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of Transportation

**Pipeline and  
Hazardous Materials  
Safety Administration**

# Public Awareness Programs for Pipeline Operators PHMSA Final Rule & Final Rule Correction

## PHMSA Workshop

### November 9, 2005

### Baltimore, MD

## Presented by Blaine Keener

### OPS Community Assistance & Technical Services Coordinator



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Public Awareness Programs for Pipeline Operators

# Not a New Regulatory Requirement

- Damage Prevention Programs for Excavators
  - 192.614(c) and 195.442(c)
- Emergency Plans for Fire, Police, & Public Officials
  - 192.615(c) and 195.402(c)(12)
- Public Education
  - 192.616 and 195.440
- Gas Transmission Integrity Management
  - 192.911(m)



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## Public Awareness Programs for Pipeline Operators

# What Is New ?

- Final Rule published May 19, 2005
  - <http://dms.dot.gov/>
  - Simple Search on Docket 15852
- 192.616 and 195.440 titled Public Awareness
- Require operators to follow the guidance in API RP 1162, First Edition, December 2003
- Baseline and Supplemental (aka Enhanced) Programs
- Final Rule Correction published June 16, 2005



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## Public Awareness Programs for Pipeline Operators

# Program Objectives

- Promote the use of One-Call Systems and other damage prevention activities
- Educate stakeholders about:
  - Possible hazards associated with unintended pipeline release
  - Physical indications of a pipeline release
  - Public safety measures in the event of a pipeline release
  - Procedures for reporting pipeline release



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# What About Damage Prevention, Emergency Plan, & Gas IM Communication Regulations ?

- Unchanged by Final Rule
- Some requirements of these regulations can be met by an effective Public Awareness Program



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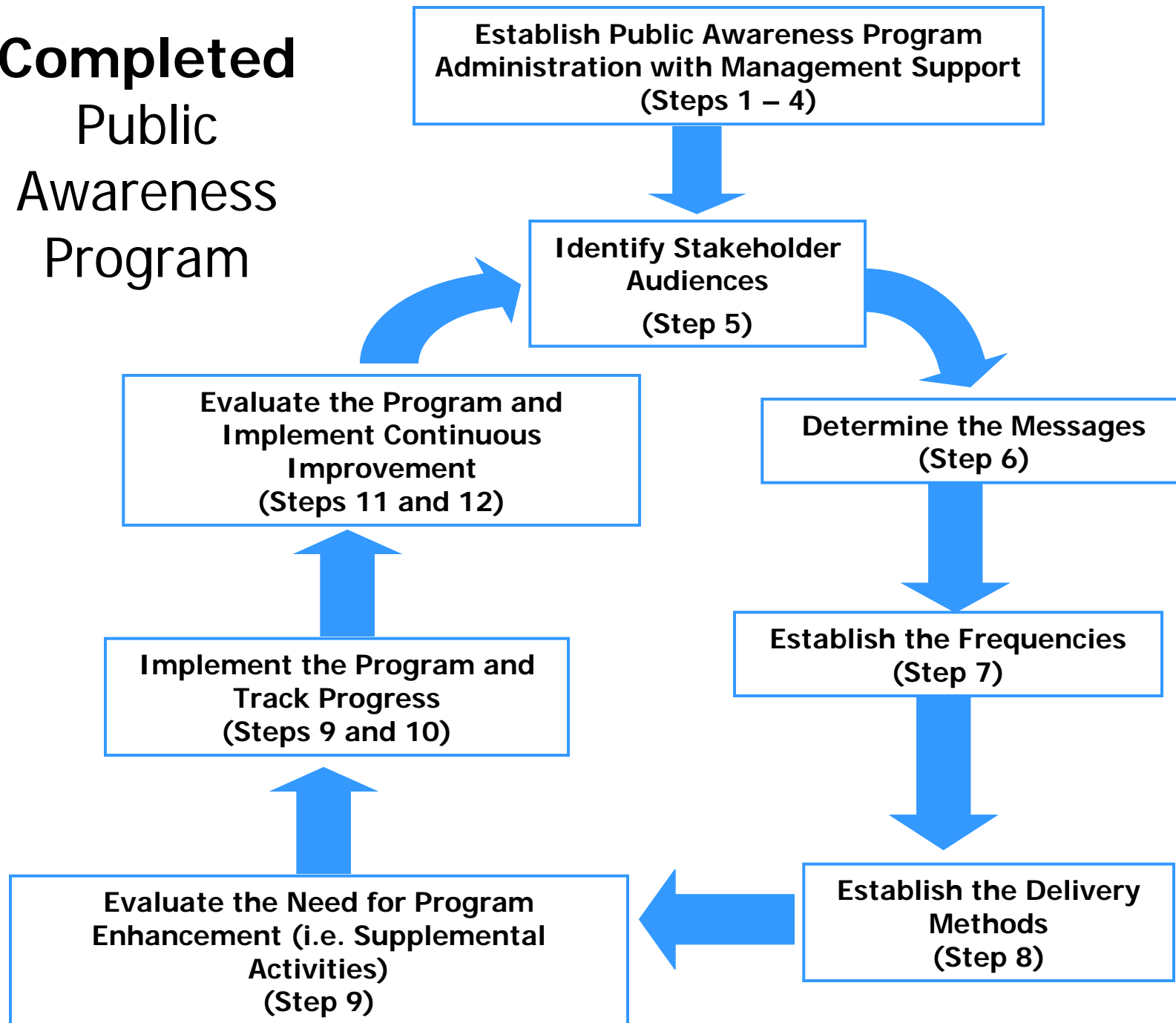
## Public Awareness Programs for Pipeline Operators

# What Else Is New ?

- Written Program must be Completed by June 20, 2006 <sup>1</sup>
- Upon request, operators must submit Written Programs to PHMSA or State Agency (intrastate operators)

<sup>1</sup> For both propane systems and master meter operators having less than 25 customers, the Written Programs are due June 20, 2007.

