



# Critical Infrastructure Division Inspections and Audits

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November 2023



# Inspection Process Agenda



- Introductions
  
- Inspection Process
  - i. Inspection Schedule
  - ii. Preparation/Review
  - iii. Inspection
  - iv. Documentation
  
- Questions





- Clearer expectations
  - Communication is **Key**
- Building lead time and planning ahead
  - Begin the process prior to the December attestation
- Refine Data
  - Verifying locations from previous submissions

# Inspection Process



**Inspection  
- Initiation  
and  
Schedule**

**Inspector  
Review of  
Attestation**

**Inspection**

**Document**



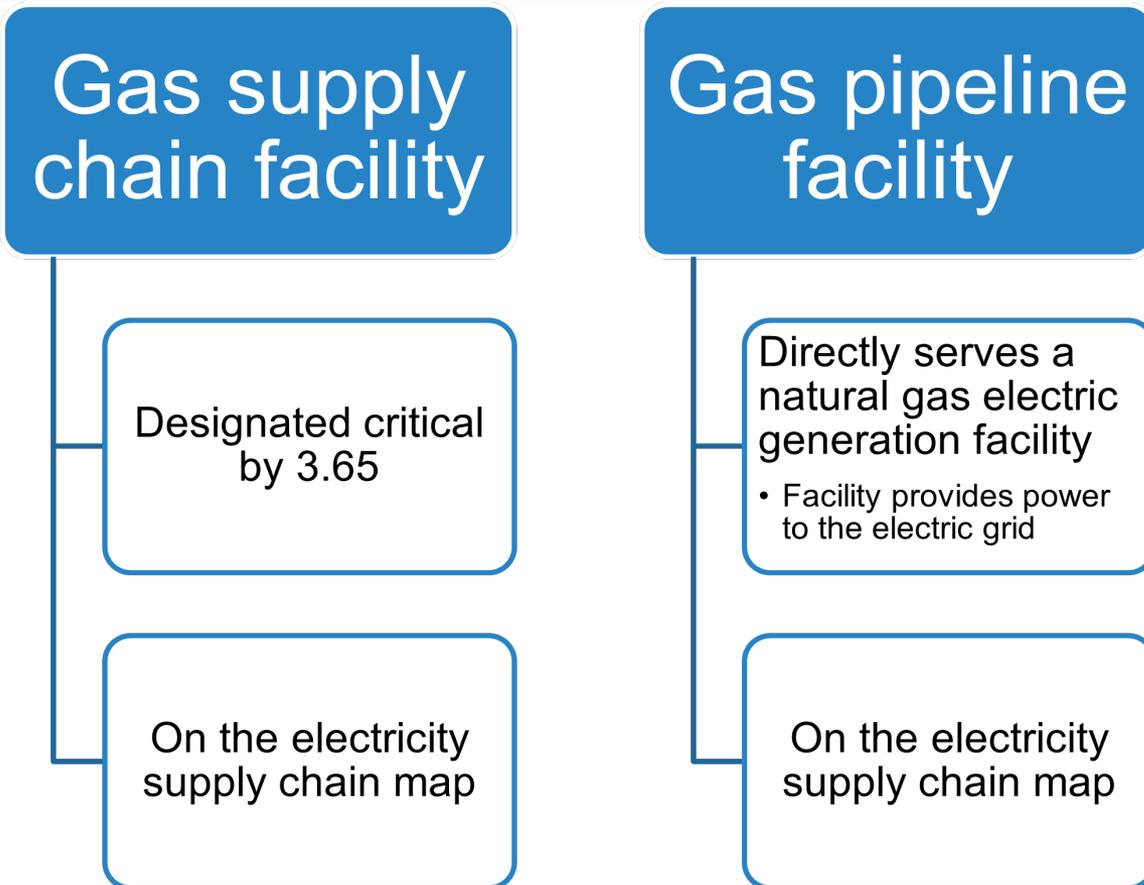
An inspection will originate from one of two places.

