



Public Awareness Requirements & Program Effectiveness Inspections

**Alabama Gas Pipeline Safety Seminar
Montgomery, AL**

December 4, 2013

Joe Mataich

CATS Program Manager
PHMSA, Southern Region



Know what's below.
Call before you dig.



PAP Effectiveness Inspections

- New Inspection Program – kicked off mid 2011
 - Result of recent high profile pipeline accidents
 - Focus on Operator's Program Effectiveness Evaluation but other aspects of Public Awareness will be looked at
 - PHMSA and Interstate Agents completed inspections of Interstate Operators Dec. 2012
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Public Awareness Regulations

§192.616 Public Awareness

- a) Written continuing public education program that follows the guidance provided in the API RP-1162.
 - a) Exception: MM and LPG operators who do not transport gas as a primary activity
 - Have written plan, assure all applicable items in 1162 are addressed
 - Be capable of demonstrating Management Commitment and Support to program
 - Identify Roles and Responsibilities of individuals administering and implementing the PAP



Public Awareness Regulations

- a) Must follow general program recommendations of API RP 1162 and assess the unique attributes and characteristics your pipeline and facilities.
- Many Vendors have gone to a “common” brochures
 - Generic messages may not convey all the required information.
 - Information about several different types of pipelines or products may provide little or no value
 - Message content should address natural gas systems if you are a natural gas operator
 - Beware of generic message material that applies to other type of pipeline systems or other operators

FAQ 17. Are generic messages acceptable?

While collaboration is acceptable and encouraged, **the operator's use of generic messages that are not specific to a particular pipeline system, stakeholder audience, and/or product information is likely to be unacceptable in most cases.** If generic messages are used, operators are still required to ensure the baseline messages are communicated to each stakeholder audience group.

There may be limited cases when the use of generic messages is acceptable. If an operator uses generic messages, then the operator is required to demonstrate that their message content and distribution for each stakeholder audience meets the PAP requirements and is specifically appropriate to the unique attributes and characteristics of each pipeline system for which the message is used and appropriate to the specific stakeholder audiences to which the message is targeted.



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 Freshkill Gas Storage, LLC
 Outer Greens Edge Storage and Transportation, LLC
 Colubata Energy Partners, LLC
 877-954-7113
 www.enstor.com



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 251-675-2872
 Union Oil Company
 of California
 Emergency number
 251-675-1182



Emergency number 800-768-4904
 www.enrgas.com/gila.htm



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 In Mississippi: (800) 833-9233
 In Pennsylvania: (866) 342-6914
 In West Virginia:
 Union, Mingo and Wayne Counties
 (877) 875-9378
 Marsha and Ohio Counties
 (866) 342-6914



Emergency number 800-715-9133
 www.marlinmidstream.com



MERIT ENERGY COMPANY

Emergency number 877-635-4999 (NM)
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Emergency number 1-877-258-4331
 www.monroegas.com



Natsong Gas Products, LLC

Emergency number 330-892-3343



Emergency number 888-287-6671
 http://www.northernnaturalgas.com/safety/
 pdf/060606/060606/060606.pdf



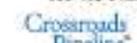
**NiSource Gas
 Transmission & Storage***



Emergency number 800-352-7191



Emergency number 800-482-3437



Emergency number 800-635-7191



www.millenniumpipe.com
 Operated by Columbia Gas Transmission
 800-635-7191



Cedar Bayou Generating Station
 NRG Texas, LLC
 Emergency number
 281-383-4337



Emergency number 833-533-6000
 www.pantherenergy.com



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 www.nustarenergy.com



Portland, OR; Crockett, CA; Vancouver, WA;
 Wilmington, CA; Linden, NJ; Virginia Beach, VA;
 Andrews, MS; Wood, MO;
 St. James, LA
 Emergency number 800-422-4328
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Emergency number 800-811-0038
 www.nustarenergy.com



Emergency number 866-875-6176



Emergency number 800-747-2376
 www.ppl.com



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 800-544-7750 (Canada)
 www.olympicpipe.com



Emergency number 251-438-8772



Emergency number 800-396-2329
 www.palmerpetro.com



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 www.seshp.com



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Emergency number 479-983-6191

How emergency responders are trained in case of a pipeline incident.

