Safety Deputy should review the current copy of the operators' program prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the inspection. The Pipeline Safety Deputy will:

- 1) Ensure that all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The Pipeline Safety Deputy will conduct the inspection, utilizing records and programs to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows.

- 1) Sat – Satisfactory, indicates that current records(s) meet compliance with the specific Part referenced.
- 2) Unsat – Unsatisfactory, indicates that current record(s) **DOES NOT** meet compliance with the specific Part referenced.
- 3) N/A – Not Applicable, indicates that the specific Part referenced does not apply to this operator.

When a specific record is not in compliance with the part referenced, the Unsat inspection box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

The Pipeline Safety Deputy will request any procedure or record needed for the inspection. If the procedure or record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection.
- 2) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193.
- 3) Records may be combined with other topics and records may be stored in various forms
- 4) Records should thoroughly disclose who, what, when and where.
- 5) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired.

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- 6) Records should be detailed enough to distinguish the person performing the task, the date the task was performed, and what action was taken.
- 7) In most cases there should be supplemental information to help determine the accuracy of the records.
- 8) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues.

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

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Section F.5-3 – Standard Procedures Inspection (O&M)

Overview

O&M Standard Inspections include a comprehensive and thorough review of an operator's compliance records, Operations and Maintenance plans, Operations and Maintenance Procedures, Operation & Maintenance Records, Emergency Procedures, Public Awareness Plans, Drug and Alcohol Programs and pipeline facilities. This would include, at a minimum, an evaluation of such items as corrosion control, leakage surveys, overpressure protection and pressure regulating equipment, odorization levels and equipment, repaired and/or active leaks, emergency valves, emergency response, etc. This includes any field verification of an operator's compliance records and activities relating to LNG facilities. This inspection can be completed as an entire inspection of the operators Procedures, or can be broken down into smaller sections, if the entire Standard Procedures Inspection is completed within the five-year time frame. This inspection can be done prior to any Standard Field Inspections, so that the Pipeline Safety Deputy is aware of current Operations & Maintenance Procedures.

Forms Used

O&M Inspection

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of the Standard Procedures Inspection with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a Standard Procedures Inspection at any time, as needed. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operators Office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection in APX for the appropriate inspection, as well as review the questions to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous Standard Procedures Inspection to have a better insight of previous issues identified, if any, as well as unique aspects of the operator's pipeline system and operations. The Pipeline Safety Deputy should review the current copy of the Operations and Maintenance Procedures provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the Standard Procedures Inspection. The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

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The Pipeline Safety Deputy will utilize Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item to document the result as follows:

- 1) Sat – Satisfactory, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat – Unsatisfactory, indicates that current procedure(s) or practice **DOES NOT** meet compliance with the specific Part referenced.
- 3) N/A – Not Applicable, indicates that the specific Part referenced does not apply to this operator.

When a specific operating or maintenance procedure is not compliant with the Part referenced or action following the specific procedure may lead to a compliance issue, the Unsat box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety Deputy, or by a printed copy of the record.

- 1) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection.
- 2) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193.
- 3) Records may be combined with other documents and may be stored in various formats
- 4) Records should thoroughly disclose who, what, when and where.
- 5) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired.
- 6) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken.
- 7) In most cases there should be supplemental information to help determine the accuracy of the records.
- 8) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

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- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed. After the inspection is complete, the Pipeline Safety Deputy will follow [Section F.6](#) for Post-Inspection Procedures.

Section F.5-4 – Distribution Integrity Management Program (DIMP)

Overview

Staff meeting the PHMSA training requirements relating to distribution integrity management inspection will perform or lead all DIMP inspections.

Qualified Staff will be assigned to conduct field inspections of the work being performed on pipeline facilities to meet the 49 CFR Part 192, Subpart P, requirements. The Staff will verify

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that all work being conducted is performed in accordance with the operator's operation and maintenance plan and integrity management plan.

Operators will have a periodic review of DIMP plans to ensure operator tests and remedial actions are being conducted and Pipeline Safety Deputies are aware of on-going DIMP activities. This periodic review will be conducted at least once per year by reviewing the operators annual report and may be considered continuous through normal conversations and inspections conducted in the Operators units.

Operators are required to report the following Plan Measures annually; listed in Paragraph (e)(1)(i) through (e)(1)(iv) of §192.1007:

- 1) Number of Hazardous Leaks either eliminated or repaired as required by §192.703(c), or total number of leaks if all leaks are repaired when found, categorized by risk:
- 2) Number of Excavation Damages:
- 3) Number of Excavation Tickets:
- 4) Total number of leaks either eliminated or repaired, categorized by cause

Forms Used

Gas DIMP Program
Gas DDIMP Implementation

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of the Distribution Integrity Management Plan, with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a DIMP Inspection at any time, as needed. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operators Office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should ensure they have access to the current DIMP Program. The Pipeline Safety Deputy should also review the previous DIMP Inspection(s) to have a better insight of previous issues identified, if any, as well as unique aspects of the operator's pipeline system and operations. The Pipeline Safety Deputy should review the current copy of the operators DIMP and Operations and Maintenance Procedures provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the DIMP Inspection. The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The Pipeline Safety Deputy will follow the DIMP Database, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows:

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- 1) Sat – Satisfactory, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat – Unsatisfactory, indicates that current procedure(s) or practice **DOES NOT** meet compliance with the specific Part referenced.
- 3) N/A – Not Applicable, indicates that the specific Part referenced does not apply to this operator.

When a specific requirement pertaining to the operators DIMP Program, Operating or Maintenance procedure is not compliant with the Part referenced, or action following the specific procedure may lead to a compliance issue, the Unsat box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' Distribution Integrity Management Plan:
- 2) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection:
- 3) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193:
- 4) Records may be combined with other documents and records may be stored in various formats:
- 5) Records should thoroughly disclose who, what, when and where:
- 6) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired:
- 7) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken:
- 8) In most cases there should be supplemental information to help determine the accuracy of the records:
- 9) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

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Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

Section F.5-5 – Gas Transmission Integrity Management Program (TIMP)

Overview

Staff meeting the PHMSA training requirements relating to distribution integrity management inspection will perform or lead all TIMP inspections. Qualified Staff will be assigned to conduct field inspections of the work being performed on pipeline facilities to meet the 49 CFR Part 192, Subpart O, requirements. Staff will verify that all work being conducted is performed in accordance with the operator's operation and maintenance plan and integrity management plan.

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Forms Used

GAS T IMP Plan Review

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of the Gas Transmission Integrity Management Plan with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a TIMP Inspection at any time, as needed. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operators Office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection in APX for the current program, as well as review the questions to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous TIMP Inspection(s) to have a better insight of previous issues identified, if any, as well as unique aspects of the operator's pipeline system and operations. The Pipeline Safety Deputy should review the current copy of the operators TIMP and Operations and Maintenance Procedures provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the TIMP Inspection. The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The Pipeline Safety Deputy will follow the DIMP Inspection, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows

- 1) Sat, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat, indicates that current procedure(s) or practice **DOES NOT** meet compliance with the specific Part referenced.
- 3) N/A, indicates that the specific Part referenced does not apply to this operator. A note must be made in the comments section for why the specific part does not apply.

When a specific requirement pertaining to the operators DIMP Program, Operating, or Maintenance procedure is not compliant with the Part referenced or action following the specific procedure may lead to a compliance issue, the Unsat box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

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This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' Gas Transmission Integrity Management Plan:
- 2) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection:
- 3) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193:
- 4) Records may be combined with other topics and records may be stored in various formats:
- 5) Records should thoroughly disclose who, what, when and where:
- 6) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired:
- 7) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken:
- 8) In most cases there should be supplemental information to help determine the accuracy of the records:
- 9) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 198, or 199 this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.

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- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted within immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

Section F.5-6 – Standard LNG Inspection

Overview

Standard LNG Inspections include a comprehensive and thorough review of an operator's compliance records, Operations and Maintenance plans, Operations and Maintenance Procedures, Operation & Maintenance Records, Emergency Procedures, Public Awareness Plans, Drug and Alcohol Programs and pipeline facilities. This would include, at a minimum, an evaluation of such items as corrosion control, leakage surveys, overpressure protection and pressure regulating equipment, odorization levels and equipment, repaired and/or active leaks, emergency valves, emergency response, etc. This includes any field verification of an operator's compliance records and activities relating to LNG facilities. This inspection can be completed as an entire inspection of the operators Procedures, or can be broken down into smaller sections, as long as the entire Standard LNG Inspection is completed within the three-year time frame.

