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March 29, 2014

Byron Coy, PE
Director, Eastern
Pipeline and Hazardous Materials Safety Administration
U.S. department of Transportation
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: Honeoye Storage Corporation – Public Awareness Plan Response
CPF 1-2-13-0006M

Dear Mr. Coy:

In response to both Notice of Amendments Honeoye Storage Corporation received dated November 20, 2013, the following is a response to the apparent inadequacies found during the New York State Department Public Service inspection for the Pipeline and Hazardous Materials Safety Administration (PHMSA) with regard to Honeoye Storage Corporation's Public Awareness Program at the Canandaigua, NY Facilities.

In order to respond to the following questions, and for continued improvement, Honeoye has enlisted the services of Roach and Associates, Inc., Registered Professional Engineers, to revise its Public Awareness Plan and to respond to the NOTICE OF AMENDMENT and assure compliance with law.

On the basis of the inspection/audit, PHMSA identified the following inadequacies which are in bold. Each response follows in a larger different font and will not be in bold.

1. **§192.616 Public awareness**

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, 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 (incorporated by reference, see § 192.7).

Honeoye will provide continuous Education and Training which is implemented in the Plan.

HONEOYE will provide a program for all operating and maintenance personnel as well as targeting specific public audiences frequently as they may be required to respond to an emergency. Through this commitment, HONEOYE can ensure that stakeholders and personnel are acquainted with the overall program procedures and written emergency procedures. This program includes:

1. Public Awareness
2. Employee Awareness
3. Program Evaluation

Honeoye's Public Awareness Program is inadequate because it failed to reference the API RP 1162 edition as seen in §192.7 (1st edition, December 2003). Honeoye's Public Awareness Program references API RP 1162, but it does not specify the edition of 1162.

There are two editions of API RP 1162. The 1st edition, December 2003, is the only version incorporated by reference in 192.7(c)(2). PHMSA has not adopted the 2nd edition. Therefore, it is important that Honeoye specify the edition of API RP 1162 being used to ensure that it complies with the edition incorporated by reference in the PHMSA regulations.

Honeoye has responded by adding "first edition, December 2003" to page 5 of its Public Awareness Plan. In order to comply to the only version incorporated by reference 192.7(c)(2).

2. Public awareness

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, 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 (incorporated by reference, see § 192.7).

Honeoye's Public Awareness Program is inadequate in that it failed to provide guidance on how they demonstrate management support of the program as required by API RP 1162, Section 2.7, overall Program Administration. Specifically, Honeoye's original Public Awareness Program, and their revised program, did not include a signed statement or other documentation to demonstrate management support of the program.

Honeoye recorded a Management Support Statement which is signed by Jim Smoot, Vice President/Manager of Operations and Scott Warnshouse, Superintendent.

3. §192.616 Public awareness

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, 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 (incorporated by reference, see § 192.7).

Honeoye's Public Awareness Program is inadequate because it fails to follow the general program recommendations of API RP 1162 Section 7.1. Specifically, Honeoye's program states that the operator Superintendent is the sole person responsible for administering all aspects of the Public Awareness Program, but it does not state him by name. Honeoye's program also lacks the required processes or procedures for conducting all the administration aspects of the program.

Scott Warnshouse, Superintendent is the sole person responsible for the administration of the Public Awareness Plan and it is now noted on Page 6 of the plan.

4. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program is inadequate because it fails to follow the general program recommendations of API RP 1162 Section 4 and assess the unique attributes and characteristics of the

operator's pipeline and facilities. Specifically, Honeoye's Public Awareness Program does not include a process for identifying when it should be conducting the program in other languages commonly understood by a significant number of non-English speaking populations.

API RP 1162 Section 4 Message Content states

“an operator should select the optimum combination of messages, delivery methods, and frequency that meets the needs of the intended audience . . . communications materials should be provided in the language(s) spoken by a significant portion of the intended audience.”

During the review, Honeoye's representatives stated that they know the stakeholders on its mailing list and that none of them are non-English speaking. However, this is not a defined and documented process.

Honeoye's current operations are in an English speaking community which is noted on Page 6 of the plan. Honeoye has added the following to its Plan which can also be found on Page 6.