# Completed Public Awareness Program





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Public Awareness Programs for Pipeline Operators

# Implementation of Completed Program

- Initial distribution of awareness materials must be completed by June 20, 2007
- First evaluation of program effectiveness must be completed by June 20, 2010





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## Public Awareness Programs for Pipeline Operators

# Should, Shall, May, Must

- Programs must follow the general program recommendations, including baseline and supplemental requirements of RP 1162, unless written program justifies why compliance with Recommended Practices not practicable and not necessary for safety
- RP 1162 Appendices only provide information and resources



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Public Awareness Programs for Pipeline Operators

# Summary of Recommendations

- Section 2.8 of RP 1162
- Separate table for each operator type
- Each table has section for each Stakeholder Audience
- Message Type, Frequency, and Delivery Method and/or Media
- Baseline and Supplemental



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## Public Awareness Programs for Pipeline Operators

# Baseline Program

- Applied to all portions of existing pipeline system
- Creates minimum level of Awareness among all Stakeholder Audiences
- Not within the scope of RP 1162
  - New pipeline construction
  - Communications after pipeline-related emergency
  - LNG Plants and Propane/Air Peak-shaving



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## Public Awareness Programs for Pipeline Operators

# Supplemental Program

- When conditions along pipeline suggest a more intensive effort is needed:
  - High Consequence Areas
  - Land Development Activity
  - Third-party Damage Incidents
  - Pipeline History
- Complete list of considerations in Section 6.2 of RP 1162



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## Public Awareness Programs for Pipeline Operators

# Forms of Enhancements for Supplemental Program

- Increased frequency of communications
- Enhanced Message Content and Additional Delivery Method and/or Media
- Widening Stakeholder Audience coverage area beyond Baseline Program



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## Public Awareness Programs for Pipeline Operators

# Supplemental Program

- Written Program must describe the process for determining whether supplemental enhancements are warranted
- Implementation records must document areas along the pipeline route where supplemental elements have been implemented



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## Public Awareness Programs for Pipeline Operators Measuring Program Effectiveness

- Is information reaching intended Stakeholder Audience ?
- Is the information understood ?
- Are stakeholders motivated to respond in alignment with the information ?
- Is there a reduction in third-party damages to the pipeline system ?



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## Public Awareness Programs for Pipeline Operators Cooperative Efforts by Operators

- RP 1162, section 2.4.6, Cooperative information exchanges or shared public awareness activities can be beneficial and economical
- RP 1162, section 8.4.2, trade-association effectiveness surveys should allow the operator to assess results relevant to the operator's pipeline system and Program





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Public Awareness Programs for Pipeline Operators

## Docket Filings After the Final Rule Correction

- American Public Gas Association (APGA)  
Petition for Reconsideration, 6-10-2005  
(discussed in following slides)
- American Petroleum Institute (API) &  
Association of Oil Pipelines (AOPL)  
Request for Clarification, 6-15-2005  
(discussed tomorrow)



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# APGA Petition for Reconsideration

- Eliminate the requirement for master meter operators (MMO) to comply with API RP 1162
- MMO public awareness program limited to passing on to its customers all safety information it receives from gas distribution, gas transmission, and hazardous liquid pipeline operators



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# PHMSA Response to APGA Petition for Reconsideration

- Finds merit in recognizing potential stakeholder confusion caused by multiple public awareness programs
- Reexamining the appropriate role of pipeline operators whose primary business is not gas distribution
- Plans to address APGA's recommendation in a future rulemaking



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# Questions ???

- [blaine.keener@dot.gov](mailto:blaine.keener@dot.gov)
- 202-366-0970
- Public Awareness Program information provided at:

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



# Using Model Public Awareness Plans

John Erickson, PE  
American Public Gas Association  
at the  
PHMSA/NAPSR Workshop  
Baltimore, MD

# What Is APGA?

- The National Trade Association for Publicly-Owned Gas Utilities
- ~ 600 member utilities
- Created in 1961
- New mission in 2004
- Moved to Washington, DC
- Expanded to 8 staff

# Goal of this Presentation

- Describe model plans
- Review typical customization requirements
- Identify common pitfalls
- Use case study as an illustration

# Available Model Plans

- American Public Gas Association  
(Available to Members Only)
- Southern Gas Association (Available to  
participating operators)
- Other associations
- Consultants
- Others



# Common Features

- Follow the 12-steps in RP 1162
- Provide written advice for customizing
- Some consulting help in customization may be available
- Cannot be used without additional work to make it fit the operator's needs.
- May provide templates, forms, etc that go beyond RP 1162 requirements

# 12 step process

- Overall Program Administration
  - 1 Define program objectives
  - 2 Obtain Management Commitment and Support
  - 3 Identify Program Administration
  - 4 Identify Pipeline Assets to be included within the Program