Forms Used

LNG Procedures
LNG Records
LNG Field

Pre-Inspection Procedures

The Pipeline Safety Deputy may-schedule the time and location of the Standard LNG Inspection with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a

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Standard Procedures Inspection at any time, as needed. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operators Office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection listed above for the current program, as well as review the questions to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous Standard LNG Inspection to have a better insight of previous issues identified, if any, as well as unique aspects of the Operators pipeline system and operations. The Pipeline Safety Deputy should review the current copy of the Operations and Maintenance Procedures provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the Standard LNG Inspection.

The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The Pipeline Safety Deputy will follow the LNG inspection, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows:

- 1) Sat – Satisfactory, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat – Unsatisfactory, indicates that current procedure(s) or practice **DOES NOT** meet compliance with the specific Part referenced.
- 3) N/A – Not Applicable, indicates that the specific Part referenced does not apply to this operator.

When a specific operating or maintenance procedure is not compliant with the Part referenced or action following the specific procedure may lead to a compliance issue, the Unsat box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any procedure or record needed for the inspection. If the procedure or record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection:
- 2) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193:

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- 3) Records may be combined with other topics and records may be stored in various formats:
- 4) Records should thoroughly disclose who, what, when and where:
- 5) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired:
- 6) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken:
- 7) In most cases there should be supplemental information to help determine the accuracy of the records:
- 8) Reports should be accurate, thorough, consistent, and complete with action required

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues.

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

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After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted within immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

Section F.5-7 – Operator Qualification (OQ) Program

Overview

Operator Qualification Inspections following the federal protocol elements are divided into 2 main groups.

- A) Program Inspection (Protocols 1 – 8); and
- B) Program Field Inspection (Protocol 9)

Forms Used

The following inspection forms will be used for Operator Qualification inspections.

- OQ 1-8 (Protocols 1 – 8); or
- OQ 9 (Protocol 9)

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of the operator Qualification Program or Field Inspection with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform an operator Qualification Program or Field Inspection at any time, as necessary. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operators Office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection listed above for the current inspection, as well as review the questions to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous operator Qualification Program or Field Inspections to have a better insight of previous issues identified, if any. The Pipeline Safety Deputy should review the current copy of the operators Qualification Program provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the operator Qualification Program or Field Inspection. The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

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The Pipeline Safety Deputy will follow the inspection form, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows:

- 1) Sat, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat, indicates that current procedure(s) or practice DOES NOT meet compliance with the specific Part referenced.
- 3) N/A, indicates that the specific Part referenced does not apply to this operator. A note will be required for this.

When a specific procedure is not in compliance with regulations, or the procedure may lead to a compliance issue, the Unsat Box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' Qualification records may be at a location(s) not the same as the inspection.
- 2) Records may be stored in various formats.
- 3) Records should thoroughly disclose:
 - a) Name of Qualified Individual(s)
 - b) Identify covered task(s)
 - c) Dates of qualifications
 - d) Qualification methods
- 4) In most cases there should be supplemental information to help determine the accuracy of the records.
- 5) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable**

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Violation, or Request for Enforcement Action after the operators 30 business-day response.

- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted within immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

Section F.5-8 – Design, Testing, and Construction

Overview

Inspections that include construction activities, installation of new Transmission pipelines, Distribution Mains, and/or Service Lines, increase in capacity or size or an existing facility, evaluation of design, and the integrity testing of new or replacement facilities.

Important Notice – Pipeline Safety Deputies will be on active construction sites during Design, Testing, or Construction Inspections. The use of safety (steel or composite) toe footwear, hard hats, safety vests, and protective eyewear is required during any on-site Design, Testing, or Construction inspection. Be aware of the dangers involved with the tasks assigned, including:

- **Hydrostatic Testing** – Pipelines will be filled with High Pressure Water, which can be deadly if a catastrophic failure occurs. Keep a safe distance away from the pipeline or components during any hydrostatic testing for safety.

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- **Bell Hole / Trenches** – Pipeline Safety Deputies will not enter any Bell Hole, Trench, or other Confined Entry Space during Design, Testing, or Construction inspections due to personal safety and training.

Forms Used

Construction Inspection

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of a Design, Testing, or Construction Records Inspection with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a Design, Testing, or Construction Inspection at any time, as necessary. The time and location of the meeting, if scheduled, should be agreeable to both the operator. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection listed above for the current inspection, as well as review the questions to ensure it reflects the current regulations, as adopted. A copy of the current inspection form should be e-mailed to any additional Pipeline Safety Staff involved. The Pipeline Safety Deputy should also review previous Design, Testing, or Construction Inspections to have a better insight of previous issues identified, if any. The Pipeline Safety Deputy should review the current copy of the operators Operation & Maintenance procedures and the operators Qualification Program provided by the operator prior to the inspection.

On-Site Inspection

- 1) The Pipeline Safety Deputy should become familiar with the following Procedures, Operation and Maintenance, operator Qualification, Corrosion Control, and Damage Prevention, as well as recent and proposed changes to the facilities including new facilities, repairs, leak history, damages, and other projects of the operator prior to the inspection.
- 2) The inspection questions shall have an indication marked in the appropriate column; Sat (Satisfactory), Unsat (Unsatisfactory), N/A (Not Applicable), or the field should be filled in as required.
 - a) An indication for Sat would indicate that current procedure or practice meets compliance with the specific section of Part 191, 192 or 193 referenced.
 - b) An indication for Unsat would indicate that current procedure or practice does not meet compliance with the specific Part 191,192 or 193 referenced.
 - c) An indication for N/A indicates that the specific Part 191,192 or 193 referenced does not apply to this operator.

When a specific Design, Testing, Construction, Operating or Maintenance procedure is not compliant with the applicable part referenced or action following the specific procedure may lead to a compliance issue, the Unsat should box be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Important Areas of Review

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- **STAY ALERT FOR ANY SAFETY RELATED OR ABNORMAL OPERATING CONDITIONS WHILE PERFORMING ANY ON-SITE DESIGN, TESTING, OR CONSTRUCTION INSPECTION**
- Verify the Class Location for the area where the work is being performed.
- Verify the system MAOP/MOP and operating pressure.
- Verify the piping and components being used are properly marked and qualified for gas piping and the pressure rating is adequate for the system MAOP/MOP.
- Verify the piping grade, specification, and wall thickness are adequate for the installation being observed. Determine if cathodic protection is required, the type of protection being applied (anode, rectifier, or bond). Determine the level of protection by performing a pipe to soil potential measurement (when applicable).
- Verify adequate depth of burial is being achieved for the type of installation being observed.
- Shoring or other acceptable trench protection should be used in excavations as defined by Company procedures where unstable soil is encountered and or the opening is 5 feet or more in depth.
- Ensure that the backfill being used is clean of debris that may damage coating or piping.
- If the possibility of a release of natural gas or hazardous liquid is present, ensure that a fire extinguisher is readily accessible. In the event of a planned release confirm that the area has been secured and no ignition sources are present prior to release. Verify that appropriate personal protection equipment is being used, as defined in the operators O&M Plan.
- Verify that individuals performing fusion or steel welding are qualified by the appropriate procedure and that qualifications are current.
- Observe fusions or welding being performed to determine if the company procedures are being followed.
- If tapping and stopping are being performed ensure that company procedures are being followed and that the employees performing the work have current qualifications.
- When new or existing pipe is being handled, transported, or excavated near, ensure that the piping and/or coating is in good physical condition. Make certain that the crew is inspecting the piping prior to installation or backfill for gouges, dents, or abrasions. If damage is observed ensure that the damaged segment is removed or repaired as defined by company procedure.
- Prior to pressure test determine if the Class Location has a bearing on the minimum test pressure (gas only).
- Adherence to pressure test duration required by company procedure and regulations should also be verified.
- Ensure that the pressure gauge or recording chart used to monitor pressure tests are in good physical condition and if required by company procedure, the calibration date is current.
- When purging is performed verify the operator has determined the area is cleared and the release is controlled and vented safely. This should include, as applicable, vent stack grounding and maintaining static control. If required by company procedure, ensure that the appropriate emergency officials have been notified of purges.
- If a meter set assembly is part of the installation being observed verify that the service regulator vent is located in an area where it can vent safely to atmosphere and is readily accessible. The riser valve or outside shutoff must-be accessible.
- Verify the service valve assembly has adequate support.