- A regular inspection conducted in accordance with the Commission's inspection schedule
  - Facilities required to comply with 3.66
- An inspection scheduled in response to a weather-related stoppage notification
  - All facilities required to comply with 3.66

# Inspection Schedule



## Facilities required to comply with 3.66

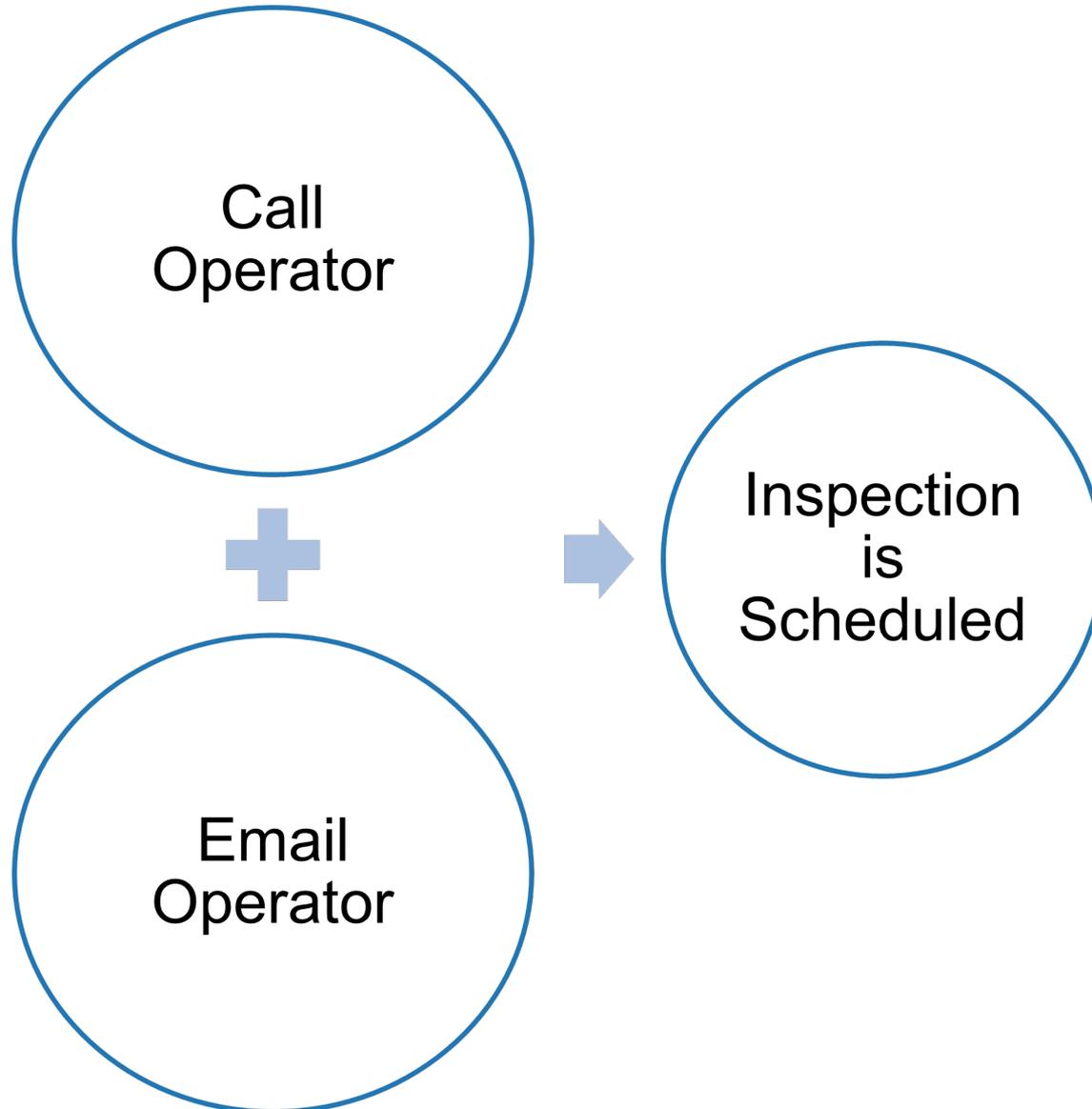


# Inspection Schedule - Winter



- Before Dec 1
  - Schedule early
  - Site Verifications
- After Dec 1
  - 3.66 facilities required to be weatherized
    - Inspect priority 1 facilities first
- During weather emergency
  - Notification of forced weather-related stoppage
    - Inspection from notification