The following guidelines are designed to ensure the safety of the public and the emergency responders in the event of an incident. Coordinating the response with the pipeline company is crucial for an effective and safe response:

- **Secure the area around the leak to a safe distance.** Because vapors from the products carried in pipelines can migrate great distances, it is important to remove all ignition sources from the area. Keep in mind, Highly Volatile Liquid (HVL) vapors are heavier than air and can collect in low areas such as ditches, sewers, etc. If safe, evacuating people from homes, businesses, schools and other places of congregation, as well as controlling access to the site may be required in some incident scenarios. Sheltering in place may be the safest action if the circumstances make going outdoors dangerous.
- **If the pipeline leak is not burning DO NOT** cause any open flame or other potential source of ignition such as an electrical switch, vehicle ignition, light a match, etc. **DO NOT** start motor vehicles or electrical equipment. **DO NOT** ring doorbells. Knock with your hand to avoid potential sparks from knockers. **DO NOT** drive into a leak or vapor cloud at any time.
- **If the pipeline leak is burning attempt to control the spread of the fire, but DO NOT** attempt to extinguish a petroleum product or natural gas fire. When extinguished, petroleum products, gas and vapor could collect and explode if reignited by secondary fire.
- **DO NOT** attempt to operate any pipeline valves yourself. You may inadvertently route more product to the leak or cause a secondary incident.
- **Establish a command center.** Work with pipeline representatives as you develop a plan to address the emergency. The pipeline operator will need to know:
 - Your contact information and the location of the emergency
 - Size, characteristics and behavior of the incident, and if there are any primary or secondary fires
 - Any injuries or deaths
 - The proximity of the incident to any structures, buildings, etc.
 - Any environmental concerns such as bodies of water, grasslands, endangered wildlife and fish, etc.
- **Evacuate or shelter in place.** Depending on the level of chemical, natural gas, or product, and whether or not the product was released, or other variables, it may be necessary to evacuate the public or have the public shelter in place. Evacuation route and the location of the incident will determine which procedure is required, but both may be necessary. Evacuate people upwind of the incident if necessary. Involving the pipeline company may be important in making this decision.

How can you help?

While accidents pertaining to pipelines and pipeline facilities are very rare, awareness of the location of the pipeline, the potential hazards, and what to do if a leak does occur can help minimize the number of accidents that do occur. A leading cause of pipeline incidents is third-party excavation damage. Pipeline companies are responsible for the safety and security of their respective pipelines. To help maintain the integrity of pipelines and their right-of-way, it is essential that pipeline and facility neighbors protect against unauthorized excavations or other destructive activities. Here's what you can do to help:

- Become familiar with the pipelines and pipeline facilities in the area (marker signs, fence signs at gated entrances, etc).
- Record the company name, contact information and any pipeline information from nearby marker/facility signs and keep in a permanent location near the telephone.
- Be aware of any unusual or suspicious activities or unauthorized excavations taking place within or near the pipeline right-of-way or pipeline facility; report any such activities to the pipeline operator and the local law enforcement.



Public Awareness Regulations

§192.616 Public Awareness

- c) Must follow general program recommendations, including baseline and supplemental requirements of API RP 1162, unless operator provides written justification why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety. **Be able to demonstrate how you developed supplemental enhancements, need procedure!**

<u>API RP 1162 – 6.2</u>	<u>Considerations of Relevant Factors</u>
Potential hazards	environmental considerations
HCA's, population density	pipeline history
land development activity	specific location situations
farming activity	regulatory requirements
third party damage	results of PAP Evaluations
	other relevant factors



Public Awareness Regulations

§192.616 Public Awareness

- d) Program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:
- (1) Use of a one-call notification system prior to excavation and other damage prevention activities;
 - (2) Possible hazards associated with unintended releases from a gas pipeline facility;
 - (3) Physical indications that such a release may have occurred;
 - (4) Steps that should be taken for public safety in the event of a gas pipeline release; and
 - (5) Procedures for reporting such an event.