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- If an emergency situation occurs while performing the inspection determine if the emergency procedures are followed and the tasks performed are conducted as defined by company procedure.
- Determine if line markers are required and are posted with the appropriate warning, company name, and a 24-hour contact number.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection. Operator Qualification Records should be onsite, and accessible by the crew foreman, or inspector (operator or Third Part Inspector).
- 2) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193.
- 3) Records may be combined with other topics and records may be stored in various formats
- 4) Records should thoroughly disclose who, what, when and where.
- 5) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired.
- 6) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken.
- 7) In most cases there should be supplemental information to help determine the accuracy of the records.
- 8) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.

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- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators’ attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators’ system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator’s management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

Section F.5-9 – Damage Prevention Plan

Overview

Review of an operator’s Damage Prevention Plan, Training, Public Education, Enforcement, etc. A Damage Prevention Inspection will occur after each reported damage, as well as every five years. A damage prevention inspection can consist of review of damages the operator sustained due to third party damages per 1000 locates during the previous year. The numbers should be compared to prior years to determine if the rate is decreasing or increasing. Inspection time spent solely on verification of one-call response is also allowed. The Damage Prevention Plan inspection may be completed with the Public Awareness Program, or as a separate inspection.

Forms Used

Gas Public Awareness Program Effectiveness

Pre-Inspection Procedures

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The Pipeline Safety Deputy may schedule the time and location of the Damage Prevention Plan with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a Damage Prevention Plan Inspection at any time, as necessary. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operator's office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection listed above for the current inspection, as well as review the form to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous Damage Prevention Plan Inspections to have a better insight of previous issues identified, if any. The Pipeline Safety Deputy should review the current copy of the operators Damage Prevention Plan provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the Damage Prevention Plan Inspection. The Pipeline Safety Deputy will:

- 1) Ensure that all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The Pipeline Safety Deputy will follow the inspection form, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows:

- 1) Sat – Satisfactory, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat – Unsatisfactory, indicates that current procedure(s) or practice DOES NOT meet compliance with the specific Part referenced.
- 3) N/A – Not Applicable, indicates that the specific Part referenced does not apply to this operator.

When a specific procedure is not in compliance with regulations, or the procedure may lead to a compliance issue, the U column should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection.
- 2) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193.

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- 3) Records may be combined with other topics and records may be stored in various formats.
- 4) Records should thoroughly disclose who, what, when and where.
- 5) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired.
- 6) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken.
- 7) In most cases there should be supplemental information to help determine the accuracy of the records.
- 8) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

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Operator Post Inspection Review

After the inspection is completed, the lead Pipeline Safety Deputy will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted within immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed. After the inspection is complete, the Pipeline Safety Deputy will follow Section F.6 for Post-Inspection Procedures.

Section F.5-10 – On-Site operator Training

Overview

Participation and or Review of training that includes a supervisor/inspector/technical staff member making a requested and announced presentation at an operators' training/safety meeting, gas association seminar/conference, damage prevention conferences or TQ seminar pertaining to the Pipeline Safety Regulations that are enforced by the State Fire Marshal. Training may be conducted on location or a common site for multiple operators.

Forms Used

Supplemental Report

Section F.5-11 – Control Room Management (CRM)

Overview

Inspection and review of an operator's Control Room to ensure compliance with regulations. Pipeline Safety Deputies will utilize the PHMSA Control Room Management Inspection form.

Forms Used

CRM

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of the Control Room Management Inspection with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a Control Room Management Inspection at any time, as necessary. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operator's office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection listed above for the current inspection, as well as review the form to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous Control Room Management Inspections to have a better insight of previous issues identified, if

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any. The Pipeline Safety Deputy should review the current copy of the operators Operation and Maintenance Program as well as the Control Room Management plan, provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the Control Room Management Inspection. The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The inspection should follow in step with Control Room Management Inspection form. The Pipeline Safety Deputy will follow the inspection form, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows:

- 1) Sat, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat, indicates that current procedure(s) or practice DOES NOT meet compliance with the specific Part referenced.
- 3) N/A, indicates that the specific Part referenced does not apply to this operator.

When a specific procedure is not in compliance with regulations, or the procedure may lead to a compliance issue, the Unsat box should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection.
- 2) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193.
- 3) Records may be combined with other topics and records may be stored in various formats.
- 4) Records should thoroughly disclose who, what, when and where.
- 5) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired.

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- 6) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken.
- 7) In most cases there should be supplemental information to help determine the accuracy of the records.
- 8) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

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Section F.5-12 – Public Awareness Inspections (PAP)

Overview

Inspections to verify operator's Public Awareness Plan and Public Awareness Plan Evaluation. The data collected during the inspection will be uploaded into the federal database. The Damage Prevention Plan inspection may be completed with the Public Awareness Program, or as a separate inspection.

Forms Used

Gas Public Awareness Program Effectiveness

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of the Public Awareness Plan with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a Public Awareness Plan Inspection at any time, as necessary. The time and location of the meeting, if scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operator's office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection listed above for the current inspection, as well as review the form to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous Public Awareness Plan Inspections to have a better insight of previous issues identified, if any. The Pipeline Safety Deputy should review the current copy of the operators Public Awareness Plan provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the Public Awareness Plan Inspection. The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The inspection should follow in step with *Public Awareness Program (PAP) Inspection Guidance Dated: July 21, 2011* for Initial plan review for procedures and implementation and records inspection. The Pipeline Safety Deputy will follow the inspection questions, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows

- 1) Sat, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat, indicates that current procedure(s) or practice DOES NOT meet compliance with the specific Part referenced.
- 3) N/A, indicates that the specific Part referenced does not apply to this operator.

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When a specific procedure is not in compliance with regulations, or the procedure may lead to a compliance issue, the “Potential Issues Identified” column should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators’ operation and maintenance records may be at a location(s) not the same as location for procedures inspection.
- 2) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192 or 193.
- 3) Records may be combined with other topics and records may be stored in various formats
- 4) Records should thoroughly disclose who, what, when and where.
- 5) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired.
- 6) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken.
- 7) In most cases there should be supplemental information to help determine the accuracy of the records.
- 8) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was

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performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.

- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

After the inspection is completed, the Pipeline Safety Deputy will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed. After the inspection is complete, the Pipeline Safety Deputy will follow [Section F.6](#) for Post-Inspection Procedures.

Section F.5-13 – Drug and Alcohol Inspection

Overview

Inspections to verify an operators Drug and Alcohol program is in compliance with Federal Protocols. This data is uploaded into the federal database.

Forms Used

Drug and Alcohol
D&A Collection Site Form

Pre-Inspection Procedures

The Pipeline Safety Deputy may schedule the time and location of Drug and Alcohol Inspection with the operator in advance of the inspection, but the Pipeline Safety Deputy can perform a Drug and Alcohol Inspection at any time, as necessary. The time and location of the meeting, if

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scheduled, should be agreeable to both the operator, and the Pipeline Safety Deputy, but typically will be at the operator's office. This should allow the operator time to schedule operator Staff to be able to meet and assist the Pipeline Safety Deputy in completing the inspection. The Pipeline Safety Deputy should prepare the proper inspection listed above for the current inspection, as well as review the form to ensure it reflects the current regulations, as adopted. The Pipeline Safety Deputy should also review the previous Drug and Alcohol Inspections to have a better insight of previous issues identified, if any. The Pipeline Safety Deputy should review the current copy of the operators Drug and Alcohol Policy provided by the operator prior to the inspection.

On-Site Inspection Procedures

The Pipeline Safety Deputy will meet with all those involved with the Drug and Alcohol Program Inspection. The Pipeline Safety Deputy will:

- 1) Ensure all involved understand the section(s) that will be inspected; and
- 2) Allow for any Pre-Inspection questions or concerns.

The Pipeline Safety Deputy will follow the inspection form, utilizing Procedures, Records, and Interviews to ensure that all criteria for the regulation are met. The Pipeline Safety Deputy will check the appropriate inspection box in each line item, to document the result as follows:

- 1) Sat, indicates that current procedure(s) or practice meets compliance with the specific Part referenced.
- 2) Unsat, indicates that current procedure(s) or practice DOES NOT meet compliance with the specific Part referenced.
- 3) N/A, indicates that the specific Part referenced does not apply to this operator.

When a specific procedure is not in compliance with regulations, or the procedure may lead to a compliance issue, the "Potential Issues Identified" column should be marked and comments specific to this line item shall be made within the comments section. These items shall be noted, and the operator apprised of the issue involved.