# 12 step process

- Program Development
  - 5 Identify the 4 Stakeholder Audiences
  - 6 Determine Message Type and Content for Each Audience
  - 7 Establish Baseline Delivery Frequency for Each Message
  - 8 Establish Delivery Methods to Use for Each Message

# Program development (cont'd)



- Program Development
  - 9 Assess Considerations for Supplemental Program Enhancements
  - 10 Implement Program and Track Progress
  - 11 Perform Program Evaluation
  - 12 Implement Continuous Improvement



## As you customize ....

- Make sure all “Insert Here” comments are gone!
- Document any decision not to include one or more RP 1162 suggestions
- Document additions/deletions/modifications

# 1 Define program objectives

- Generally boilerplate language
- Operators should ensure they are comfortable with the wording and modify as needed

## 2 Obtain Management Commitment and Support



- Company policy
- Management participation
- Allocation of resources and funding

# 3 Identify Program Administration



- Name program administrator(s)
- Identify roles and responsibilities
- Document program administration
- Suggest that the final plan be reviewed once more to ensure all actions listed in the plan are assigned to someone



# Case Study: Examples of Responsibilities



- Manager, Public Affairs
  - Overall plan implementation
  - Placement of radio/TV ads
  - Ensure newsletter articles, bill inserts, etc are placed according to schedule
  - Maintain Gov't lists & conduct meetings (2-yr)
  - Manage effectiveness review
- Safety Programs Manager
  - Maintain excavator, trash hauler, ice remover lists
  - Develop and mail information to these lists

# 4 Identify Pipeline Assets to be included within the Program



- Do you have:
  - Transmission facilities?
  - More than one autonomous distribution system?
  - Service areas with distinctly different systems?
- You might want to develop separate plans for each system, or
- The same plan can address all pipeline assets

# 5 Identify Stakeholder Audiences



- Model plans may list one method or all RP 1162 suggestions
- Modify the plan to list **ONLY** methods you will actually do.
- One “final” plan reviewed had left in every suggested method

# Customers

- If you do not have a list of your customers, developing a public awareness plan is the least of your problems!

# Non-customers near gas lines



- Methods of identifying listed in RP 1162:
  - Zip codes (zip + 4)
  - Geospacial address databases
  - Other

# Emergency/Public Officials



- Model plans may provide a list similar to RP 1162
- Delete/Add/Modify so that the final list matches what is in your area
- Document why you made each change

# Case Study: Developing Stakeholder Lists



- Customers – Information Systems
- Excavators – Yellow Pages and Dig-Safe
- Government Officials – State Handbook and telephone calls to government offices
- Emergency Officials – Telephone calls
- Residents Along Transmission Line – Land records and return mail
- Residents Along Distribution Lines – No list required as direct mail is not employed

# Recommended Messages by Target Audience



- Should consider each recommended message
- Add/change/delete as appropriate, but
- Document rationale for changes and deletions



# 7 Establish Baseline Delivery Frequency



- Model plans include recommended frequencies matching RP 1162 Tables 2-1, 2-2 and 2-3
- Suggest using these recommendations as the basis for initial frequencies or use current utility practice, if more frequent

# 8 Establish Delivery Methods



- The plan should specify the method of delivery for each message to each stakeholder
- Not all methods are effective in all situations
  - Bill stuffers do not go to non-customers
- APGA spreadsheet is one way to list delivery methods

# Where Are You Now?

- Need to assess how current programs satisfy RP 1162 requirements
- May use the APGA worksheets, but not required
- Recommended Steps:
  - Compile all current materials
  - Identify which target audiences get each piece
  - Determine which messages are in each piece

<b>Public Awareness Materials</b>					
<b>Target Audience: Customers</b>	<b>Baseline Messages</b>				
<b>Message --- &gt;</b>	Pipeline purpose and reliability	of hazards and prevention measures undertaken	Damage Prevention Awareness	Leak Recognition and Response	How to get additional information
<b># of materials on message - &gt;</b>	0	0	0	0	0
<b>TARGETED DISTRIBUTION OF PRINT MATERIALS</b>					
Brochures, Flyers, Pamphlets, and Leaflets					
Letters					
Pipeline Maps (Transmission or major mains)					
Response Cards					
Bill Stuffers					

# Case Study



- Investor owned utility
- 34,000 customers
- 488 miles of mains
- 64 miles of transmission pipeline

# Case Study: Changes to Program



- Developed written Public Awareness Plan
- Revised existing materials to include missing messages
- Specified a pre-test for all new and significantly modified materials using operator's employees and family members

# Case Study: Pending

- Complete assignment of responsibilities
- Define and conduct effectiveness assessments
- Telephone surveys for:
  - Excavators
  - Customers
  - Non-customers
- Post meeting feedback for:
  - Emergency officials
  - Local government officials

# If You Use A Model Plan

- Read the instructions carefully
- Insert operator-specific information wherever required
- Delete/Modify/Add as appropriate, but document why
- Make sure it is exactly what you intend to do
- Have compliance experts review final form



# Questions?

- Call or e-mail with any questions
- [jerickson@apga.org](mailto:jerickson@apga.org)
- 202-464-0834
- Orr check [www.apga.org](http://www.apga.org)