“If a non-English speaking population becomes apparent in the HONEOYE area through its mailing list, HONEOYE will contact local election boards to determine what languages voting ballots are required to be provided in the communities HONEOYE serves, and augment our message accordingly.”

5. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 3 Stakeholder audiences, and assess the unique attributes and characteristics of the operator's pipeline and facilities, and refer to Appendix B of API RP 1162. Specifically, Honeoye's Public Awareness Program states the identification of the affected stakeholders in Section VII and Appendix A. Neither of these includes the criteria for determining the buffer area, boundary or the extent of the notifications used for identifying stakeholders that should be included on Honeoye's contact lists.

API RP 1162 Section 3 Stakeholder Audience defines the intended audiences that should be included in the public awareness program. For further examples, operators are referred to Appendix B of API RP 1162. In Appendix B of API RP 1162, under B.1.1 Affected Public, it states that "transmission pipeline operator should tailor its communication coverage area (buffer) to fit its particular pipeline, location, and potential impact consequences."

Honeoye has noted the Affected Public in several locations throughout the Plan. Appendix I of the Plan discusses tailoring the communication effort. Appendix A and B which notes the following:

Appendix A

- **Affected Public**

How Audience is Determined:

- Use Zip +4 and carrier route shape files for service territory
- HONEOYE uses town assessment rolls to identify property owners and residents which are sent to HONEOYE on a bi-weekly basis

- Along the pipeline, Honeoye has access to the county tax rolls and pipeline is mapped in the tax maps. This helps identify people along the pipeline
- Database to track customers in service territory
- If applicable, make contact with HCAs in accordance with federal regulations (for residents along distribution system)

- Emergency Officials
How Audience is Determined:
 - Discussions with identified local Emergency Responders (Emergency Officials)
 - Existing emergency response plans
 - Local Emergency Planning Committee databases
 - Some of the employees of Honeoye are members of the emergency response units, such as fire, and ambulance squads.
 - Use of County Supervisors handbook to identify the supervisors
 - Liaison with the County Director of Emergency Management which helps to schedule onsite meetings periodically
 - State and local emergency management agencies
 - Field operations personnel

- Public Officials
How Audience is Determined:
 - Local telephone directories
 - Use of the Ontario County Board of Supervisors handbook to identify the local public officials
 - Use of database to identify newly elected officials
 - Input of local personnel who routinely work with government or regulatory bodies
 - Internet searches and research
 - State and local government databases

- Excavators
How Audience is Determined:
 - Dig Safely Database system identifies contractors
 - Attend periodic Dig Safely contractor meetings
 - Honeoye keeps an updated contractor list
 - Excavation equipment rental companies
 - Utility coordinating committees
 - Maintenance records
 - Standard Industrial Codes (SIC)
 - Field personnel
 - Telephone directories

Along with the annual Newsletter, Appendix B, now in the Public Awareness Plan

provides a sample of a Notification to the Local Newspaper explaining the damage protection program.

6. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow API RP 1162 Section 4.3, and assess the unique attributes and characteristics of the operator's pipeline and facilities. Specifically, Honeoye's Public Awareness Program failed to provide information about specific potential hazard release characteristics and potential hazards posed by natural gas.

Honeoye has added the following information to its Plan located in Section L, Paragraph (m):

(m) Specific Information for Education

- (1) Information on how to recognize an emergency or potentially dangerous situation by recognizing various physical indicators such as:**
 - An odor of gas in or around a building
 - A hissing sound
 - A fire in or near a gas appliance or piping
 - Unusual noise at an appliance
 - Unusual behavior of the flame at the appliance burner
 - Gas outside (odor, blowing, burning)
 - Odor of gas where excavation work is in progress or has recently been completed
- (2) Information and/or warnings as to actions that will not be taken until a company official can arrive include:**
 - Do not attempt to locate gas leaks with matches or other open flames
 - Do not remain in a building when there is a strong gas odor
 - Do not turn lights on or off or unplug electrical appliances where there is a strong gas odor
 - Do not use a telephone in the area of a strong gas odor
- (3) Periodic Review of Message Content**
 - After each emergency, audience activities are to be reviewed to determine whether or not the procedures were effectively followed by examining the log of events and the remedial action taken (see Appendix F).
- (4) Recommendations for Supplementing the Program**
 - Increased communication frequency
 - Supplement efforts (additional messages and/or delivery methods)
 - Broadening the audience coverage
 - Customize supplements based on pipeline or segment characteristics

Honeoye mails an all-inclusive single newsletter to all affected stakeholders that does not contain information related to the specific hazards of natural gas releases, as mentioned in Honeoye's program Section VIII, B. 1.

