



City of Duluth

DEPARTMENT OF PUBLIC WORKS/UTILITIES
Engineering Division
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RECEIVED APR 14 2014

April 11, 2014

Pipeline and Hazardous Materials Safety Administration
C/O: Linda Daugherty, Central Region Director
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

RE: Conforming Response to Notice of Amendment Related to Case File CPF 3-2014-1003M

Dear Ms. Daugherty:

The City of Duluth is responding to your March 13th 2014 request for additional information to supplement your understanding of how inadequacies identified during the August 2012 Public Awareness Program inspection were addressed. Since that time the City has implemented changes which should resolve all the concerns discussed during the inspection. The following will explain how the City responded to each of the inadequacies identified in your request.

Duluth Public Works and Utilities does conduct annual implementation reviews to make recommendations to improve its pipeline safety public awareness program. At these meetings program changes or recommendations for improvements to the public awareness program will be made and tracked. The resulting decisions, actions and outcomes will be documented in meeting minutes. These annual meetings will ensure approved changes or actions are implemented as a result of the annual implementation reviews and effectiveness evaluations as appropriate, and in accordance with API RP 1162.

The effectiveness of the public awareness program is primarily evaluated by using the following feedback:

- Correlations between gas hits in a calendar year and the quantity of excavation tickets requested,
- Post seminar quizzes of the public officials and emergency responders whom attended the MnCAER meetings,
- Post seminar quizzes of the contractors whom attended the Annual Damage Prevention Meetings sponsored by Gopher State One Call,
- And primarily, periodic public surveys mailed to the population living within the utilities' service area.

The yearly comparison of gas hits to excavation tickets does provide a general conclusion of the public awareness program effectiveness. However the public surveys and meetings responses provide information very specific to our plan.

The responses from the meeting quizzes are checked to identify which parts of the program are being understood or recalled better than others. The public surveys are scheduled every 4 years and use questions from RP 1162, or questions that were specifically developed based upon our public awareness plan. We believe this feedback is effective to identify specific items in our program where the outreach of information either excels or is deficient. These results are compared to public surveys from neighboring utilities to equate how effective our message is, and also to look for shared trends of successful outreaches or common areas that need improvement.

Due to concerns that annual implementation reviews and effectiveness evaluations were not being performed, the City has become more diligent in conducting this annual meeting. The most recent compliance audits were held on October 3rd, 2013. At this meeting solutions to issues identified during the 2012 inspection were determined, documented, and then later written into the City's Public Awareness Program. These written changes included the requirement to perform the annual compliance audit/effectiveness reviews.

In response to the second identified deficiency regarding lack of contact with the owners of vacant land near the pipeline, the Duluth Public Works & Utilities is now using land parcel records to identify the owner(s).

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These records provide the names and addresses of vacant land owners and the address of property on the parcels. This information is used to send parcel pipeline safety publications to both addresses. With the mailing is also a written request to share the information with leased tenants that may be actively working on the land for a variety of purposes.

Hopefully these responses provide satisfactory justifications to the concerns addressed in the March 13, 2014 letter. Thank you for the opportunity to clarify these concerns.

Sincerely,

Handwritten signature in blue ink that reads "Howard Smith, P.E." with "for" written below it.

Eric Shaffer
Chief Engineer of Utilities

Cc: James Benning, Director of Public Works
Eric Schlacks, Gas and Energy Coordinator