# *RP 1162 Implementation*





# *RP 1162 Impact*

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SCANA Corporation has four subsidiaries impacted by RP 1162. These subsidiaries operate transmission and distribution systems in South Carolina, North Carolina, and Georgia



## *Existing Public Awareness Programs*

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- Separate and autonomous programs
- Several overlapping stakeholder audiences
- Common safety and damage prevention messages
- Separate use of corporate resources
- Joint Emergency Responder/Public Official Liaison Meetings



## *Joint Emergency Responder Meetings as a Catalyst*

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- SC Pipeline and SCE&G's chase around the state
- Transmission and LDC system overviews – “one stop shop”
- Common safety and emergency response messages
- Sharing of resources
- Building on existing relationships
- Partnership with State Fire Marshal on NASFM initiatives



## *A Committee Approach...*

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- SCANA RP 1162/Public Awareness Committee established during Fall, 2003
- Representation
  - Subsidiary Operations & Engineering
  - Corporate Communications/Public Affairs
  - Governmental Affairs
  - Marketing
  - Safety
  - Executive Sponsor



# *Self Assessments*

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- “Self-Assessment of Gas and Hazardous Liquid Pipeline Operator Public Education/Awareness Programs” completed by each subsidiary
- Results compared and aggregated for SCANA Corporation
- Most responses were very similar
- Provided basis for SCANA RP 1162/Public Awareness Committee action plan



# *Action Plan*

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- Solicit involvement from Corporation “stakeholders”
- Inform senior management and solicit support
- Collect and review current materials/vehicles used to convey public awareness messages (brochures, flyers, bill stuffers, PSA text, etc.)





# *Action Plan*

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## ■ **Stakeholder Audience Subcommittees**

- Affected Public, Emergency Officials, Public Officials, Excavators
- Review the requirements as outlined in Tables 2.1 & 2.2 of RP 1162 and conduct gap analysis
- Review current communication vehicles to determine if they meet the requirements for the designated stakeholder groups, and if there is the potential for consolidation among subsidiaries within SCANA
- Participate in Southern Gas Association Public Awareness Collaborative Effort



## ***SGA Collaborative Effort...***

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- Participated in SGA effort to solicit vendor support in development of written plan framework and communication vehicle deliverables
- Joined 20 operators in procuring “Pipeline Public Awareness Plan” framework document developed by Nixon & Associates
- Obtained “Operator Tool Kit” of targeted communication vehicles developed by Devaney & Associates



# *SGA Pipeline Public Awareness Plan*

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## Goals:

- Create a fully compliant RP 1162 Plan, Program, and Methodology applicable to broad range of SGA members
- Not a “cookie-cutter” approach – instead create a framework compliance document for operators to work from in developing their own plans & programs
- Emphasis on “the right way to do business” as opposed to just compliance



# *SGA Operator Tool Kit*

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- Theme: Neighbors
- Components: Print Ads, Bill Stuffers, Fact Sheet, Brochure, Poster, PowerPoint Presentation, Press Release, Contributed Articles, Key Messages/Talking Points, Website
- Messaging for Distribution and Transmission operations
- Customizable



## ***NASFM Initiatives***

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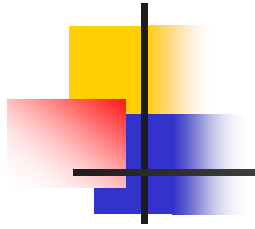
- Technical review of the NASFM “Pipeline Emergencies” as part of the SGA Emergency Responder Task Force
- Joined forces with the S.C. Fire Marshal to publicize the NASFM “HCA Initiative”
- Joint pipeline operator and emergency responder “Pipeline Emergencies Train-the-Trainer program at S.C. Fire Academy



# *Areas of Interest*

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- Measuring Program Effectiveness
- Cost efficiency
- Cataloging current public awareness activities and opportunities across the corporation
- Focus on Supplemental Messages
- Synergies related to Pipeline Integrity Communications and Pipeline Public Awareness/RP1162



*Thank You*

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Glen Boatwright

South Carolina Pipeline Corporation

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803-217-1812



# NGA REGIONAL PUBLIC AWARENESS PLAN

OPS Public Awareness  
Workshop

Baltimore, MD

November 9, 2005

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John Borchert  
Central Hudson Gas & Electric



## Northeast Gas Association (NGA)

- The Northeast Gas Association represents LDCs in New England, New Jersey, and New York State that collectively serve 8.4 million customers. In addition, NGA's membership includes transmission companies, liquefied natural gas importers, and manufacturers.
- Public Awareness Working Group Established in March 2004

# NGA PUBLIC AWARENESS COMMITTEE

- **DEVELOP A REGIONAL PLAN TO MEET THE REQUIREMENTS OF API RP 1162.**
- **PLAN MUST ALSO MEET ANY ADDITIONAL REQUIREMENTS OF FINAL RULE.**
- **PLAN MUST BE CONSISTENT WITH THE REQUIREMENTS OF THE TRANSMISSION PIPELINE INTEGRITY RULE.**

# COMMITTEE'S APPROACH

- **DEVELOP A REGIONAL PLAN**
  - **PLAN WOULD BE GENERIC IN STRUCTURE**
  - **WOULD HAVE AREAS WHERE UTILITIES WOULD CUSTOMIZE**
  - **WOULD SPECIFY THE MESSAGE CONTENT, FREQUENCY, AND AUDIENCE**
  - **WOULD MEET ALL REQUIREMENTS OF RP 1162, THE FINAL RULE, AND PIPELINE INTEGRITY REQUIREMENTS**