Honeoye has added the following to its Plan which can be found on page 128.

"HONEOYE publishes an annual newsletter "*Honeoye Storage Corporation Facilities Newsletter*" or does a mass mailing letter or other document that serves to communicate the purpose, description, existence, characteristics and locations of the HONEOYE high pressure natural gas underground pipelines and how they are identified by line marker posts and signs. The newsletter contains information concerning pipeline reliability, preventive maintenance programs, how to identify a gas leak, and actions to take in the event of a gas leak. The newsletter contains HONEOYE's website url (<http://www.honeoyestoragecorp.com/index.htm>) for those interested parties who may wish to access the site for additional information about HONEOYE. Included in the newsletter are the names and contact information of HONEOYE's operational personnel. The newsletter also contains information related to specific hazards of natural gas releases. The information is mailed to Emergency Officials and their departments and is designed to be returned to HONEOYE with information that the letter has been received and noted by the proper Emergency Official."

7. §192.616 Public awareness

(a)...

(b) **The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.**

Honeoye's Public Awareness Program was inadequate because it failed to follow API RP 1162 Section 4.6.2, and assess the unique attributes and characteristic of the operator's pipeline and facilities. Specifically, Honeoye's Public Awareness Program describes the message content in Section VIII and Appendix B. The requirement for this content is included within Appendix B. However the information pertaining to these items does not include any reference to the National Pipeline Mapping System (NPMS) database.

Honeoye has referenced the National Pipeline Mapping System (NPMS) on Page 29 and 121 of the updated Plan.

API RP 1162, Section 4.6.2 Transmission Pipeline Mapping states that:

"Pipeline maps developed by transmission pipeline operators can be an important component of an operator's Public Awareness Program. The level of detail provided on the map should, at a minimum, include line size, product transported and the approximate location of the pipeline, as well as any other information deemed reasonable and necessary by the operator..." and that "The public can also receive information about which pipelines operate in their community by accessing the NPMS..." and that "Operators should include information on the availability of the NPMS within their public awareness materials..."

"Transmission Pipeline Mapping - Pipeline maps developed by HONEOYE is an important component of our Public Awareness Program. The level of detail provided on the map include the line size, product transported and the approximate location of the pipeline, as well as any other information deemed reasonable and necessary by HONEOYE. National energy infrastructure security issues are considered in determining information

and distribution related to pipeline maps. The public will receive information about which pipelines operate in their community by accessing the National Pipeline Mapping System (NPMS). The NPMS will provide the inquirer a list of pipeline operators and operator contact information. HONEOYE will include information on the availability of the NPMS within their Newsletter and website."

8. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general recommendations of API RP 1162 Section 4.4.3., and assess the unique attributes and characteristic of the operator's pipeline and facilities. Specifically, Section VIII., B of Honeoye's Public Awareness Program describes the interaction with emergency officials, but does not contain information related to documenting the interactions.

API RP 1162, Section 7.2 states that:

"The operator should maintain records of key program elements to demonstrate the level of implementation of its Public Awareness Program..."

Honeoye has included a new section to the Plan regarding recordkeeping is in Section VI.

"Annual files for all required reports will be kept for records and other documentation that reflects communications to stake holder audiences will be retained for a minimum of five (5) years. Records of program activities may be stored either in electronic or "hard copy" (paper) format."

API RP 1162, Section 4.4.3 Emergency Preparedness Response Programs states that:

"Operators are required by federal regulations to have emergency response programs. These programs . should be developed for use internally and externally, with appropriate officials, and in accordance with applicable federal and state emergency regulations..." and that "The operator should include information about how emergency officials can access the operator's emergency response programs covering their jurisdiction..."

All files can be accessed at the Honeoye main office location on Egypt Road and emergency officials will be alerted this fact in the next transmittal.

9. Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general recommendations of API RP 1162 Section 4.4.4., and assess the unique attributes and characteristic of the operator's pipeline and facilities. Specifically, Section VIII., B of Honeoye's Public Awareness Program describes the interaction with emergency officials but does not contain information related to documenting the interactions.

Honeoye will document all communication efforts with emergency officials. The records will be kept on file for five (5) years.

API RP 1162, Section 4.4.4 Emergency Preparedness - Drills and Exercises states that:

"A supplemental means of two-way communication about emergency preparedness is to establish a liaison with emergency response officials through operator or joint emergency response drills, exercises or deployment practices. Information on "unified command system" roles, operating procedures and preparedness for various emergency scenarios can be communicated effectively and thoroughly through a hands-on drill or exercise..."

Honeoye's representative stated that Honeoye provided special emergency response information and training/drills as described in the program for the emergency responders who cover their territory. However, Honeoye did not retain any documentation supporting these actions, nor is documentation mentioned in the Honeoye program.

Honeoye will document all communication and training efforts. Records will be kept on file for a period of five (5) years.

10. Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program is inadequate because it failed to follow the general recommendations of API RP 1162 Section 8.2, and assess the unique attributes and characteristics of the operator's pipeline and facilities. Specifically, Honeoye's Public Awareness Program states that the Superintendent will conduct the continual evaluation of the Public Awareness Program that will include at a minimum an annual review that is developed and implemented according to the guidelines in API RP 1162. Honeoye conducted annual self-assessments but the Public Awareness Program did not describe the process or procedures for conducting the annual evaluation.

API RP 1162 Section 8.2 Elements of the Evaluation Program states that

"A program evaluation program should include the measures, means and frequency for tracking performance. The selected set of measures should reflect:

- Whether the program is being implemented as programmed - the process**
- Whether the program is effective - program effectiveness.**

Based on the results of the evaluation addressing these two questions, the operator may need to make changes in the program implementation process, stakeholder identification effort, messages, means and/or frequency of delivery... "

In order for Honeoye to become more effective in its process and procedures for conducting its annual evaluation, Honeoye will conduct the following:

1. Outreach: Percentage of Each Intended Audience Reached with Desired Messages

- Honeoye will track number of inquiries by phone**
- Input received via feedback postcards, stakeholder audiences at events or meetings, sent by mail, or as a result of Honeoye canvassing the right-of-way**
- Track the number of officials or emergency responders who attend emergency response exercises**

2. Understanding of the Content Message

- Honeoye will survey target stakeholder audiences in order to validate Honeoye's methodology of the content used in its materials

3. Desired Behaviors by the Intended Stakeholder Audience

- This measure will help Honeoye determine if prevention behaviors have been learned. Questions in surveys will ask respondents their actual behaviors following an incident.
- Supplemental information included on surveys directed at the excavator regarding Dig Safely, assessment of the first responder behaviors, and in the event of a reported incident, were safety actions consistent with the public awareness communications.

4. Achieving Bottom-Line Results

- Honeoye will document the number of incidents and consequences caused by 3rd party excavators. This will include near misses and reported pipeline damage occurrences that did not result in a release and events that resulted in pipeline failures. This information will be compared with other similar situations of pipelines in the same sector. All information will be recorded and kept on file for five (5) years.

11. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 8.3, and assess the unique attributes and characteristics of the operator's pipeline and facilities. Specifically, Honeoye's Public Awareness Program lacks the required process or procedures for measuring program implementation and for determining whether the program is effective.

API RP 1162 Section 8.3 Measuring Program Implementation states that..

"The operator should complete an annual audit or review of whether the program has been developed and implemented according to the guidelines in this RP..." and "- Has the public Awareness Program been developed and written to address the objectives, elements and baseline schedule as described Section 2 and remainder of this RP?" and "- Has the Public Awareness Program been implemented and documented according to the written program?...?"

Honeoye's Public Awareness Program sections V and XIII state that an annual audit or review will be conducted and documentation maintained of the self-assessment review performed for each annual review. However, Honeoye's program does not define the methods to document the annual audit or review process, including any forms used, and any changes in Honeoye's program since the last review.

