



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



PHMSA/NAPSR Public Awareness Program (PAP) Workshop



**June 30, 2010
Houston, Texas**

**Steve Fischer, Director of Program Development
Annmarie Robertson, Program Manager
Christie Murray, National CATS Coordinator**



Welcome

- On Behalf of PHMSA & NAPSR– Welcome
- Administrative Moment
- Questions
- Agenda Review



Administrative Moment

- Sign-in sheet
- Safety and comfort
 - Fire exits
 - Restrooms
 - Cell phones and pagers
 - Closed doors = Meeting in Session
- Show of Hands
 - Government: Federal, State
 - County/Local
 - Industry
 - Service Providers
 - Public



Questions

- Audience can step up to the microphone or write comment on index cards
- Webcast:
 - Webcast participants can ask questions
 - Click the “Ask a Question” button
 - Questions routed to the meeting room
 - Questions may be read during the Q&A Forums
 - To be considered, please include:
 - Name
 - Organization You Represent, If Applicable



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



Web Cast Question?



PHMSA
Public Awareness Webcast



JUNE 30, 2010



[HELP](#) | [PREFERENCES](#) | [ASK A QUESTION](#)

powered by **ROLLCALL**



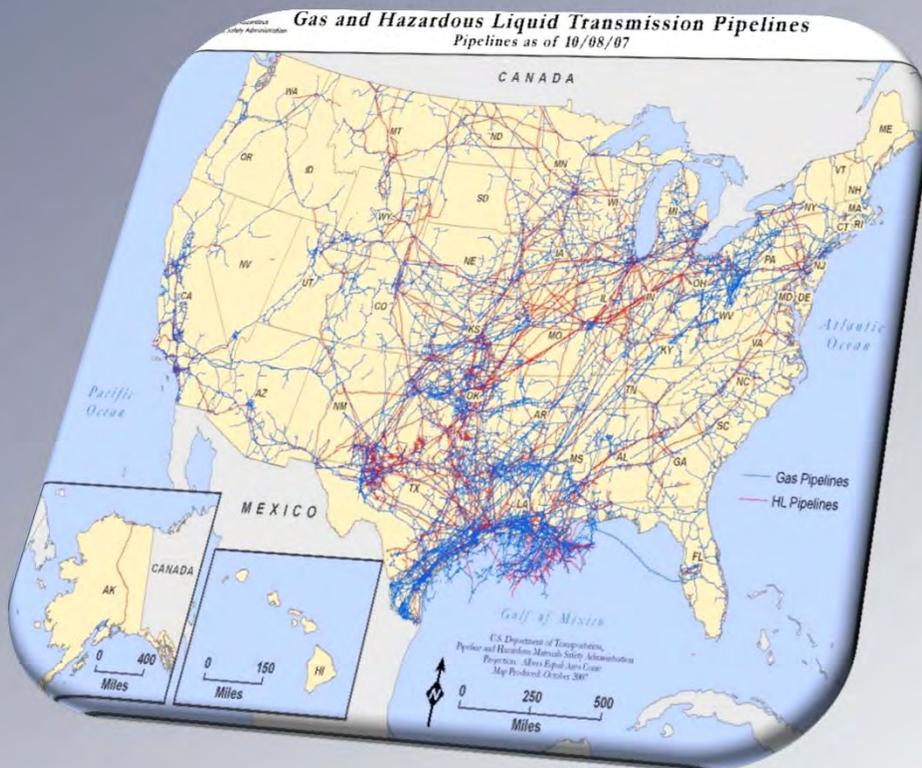
Agenda

- Purpose
- Chronology & Background
- PHMSA Observations
- NAPSР Perspectives
- PST Public Perspective
- Pipeline Trade Association Observations
- Open Forum Q&A
- Pipeline Operator Panel Discussion
- Group Discussion
- Closing



Purpose

Office of Pipeline Safety Mission



**“ To ensure the safe,
reliable, and
environmentally sound
operation of the
Nation’s pipeline
transportation
system.”**



Purpose

What Does PHMSA Regulate?

