



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**



Public Awareness Program Effectiveness Evaluations



**Northeast Gas Association
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Public Awareness

Regulations

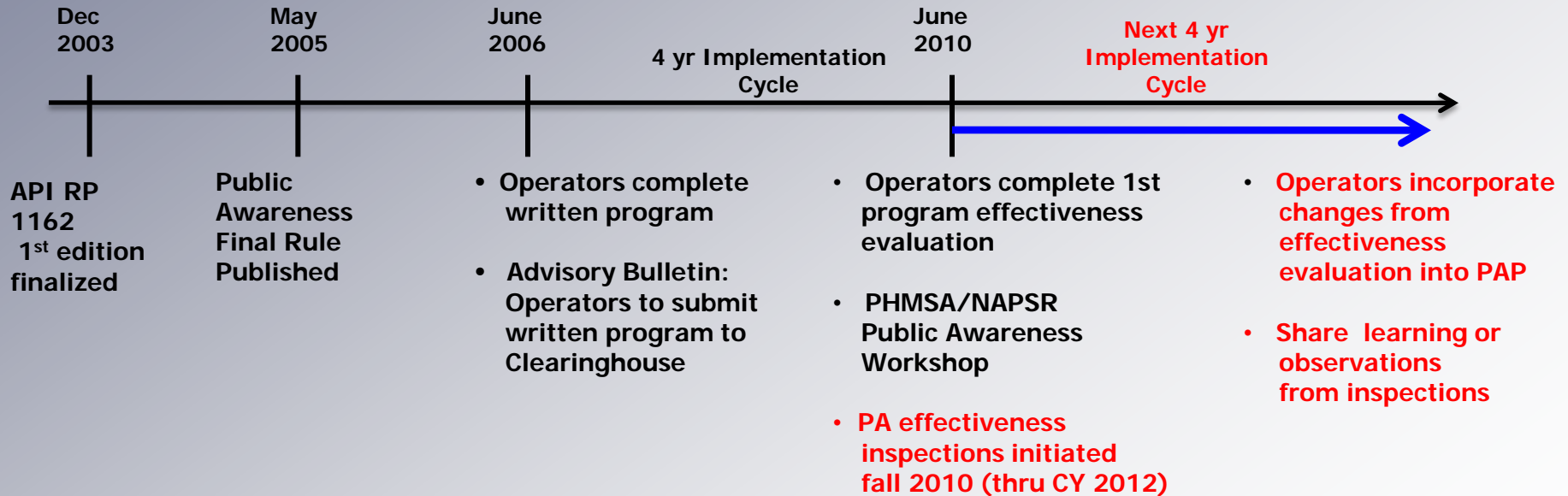
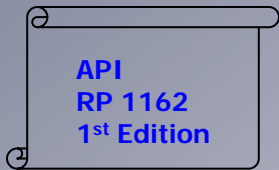
“...each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162.”

192.616 Public Awareness (Natural Gas or Other Gas)

195.440 Public Awareness (Hazardous Liquids)



Public Awareness Chronology





Public Awareness Effectiveness Inspections

- Focus on program effectiveness evaluations:
 - If/how operator evaluated program for effectiveness?
 - What were the evaluation results or findings?
 - What improvements were identified? Implemented?
- May verify operator implemented according to their written program or probe deeper
- Emphasis placed on continuous improvement



Public Awareness Inspection Rollout

- PHMSA using a Risk-based Inspection Approach:
 - Gas Transmission
 - Hazardous Liquids
 - Gas Distribution
- Large operators (mileage, # of customers)
- Operators with incidents/accidents/violations where public awareness was a facet
- Combine with other planned inspections or partner with States where it makes sense



Inspection Form

- PHMSA Form – 21
Public Awareness
Program
Effectiveness
Inspection Form
- Available on
PHMSA's website



Inspection, Evaluation, and Qualification Forms

- [PHMSA Form-01](#)
Standard Inspection Report of a Gas Transmission Pipeline
- [PHMSA Form-02](#)
Standard Inspection Report of Gas Distribution Operator
- [PHMSA Form-03](#)
Standard Inspection of a Liquid Pipeline Carrier
- [PHMSA Form-04](#)
Standard Inspection Report of an LNG Facility
- [PHMSA Form-05](#)
Evaluation Report of Gas Pipeline & Compressor Station Construction
- [PHMSA Form-07](#)
Evaluation Report of Liquid Pipeline Construction
- [PHMSA Form-10](#)
Breakout Tank Inspection Form
- [PHMSA Form-11](#)
Pipeline Failure Investigation Report
- [PHMSA Form-12](#)
Gas Storage Field Review
- [PHMSA Form-13](#)
PHMSA Pipeline Drug & Alcohol Questions
- [PHMSA Form-14](#)
Operator Qualification Inspection Form
- [PHMSA Form-15](#)
Operator Qualification Field Inspection Protocol Form
- [PHMSA Form-16](#)
Gas IMP Field Verification Inspection
- [PHMSA Form-17](#)
Supplemental SCC Questionnaire Gas Transmission or Liquid Pipeline
- [PHMSA Form-18](#)
Evaluation of LNG Facility Siting, Design, Construction, and Equipment
- [PHMSA Form-19](#)
Hazardous Liquid IMP Field Verification Inspection
- [PHMSA Form-20](#)
Ethanol Pipeline Transportation Questions
- [PHMSA Form-21](#)
Public Awareness Program Effectiveness Inspection Form