# COMMITTEE'S APPROACH

- **DEVELOP REGIONAL PUBLIC AWARENESS MATERIALS**
  - **BROCHURES & BILL INSERTS**
  - **LETTERS**
  - **PRINT ADS**
  - **RADIO SPOTS**
  - **WEB SITE MATERIAL**

# NGA REGIONAL PUBLIC AWARENESS PLAN



*Regional Public Awareness and  
Education Program for Gas  
Distribution and Transmission  
Systems*

Adopted By:  
Company Name

*October 17, 2005  
DRAFT*

- Plan focuses on a consistent baseline approach to Public Awareness
- Plan allows for utilities to customize and add supplemental activities

# NGA Public Awareness Plan Print Material

- Committee developed generic print material for mass printing

**Safe, Reliable and Popular Energy Choice**  
The United States relies on natural gas for nearly one-fourth (23 percent) of its energy needs. Natural gas is clean, convenient, and efficient, which makes it the country's most popular home heating fuel. Almost all of the natural gas consumed in the United States is produced domestically and delivered via a transmission and distribution infrastructure that has an outstanding safety record. More than 2.2 million miles of pipelines and mains quietly, reliably and efficiently deliver natural gas everyday for use by residential, commercial and industrial customers.

**Ensuring Your Safety**  
Like all forms of energy, natural gas must be handled properly. We work very closely with industry and government agencies and stay abreast of new technologies and security methods to ensure the highest levels of service and safety. Despite an excellent safety record, a gas leak caused by damage to a pipeline may pose a hazard and has the potential to ignite. A variety of measures are used to ensure pipeline safety including:

- Coordination with local One Call Centers
- Inspection programs
- Design and construction practices
- Workforce qualifications
- Industry safety practices and government oversight
- Pipeline markers and facility mapping
- Public education programs

**Know What You're Digging Into**  
The greatest risk to underground natural gas pipelines is accidental damage during excavation. Even minor damage such as a gouge, scrape, dent, or crease to a pipeline or its coating may cause a leak or failure. To protect pipelines and other underground facilities, the law requires that all excavators contact the local One Call Center before excavation work begins on public or private property. The One Call Center will contact the gas utility owners of underground facilities in the immediate area so the location of pipelines and other facilities can be marked prior to excavation. This service is performed at no cost to you.

Underground pipelines often run along a public street, but may also be near private property. The area along each side of the pipeline is known as a right-of-way, which gives the facility owner the "right" to restrict certain activities, even on private property. Right-of-way locations must be respected and are usually marked on maps filed with local municipalities. The One Call Center can provide excavators with specific data regarding precautions required in addition to having the location of underground facilities marked. Failure to comply with the law can jeopardize public safety, result in costly damages and lead to substantial fines.

**Using Your Senses**  
A gas leak is usually recognized by smell, sight, or sound.  
**SMELL** – Natural gas is colorless and odorless. A distinctive, pungent odor is added so that you'll recognize it quickly. Not all transmission lines are odorized.  
**SIGHT** – You may see a white cloud, mist, fog, bubbles in standing water or blowing dust. You may also see vegetation that appears to be dead or dying for no apparent reason.  
**SOUND** – You may hear an unusual noise like roaring, hissing, or whistling.

**What You Should Do if You Suspect a Leak**

- MOVE to a safe environment.
- CALL us immediately.
- DO NOT smoke or operate electrical switches or appliances. These items may produce a spark that might ignite the gas and cause an explosion.
- DO NOT assume someone else will report the condition.
- Provide the exact location, including cross streets.
- Let us know if sewer construction or digging activities are going on in the area.

- A tri-fold brochure (shown) and a bill insert

**Pipeline Markers Show the Way**  
Whether you are at home, at work, or in a public place, it's likely you are in an area served by natural gas pipelines. Since pipelines are underground, line markers are sometimes used to indicate their approximate location along their route. The markers display the material transported in the line, the name of the pipeline operator, and the telephone number where the operator can be reached in the event of an emergency. Markers only indicate the general location of a pipeline and cannot be relied upon to indicate the exact position. Because many lines are not marked, it is critical that you contact the One Call Center prior to any excavation.

**Call Before You Dig**  
Your local One Call Center is available to process requests for locating and marking underground facilities prior to an excavation project. Excavators are required by law to contact the One Call Center before excavation work begins on public or private property.

**Helpful Resources**  
Additional information can be obtained through the following organizations:  
National Pipeline Mapping System ([www.npms.rspa.dot.gov](http://www.npms.rspa.dot.gov))  
Office of Pipeline Safety ([www.osp.dot.gov](http://www.osp.dot.gov))  
Common Ground Alliance ([www.commongroundalliance.org](http://www.commongroundalliance.org))  
Northeast Gas Association ([www.northeastgas.org/aware](http://www.northeastgas.org/aware))  
American Gas Association ([www.aga.org](http://www.aga.org))

**Preparing for Emergencies**  
We work with emergency responders, state and local agencies to develop and practice for emergencies through training and periodic drills. These exercises test procedures, logistics, communications and more. Emergency plans and procedures are periodically updated and made available to state authorities.