Make sure all brochures/flyers contain each of these!



Public Awareness Regulations

§192.616 Public Awareness

- e) Program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.
 - f) Program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.
 - g) Program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.
 - h) Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. Operators of MM and LPG systems covered under (J) must complete its written procedure by June 13, 2008.
 - **Make sure plan is dated-maintain revision log**
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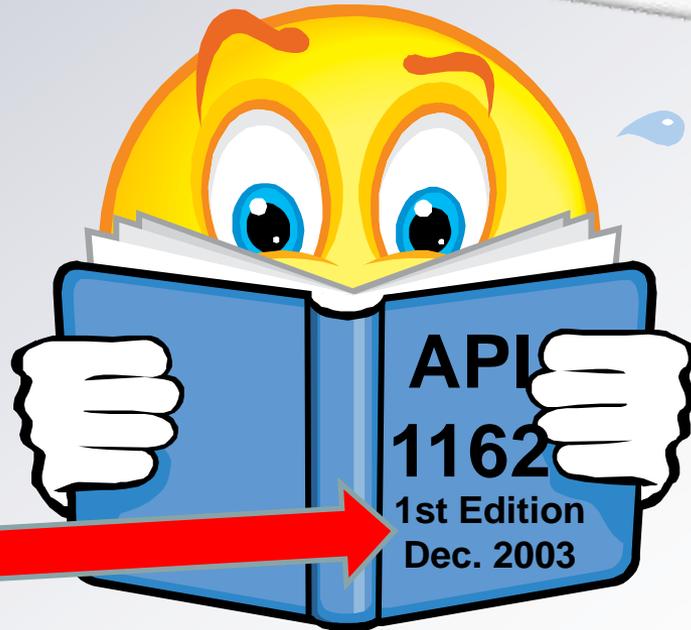
Public Awareness Regulations

- j) MM and LPG operators who do not transport gas as a primary activity, must provide Customers Public Awareness Message twice annually
- Description of the purpose and reliability of the pipeline
 - Overview of the hazards of the pipeline and preventative measures used
 - Information about damage prevention
 - How to recognize and respond to a leak
 - How to get additional information
 - **Maintain documentation to demonstrate this has been done**



American Petroleum Institute Recommended Practice API RP-1162

Is this
the
correct
edition?





API RP 1162

Purpose:

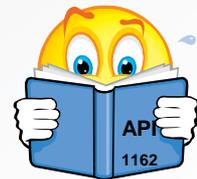
Assist pipeline operators in developing and actively managing their Public Awareness Programs.

Goal:

Raise the quality and effectiveness of pipeline operator's Public Awareness Programs, establish consistency of programs throughout industry, and provide mechanisms for continuous improvement.

Guidance:

- ✓ Intra- and interstate hazardous liquid pipelines;
- ✓ Intra- and interstate natural gas transmission pipelines;
- ✓ Local distribution pipelines; and
- ✓ Gathering pipelines.





API RP 1162

One size
doesn't
fit all



Program Development:

- ✓ Provides recommended elements of a **Baseline** Program
- ✓ Provides considerations to determine when and how to enhance (**Supplement**) the baseline program

3 principal regulatory
compliance elements



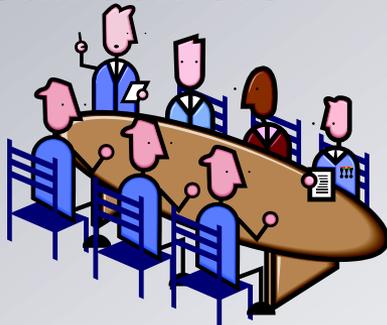


API RP 1162



Target Audience:

- ✓ Affected public (residents and places of congregation along ROW);
- ✓ Local and State ER and planning agencies;
- ✓ Local public officials; and
- ✓ Excavators/contractors
- ✓ One-Call centers





API RP 1162



Message Content (LDC'S):

- Pipeline Purpose and Reliability
- Hazard Awareness and Prevention Measures
- Damage Prevention Awareness
- Leak Recognition and Response
- Emergency Preparedness Communications (Emergency & Public Officials)
- One Call requirements (Excavators)
- How to get additional information

Don't forget about requirements of 192.616 (a) thru (j)



API RP 1162

Message Delivery Methods and/or Media:

Some may satisfy Supplemental but not Baseline Requirements

- ✓ Print Materials (brochures, flyers, bill stuffers, letters, maps)
- ✓ Personal Contact (door-to-door, calls, open houses)
- ✓ Electronic Communications (videos, CDs, email)
- ✓ Mass Media Communications (PSAs, newspapers, advertising)
- ✓ Specialty Advertising Materials
- ✓ Informational or Educational Items
- ✓ Pipeline Markers
- ✓ One-Call Center Outreach
- ✓ Operator Websites





API RP 1162

Self Assessment of Implementation (Annually)

- 1) Internal Review**
 - 2) Third-Party Assessment**
 - 3) Regulatory Inspection**
 - **Maintain documentation to demonstrate this was done**
 - **Make sure plan describes how these assessments are conducted**
 - **Did assessments result in changes to improve program?**
 - **Should summarize years activities and provide information for program evaluation**
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API RP 1162

Pre-Test Effectiveness of Materials (upon design or major changes in PA materials/messages)

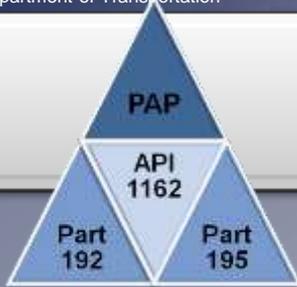
- **Focus Groups**
 - In-house or,
 - External participants
 - **Maintain documentation to demonstrate this was done**
 - **Did pre-test identify any deficiencies?**
 - **Make sure plan describes how these Pre-Tests are conducted**
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API RP 1162

Program Evaluation (at least every 4 years)

- Assessment of Program Implementation – As Planned?**
 - Measure of Program Effectiveness**
 - Establish Information on Implementing Improvements!**
- **First evaluation was due by June 20, 2010**
 - **Make sure plan describes how these evaluations are conducted**
 - **Have written evaluation to document the effectiveness**
 - **Is program achieving its intended goals and objectives?**
 - **Is the PAP information reaching the intended stakeholders?**
 - **Are the recipients understanding the message content?**
 - **Are recipients responding appropriately to pipeline events?**
 - **Is the program effective in impacting bottom line results such as excavation damage and response by stakeholders to signs of releases of gas?**
 - **Have improvements been identified?**
-
-



Public Awareness Program (PAP): *Program Evaluation*

Program Evaluation

- ✓ Purpose and Scope of Evaluation
- ✓ Elements of Evaluation Plan
- ✓ Measuring Program Implementation
- ✓ Measuring Program Effectiveness

