

#### Effective Public Awareness



#### CGA Excavation Safety Conference & Expo March 10, 2011

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U.S. Department of Transportation 0.S. Department of Hater Pipeline and Hazardous Materials Safety Administration



#### Mission Office of Pipeline Safety (PHMSA)



" To ensure the safe, reliable, and environmentally sound operation of the Nation's pipeline transportation system."

Over two and a half million miles of pipelines in U.S.

## Why Public Awareness?

Significant Incidents caused by Excavation Damage (2001 thru 2010)

- National, Gas Distribution Pipelines
  - 36% of Significant Incidents
  - 22% of Fatalities and 30% Injuries
- National, Gas Transmission Pipelines
  - 13% of Significant Incidents
  - 42% of Fatalities and 13% Injuries
- National, Liquid Pipelines
  - 14% of Significant Incidents
  - 32% of Fatalities and 18% Injuries





### **Regulations Require**

"...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)

#### API RP 1162 1<sup>st</sup> Edition issued in December 2003

- Incorporated by reference in federal regulations
- Inspections based on 1<sup>st</sup> edition not 2<sup>nd</sup> edition
- Appendices are <u>not</u> enforceable:
  - Intended to provide clarification, examples, and additional information
  - Can be viewed as a separate document
- Section 2.7 highlights a continuous process for the development, implementation, and management of the PAP



#### API RP 1162 Process Guide



### **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



### Public Awareness Stakeholders

- Affected Public
- Excavators
- Emergency Officials
- Local Public Officials





### Chronology Where are we now?







#### **NTSB Recommendation**

#### Pipeline and Hazardous Materials Safety Administration:

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

Pipeline and Hazardous Materials Safety Administration

### Public Awareness Effectiveness Inspection Focus

- Ad Hoc Team worked to develop inspection forms and guidance
- 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
- Four initial inspections conducted (~2 days each)
- Public awareness effectiveness inspections from 2010 2012

## **Inspection Sections**

Administration and Development of PAP
 Program Implementation
 Program Evaluation (Annual Audits)
 Program Evaluation (Results)
 Inspection Results

Documentation and records reviewed throughout each section

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## **Inspection Format**

#### 1. Administration and Development of Public Awareness Program

- Step 1: Define Program Objectives
- Step 2: Obtain Management Commitment and Support
- Step 3: Identify Program Administration
- Step 4: Identify Pipeline Assets to be Included within the Program
- Step 5: Identify the Four Stakeholder Audiences
- Step 6: Determine Message Type and Content for Each Audience

## **Inspection Format**

#### 2. Program Implementation

Step 7:	Establish Baseline Delivery Frequency
	for Each Message
Step 8:	Establish Delivery Methods to Use for
	Each Message
Step 9:	Assess Considerations for Supplemental
	Program Enhancements
Step 10:	Implement Program and Track Progress

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## **Inspection Format**

#### 3. Program Evaluation (Annual Audits) 4. Program Evaluation (Effectiveness)

- Step 11: Perform Program Evaluation
- Step 12: Implement Continuous Improvement

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## **Inspection Format**

#### 5. Inspection Results

Summary Findings

## **Guidance Document**

- Provides guidance to pipeline safety inspection personnel in undertaking their compliance inspection activities
- Intended to be used solely as a reference
- Guidance is not a regulation and creates <u>no</u> new legal obligations
- In the event of a conflict between this document and any regulation, the regulation is controlling

Initial Inspection Observations "How effective is your public awareness program?"

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

- Many operators used third party contractors
  - Direct mailings, public meetings, evaluations, advertising/television/radio ads
  - Customize to meet operator needs
  - Important to stay engaged with QA/QC & oversight:
  - Mailing list accuracy (direct mailings/print ads)
  - New developments
  - Returned or undeliverable mailing follow-up
  - Understand your requirements and ask for it early
  - Operators responsible for PAP compliance

- Stakeholder list identification (SIC codes, geocoding, address lists, shape files, street databases)
- Some operators had proof of mailings sent out
- Specific and generic messages used
  - Generic messages may lead to confusion
  - Acceptable if:
    - Baseline requirements still met (each stakeholder audience)
    - Specific to operator's pipeline system/unique attributes (i.e. odorized line?)
    - Specifies the type of products

- Public meetings, operator presence (yes & no)
- Sample sizes and % limits defined by the operator
  - Not prescribed by regulator
  - Be able to explain methodology to support data/results
- Non-English speaking language considerations across the board
  - Data/Analysis to support decisions
  - Census data, county courthouse records, school records, hospital records, field personnel, focus groups

- Three annual audit methods used (internal self-assessments, third party audits, regulatory inspections\*)
- Annual audit & effectiveness evaluation (year 4); documented?
- Evaluation feedback:
  - Phone/online surveys/questionnaires
  - One-call center data
  - Response cards
  - Website hits
- Documentation/justification not always there
  - PAP changes, annual audits, methodologies
  - Key changes and recommendations

### **Good Practices Observed**

- Creative outreach approaches:
  - National 811 campaigns
  - Children campaigns (videos, radio clips, contests)
  - Website development
  - Email messages
  - Magazine centerfolds
- Collecting baseline data since 2006, understand trends
- Public meeting tracking attendance since 2006 and following up with those who did not
- Some operators use management system to schedule and document program activities

### **Good Practices Observed**

- Numerous supplemental activities:
  - Tracking excavators who hit line or dig without one-call ticket
  - More frequent mailings to stakeholders
  - Messages in multiple languages
    - Website
    - Posters
    - Emergency # translates to other languages (Spanish, French, Japanese, Russian, Korean, Arabic, etc)
  - 24 hour public awareness phone #
  - Participate with ER officials in emergency exercises and drills



### **Looking Ahead**

- Inspection activities:
  - Ramping up inspections
  - Inspection form/guidance finalized
  - Training schedule finalized for Federal/State inspectors (April)
  - FAQs published (April)
  - Information on Stakeholder Communications website
- Operators:
  - Evaluated program for effectiveness (data, results, findings)
  - Lessons learned (changes needed?)
  - Implementing changes? What's the plan?

### API RP 1162 2<sup>nd</sup> Edition

- API published RP 1162 2<sup>nd</sup> Edition
- Operator is still required to comply with the 1<sup>st</sup> edition incorporated in the regulations
- If PHMSA determines that the revision is appropriate to incorporate into regulation, may incorporate into rule at later date

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Pipeline Basics	The mission of the OPS Community Assistance & Technical Services (CATS) team is an ambitious one: To advance public safety, environmental protection and pipeline reliability by facilitating clear communications among all pipeline stakeholders, including the public, the operators and government officials. Periodically a CATS communication update, the Community Assistance and Technical Services Connection, is published to provide timely information about
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http://primis.phmsa.dot.gov/comm/CATS/htm



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#### **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): <u>www.npms.phmsa.dot.gov</u>
- Grant Information: <u>www.grants.gov</u>
- State Damage Prevention Grants: <u>http://primis.phmsa.dot.gov/sdp/</u>
- Technical Assistance Grants (TAG): <u>http://primis.phmsa.dot.gov/tag/</u>



### Questions



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