- Over two and a half million miles of pipelines in U.S.
 - 183,000+ miles of hazardous liquid pipelines
 - 331,000+ miles of gas transmission pipelines
 - 2,000,000+ miles of natural gas distribution pipelines
- 109 LNG plants connected to our natural gas transmission and distribution systems
- These pipelines are operated by more than 3,000 companies, large and small
- Natural gas provides 24% of U.S. total energy consumption
- Petroleum provides for another 39%



Purpose

Public Awareness Objective

- Promote the use of One-Call notification system prior to excavation
- Educate stakeholders about:
 - Possible hazards associated with unintended releases from pipeline facility
 - Physical indications of a pipeline release
 - Public safety measures in the event of a pipeline release
 - Procedures to reporting a pipeline release



Purpose Workshop

- Listen to industry on how PAPs were developed and implemented to understand:
 - strategies that working well
 - challenges faced
 - operator experiences specific to program effectiveness evaluations
- Identify critical elements of “successful” PAPs
- What questions do regulators need to ask to understand operators’ effectiveness evaluations



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



Public Awareness Chronology & Background



Annmarie Robertson
Program Manager

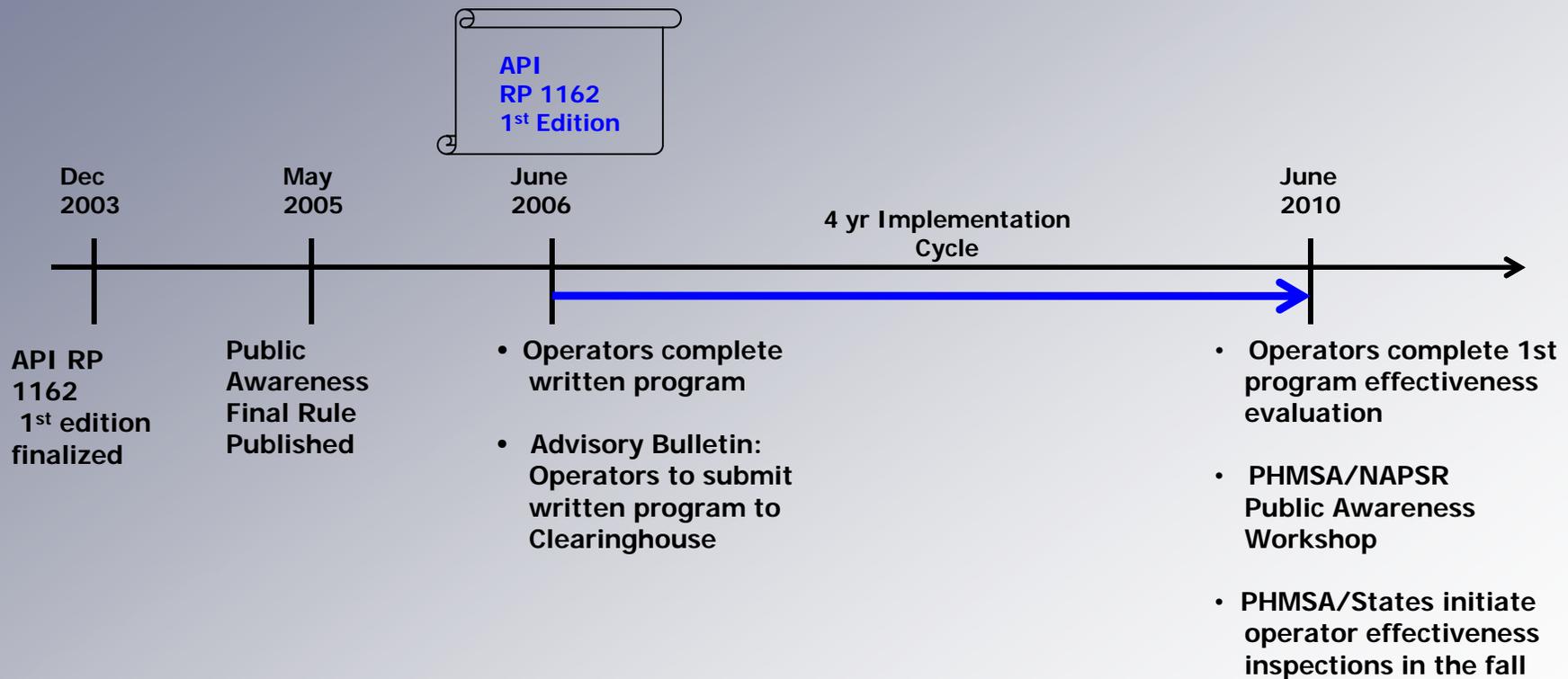


Chronology & Background

- Regulatory Background
 - Gas – some key milestones
 - 1970: 192.615 (original)
 - 1983, 1995: 192.614 (Amendments 40, 73)
 - 1995: 192.616 (Amendment 71)
 - Liquid – no requirements in original
 - 1980: 195.440 (Amendment 15)
 - 1995: 195.442 (Amendment 54)
 - 2005: Amendment 99 incorporates API RP 1162, 1st edition for both gas and hazardous liquids pipelines