Records

This list of Records information is for guidance and is not a complete list. The Pipeline Safety Deputy will request any Procedure or Record needed for the inspection. If the Procedure or Record is in digital format, the Pipeline Safety Deputy will request that the operator allow access to view the required document, either visually on a monitor or screen, digital file e-mailed to the Pipeline Safety operator, or by a printed copy of the record.

- 1) Inspection of the operators' Drug and Alcohol Policy:
- 2) Inspection of the operators' operation and maintenance records may be at a location(s) not the same as location for procedures inspection:
- 3) The deputy should be familiar with the form utilized by the operator to document compliance with a specific section or subsection of 49 CFR Part 191, 192, 193, 199 or 40:

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- 4) Records may be combined with other topics and records may be stored in various formats:
- 5) Records should thoroughly disclose who, what, when and where:
- 6) Records should be thorough enough to distinguish the address, site, location, or area where informational data is acquired:
- 7) Records should be detailed enough to distinguish the person performing the task, the date the task was performed and what action was taken:
- 8) In most cases there should be supplemental information to help determine the accuracy of the records:
- 9) Reports should be accurate, thorough, consistent, and complete with action required.

Guide for Possible Compliance Actions

Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Operator Post Inspection Review

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After the inspection is completed, the Pipeline Safety Deputy(s) will conduct an Exit Interview with the Operator's management staff associated with the inspection. This review will be conducted immediately after the inspection is completed. The Pipeline Safety Deputy will ensure that the operator is aware of any outstanding compliance issues or concerns found in the inspection, as well as comments of the overall progress of the operator. The Pipeline Safety Deputy will afford time to the operator for questions, as well concerns of the operator to be addressed.

Section F.5-14 – Annual Report Review

Overview

Pipeline Safety Deputies will perform the Annual Report Review for the previous year annually.

Forms Used

Gas Annual Distribution
Gas T Annual
LNG Annual

Pre-Inspection Procedures

- 1) Pipeline Safety Deputies will gather the following reports as provided by the operators:
 - a) Incident Report for Gas Distribution System
 - b) Annual Report for Gas Distribution System
 - c) Incident Report for Gas Transmission and Gathering Systems
 - d) Annual Report for Gas Transmission and Gathering Systems
 - e) Incident Report for Liquefied Natural Gas Facilities (LNG)
 - f) Annual Report for Liquefied Natural Gas Facilities (LNG)

Inspection Procedures

- 1) Pipeline Safety Deputies will use the inspections identified above for each operator and type (Transmission, Distribution, Gathering, and LNG) to complete the Annual Report Inspection.
- 2) Pipeline Safety Deputies should have copies of the previous five years of Annual Inspection Reports and/or Annual Reports filed by the operator(s) being inspected.
- 3) All data gathered from the Annual Reports submitted by the operators will be entered into the Risk Analysis excel sheet.

Guide for Possible Compliance Actions

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Pipeline Safety Deputies will follow [Section H](#) for a complete guide on Compliance Actions. The following is a recommended course of action for Compliance Issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.
- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

[Section F.6](#) – Post-Inspection Activities

[Section F.6-1](#)- Submitting Completed Reports

All inspection forms and reports shall be submitted to the Fuels Division Chief Deputy within 7 days of completing an inspection. All checklists shall be complete and accompany any Supplemental Report with any other adequate documentation needed. Compliance issues shall be thoroughly outlined, and any follow-up reports made as detailed in [Section F.5-11](#). Any final reports not requiring further compliance action shall be reviewed by the Fuels Division Chief Deputy and filed. Probable violations or other issues discovered should follow procedures in [Section H](#) for further follow-up.

[Section F.6-2](#) – Inspection Closure Letters

After completing any inspection, if no issues were identified, the Pipeline Safety Deputy will issue an Inspection Closure letter to the operator, detailing the type and results of the inspection. The Inspection Closure letter will be issued to the operator no later than 30 days from the completion

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of the inspection if no issues were identified. If issues were identified during the inspection, refer to [Section H](#) for guidance.

[Section F.7](#) – **Reserved**

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Section G – Pipeline Safety Damage Prevention Program

Section G.1 – Damage Prevention Goals

- 1) Primary performance goal for the Pipeline Safety Section is reduction in damage to pipelines caused by demolition, excavation, tunneling, or construction activity.
 - a) The following provide objectives to help meet that goal.
 - i) Encourage and promote participation in the Nebraska One Call program by operators, excavators, and other stakeholders in the development and implementation of methods for establishing and maintaining effective communications between stakeholders from receipt of an excavation notification until successful completion of the excavation, as appropriate.
 - ii) To support activities directed in reducing excavation damage to pipelines, by the operator's and associated groups such as Nebraska Common Ground Alliance, Nebraska 811, and Nebraska One Call Board.
 - iii) To promote training of personnel who perform tasks of locating and marking of pipeline facilities, and those who excavate on or near underground facilities.
 - iv) To review and evaluate the operator's training and qualification requirements for personnel and contractor personnel working for the operator, who perform tasks associated with excavation on or near pipeline facilities?
 - v) To investigate reported excavation damage to the operator's pipeline, for root cause.
 - vi) Recommend to the operator activities to reduce repeated damage in the future, utilizing damage prevention and public awareness programs.
 - vii) Inform excavators, as well as operators, the requirements of part 196.
 - b) The effectiveness of these activities will be measured in:
 - i) The number of excavation damages that caused a leak, as reported on the annual report.
 - ii) The reduction of overall excavated related damage to pipelines of the operator.
- 2) In gathering data and related information the deputy will periodically review the damage prevention plan of the operator. Included in the review will be the operator's participation in the Nebraska One Call system.
- 3) Review the implementation of methods for establishing and maintaining effective communications of an excavation notification until successful completion of the excavation.
- 4) Review annual reports for damage caused by excavation, whether by operator; contractor on behalf of operator; or by outside contractor, excavator, or individual.
- 5) Review and evaluate the operator's training and qualification requirements for personnel and contractor personnel working for the operator, who perform tasks associated with excavation on or near pipeline facilities.
- 6) Investigate excavation caused damage when requested by operator, directed by supervisor, or at the request of the attorney general office.

Section G.2 – Damage Prevention Education

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The deputies will participate in training, seminars, meetings, and exhibits to promote the importance of damage prevention; and provide education related to current Nebraska excavation laws and best practices provided by the Common Ground Alliance. The deputies will document participation in training and education courses.

[Section G.2-1](#) – Damage Prevention Safety Education Course

Deputy Bumgardner may schedule and conduct damage prevention safety education courses every quarter, or as necessary. These courses will be offered in different areas of the state to allow for those required to participate. This course will be open for anyone wishing to attend.

- a) These courses will cover the Nebraska One-Call Notification System Act.
- b) Participation will be open to public or can be required by the consent decree from the Nebraska Attorney General.
- c) Participants must complete written test after the course.
- d) Participation rosters will be submitted to the Nebraska State Fire Marshal, as well as forwarded to the Nebraska Attorney General.

[Section G.2-2](#) – Nebraska Excavation Meetings

The deputies may attend the Nebraska excavation meetings that are held throughout Nebraska. These meetings are a review of the Nebraska One Call statutes, CGA Best Practices, case studies and the One Call Center ticket request process.

[Section G.2-3](#) – Damage Prevention Presentations

The deputies may provide presentations relating to one call violations and pipeline damages, when requested.

[Section G.3](#) – Damage Prevention Investigations

The deputies may investigate for third party damages to intrastate pipeline facilities. Investigations will follow [Section I](#) for additional procedures. This section will provide steps specific to a damage investigation.

Overview

When a Pipeline Safety Deputy is notified of a third-party damage, the investigating deputy will determine if one of the following responses is necessary:

- 1) [Investigation without responding to the damage site;](#)
- 2) [Investigation with a delayed response to the damage site;](#) or
- 3) [Investigation with an immediate response to the damage site.](#)

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Forms Used

Damage Investigation

Damage Activity Investigation

When the Nebraska State Fire Marshal Pipeline Safety Section receives notification of damage to a pipeline structure or components, from operators that are required to report any unintentional release of gas via telephone number, (531) 333-2710, that will notify all deputies and the chief simultaneously. The answering deputy at the end of the call will text the Pipeline Safety section the details of the call. It is this information that will determine the response.