Honeoye will send out a questionnaire/survey with its annual newsletter to the affected public, excavators, emergency personnel, and public officials. The questionnaire/survey will be postage paid for easy return. All returned surveys will be kept on file by year for at least five (5) years. All results will be reviewed and if necessary, acted upon.

12. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 8.4.2, and access the unique attributes and characteristics of the operator's pipeline and facilities. Specifically, Section XII of Honeoye's Public Awareness Program entitled Program Evaluation states that methods will be completed for evaluating the program to determine the effectiveness of the program. However, Honeoye's Public Awareness Program does not have any documented process or procedures for conducting the required effectiveness evaluation every four years.

API RP 1162 Section 8.4.2 Measure 2- Understandability of the Content Message states that

"Program effectiveness surveys are meant to validate the operator's methodologies and the content of the materials used. Upon initial survey, improvements should be incorporated into the program based on the results. Once validated in this initial manner, a program effectiveness survey is only required about every four years. However, when the operator introduces major design changes in its Public Awareness Program a survey to validate the new approaches may be warranted..."

Honeoye has added the following under Measure 2 - Understandability of the Content of the Message located on Page 40 of the plan under subheading; "Survey Target Stakeholder Audiences":

"Upon initial survey, HONEOYE will make improvements which will be incorporated into the program based on the results. Once validated in this initial manner, a program effectiveness survey is only required every four (4) years. However, if HONEOYE introduces major design changes in its Public Awareness Program, a survey to validate the new approaches may be warranted."

13. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 8.4.2, and access the unique attributes and characteristics of the operator's pipeline and facilities. Honeoye substantiated that it mailed its survey to all of the stakeholders identified on its mailing list. Honeoye's Public Awareness Program Section XII entitled Program Evaluation states that methods will be completed for evaluating the program to determine the effectiveness of the program. The Program Evaluation section does not contain any processes or procedures for conducting the effectiveness evaluation.

API RP 1162 Section 8.4.2 Measure 2- Understandability of the Content Message states that

"Operators should pre-test public awareness materials for their appeal and the messages for their clarity, understandability and retain-ability before they are widely used..."

HONEOYE will pre-test public awareness materials for their appeal and the messages for their clarity, understandability and retainability before they are widely used. A pre-test can be performed using a small representative audience, for example, a small sample group of HONEOYE employees not involved in developing the Public Awareness Program, a small section of the intended stakeholder audience or others (often referred to as focus groups).

Results will be documented and implemented in a future survey.

14. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 8.4.3, and assess the unique attributes and characteristics of the operator's pipeline and facilities. Honeoye indicated that it mailed its survey to all of the stakeholders identified on its mailing list. Honeoye's Public Awareness Program does not contain adequate procedures on how to measure the stakeholder desired behavior.

API RP 1 162 Section 8.4.3 Measure 3-Desired Behaviors by the Intended Stakeholder Audience states that.

This measure is aimed at determining whether appropriate prevention behaviors have been learned and is taking place when needed and whether appropriate response or mitigation behaviors would occur and have taken place. This is a measure of learned and, if applicable, actual reported behavior..."

Honeoye has inserted the following information on Page 41 of its updated Plan.

- **Baseline evaluation: The survey conducted as the means of assessing Measure 2 (previously noted-Understandability of the Content of the Message) is designed to include questions that ask respondents to report on actual behaviors following incidents.**
- **Supplemental evaluation: As a supplement to these measures, HONEOYE will assess whether the Public Awareness Program successfully drove other behaviors. HONEOYE may consider the following examples as a supplemental means of assessing this measure:**
 - (a) Whether excavators are following through on all safe excavation practices, in addition to calling the Dig Safely Center.**
 - (b) The number of notifications received by HONEOYE from the excavation Dig Safely (e.g. is there a noticeable increase following distribution of public awareness materials?)**
 - (c) An assessment of first responder behaviors, including the response to pipeline-related calls, and a post-incident assessment to determine whether their actions would be and were consistent with the key messages included in the public awareness communications. Assessments of actual incidents will recognize that each response requires unique on-scene planning and response to specifics of each emergency.**

- (d) Measuring the appropriateness of public stakeholders' responses is also anecdotal but could include tracking whether an actual incident that affected residents was correctly identified and whether reported and personal safety actions undertaken were consistent with public awareness communication.