Chronology & Background Timeline





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



2007: Carmichael, MS





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



2007: Carmichael, MS





NTSB Findings

- Residents of incident area had been missed by public awareness plan mailing campaign
- Many calls during incident to 911, but 911 operators and county dispatchers were not included in public awareness plan or liaison activities



NTSB Recommendation

NTSB Recommendations to the Pipeline and Hazardous Materials Safety Administration:

Initiate a program to evaluate pipeline operators' public education programs, including pipeline operators' self-evaluations of the effectiveness of their public education programs. Provide the National Transportation Safety Board with a timeline for implementation and completion of this evaluation





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



Public Awareness PHMSA Observations



Christie Murray

National Community Assistance & Technical Services Coordinator



PHMSA Observations

- Inspections
- Upcoming Inspection Focus
- Considerations



Inspections

- From 2006 to 2010 operators:
 - Implemented public awareness programs
 - Conducted annual audits and potentially supplemented their program
- Previous public awareness inspections focused on:
 - Did the operator have a written program?
 - Was it tailored to specific pipeline assets?
 - Was the program being implemented?
- June 2010: Operators' initial four-year evaluation of effectiveness due



Inspection

Upcoming Focus

- Public awareness inspections in the fall of 2010 may primarily focus on program effectiveness evaluations (NTSB Report reinforced this):
 - How operator evaluated program for effectiveness?
 - What were the evaluation results? Documented?
 - What improvements were identified? Implemented?
- Emphasis placed on continuous improvement
- May verify operator implemented according to their written program or probe deeper
- Operator must demonstrate compliance with current regulations



Inspection Planning

- PHMSA working with States to develop policy and guidance material (formed an Ad Hoc Team)
 - Enforcement and Inspection Guidance Document
 - Inspection Questions/Forms
 - Frequently Asked Questions
- Still vetting policy and guidance material internally
- Planning to conduct pilot inspections
- Milestones
 - Develop policy and guidance material
 - Post FAQ to website
 - Conduct pilot inspections
 - Feedback from industry
 - Conduct program effectiveness inspections in the fall



Considerations

- Public Awareness vs Public Education
- The word educate implies a one-way action
- The word awareness implies a two-way action
 - The recipient not only received the information but perceives, has knowledge of, understands, or is otherwise cognizant of the information being presented
 - The information is provided, the recipient gives feedback
- The significance of this word change in the regulations cannot be overlooked or downplayed
- The current rules now require a pipeline operator to
 1. provide information to stakeholder audiences, and
 2. to measure if and how well the stakeholder audiences grasped the information.



Considerations

- Outreach levels (One size does not fit all)
 - PHMSA will not set outreach levels or percentages for desired messages
 - Rather operators explain how they derived at the percentage limits and how they addressed their program to fill gaps
- “Must”, “May”, “Should”
 - “Must” - means an action is mandatory
 - “May” - means an action is permitted or authorized but not required
 - “Should” - When PHMSA incorporated , by reference, API RP 1162 (1st ed) into the pipeline safety regulations, the word “should” changed from meaning a recommendation to meaning a requirement for regulated pipeline systems



Considerations

- "Should" - means an action is required unless an operator provides justification

To be valid the justification must:

- be written,
 - be based on a sound engineering and/or safety analysis,
 - adequately explain why compliance with the action is not practicable for the specific pipeline system,
 - adequately explain why compliance with the action is not necessary for safety on that specific pipeline system, and
 - provide a level of safety equal to, or greater than, that which would be provided had the operator followed the action
- This is consistent with numerous regulatory interpretations PHMSA has issued since 1970. Operators still have a due process, if needed



Considerations

- The intent of the regulation is that messages should provide "enough information so that in the event of a pipeline emergency, the intended audience will know how to identify a potential hazard, protect themselves, notify emergency response personnel, and notify the pipeline operator" (API RP 1162, Section 4)
- Generic messages do not meet the intent of the PAP regulations because they do not necessarily provide "awareness"
- Message content must be pipeline system and product specific



Useful Links

- **PAP Workshop Presentations:**

<http://primis.phmsa.dot.gov/comm/PublicAwarenessWorkshops.htm>

- **PAP Workshop Webcast:**

<http://events.variview.net/clients/usdot/20100630/comeback.htm>

- **PHMSA Website:**

<http://www.phmsa.dot.gov>

- **Stakeholder Communications:**

<http://primis.phmsa.dot.gov/comm/>

- **Federal Regulations:**

<http://www.gpoaccess.gov/cfr>



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



Questions



Thank you!