During the investigation all parties involved in the damage event will be interviewed separately and contact information shall be collected for each person interviewed. This information should include name, mailing address, business phone, cell phone, etc. The investigation could include an inspection of the operator's damage prevention and emergency response plans as well as operator qualification plans for personnel responding to the damage event. The inspection of these plans shall be documented if used in a report along with a determination as to whether the operator personnel have correctly followed the plans adopted by their respective companies.

At any time during an investigation, it is determined that a federal incident has occurred, the investigating deputy will notify the Fuels Division Chief Deputy immediately.

Response Criteria

When a notification of a gas leak or damage is received, the Chief will determine the response needed based on information received.

Investigation Criteria

- 1) **Investigation without responding to the damage site**
 - a) Contact excavator to perform an interview
 - i) over the phone; or
 - ii) in person.
 - b) Contact operator staff involved in damage activity to perform interview(s)
 - i) over the phone; or
 - ii) in person interview.
 - c) Review One Call locate, damage and emergency tickets
 - <http://ne.itic.occinc.com/search>
 - Review for One Call violations
 - d) Conduct inspection on damage prevention program
 - §192.614
 - e) Verify operator qualification tasks, training, and current qualifications for responding operator staff
 - §192, Subpart N
 - f) Determine root cause of damage.
 - g) Conduct follow-up activities as necessary.

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2) Investigation with an immediate response to the damage site

- a) Visually inspecting damage site may include:
 - Safety related conditions
 - Locating marks present (paint or flags)
 - Excavation or damage prevention devices/marking present
 - Verify accuracy of Locate Markings
 - Damage to facilities
 - Potential regulation violations
- b) Collect photographic evidence.
 - Use of a scene marking and identification kit is recommended.
- c) Contact excavator to perform an interview
 - i) over the phone; or
 - ii) in person.
- d) Contact operator staff involved in damage activity to perform interview(s)
 - i) over the phone; or
 - ii) in person.
- e) Review One Call locate, damage and emergency tickets.
 - <http://ne.itic.occinc.com/search>
 - Review for one call violations
- f) Conduct inspection on damage prevention program.
 - §192.614
- g) Verify operator qualification tasks, training, and current qualifications for responding operator staff.
 - §192, Subpart N
- h) Determine root cause of damage.
- i) Construct scene diagram.
- j) Conduct follow-up activities as necessary.

Records

All reports, interviews, photographic evidence, and supporting documentation will be attached to the final investigation report and will be submitted to the Fuels Division Chief Deputy within seven days after completing the investigation.

Guide for Possible Compliance Actions

The investigating deputy will follow [Section H](#) for a complete guide on compliance actions. The following is a recommended course of action for compliance issues:

- 1) **Failure to Comply with Regulations** – When records/documentation indicates that the operator failed to adhere to parts 191, 192, 193, etc. this failure should be brought to the attention of the operator. This violation should be addressed in a **Notice of Probable Violation**, or **Request for Enforcement Action** after the operators 30 business-day response.
- 2) **Insufficient Data Provided** – When records or documentation do not give sufficient data or provide sufficient detail to determine: Who performed the task? What task was

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performed? When the task was performed? Where the task was performed? This is an issue that could lead to a violation of Part 191, 192, 193, etc. This issue shall be brought to the operators' attention and should be addressed in a **Letter of Concern**. If the problem persists, please see number (1) above.

- 3) **Changes in Regulations or Policy** – When changes have been made to Part 191, 192, 193, etc. by regulation or as an example when there is a change in operator management or change in equipment or change in operating practice, this may affect the documentation of activities, thus when an area of question arises the operator should be given an opportunity to defend present course of action. A **Letter of Amendment** should be provided to the operator.
- 4) When in the opinion of the Pipeline Safety Deputy a recommendation that could enhance or broadened to allow the operator to improve the integrity of the operators' system, this item shall be noted within the comments section of the inspection form. The operator shall be apprised of the issue and a **Letter of Recommendation** to enhance the operation or maintenance program shall be issued.

Section H – Pipeline Safety Program Compliance Actions

When a Pipeline Safety Deputy determines that an operator has, or could violate Title 155, and adopted regulations, the Pipeline Safety Deputy will take any of the following compliance actions, as necessary to ensure compliance by the operator or to prevent a risk to public safety. Any compliance action taken must be submitted to the operator within 30 days after completing the inspection or investigation. See for compliance action letter templates.

Section H.1 – Compliance Action Jurisdiction Laws

§81-546. Violations; notice; failure to comply; penalty.

- (1) *Whenever the State Fire Marshal has reason to believe any person is violating any provision of subsection (1) of section 81-545 or any regulation under the Nebraska Natural Gas Pipeline Safety Act of 1969, the State Fire Marshal shall give notice to such person and permit such person reasonable opportunity to achieve compliance. If compliance has not been achieved in a reasonable time, the State Fire Marshal may request the Attorney General to bring an action under section 81-547 in the district court for the county in which the defendant's principal place of business is located, and the district court may impose a civil penalty not to exceed ten thousand dollars for each violation for each day that such violation persists, except that the maximum civil penalty shall not exceed five hundred thousand dollars for any related series of violations.*
- (2) *In determining the amount of such penalty, the court shall consider the appropriateness of such penalty to the size of the business of the person charged, the gravity of the violation, and the good faith of the person charged. The amount of such penalty, when finally determined, may be deducted from any sums owing by the State of Nebraska to the person charged.*

Source: *Laws 1969, c. 763, ' 5, p. 2887; Laws 1993, LB 49, ' 1. Effective date September 9, 1993.*

81-547. Violations; district court; jurisdiction.

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- (1) The district courts shall have jurisdiction to restrain violations of this act, including the restraint of transportation of gas or the operation of a pipeline facility, or to enforce standards established hereunder upon petition by the Attorney General on behalf of the State of Nebraska. Whenever practicable, the State Fire Marshal shall give notice to any person against whom an action for injunctive relief is contemplated and afford him an opportunity to present his views, and, except in the case of a knowing and willful violation, shall afford him reasonable opportunity to achieve compliance. The failure to give such notice and afford such opportunity shall not preclude the granting of appropriate relief.*
- (2) Actions under subsection (1) of this section and section 81-546 shall be brought in the county in the State of Nebraska in which the defendant's principal place of business is located, and process in such cases may be served in any other county in the State of Nebraska where the defendant may be found or in which the defendant is an inhabitant or transacts business.*

Source: Laws 1969, c. 763, ' 6, p. 2888.

Section H.2 – Notice of Probable Violation (NOPV)

Probable Violation

- 1) A probable violation is a non-compliance with any section or, where the section is divided into subsections (a) (b) (c) etc. any subsection of regulation.
- 2) Each numbered section should be counted separately.

Operator Notification: NOPV

- 1) The Notice of Probable Violation shall:
 - a) Be issued to the operator's chief executive officer, or similar, of the locality or company.
 - b) Disclose the specific part, section, or subsection of the code violation.
 - c) Give specific location, action, or documentation where infraction occurred.
 - d) Describe potential enforcement actions, including civil penalties that could be assessed due to non-compliance.
 - e) Require a written reply.
 - f) Prescribe a maximum time of 30 business days for the operator to reply in writing.
 - g) Describe options the operator has to address the violation, or the operator can disagree with the findings.
 - h) Provide the operator with an address for the written reply to be sent.
 - i) Copies will be sent via e-mail and addressed to other supervisors and managers involved with the specific unit or operation as necessary.
- 2) A copy of the **Notice of Probable Violation** letter shall be placed in a permanent file

Options for the operator

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- 1) Agree to the proposed compliance order:
- 2) Submit a work plan to the Nebraska State Fire Marshal for consideration to resolve issue(s).
- 3) Object to the proposed compliance order and submit written explanations, information, or other materials in answer to the allegations in the notice of probable violation.

Operator Reply

- 1) Receipt of reply for a **Notice of Probable Violation** shall be date stamped as to the receipt.
- 2) The appropriate Pipeline Safety Deputy will be informed of the reply letter and the Pipeline Safety Deputy shall review such letter to determine compliance action.

NOPV Correction

- 1) Acceptable remediation for a **Notice of Probable Violation** may be:
 - a) Report that the violation has been corrected and a follow-up inspection.
 - b) Report that a work plan is proposed/requested to rectify the violation.
 - c) Adequate documentation from the operator that the **NOPV** has been corrected.
- 2) Follow-up inspection or meeting will be conducted by the Pipeline Safety Deputy to resolve or provide guidance to the resolution of the **NOPV**.
- 3) When a follow-up inspection indicates that a **NOPV** has been corrected, the Pipeline Safety Deputy shall complete a Compliance Follow-up inspection form and issue to the operator a closure letter.
- 4) Enforcement may be requested for repetitive violations.
- 5) Enforcement may be requested depending on the severity of the violation.
- 6) Closure of the **NOPV** will be filed.