**Program Effectiveness
Evaluations were due June 20,
2010 (April 12, 2010 gas
gathering line operators).**

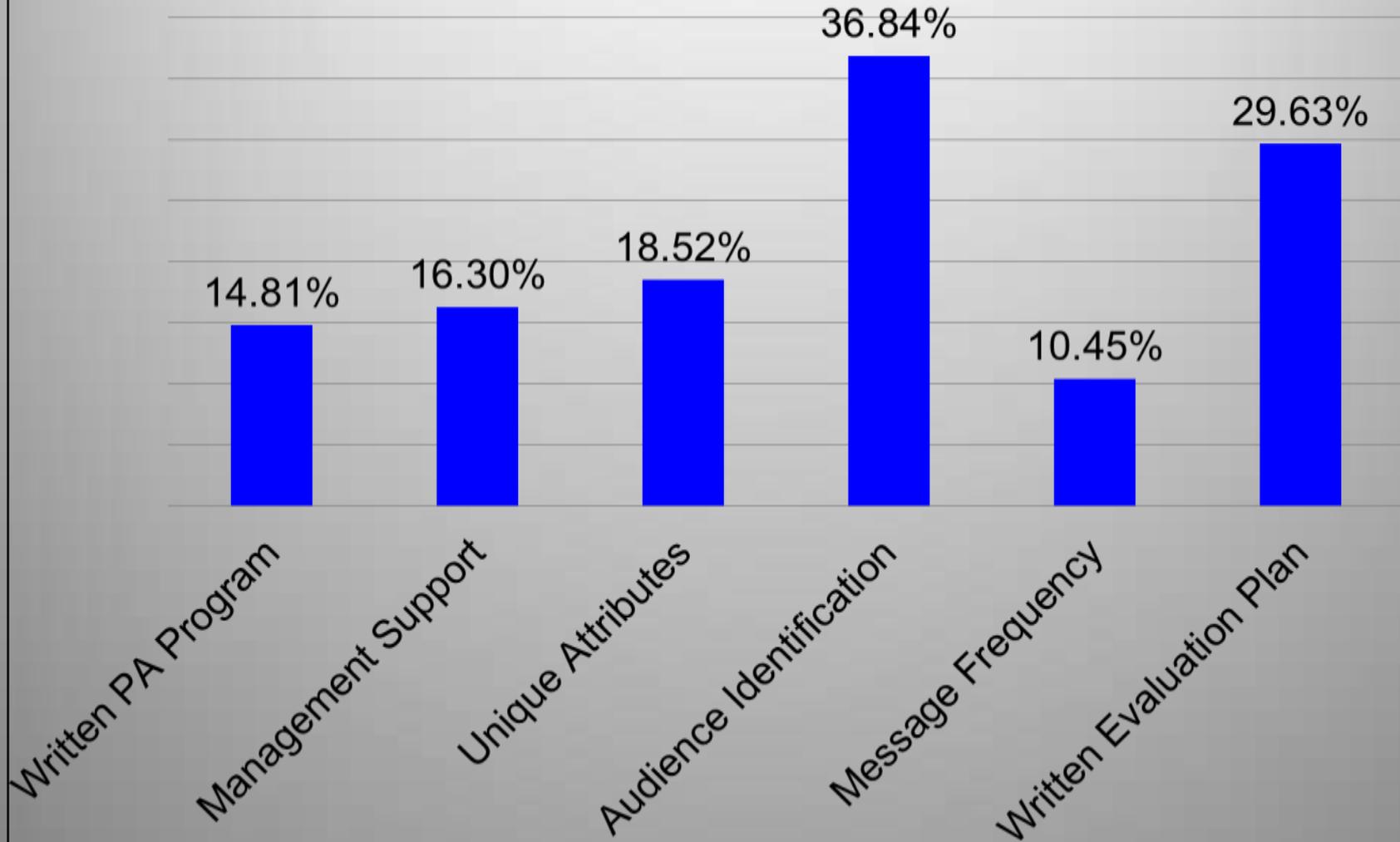


PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION (FORM 21)