**Commitment to Safety**  
We work with industry groups to continually enhance pipeline safety and training methods. At the state level, we work with regulators on programs designed to ensure the safe operation of the natural gas distribution system for customers and residents. And, as new technologies are developed in pipeline design, construction, inspections, and operations, we will continue to invest in pipeline integrity programs that will allow for the safe and secure delivery of natural gas.

**Natural Gas Pipeline Safety**

**What You Need to Know**  
(company logo)

(company logo)  
Emergency Numbers  
Company Map Site  
One Call Center Numbers  
One Call Center Web Site

This safety information provided in partnership with:  
**NGA logo**

NGA 806

# NGA Public Awareness Plan

## Other Media Approaches

### Northeast Gas Association

#### Public Awareness

[PIPELINE PURPOSE AND RELIABILITY](#)  
[HAZARD AWARENESS AND PREVENTION MEASURES](#)  
[DAMAGE PREVENTION \(CALL BEFORE YOU DIG\)](#)  
[LEAK RECOGNITION AND RESPONSE](#)  
[WHAT SHOULD YOU DO IF YOU SUSPECT A LEAK?](#)  
[TO REPORT A GAS LEAK](#)  
[PIPELINE LOCATION MARKERS](#)  
[EMERGENCY PREPAREDNESS](#)  
[EMERGENCY RESPONDERS](#)  
[EXCAVATORS](#)  
[PUBLIC OFFICIALS](#)  
[FOR ADDITIONAL INFORMATION AND INDUSTRY LINKS](#)

- Developing Common Website (shown)
- Developed correspondence for Municipal and Emergency Officials
- Developing Radio and Print Ads

# NGA Public Awareness Plan Coordination with Dig-Safely

- Inserted Language into Quarterly Newsletter
- Brochure Included in mailing
- Working with New York Damage Prevention Grant Team to:
  - Expand Mailing List
  - Develop Radio Ads
  - Perform Baseline Awareness Evaluation



# NGA Regional Public Awareness Evaluation



Request For Proposal  
**Regional Baseline  
Evaluation of  
Effectiveness**

© 2005 Northeast Gas Association  
75 Second Ave.  
Suite 510  
Needham, MA 02494

- Plan to perform a region wide evaluation
- RFP Nov/Dec 2005
- Company specific territory evaluation data available

## Where do we go from here?

- Finalize development of regional plan
- Finalize development of generic public awareness material
  - Website, letters, print ads, radio ads, brochures
- Develop customizing instructions for utilities
- Perform baseline awareness evaluation
- Work with regulators on our approach

## Questions that remain

- How do we bridge the gap from the communication requirements due now for Transmission Pipeline Integrity and the 1162 requirements due by June '06?
- How should we approach the supplemental activities and the requirement in the rule to justify not using them?
- How do we approach the multi language issue consistently and meet the requirements of the rule?

## Questions that remain

- How can we assure ourselves that the unique characteristics of the audience are being addressed with a generic regional plan?
- Can we develop a regional evaluation approach that will be effective in evaluation public awareness across diverse audiences?
- Will we be able to maintain a consistent approach among the utilities?

# NGA Public Awareness Plan Questions?

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John Borchert

Central Hudson Gas & Electric

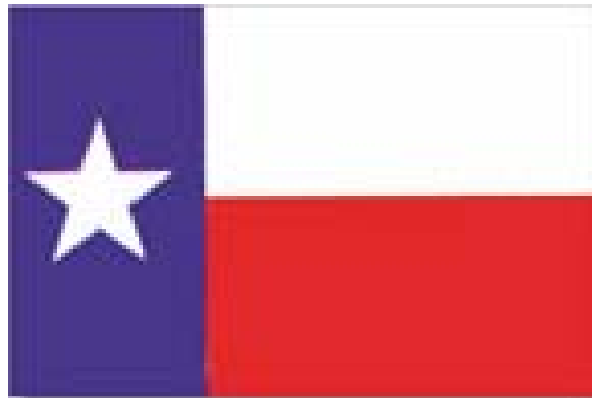
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Jose Costa

Northeast Gas Association

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# General/Affected Public State of Texas Collaborative Update



November 9, 2005

# *Summary*



- **The State of Texas collaborative effort focuses solely on the safety education for the Affected/General Public addressed in API RP-1162**
- **The effort is voluntary and open to all pipeline operators (gas and hazardous liquids) and LP gas operators in the state**
- **The effort is to increase public safety communication, decrease damages caused by activities along our pipeline rights of way and enhance awareness of the general public knowing what to do in case of energy related releases/incidents**
- **The effort is fully supported by the Railroad Commission of Texas**

- **Increase public awareness across the entire state to the general public/affected public**
- **Provide consistent safety messaging for this broad transient audience**
- **Reduce or eliminate duplicate efforts by the industry**
- **Develop standard performance metrics for evaluating effectiveness**
- **Develop a program where all pipeline and LP operators can reduce overall costs to the industry**
- **Be seen as an example for other states**



# *Organizational Structure*



- **The state-wide effort will be the direct responsibility of the participating pipeline (gas and hazardous liquids) /LP operators in the state**
- **A state-wide oversight committee made up of representatives from LP, Pipelines, LDC's and Municipalities has been formed to be directly responsible for communicating with all participating operators and managing four sub-committees (more later)**
- **The state-wide effort will have indirect consultation from the Director of Safety at the Railroad Commission for the State of Texas (especially in our effort and final process for standard performance metrics measuring our efforts overall effectiveness)**