Work Plans

- 1) Work plans shall be agreed to by the operator, Fuels Division chief and Pipeline Safety Deputy.
- 2) Work plans shall include a start date and anticipated completion date.
- 3) The appropriate Pipeline Safety Deputy shall monitor the operator's work plan until the operator has successfully corrected all issues or violations.
- 4) Work plans that extend over a period of one year will require at least, an annual follow-up inspection.

Section H.3 – Letter of Concern

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Concern

- 1) A concern is any action taken by an operator that could lead to a probable violation or when a Pipeline Safety Deputy has reason to believe that a person is engaging in conduct that could lead to a violation of Title 155 Nebraska Administrative Code Chapter 1.001 adopting by reference Pipeline Safety Regulations Title 49, Code of Federal Regulations, Part 191, 192, 193, 199.
- 2) The **Letter of Concern** should:
 - a) Be issued to the operator's chief executive officer, or similar, of the locality or company.
 - b) Disclose the specific concern with link to part, section or subsection of code that could become a violation if steps aren't taken to address the concern.
 - c) Give specific location, action, or documentation where infraction occurred.
 - d) Describe options for the operator in order to resolve the concern.
 - e) Require a written reply.
 - f) Prescribe a maximum time of 30 business days for the operator to reply in writing.
 - g) Describe options the operator has to address the concern, or the operator can disagree with the findings.
 - h) Provide the operator with an address for the written reply to be sent.
 - i) Copies will be sent via e-mail and addressed to other supervisors and managers involved with the specific unit or operation as necessary.
- 3) A copy of the **Letter of Concern** shall be placed in a permanent file.

Options for the Operator

- 1) Agree to the proposed suggestion for resolution.
- 2) Disagree with the concern and suggested action.
- 3) Submit written explanations, information, or other materials in answer to the concern.

Follow-Up

- 1) Follow-up inspection or meeting will be conducted by the Pipeline Safety Deputy to resolve or provide guidance to the resolution of the concern.
- 2) Adequate documentation or report by the operator to the Pipeline Safety Deputy can also be considered as resolution to a concern.
- 3) When a follow-up indicates that a concern has been corrected, the Pipeline Safety Deputy shall complete a Compliance Follow-up inspection form and issue to the operator a closure letter.
- 4) Closure of the **Letter of Concern** will be entered into the file.
- 5) Failure to address a **Letter of Concern** may lead to a violation.

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Section H.4 – Requested Amendment

Amendment Letter

- 1) When a Pipeline Safety Deputy concludes an inspection of required procedures, plans or programs of an operator and there are deviations from recommended guidelines or preferences in specific wording or the Pipeline Safety Deputy perceives it to be inadequate to assure safe operation of a pipeline facility, the Pipeline Safety Deputy will issue an **Amendment Letter**.
- 2) The **Amendment Letter** will:
 - a) Be issued to the operator's chief executive officer, or similar, of the locality or company.
 - b) Disclose the specific part, section, or subsection of the code referenced.
 - c) Disclose the specific concern with inadequacy, deviation from recommended practices or preferential wording.
 - d) Describe options for the operator to be taken to resolve the amendment.
 - e) Require a written reply.
 - f) Prescribe a maximum time of 30 business days for the operator to reply in writing.
 - g) Provide the operator with an address for the written reply to be sent.
 - h) Copies will be sent via e-mail and addressed to other supervisors and managers involved with the specific unit or operation as necessary.
- 3) A copy of the **Amendment Letter** shall be placed in a permanent file.

Options for the Operator

- 1) Agree to the proposed suggestion for resolution.
- 2) Disagree with the amendment and suggested action.
- 3) Submit written explanations, information, or other materials in answer to the amendment. .

Follow-Up

- 1) A follow-up inspection or meeting will be conducted by the Pipeline Safety Deputy to resolve or provide guidance to the resolution of the requested amendment.
- 2) Adequate documentation presented by the operator to the Pipeline Safety Deputy can be considered as resolution to the requested amendment.
- 3) When a follow-up indicates that a requested amendment has been resolved, the Pipeline Safety Deputy shall complete a follow-up inspection form and issue to the operator a letter indicating resolution of the requested amendment.
- 4) Resolution of a requested amendment will be entered into the file.

Section H.5 – Request for Enforcement Action

Enforcement Action

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When the State Fire Marshal's Agency has issued a **Notice of Probable Violation** to an operator where it has been determined by the Nebraska State Fire Marshal's Agency that an individual violation placed, or could have placed the public safety at risk, the State Fire Marshal may request the Nebraska State Attorney General to bring an action under Nebraska Natural Gas Pipeline Safety Act, section §81-547 or One Call Notification Act 76-2325, in the district court for the county in which the defendant's principal place of business is located.

- 1) When a probable violation meets the above criteria, the Pipeline Safety Deputy will notify the Fuels Division Chief Deputy with the discovery of the probable violation. The Pipeline Safety Deputy will then complete a **Request of Enforcement Action** letter indicating the following cause for such request:
 - a) Identify the part, section, or subsection of Title 155, or regulation adopted by Title 155.
 - b) Description of the specific concern.
 - c) Date(s) of previous **NOPV's** (if applicable) with same violation.
 - d) Date(s) of previous **NOPV's** (if applicable) with similar violations, and an explanation of how the violations are similar.
 - e) Explanation supporting the severity of the risk associated to the violation.
 - f) Information or statements from operator personnel involving the incident or violation.
 - g) Copies of the inspection and investigation report(s) and supporting documentation attached to the letter.

- 2) The Pipeline Safety Deputy will *submit a written or verbal request*, and all attachments to the Fuels Division Chief Deputy for review. The Fuels Division Chief Deputy will determine if the **Request for Enforcement Action** will be referred to the Nebraska Attorney General.

Section H.6 - Monitoring of Pending Actions

When the Pipeline Safety Section issues a Notice of Amendment, Letter of Concern, or Notice of Probable Violation, the details of the letter will be entered into file. Deputies will be required to submit all activities associated with pending actions to the Pipeline Safety Section office. The Pipeline Safety Section office will monitor pending actions for follow-up and e-mail the report to the deputies for review. This report will indicate the following information: "Letter ID", "Operator", "Date Sent", "Date Received", "Response Due", "Date Responded", "Work Plan Issued", "Work Plan Expiration", and "Assigned Deputy". This report will only generate actions pending closure.

When in the case of compliance action that the operator has not responded to in the required time thirty business days (30). The Deputy will need to contact the operator to ensure response is given to the compliance action. Failure to give a response could result in further enforcement action.

When a report is generated and indicates any of the following, action will be required:

Date Responded – If the date indicated in the "Date Responded" is past the "Response Due" or is blank, the assigned Deputy will need to contact the Operator for an explanation. Depending on the nature of the explanation, the Deputy may request the Operator provide a written response immediately, or the Deputy may need to submit a Notice of Probable Violation or Request for Enforcement.

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Work Plan Expiration – If the pending action is not cleared prior to the “Work Plan Expiration” date, the assigned Deputy will need to contact the Operator for an explanation. Depending on the nature of the explanation, the Deputy may request the Operator provided a written response indicating the cause for delay and to request an extension, or the Deputy may need to submit a Notice of Probable Violation or Request for Enforcement.

Section I – Pipeline Safety Program Investigations

There is the possibility of litigation in all incidents, and you may be called as a witness. With this in mind, your report should contain the facts as you find them, and your conclusions should be supported by accurate documentation. Our role in incident investigations is to determine the probable cause of the incident, if possible, and may make recommendations, which could prevent recurrence. Accurate documentation should support any determination made.

Section I.1 – Incident/Accident Investigation Guidelines

The State Fire Marshal and Pipeline Safety Section have no greater responsibility during and after an incident than for the safety of the general public, and the personnel involved in an investigation.