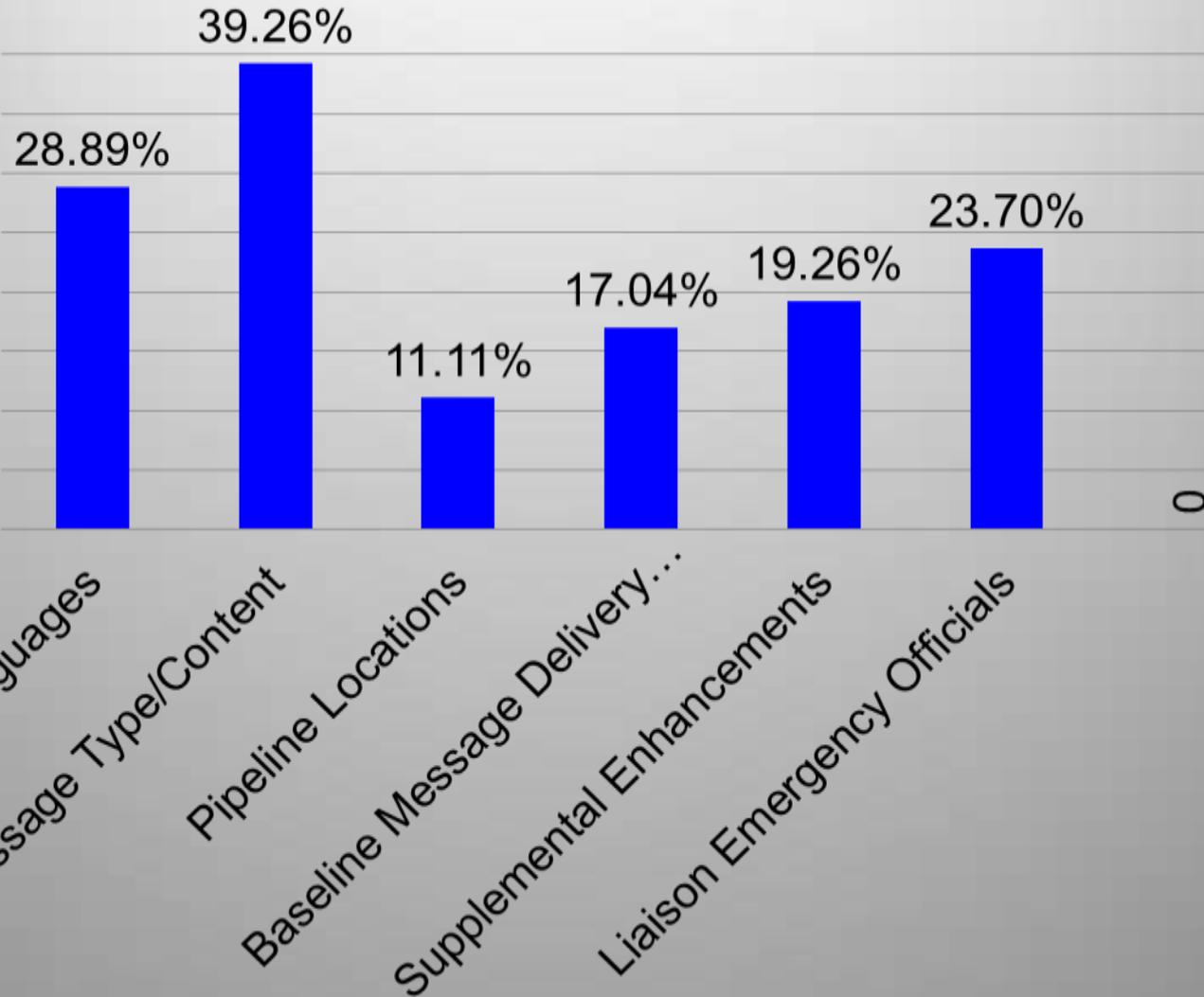
1. Administration and Development of Public Awareness Program
2. Program Implementation
3. Annual Implementation Audits
4. Program Effectiveness Evaluations