# *Objectives/Sub-Committees*



- **Develop Consistent Safety Messaging for the General/Affected Public – Sub-Committee #1**
- **Select the best communication vehicles to reach the entire state effectively – Sub-Committee #2**
- **Develop fair and equitable cost sharing formulas or best practices – Sub-Committee #3**
- **Develop standard performance metrics for evaluating effectiveness – Sub-Committee #4**

*These four sub-committees were formed from a show of interest sign-up sheet gathered from our four state-wide meetings held in October (Austin, Lubbock, Corpus Christi and Longview).*

## *Timeline and Administration*

- **October 2005 – Conduct preliminary discussion meetings across the state at the following locations – Austin, Lubbock, Corpus Christi and Longview - Completed**
- **November 2005 – Send Minutes from all meetings to all attendees using the state-wide collaborative address – [1162@atmosenergy.com](mailto:1162@atmosenergy.com)**
- **November 2005 – Form committees and elect chair or co-chairs for each discussing their deliverables**
- **January 2006 – First reports back to the oversight committee**
- **February 2006 – Second reports back to oversight committee/RRC/DOT/AGA/Others**
- **March 2006 – Make final decisions and select party to handle all administration for the ongoing Texas effort**

*State of Texas API RP-1162 Collaborative  
Effort*



Questions



**API 1162**  
**Pipeline Safety Communications Plan**  
**DRAFT 11-09-05**

# Objectives

- Develop and implement a state-wide awareness plan that communicates pipeline safety information to all affected parties.
- Accommodate the requirements and objectives of the American Petroleum Institute's recommended practice 1162.



# Wisconsin Companies Involved

- Alliant Energy
- Madison Gas and Electric
- Wisconsin Public Service
- We Energies
- Xcel (tentative)



# Tactics

- Research Study
- Mass Advertising Campaign
- Direct Mail
- First Responder, Public Official and Contractor Communications
- Transmission Communications





# Research Study

- Audiences
- Timing
- Margin of Error
- Follow-up



# Mass Advertising

- Radio Campaign
- Timing
- Content
- Size of Buy



# Direct Mail

- Bill Inserts
- Frequency
- Timing



# First Responders, et.al.

- First Responders, Public Officials and Contractors
- Annual Safety Meetings
- Direct Mail



# Transmission Communications

- Not part of state-wide plan.
- Direct Communications as prescribed by API 1162
- Building the Database
- 1000' on either side
- Meeting the requirements of ASME B31.8S Managing System Integrity of Gas Pipelines.



# **Integrity Management Communication Plan**

**Integrating External  
Communication Requirements of  
Gas IM Rule with Pending  
Requirements of New Public  
Education Programs Rule**

**Originally Presented by Jeff Wiese, PHMSA,  
and Denise Hamsher, Enbridge in February 2005**

**Updated by Blaine Keener, PHMSA, 11-14-2005**

**[blaine.keener@dot.gov](mailto:blaine.keener@dot.gov)**

**202-366-0970**

# API RP 1162 Goals

- **Develop public education programs to**
  - Establish communications with stakeholders
  - Provide needed information to enhance awareness
  - Communicate stakeholder roles & responsibilities
  
- **Ensure programs are effective to ensure the continued safe operation of pipelines.**
  - Improve damage prevention,
  - Reduce encroachments,
  - Improve safety performance, and
  - Enhance emergency response coordination
  
- **Part of a broader effort by PHMSA/OPS to :**
  - enhance pipeline safety and performance
  - reach out to stakeholders and provide relevant information

# Regulatory Communication Requirements

## Public Awareness Rule

- Operators must have a public awareness program that follows the guidance provided by API RP 1162.
  - Baseline Program
  - Supplemental Enhancements
- Programs must address specific requirements of PSIA '02

## Gas IM Rule

- ...operator's integrity management framework & program must, at minimum, contain...
  - A communication plan that includes the elements of ASME/ANSI B31.8S, section 10, and
  - a process for addressing safety concerns raised by OPS, including concerns raised on behalf of an interstate agent.



# Bottom Line

- There are some differences in the specifics of the two rules
- Operators
  - may develop and implement a single public awareness program to address requirements of both rules
  - must be able to demonstrate where & how their programs address the requirements of each

# Focus

- Focus is the primary difference
  - ASME B31.8S, Section 10 – communication of integrity management information.
  - API RP 1162 – increasing public awareness, recognition and response to emergency conditions, and damage prevention.
  - API RP 1162 Supplemental Element – communication of IM information for high consequence areas

# Focus

## API RP 1162

- Generally addresses External Communications requirements of ASME B31.8S, Section 10.2
- Does not address IM Rule requirement that operators have procedures to address safety concerns raised by OPS or interstate agents (49 CFR 192.911(m))
- Does not address Internal Communications requirements of ASME B31.8S, Section 10.3

# Focus

## ASME B31.8S

- Section 10.1
  - Operators shall develop and implement a communications plan to keep personnel, jurisdictional authorities and the public informed about integrity management efforts and results
  - information may be communicated as part of other required communications
- Section 10.2
  - dialogue with public may be necessary to convey
    - operator's confidence in its pipeline integrity &
    - expectations on how the public can help maintain integrity