- 1) All pipeline incident investigations shall be documented in writing by the deputy.
- 2) Incident investigations may be conducted by use of verbal communication and written documentation from the operator and/or on-site investigation.
- 3) Pipeline incidents that include injury or death shall be investigated on scene to determine the cause.
- 4) Reported incidents/accidents with sufficient dollar loss, interruption of service, release of gas or fire shall be investigated when directed by a supervisor, an on-site investigation will be conducted.
- 5) Investigation of pipeline incidents will be documented utilizing the Nebraska State Fire Marshal Pipeline Incident Investigation form and/or the Nebraska State Fire Marshal Investigation Supplemental report.
- 6) When a detailed investigation is to be made, a fully qualified individual or investigative team should be designated. The investigative individual or investigative team should be qualified either by training or experience in the proper procedures for investigation of an incident.
- 7) The investigation should include the following
 - a) Conducting interviews.
 - b) Gathering data related to the incident/accident.
 - c) Determination of the probable cause of the incident.
 - d) Evaluation of the initial response of operator to the incident.
 - e) The need for system or facility improvements if necessary.
 - f) The need for improvements in response, management, and investigation of incidents.
 - g) Summary and timeline of events.

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- 8) The inspection of the operator’s response to an emergency will evaluate the operator for compliance with their procedures and with 192.615(a) and 192.615(b). Further inspection will determine if the operator complied with the requirements of their failure investigation procedures and 192.617. Appropriate inspection documentation will reference each section of the above cited regulations and the compliance of the operator.

Section I.2 – Investigation reports

- 1) Investigations will be documented and contain a “conclusion” statement by the investigating deputy.
 - a) This conclusion should state:
 - i) Was natural gas and/or facilities involved?
 - ii) Were there contributing factors?
 - iii) Violations of the operator to Part 191 or Part 192?
- 2) All individuals mentioned in the report will be identified in the appropriate section of the investigation (supplemental) report. Individual full name will be listed at the top of the report. Last name will be used in the body of the report for reference purposes.

Section I.3 – News Media/Press release

- 1) During the investigation, Pipeline Safety Deputies shall not make statements to the press or news media without prior approval of the State Fire Marshal. Pipeline Safety Deputies should work closely with the Fuels Division Chief, State Fire Marshal and State Fire Marshal Public Information Officer to coordinate and gather information for the release of a statement.
- 2) If a statement is demanded the response should be “The incident is currently under investigation, when the investigation is completed the State Fire Marshals Public Information Officer will release a statement concerning the incident”.

Section I.4 – Background for Investigations

The Nebraska State Fire Marshal enforces safety standards for the transportation of natural and other gas by pipeline pursuant to the [Section A.2](#) – Nebraska Natural Gas Pipeline Safety Act (§81-542 through §81-552) and [Title 155](#) of the Nebraska Administrative Code. The Nebraska Fire Marshals Agency has adopted and maintained rules establishing minimum safety standards that are at least as inclusive, as stringent, and compatible with the minimum safety standards adopted by the Secretary of Transportation under the Federal Act.

The Nebraska Fire Marshals Agency – Pipeline Safety Section conducts on-site inspections of intrastate gas operators to determine compliance with all applicable federal and/or state regulations. Deputies inspect operator records concerning inspection, operation, maintenance, emergency procedures, and construction. Inspectors also conduct field inspections of operator facilities to verify compliance with regulations covering design, construction, operation, and maintenance of the pipeline facilities.

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Under the State agency's certification agreement with the U.S. DOT, the State agency must investigate all incidents involving operator procedures or facilities resulting in.

- (1) Death,
- (2) Injury requiring overnight hospitalization, or
- (3) Property damage that results in equal to or greater than amounts listed in 191.3 definition of Incident (1)(ii); or
- (4) Unintentional estimate gas loss of three million cubic feet or more.
- (5) An event that results in an emergency shutdown of an LNG facility or an underground natural gas storage facility. Activation of an emergency shutdown system for reasons other than an actual emergency does not constitute an incident.

Additionally, events which do not satisfy one of these five thresholds may be investigated if the circumstances are unclear or if staff believes operator procedures or facilities may have contributed to or have caused the incident. i.e., Title 155 – Chapter 1 explosion or ignition of natural gas (before or after the meter).

Section J – Reserved

Section K – Pipeline Safety Program Equipment

All Pipeline Safety Deputies will test their multimeter, reference half-cells, and multi-gas detector every 3 months to ensure accuracy for field inspection use. The following protocols will be used to test all devices.

Section K.1 – Multimeter – Testing

DC Voltage Short Test – This test will confirm that the multimeter has no internal interference effecting the reading of the DC Volts.

- 1) Ensure that the voltmeter is operable by turning the meter on to DC Volts, within the 2- or 4-volts scale. Make sure that there are no warnings present, such as "LOW BATTERY".
- 2) Connect one test lead, usually black test lead, to the COM port; this is the Negative Test Lead port.
- 3) Connect one test lead, usually red test lead, to the Volts/Ohms (V/ Ω) port; this is the Positive Test Lead port.
- 4) The meter display might be reading static charge (variance in volts) while holding the test leads, this is normal.
- 5) Touch the tips of the Positive and Negative test leads together and verify that the meter reads 0.000 or -0.000 (if digital) without any change, and then pull the tips apart.
- 6) Repeat step 5 two more times and verify both times the meter readout does not change while the tips are connected.

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DC Positive Voltage Test – This test will determine that the meter is within accuracy of the manufacture’s specifications.

- 1) Ensure that the voltmeter is still set to DC Volts in the 2- or 4-volts scale, and that you have a charged Lithium Coin Battery (CR2032 or similar 3V Lithium Coin) test battery.
- 2) Press the Positive Test Lead to the Positive Terminal on the battery.
- 3) Press the Negative Test Lead to the Negative Terminal on the battery.
- 4) The meter should display a constant positive value (i.e.: 3.227) for digital and analog meters.
- 5) Repeat steps 2-4 two more times and verify both times the meter displays a constant positive value.
- 6) This value should be within the variance allowed by the manufacture. If the value is outside this variance, you must verify the battery voltage with another reference multimeter that has been calibrated. If the value is the same with the reference multimeter, the test is considered valid.

DC Negative Voltage Test – This test will determine that the meter is within accuracy of the manufacture’s specifications, and for digital meters, will display a negative voltage. For analog meters, ensure that the meter displays the correct voltage as the previous test.

- 1) Ensure that the voltmeter is still set to DC Volts in the 2- or 4-volts scale, and that you are using the same charged test battery from the previous test.
- 2) Press the Positive Test Lead to the Negative Terminal on the battery.
- 3) Press the Negative Test Lead to the Positive Terminal on the battery.
- 4) The meter should display a constant negative value (i.e.: -3.227V), if digital, and equal to the voltage as the Positive Voltage test.
- 5) Repeat steps 2-4 two more times and verify both times the meter displays a constant negative value.
- 6) This value should be within the variance allowed by the manufacture. If the value is outside this variance, you must verify the battery voltage with another reference multimeter that has been calibrated. If the value is the same with the reference multimeter, the test is considered valid.

Test Results

Pass – If the multimeter passes all the above tests, the multimeter is considered accurate as of the date of the test. This test shall be conducted as required above but can be retested at any time.

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Fail – If the reference multimeter fails the Short Test, fails the Positive or Negative Voltage Tests, does not display the same value as the reference multimeter (if used), or does not properly read the current (+ vs -), the multimeter being calibrated will not be used until it has been evaluated by a qualified person.

Section K.2– Copper-Copper Sulfate Reference Electrode Cell (Reference/Half-cell)

All Pipeline Safety Deputies are issued a minimum of two Copper-Copper Sulfate Reference Electrode Cells. 1 reference cell will be labeled “Virgin Half-cell” and 1 reference cell will be labeled “Field Half-cell”. Pipeline Safety Deputies are required to ensure that both reference cells are properly taken care of and tested. The issued Virgin Half-cell will not be used in the field at any time by Pipeline Safety Deputies to ensure no contamination of the cell occurs. Pipeline Safety Deputies will use distilled water in the Virgin Half-cells and Copper Sulfate Anti-Freeze solution in the Field Half-cells when creating the copper-sulfate solution.

Reference Cell Cleaning and Setup – The following will be a reference to cleaning and setting up the field and virgin half-cells as needed. This will be done in an area that reduces the chance of other people or animals from coming in contact with the copper-sulfate solution. Remember to wear personal protective equipment (gloves and safety glasses) when cleaning the half-cell. The copper-sulfate solution should be rinsed off with enough water to dilute the discarded solution. Distilled water will be used to rinse the half-cell and tips to ensure no contaminates are left in the half-cell for later steps.