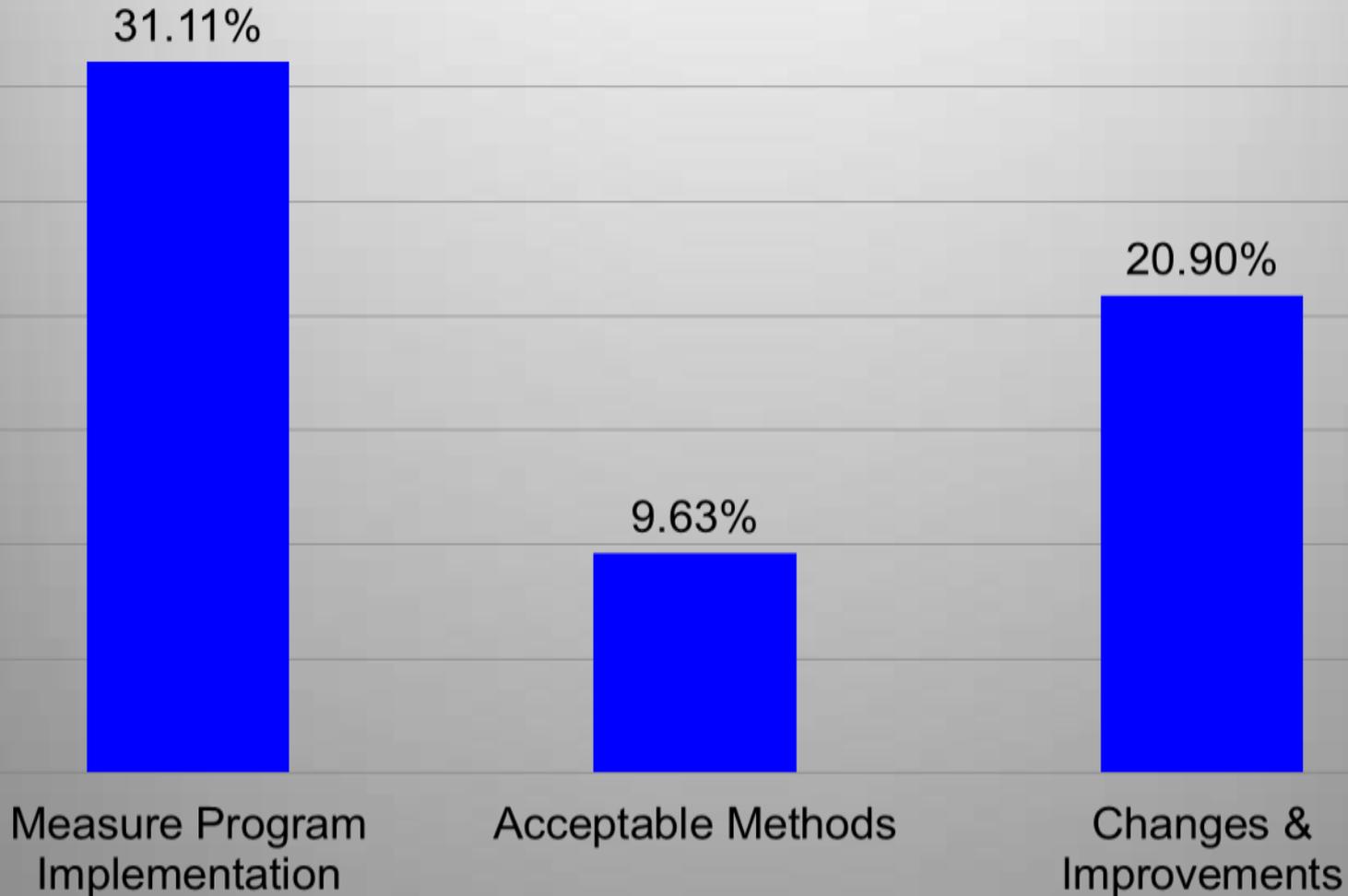
1. Administration & Development of PA Program (% Unsatisfactory)