<http://www.phmsa.dot.gov/pipeline/library/forms>



Inspection Sections

1. Administration and Development of PAP
2. Program Implementation
3. Program Evaluation (Annual Audits)
4. Program Evaluation (**Effectiveness**)
5. Inspection **Summary/Findings**

- Documentation and records reviewed throughout each section
- API RP 1162 12-Step Process elements included in these sections



Inspection Plan

- PHMSA inspection plan provides for all federally-inspected pipelines to be completed by December 31, 2012
- States will incorporate PA inspections into their inspection plans; PHMSA encouraged Intrastate jurisdictional inspectors to conduct inspections in similar timeframe or to develop and inspection plan and timeline for completing
- Interstate inspection cannot be used to substitute for the states inspection of the plan as it pertains to the Intrastate pipelines; PHMSA has no authority to inspect intrastate facilities and plans where state program is in place



Initial Inspection Observations

“How effective is your public awareness program?”

- Operators collected effectiveness evaluation data
 - Survey/assessment data \neq completing the effectiveness evaluation
 - Any findings or conclusions related to effectiveness?
 - Changes identified?
 - Can operator describe methodology used?



Observations: Use of external resources

- Does operator understand the regulations and RP? Is operator able to explain how its program works and provides for compliance or does operator rely heavily on contractors?
- What level of operator involvement and oversight occurs?
 - Ex. Operator presence at ER meetings?
- Is data provided by contractor specific to operator or generic to industry?
- Does operator recognize successes, challenges in its program?
 - Taking credit for all outreach?



Identifying Stakeholder Audiences

- Can operator explain methodologies used to identify and reach out to audiences (SIC codes, geocoding, street databases, address lists, etc. – or combination of those sources)
 - Verification of outgoing mail should be available
 - How are returns tracked and handled?
 - How is new construction incorporated into program
- Meetings for stakeholders – how tracked? Follow up for those absent?
- What is operator's confidence level that members of target audiences are being identified?



Messages

- Does the program include the required messaging for each stakeholder group? Are the messages appropriate for the operator's system?
 - Ex. – transmission ROW: smell of gas may not be an appropriate message
- Collaborative efforts: Balancing the potential for “information overload” with ensuring the information is appropriate for that operator
 - Multiple operators: “Who is this from”?
- Basis for decisions about providing information in multiple languages



Evaluations

- Implementation: Annual. Effectiveness: Every four years. May be combined. But documented clearly.
- How are sample sizes determined – can operator explain?
- What does operator consider acceptable return rates for surveys, bounce-back cards? Can operator explain basis?
- Who conducts analysis and follow up? Contractor? Operator? Both?
- In addition to surveys, what else is collected?
 - Web site hits, call center data, e-mail, etc.



Observations - Miscellaneous

- Does operator have documentation to support its activities and findings? Such as....
 - Mailing lists
 - Undelivered mailings
 - Invitation list for meetings
 - Attendance list for meetings
 - Survey questions
 - Survey results
 - Audit documentation, program change documentation
 - Etc.



Good Practices Observed

- Creative messaging:
 - National 811 campaigns
 - Children campaigns (videos, radio clips, contests)
 - Website development
 - Email messages
 - Magazine centerfolds
- Collecting baseline data since 2006, understanding trends, taking action
- Active participation in ER drills and scenarios
- Use of management system to schedule and document program activities
- Many more



Public Awareness - General

- Inspections are still in early stages
- First four-year cycle for effectiveness
- Inspection results, feedback from our stakeholders will help determine path forward
- We are still learning



API RP 1162 2nd Edition

- API published RP 1162 2nd Edition
- Operator is still required to comply with the 1st edition incorporated in the regulations
- PHMSA and industry will learn what changes to the regulations may be needed through inspection program
- If PHMSA determines that the revision is appropriate to incorporate into regulation, may incorporate into rule at later date



Additional Factors

- NTSB Hearings
- Panel on Public Awareness
- San Bruno's fire chief testified that he was not aware before last year's deadly natural-gas explosion that a major PG&E pipe ran under the city, although he acknowledged that it had been his responsibility to know. Only after the San Bruno disaster did he realize that "there was a need to know" what lines were in the area, and that online maps and other resources were available to first responders.
- NTSB report anticipated in September 2012
- PHMSA providing updates to NTSB (from Carmichael incident)



Useful Links

- **PHMSA Website:**
<http://www.phmsa.dot.gov>
- **Federal Regulations:**
<http://www.gpoaccess.gov/cfr>
- **Stakeholder Communications:**
<http://primis.phmsa.dot.gov/comm/>
- **National Pipeline Mapping System (NPMS):**
www.npms.phmsa.dot.gov



Questions



Thank you!