- 1) Carefully remove the half-cell top cap (screw terminal):
- 2) Empty most of the old copper-sulfate solution in the drain:
- 3) Remove the porous tip off the bottom end carefully as not to damage the tip:
- 4) Rinse off any remaining solution and crystals from inside the half-cell and from the tips, do not use any cleaners when cleaning out the half-cells or tips:
- 5) Inspect the copper rod in the center of the top cap. If the rod is discolored or has any corrosion on it, remove it using a non-metallic scouring pad or sandpaper. Do not use any sandpaper containing metal particles like emery cloth or aluminum oxide, or a metallic scouring pad. Use of any metallic sandpaper or scouring pad will contaminate the copper rod. Remove the discoloring or corrosion until the copper rod is bright and reflective. Remember to use distilled water to rinse off the copper rod after cleaning.
- 6) Once all the copper-sulfate solution is rinsed off, rinse all the parts off again using distilled water to remove any possible contaminates:
- 7) Dry off the half-cell and tips, and inspect the rubber seals, replace if needed:
- 8) Replace the ceramic tip, ensuring the tip is properly tightened (hand tight):
- 9) Pour approximately 1 to 1½ inches of copper sulfate crystals inside the tube:

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- 10) Fill the tube approximately 2/3 full of Copper Sulfate Anti-Freeze (Field Half-Cell) or Distilled Water (Virgin Half-Cell), and replace the top cap, insuring it is properly tightened (hand tight):
- 11) Shake the half-cell for about 30 seconds to 1 minute to ensure all the crystals mix with the liquid:
- 12) Verify that not all crystals have dissolved to ensure a saturated solution has been created, if all the crystals have dissolved, remove the top cap, and pour in a small amount of crystals. Follow steps 11 and 12 as needed until a small amount of crystals are seen in the half-cell.

Reference Cell Calibration – To test and ensure that the field reference cell, Pipeline Safety Deputies will calibrate their field half-cell with their virgin half-cell. Ensure that multimeter used for this test has been calibrated prior to this test.

- 1) Fill a clean non-metallic container with approximately 2 inches of fresh water. Do not use Distilled Water:
- 2) Ensure that the Virgin Half-cell is clean and properly setup for use. Attach the Positive Test Lead to the Virgin Half-cell:
- 3) Ensure that the Field Half-cell is clean and properly setup for use. Attach the Negative Test Lead to the Field Half-cell:
- 4) Turn on the multimeter and set it to the 2- or 4-volt scale(i.e.: 0.000V).
- 5) Place the ceramic tips of both half-cells in the container and verify that water has covered most or all of the ceramic tips.
- 6) Allow both half-cells to rest against the side of the container and let go of the half-cells, ensuring that the half-cells stay vertical.
- 7) The meter should read within +/- 10mV (i.e., 0.010V), if not, the solution in the field half-cell needs to be cleaned and the copper-sulfate solution replaced, and retested. If the same field half-cell fails again, the half-cell must be evaluated by a qualified person before being used.
- 8) To reduce the chance of contaminating the half-cells, after verifying the reading, remove both half-cells from the container, and dry them off. Do not allow the half-cells to stay submerged in the water longer than needed for testing.

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Section L – Pipeline Safety Program Training

Section L.1 – Pipeline Safety Deputy Training

TQ provides training for our Pipeline Safety Program staff primarily at its PHMSA Training and Qualification (“TQ”) facilities in Oklahoma City, OK. Pipeline Safety Deputies will be required to comply with TQ classroom and testing rules, as documented by PHMSA-TQ.

Appendix – Pipeline Safety Program

Appendix A – NSFM Schedule 1 – Records Retention Table

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RETENTION OF RECORDS AND PROCEDURES

Code Ref.	Type / Title / Style	Cycle	Retention	Status
191.5	Telephonic Notice of Incident	As Required	Life	Pipeline
191.9	Incident Report	As Required	Life	Pipeline
191.11	Annual Report	Annual	Life	Pipeline
191.25	Safety Related Conditions	As Required	Life	Pipeline
192.13	General Procedures	Current	Current	
192.14	Conversion to Gas Procedure	Current	Life	Pipeline
192.14	Conversion to Gas Inspection Tests and Reports	As Required	Life	Pipeline
192.16	Customer Notification Form	Current	Current	
192.16	Customer Notification detail	When Contacted	Life	on file
192.55	New Pipe Visual Examination	As Required	Life	Pipeline
192.65	Pipe Transported by Rail	As Required	Life	Pipeline
192.153	Components Fabricated by Welding	As Required	Life	Pipeline
192.225	Weld Procedures	As Required	Life	Pipeline
192.227	Qualification of Welder	Annual	Life	Employment +5
192.229	Limitations on Welders	7 1/2 months	Life	Employment +5
192.241	Inspection and Test of Welds	As Required	Life	Pipeline
192.241	Nondestructive Test Procedure	Current	Current	
192.241	Nondestructive Test Records	Current	Life	Pipeline
192.245	Repair or Removal of Weld Defects	As Required	Life	Pipeline
192.273	Mechanical Joining Procedures	Current	Current	
192.273	Joining of Materials Test	Current	Life	Pipeline
192.281	PE Electrofusion Procedure	Current	Current	
192.281	PE Electrofusion Test	As Required	Life	Employment +5
192.283	PE Fusion Joining Procedure	Current	Current	
192.285	PE Fusion Qualification Test	Annual	Life	Employment +5
192.303	Written Construction Standards	Current	Current	
192.305	Construction Inspection	As Required	Life	Pipeline
192.307	Inspection of Materials	As Required	Life	Combine w/305
192.359	Customer Meter, Operating Pressure	Received	Life	Meter
192.381	Identified Excess Flow Valve Site	List	Life	Pipeline
192.455	Corrosion Control Procedures	Current	Current	Pipeline
192.457	External CP for Pipeline before 8/71	As Required	Life	Pipeline
192.459	Examination of Exposed Pipe	As Required	Life	Pipeline
192.465	Monitoring CP Areas	Annual	Life	Pipeline
192.465	Monitoring Isolated Short Sections	10% Total	Life	Pipeline
192.467	Electrical Isolation Test	As Required	Life	Pipeline
192.467	Electrical Isolation Test (Casings)	Annual	Life	Pipeline

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192.473	Test for CP Interference Test	As Required	Life	Pipeline
192.475	Internal Corrosion	As Required	Life	Pipeline
192.475	Internal Corrosion Type of Product	Periodic	Life	Pipeline
192.479	Atmospheric Corrosion Program	Current	Current	
192.481	Atmospheric Corrosion Monitoring	3 year	Current	Current + 1
192.491	CP Maps	Current	Current	Pipeline
192.503	Pressure Test Procedures	Current	Current	
192.509	Pressure Test Procedures	Current	Current	
192.511	Service Line Test Procedures	Current	Current	
192.513	PE Pressure Test Procedures	Current	Current	
192.517	Pressure Test Records	As Required	Life	Pipeline
192.553	Uprating Procedures	As Required	Life	Pipeline
192.557	Uprating Leak Surveys & Tests	As Required	Life	Pipeline
192.603	Review of O&M Manual	Annual	Current	
192.609	Class Location Study	Periodic	Current	Pipeline
192.611	Class Location Confirmation	18 months	Life	Pipeline
192.613	Continuing Surveillance Program	Ongoing	Current	Pipeline
192.614	Damage Prevention Program Review	Annual	Current	Pipeline
192.615	Emergency Plan Review	Annual	Current	Pipeline
192.616	Public Education Program Review	Annual	Current	Pipeline
192.617	Investigation of Failures	As Required	Life	Pipeline
192.625	Odorization of Gas (Purchase)	Current	5 year	Pipeline
192.625	Odorization of Gas (Volume)	Periodic	5 year	Pipeline
192.625	Odorization of Gas (Perception Test)	Monthly	5 year	Pipeline
192.721	Patrolling Business District	4 x year	5 year	Pipeline
192.721	Patrolling Outside Business District	2 x year	5 year	Pipeline
192.723	Leak Survey Business District	Annual	Life	Pipeline
192.723	Leak Survey Outside Business District	5 year	Life	Pipeline
192.723	Leak Survey on Bare pipe Outside BD	3 year	Life	Pipeline
192.725	Reinstated Service Line tests	As Required	Life	Pipeline
192.727	Abandonment or Inactivation of Pipe	As Required	Life	
192.739	Pressure Limiting/Regulating Station Test	Annual	Life	Pipeline
192.741	Telemetry/Recording Gauge Inspection	Annual	Life	Pipeline
192.743	Testing/Review of Relief Valve	Annual	Life	Pipeline
192.747	Distribution Key Valve Maintenance	Annual	Life	Pipeline