# API RP 1162 Drivers

- Current regulatory requirements performance based
- Pipeline Safety Improvement Act
- NTSB recommendations
- Incorporate Integrity Management communications:
  - B31.8S Section 10 for natural gas transmission
  - No parallel IMP requirement for liquid transmission
- Public expectations for additional outreach
- Desire to improve outreach in way that contributes most to improving safety

# API RP 1162

- Framework for public awareness program development, implementation, and administration
- Recommendations and guidance for baseline programs
- Guidance and considerations for supplemental efforts
- Guidance for program performance evaluation and continuous improvement

# Audiences

## API RP 1162

- Affected public
- Local public officials and governing councils
- Local and state emergency response and planning agencies
- \*
- Excavators

## ASME B31.8S

- Landowners & tenants along the ROW
- Public officials other than emergency responders
- Emergency responders, local and regional
- General public
- --

\* RP 1162 does not address "General Public" specifically; rather, it defines and focuses on the affected public for effective communications and defines "landowners" as those who live or work along the pipeline ROW.

# Messages

- API RP 1162 recommends messages for specific audiences and based on pipeline type
- Message content compares with ASME B31.8S, Section 10.2, suggestions for specific audiences
- Not always one-to-one correspondence but most are accommodated



# Messages

## API RP 1162, Transmission

### 2-1.1 Affected Public

- **Baseline:**
    - How to get additional information
    - Availability of list of pipeline operators through NPMS

---
  - Pipeline Location Information

---

  - Pipeline purpose and reliability

---

  - Leak Recognition and Response
  - Awareness of hazards and prevention measures undertaken

---

  - Damage Prevention Awareness
  - One-Call Requirements

---
- **Supplemental:**
  - Information and/or overview of operator's Integrity Management Plan
  - ROW encroachment prevention
  - Any planned major maintenance/construction activity

## B318.S, Section 10.2

### Landowners and Tenants along the rights-of-way

- Company information
- Operator contact phone numbers

---

- Pipeline location information

---

- Commodity transported

---

- Leak recognition & response

---

- Damage prevention information


---

- General IM and emergency preparedness information


# Messages

## API RP 1162


### 2-1.2 Emergency Officials

- **Baseline:**
  - How to get additional information 
  - Pipeline Location Information and availability of NPMS


---

  - Pipeline purpose and reliability 

---

  - Emergency Preparedness Communications 

---

  - Potential hazards 
  - Awareness of hazards and prevention measures undertaken
- **Supplemental:**
  - Provide information and /or overview of Integrity measures undertaken

---

  - Maintenance construction activity

## B318.S, Section 10.2

### Emergency responders

- Company name & contact numbers
- Local pipeline maps
- Station locations and descriptions

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- Facility description and commodity transported

---

- Maintain continuing liaison with all emergency responders
- Coordination of operators' emergency preparedness with local officials
- Summary of operators emergency capabilities

---

- Leak recognition & response
- General information about pipeline prevention and integrity measures

# Messages

## API RP 1162

### 2-1.3 Local Public Officials

- **Baseline:**
  - Pipeline Location Info and availability of NPMS
  - How to get additional information

- 
- Pipeline purpose and reliability
  - Awareness of hazards and prevention measures undertaken
  - One Call Requirements

- 
- Emergency Preparedness Communications

- **Supplemental:**
  - If applicable, provide information about designation of HCA (or other factors unique to segment) and summary of integrity measures undertaken

- 
- ROW encroachment prevention
  - Maintenance Construction activity

## B318.S, Section 10.2

### Public Officials

- Periodic distribution to each municipality of maps and company contact information

- 
- Summary of emergency preparedness and Integrity Management Program

# Messages

## API RP 1162

### 2-1.4 Excavators / Contractors

- **Baseline:**
  - Pipeline purpose and reliability
  - Awareness of hazards and prevention measures undertaken
  - Damage Prevention Awareness
  - One-call Requirements
  - Leak Recognition and Response
  - How to get additional information
  
- **Supplemental:**
  - Pipeline purpose, prevention measures and reliability

## B318.S, Section 10.2

Does not address  
excavators

# Messages

## API RP 1162

### 2-1.1 Affected Public\*

- **Baseline:**
  - Availability of list of pipeline operators through NPMS
  - How to get additional information

---

- Damage Prevention Awareness
- One-Call Requirements

---

- Pipeline Location Information
- Pipeline purpose and reliability
- Leak Recognition and Response
- Awareness of hazards and prevention measures undertaken
- **Supplemental:**
  - Information and/or overview of operator's Integrity Management Plan
  - ROW encroachment prevention
  - Any planned major maintenance/construction activity

## B318.S, Section 10.2

### General Public

- Company name, contact and emergency reporting information including general business contact

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- Information regarding operator's efforts to support excavation notification and other damage prevention initiatives

\* RP 1162 does not address "General Public" specifically; rather, it defines and focuses on the affected public for effective communications

# Bottom Line

To re-emphasize:

- There are some differences in the specifics of the two rules
- Operators
  - may develop and implement a single program to address requirements of both rules
  - must be able to demonstrate where & how their programs adequately address the requirements of each

# Summary of IMP

- Outreach to emergency and public officials by operators needs to gain input to incorporate into Integrity Management Plans
- Summary of IMP should be made available
  - Relevant details to emergency/public officials for their area
- Recommendation:
  - Develop summary of IMP plan for website
  - Print in form that can be mailed upon request
  - Industry committees to develop examples of IMP summaries