Florida Pipeline Safety Seminar
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PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTIONS
PAP Effectiveness Inspections

- New Inspection Program
- 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 to complete inspections of Interstate Operators by December 2012
San Bruno, CA
September 2010
Allentown, PA
February 2011
History of *Public Awareness Regs*
History of Public Awareness Regs

1970

Part 192 (Original – published Aug 19, 1970)
§192.615 Emergency Plans
(d) - Establish an educational program to enable customers and the general public to recognize and report a gas emergency to the appropriate officials.

1976

Amendment 192-24 (effective Oct 1, 1976)
§192.615(d) - Each operator shall establish a continuing educational program to enable customers, the public, appropriate government organizations, and persons engaged in excavation related activities to recognize a gas pipeline emergency for the purpose of reporting it to the operator or the appropriate public officials. The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas. The 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.
History of Public Awareness Regs

1995
Amendment 192-71 (effective Feb 11, 1995)
§192.615(d) Emergency Plans → §192.616 Public Education

2005
Amendment 192-99 (effective June 20, 2005)
§192.616 Public Education → §192.616 Public Awareness
  ▪ More robust language in the Code
  ▪ PHMSA incorporates by reference
    American Petroleum Institute Recommended Practice 1162
    Public Awareness Programs for Pipeline Operators,

2007
Amendment (no number) (effective Jan 14, 2008)
§192.616 Public Awareness - relaxed rules for MM and some LPG.
Public Awareness Chronology

API RP 1162 1st Edition finalized

Dec 2003

Public Awareness Final Rule Published

May 2005

Operators complete written program

June 2006

Advisory Bulletin: Operators to submit written program to Clearinghouse

4 yr Implementation Cycle

June 2010

Operators complete 1st program effectiveness evaluation

PHMSA/NAPSR Public Awareness Workshop

PA effectiveness inspections initiated fall 2010 (thru CY 2012)

Next 4 yr Implementation Cycle

June 2010

Operators incorporate changes from effectiveness evaluation into PAP

Share learning or observations from inspections

Dec 2003
§192.616 Public Awareness

a) Written continuing public education program that follows the guidance provided in the API RP-1162.
   • Be capable of demonstrating Management Commitment and Support to program

b) Must follow general program recommendations of API RP 1162 and assess the unique attributes and characteristics your pipeline and facilities.
   • 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 operators
§192.616 Public Awareness

a) **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’s
- API RP 1162 – 6.2 Considerations of Relevant Factors
- Potential hazards, HCA’s, population density, land development activity, farming activity, third party damage incidents, environmental considerations, pipeline history, specific location situations, regulatory requirements, results of PAP Evaluations and any 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.
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.
   • Make sure plan is dated-maintain revision log

i) Program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.
Public Awareness Regulations

j) Must provide Customers Public Awareness Message twice annually (MMO’s)
   - 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
Purpose:
Pipeline operators use API RP 1162 to develop and actively manage their Public Awareness Programs.

Goal:
It establishes guidelines for operators to develop, implement, and evaluate their Public Awareness Programs in an effort to raise the effectiveness of Public Awareness Programs throughout the pipeline industry.

Guidance:
- Intra- and interstate hazardous liquid pipelines;
- Intra- and interstate natural gas transmission pipelines;
- Local distribution pipelines; and
- Gathering pipelines.
API RP 1162

Program Development:

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

Target Audience:

☑ Affected public (residents, businesses and visitors);
☑ Emergency officials;
☑ Local public officials; and
☑ Excavators.
API RP 1162

Message Content (LDC’S):

- Pipeline Purpose and Reliability
- Hazard Awareness and Prevention Measures
- Damage Prevention
- Leak Recognition and Response
- Emergency Preparedness Communications (Emergency & Public Officials)
- One Call requirements (Excavators)
- How to get additional information
API RP 1162

Message Delivery Methods and/or Media:

- 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?
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

API RP 1162
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 June 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?
Information on PHMSA Website

- [http://phmsa.dot.gov/pipeline](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