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Public Awareness Programs for Pipeline Operators

Idaho Pipeline Safety Seminar

May 9, 2007

Coeur d'Alene, ID

Presented by Ross Reineke



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PHMSA's Public Awareness History

- Pipeline Safety Regulations Requiring:
 - Damage Prevention awareness for Excavators
 - Emergency Plans for Fire, Police, & Public Officials
 - Public Education
- Participant in American Petroleum Institute (API) committee to create API RP 1162
- Operator workshops in 2003 and 2005
- Final Rule published May 2005 requiring RP 1162-style programs by June 20, 2006



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New Features of Public Awareness

Local Public Official Audience

- Messages (partial list)
 - Risky land use practices
 - Operator contacts for Integrity Management, land use practices, emergency preparedness, etc
- Audience Members (partial list)
 - Planning & Zoning Boards
 - Licensing & Permitting Departments
 - Town & City Councils
 - Franchise Managers



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New Features of Public Awareness Evaluating Program Effectiveness

- Due at 4 year intervals
- Survey Stakeholder Audiences to Determine
 - Percentage of Audience Reached
 - Understandability of the Message
 - Desired Behaviors by Audience
 - Achieving Bottom-Line Results
- Revise Program Based on Evaluation



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Implementation of Completed Program

- There is no single “due date” for distributing RP 1162-style awareness materials to stakeholders
- “Due date” calculated by a simple formula:
June 20, 2006 + RP 1162 Frequency
- First evaluation of effectiveness due in June 2010



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Written Program Review

- PHMSA Advisory Bulletin published June 16, 2006 requested submission of programs by October 8, 2006
- 8 States decided to conduct independent reviews
- As of April 6, 2007, 1,319 Programs covering 1,704 OpIDs have been received
- Programs are being reviewed by a central Clearinghouse with feedback to the jurisdictional pipeline safety agency



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Establishing the Clearinghouse

- PCCI Marine & Environmental under contract
- Gas Dist Written Program review began in October 2006
- Gas Trans & Haz Liq Program review began in late January 2007.
- Review Criteria for the Clearinghouse have been developed jointly by National Association of Pipeline Safety Representatives (NAPSR) & PHMSA
- Review of the written program will be concurrent with implementation of the program by operators



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Gas Operator Roll Call

As of March 15, 2007

Based on CY2005 Annual Reports

- Gas Distribution for 97% of main miles and 98% of services. No submission from 321 combinations of OpID and State.
- Gas Transmission for 96% of onshore miles. No submission from 293 combinations of OpID and State.
- Gas Gathering for 66% of onshore miles. No submission from 172 combinations of OpID and State.



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Liquid Operator Roll Call

As of March 15, 2007

Based on CY2005 Annual Reports

- 82% of onshore Low-Stress miles and 96% of onshore High-Stress miles. No submission from 80 OpIDs.
- All Haz Liq Gathering operators who did not submit are included in 80 OpIDs above
- Should Public Awareness Programs for Gathering, Low-Stress, and High-Stress pipelines be the same?



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Clearinghouse Results

- Review of programs stored as database
- For each operator, the pipeline safety agency(ies) will receive
 - List of program aspects that deviate from RP 1162 recommendations
 - List of supplemental elements implemented
- Pipeline Safety Agency(ies) and Operator need to resolve deviations and supplemental element issues



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Clearinghouse Progress

as of 04-06-2007

Operator Type	Programs Submitted	Program Reviews Complete	% Complete
Gas Distribution	872	815	93
Gas Trans & Haz Liq	484	242	50
Gathering	101	59	58



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Over 50% Deviations Elements Common to All Operator Types

- No process and procedure to determine whether Supplemental Elements will be implemented in response to Third-Party Damage and other considerations listed in RP-1162 Section 6.2
- No Management Statement of Support
- Evaluation of effectiveness not called for at maximum four year intervals
- No annual implementation audit



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Over 50% Deviations Gas Distribution

- Lack of damage prevention awareness and pipeline purpose and reliability messages to General Public
- Message delivery method to Excavators and Emergency Public Officials not specified or deviates from RP 1162
- No awareness of hazards and protective measures undertaken message to Affected Public



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Over 50% Deviations Gas Trans & Haz Liq

- Insufficient pipeline marker **or** NPMS information to Local Public Officials and Emergency Officials
- Insufficient pipeline marker **and** NPMS information to Affected Public
- No process and procedure to determine whether Supplemental Elements will be implemented in response to High Consequence Areas



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Over 50% Deviations Gas Gathering

- Materials to Local Public Officials do not include copies of materials provided to Affected Public and Emergency Officials



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Significant Incidents caused by Excavation Damage 2002 thru 2006

- Liquid Pipelines
 - 14% of Significant Incidents
 - 63% of Fatalities and 16% Injuries
- Gas Transmission Pipelines
 - 13% of Significant Incidents
 - 80% of Fatalities and 23% Injuries
- Gas Distribution Pipelines
 - 37% of Significant Incidents
 - 28% of Fatalities and 32% Injuries



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Supplemental Elements

- Additional actions beyond the Baseline implemented by an operator in response to one of 12 specific considerations listed in RP 1162
- Considerations include Third-Party Damage and High Consequence Areas
- Section 6.2 of RP 1162 provides leading questions for each Stakeholder Audience



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Supplemental Elements

- 11% of Programs reviewed implement Supplemental Elements in response to Third-Party Damage
- 47 Gas Trans or Haz Liq Programs reviewed covered HCA miles but did not implement Supplemental Elements in response to HCAs
- Gas Integrity Management regulations **require** external communication program for the public equivalent to Supplemental Elements



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Implementation Inspections

- PHMSA Regions will inspect implementation records as part of an operator Standard Inspection
- NAPSAR members may inspect intrastate operators
- Pipeline Operators and Pipeline Safety Agencies will both experience a learning curve, especially regarding Supplemental Elements
- PHMSA inspection goal is to **Foster Improvements**, not to cite for non-compliance



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Revising Messages

NPMS

www.npms.phmsa.dot.gov

- April 2007 changes to the National Pipeline Mapping System (NPMS)
 - Public access to maps within a zip code, including attributes such as operator name, product, and operator contact
 - Local public officials can get electronic data layer **AND** add this layer to their own GIS
- Operator messages about NPMS should be modified to reflect new capabilities



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Revising Messages

811

www.call811.com

- National “Call Before You Dig” number officially went live May 1, 2007
- Market research demonstrates homeowners often don’t make the call
- CGA DIRT report of CY 2004 and 2005 shows 31% of damages and near misses have a root cause of “No Notification to One-Call Center”
- 811 should have a prominent role in Public Awareness Programs.



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Questions ???

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