# Connect and Schedule Inspection





## **RRC inspectors will use attestation information when inspecting facilities subject to §3.66**

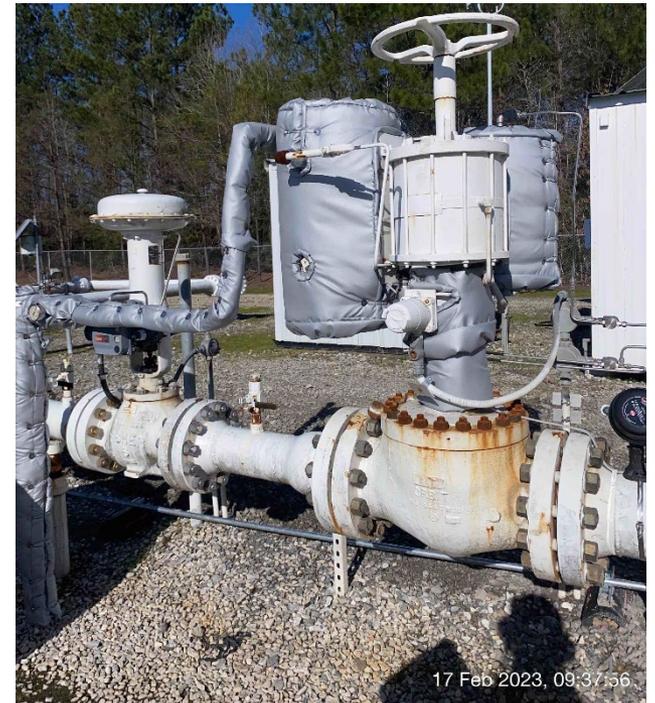
Inspector should be able to identify which weatherization methods apply to which facility

Inspector will confirm with operator, safety requirements and further items to consider.

# Inspection



- **Confirm Weather Preparedness**
- **Confirm Facility Weatherization (Facility Observations)**
  - **Weatherize all facilities subject to Rule 3.66**





## Required weather emergency preparation measures:

- Consideration of the risk to the health and safety of employees and protection of the environment.
- Providing training on weather emergency preparations and operations to relevant operational personnel
- **Weatherization** of the facility

## Weatherization

Correcting  
Failures

Installing  
Equipment

Internal  
Inspections

Identify, Test,  
and Protect

# What “Right” Looks Like (1 of 3)



A few facility observations that inspectors will look for during an inspection:

- Methanol injection/drip
- Water removal – e.g. solid absorption, glycol unit
- Thermal insulation/heat tracing
- Wind breaks and temporary enclosures
- Heating devices
- Monitoring devices, instrument controls (Nitrogen), enclosing sensors
- Drip pots (prevent static water)

# What "Right" Looks Like (2 of 3)



# What "Right" Looks Like (3 of 3)



## Critical Infrastructure Inspection System (CIIS)

- Confirmation of weather preparedness is documented.
- Weatherization methods of facility are documented as facility observations.
- Inspections are reviewed.
  - Inspector Comments.
  - Facility Observation(s).
  - Location(s) [Geolocation(s)].

# Summary



**Facility is  
Assigned  
to  
Inspector**

**Inspector  
Reviews  
Attestation**

**Inspector  
Arrives at  
Location -  
Performs  
Inspection**

**Submit  
Inspection  
and  
Review**

# Conclusions



Before December 1 – site verification and early inspection scheduling (not required but recommended).

December 1 – 3.66 facilities required to have weather preparations implemented.

Forced Stoppage – Inspect facility once RRC is notified of forced stoppage

# CID – Director Contact Information



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# Questions



## Facility is Assigned to Inspector

- Inspector calls operator to schedule inspection
- Inspector emails confirmation details
- Inspection is scheduled

## Inspector Reviews Attestation

- Gains an understanding of facility's weather preparedness
- Prepares for inspection
  - Safety requirements, checklists, etc.

## Inspector Arrives at Location - Performs Inspection

- Confirm weather preparedness
- Confirm facility weatherization (facility observations)

## Submit Inspection and Review

- Inspection is reviewed
  - Inspector comments
- Facility observation(s)
  - Geolocation(s)
  - Other inspection details



# Backup Slides

# Priority 1 Facilities - Winter



- Leases producing 5,000 mcf/day or more.
- Gas Processing Facilities.
- Storage Facilities.
- Components of Transmission lines directly connect to power generators.
- Compressors.

# Priority 1 Facilities – Heat



- Gas Processing Facilities.
- Storage Facilities.