Information gleaned from the supplemental evaluation will be documented and retained for 5 years. The information will be included in the next survey if applicable.

15. §192.616 Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 8.4.4, and assess the unique attributes and characteristics of the operator's pipeline and facilities. Specifically, Honeoye did not have comprehensive process to measure the bottom line results of its Public Awareness Program.

API RP 1162, Section 8.4.4 Measure 4 Achieving Bottom-Line Results states that:

"As a baseline, the operator should track the number of incidents and consequences caused by third party excavators. This should include reported near misses; reported pipeline damage occurrences that did not result in a release; and third-party excavation damage events that resulted in pipeline failures..."

Honeoye representatives said that the significant bottom line measurement was that they have not had any third-party pipeline damages to the system. However, Honeoye needs to include Program Evaluation criteria related to third party damages into its Program.

Considerations of Relevant Factors have been added to the Plan:

As HONEOYE develops its Public Awareness Program and performs subsequent periodic program evaluations, it is recommended that a step for assessing relevant factors along the pipeline route be included to consider what components of the Public Awareness Program should be enhanced. HONEOYE will consider each of the following factors applied along the entire route of the pipeline system to determine the bottom line results.

- Potential hazards
- High Consequence Areas
- Population density
- Land development activity
- Land farming activity
- Third-party damage incidents
- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements

- Results from previous Public Awareness Program evaluations
- Other relevant needs

16. Public awareness

(a)...

(b) The operator's program must follow the general program recommendations of API RP1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Honeoye's Public Awareness Program was inadequate because it failed to follow the general program recommendations of API RP 1162 Sections 8.5 and 2.7 Step 12, and assess the unique attributes and characteristics of the operator's pipeline and facilities. Specifically, Honeoye did not establish a process or procedure to implement changes to the Public Awareness Program based on the results of the evaluation findings.

API 1162 - 8.5 Summary of Baseline Evaluation Program contains Table 8-1 entitled "Summary of "Baseline Evaluation Program", and API 1162 - 2.7 Program Development Guide, Step 12 outlines ways to "Implement Continuous Improvement..."

Honeoye's Public Awareness Program Section XII entitled Program Evaluation states that methods will be completed of evaluating the program to determine the effectiveness of the program. The Program Evaluation section does not contain any processes or procedures for conducting the effectiveness evaluation.

Honeoye has incorporated Table 8-1 into its Plan. Additionally, Scott Warnshouse, Administrator of the plan will:

- (1) Establish the parameters associated with the selection of the affected public, public officials, emergency responders, excavators and other groups that will be the target audience
- (2) Develop relationships with other companies, associations or organizations to reduce redundancies and optimize common efforts
- (3) Determine the messages, methods and media used to deliver the communications to the intended stakeholder
- (4) Administer and maintain the Plan and HONEOYEs on-going public awareness program
- (5) Assign specific responsibilities to employees, functions or groups
- (6) Coordinate feedback from stakeholder audiences
- (7) Review any incidents or situational changes that might necessitate supplemental program enhancements
- (8) Document and summarize activities related to the Plan and present these to management.
- (9) Ensure annual reviews of program implementation are conducted using third party audits and/or, internal self-assessments and/or regulatory inspections
- (10) HONEOYE will determine a statistical sample size and margin-of-error for stakeholder audiences' surveys and feedback.
- (11) Determine program changes or modifications based on the results of the evaluation which will improve effectiveness. Program changes will be in areas such as:
 - Audience
 - Message type or content

- Delivery frequency
 - Delivery method
 - Supplemental activities
 - Other program enhancements
- (12) Document program changes
- (13) Determine future funding and internal and external resource requirements resulting from program changes made
- (14) Implement changes

We want to thank you for the past and continued guidance in making this pipeline system safer for the public and employees of HSC.

Honeoye will continue to work with Roach and Associates, Inc. to ensure that continued monitoring of the Public Awareness Plan is ongoing for safe and compliant operations of its storage facility and pipelines. All of the aforementioned augmentations are available for review at the next audit at the Canandaigua office of HSC.

Yours very truly,
ROACH AND ASSOCIATES, INC.



William E. Roach, PE
President
PE 036140E

WER/mcd

cc: Jim Smoot
Scott Warnshouse