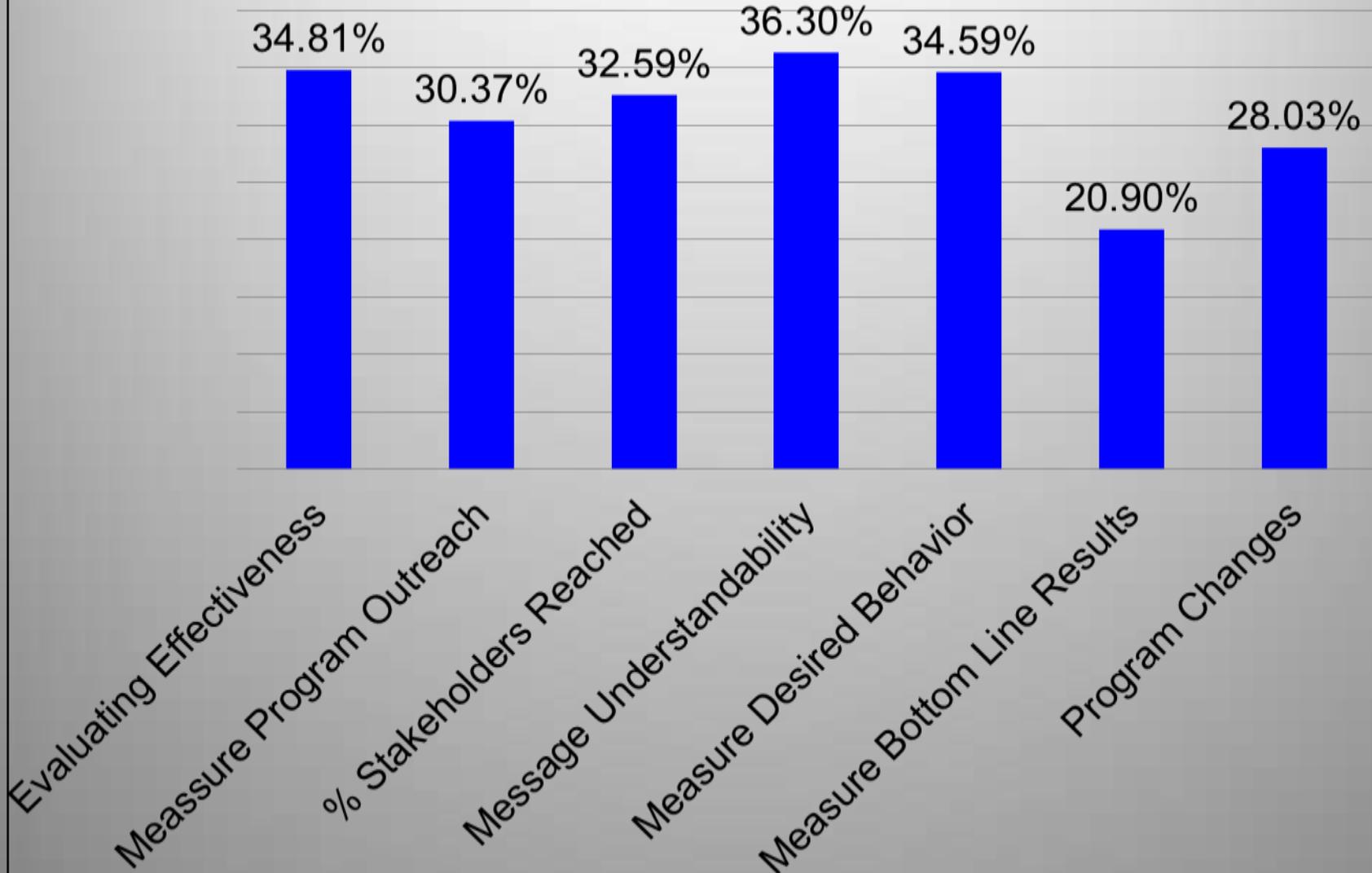
2. Program Implementation (% Unsat.)



3. Annual Implementation Audits (%Unsatisfactory)



4. Program Effectiveness Evaluations (% Unsat.)





Information on PHMSA Website

- <http://phmsa.dot.gov/pipeline>
 - Stakeholder Communications
 - Public Awareness
- Documents available
 - API RP 1162
 - PHMSA Form 21 Public Awareness Program Effectiveness Inspection
 - PHMSA Enforcement Guidance document
 - Frequently Asked Questions (FAQ's)





Questions

