



# Public Awareness Program Effectiveness Evaluation Update



**Nebraska State Fire Marshal  
Pipeline Safety Seminar  
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## PAP Inspection Updates

- PAP Inspection timeline:
  - Federal PAP Inspections completed by end of 2012
  - Interstate agent inspections completed by end of 2012
  - States are also incorporating PAP inspections into their normal inspection cycle by end of 2013
- Finalized document published online:
  - PAP Effectiveness Inspection Form  
<http://www.phmsa.dot.gov/pipeline/library/forms>
  - PAP Enforcement Guidance Document  
<http://www.phmsa.dot.gov/foia/e-reading-room>



# Public Awareness Effectiveness Inspections

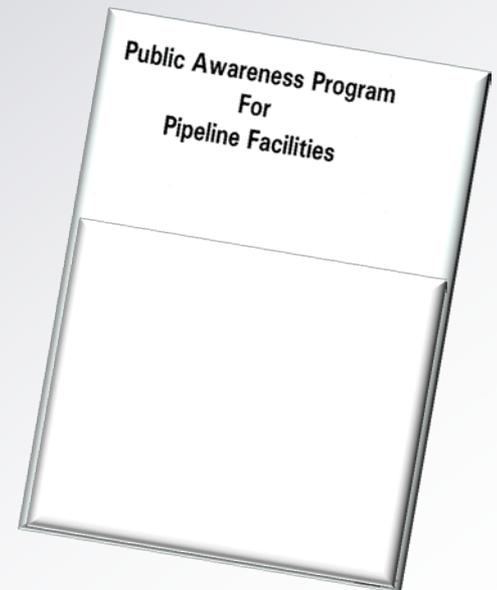
How effective is the operator's public awareness program?

- Collecting data is not the only component to completing an effectiveness evaluation.
- Operator effectiveness evaluations should:
  - Identify program metrics
  - Describe evaluation methodology
  - Summarize findings or conclusions
  - Identify changes in written plan and/or implementation



## Written PAP

- Written program described who, what, when, where, how, why
- Cross referenced to other company procedures such as:
  - Emergency response plans
  - Integrity management plans
- Unique attributes not listed or specific, missing:
  - System type
  - Types of products
  - Lines and/or facilities covered
  - All company assets/facilities covered





## Written PAP

- Third parties used often
- Lacked process for verifying mailing list QA/QC
- Tracked definition how returned mail be handled
- Return address not always included
- Analyzed total mailings trends from year to year?

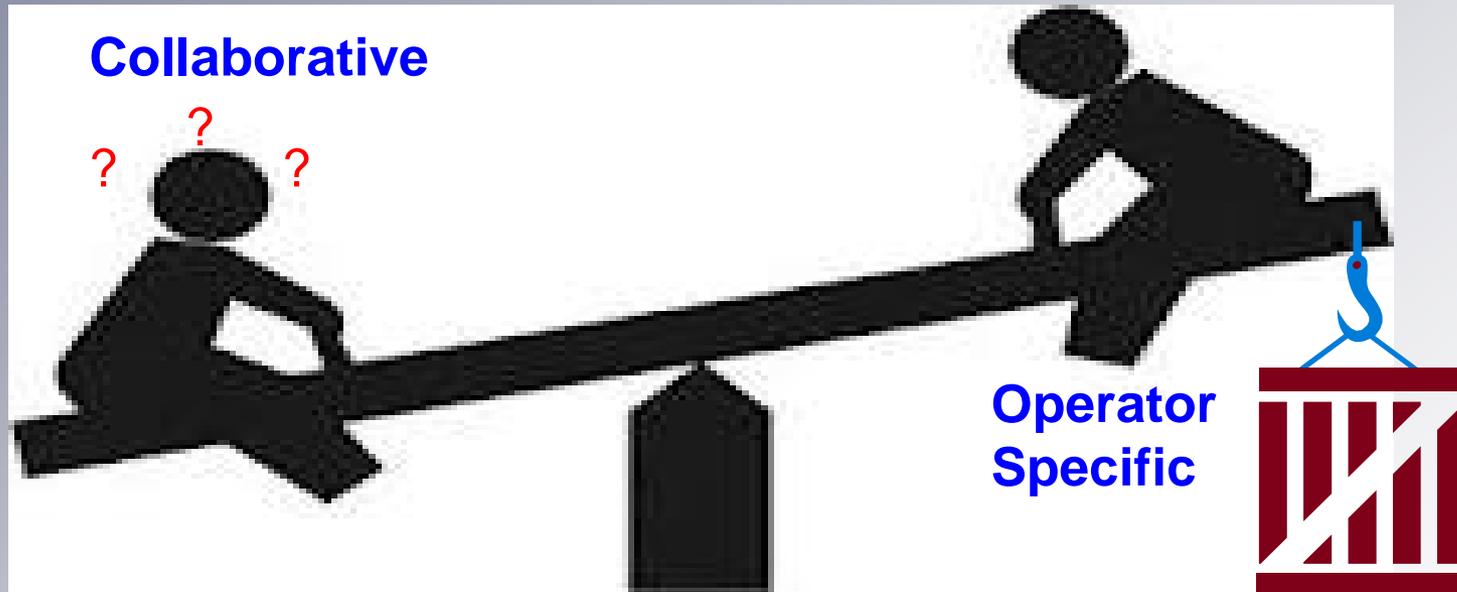


# Implementation Languages

- Defined process with thresholds for actions
- Commonly provided in Spanish (as default)
- Emergency Response & Public Official (English only)
- (800) Translation number on print material
- TDD/TYY (speech - hearing impaired #on print material)



# Implementation Messages



**Educating Stakeholders**



# Implementation Messages

- Specific and collaborative messages used:
  - Generic messages may lead to confusion
  - Encouraged and acceptable if:
    - Baseline requirements still met (each stakeholder audience)
    - Specific to operator's pipeline system/unique attributes (i.e. odorized line?)
    - Specified product types



# Implementation Supplemental Enhancements

- Increased message delivery frequency
- Messages in multiple languages
- Emergency # translates to other languages (Spanish, French, Japanese, Russian, Korean, Arabic, etc)
- 24 hour public awareness phone #
- Agricultural mailings
- Scratch and sniff NG cards
- ER website portal to get operator specific information (capabilities across the state)



## **Implementation**

### **Maintaining Liaison w/ ER Officials**

- Collaborative operator public meetings (limited specific operator interaction)
- Tracked who attended meetings and followed up
- Verified ER lists for accurate contact information
- Generic information sent may not motivate to attend
- Inconsistent information shared from ER plan
- Difficult getting ER officials engaged



# Evaluations (Annual Audits)

- Some operators:
  - Documented meetings, dates, participants, agenda
  - Met with cross-functional review teams (or silos)
  - Defined/monitored metrics
  - Combined annual audit & effectiveness evaluation in year 4
- Linked timing and review with other programs:
  - Integrity management
  - Emergency response



## Evaluation (Effectiveness)

- Variety of effectiveness approaches taken:
  - Collected baseline data since 2006, understand trends
  - Performed industry surveys/independent assessments
- Lacked defined metrics in written program
- Typical sample size of survey participants ranged from (~150-400 with 95% confidence level)
  - 400 for all stakeholders
  - All product types
- Challenges with measuring desired behaviors and understandability



# Program Changes and Improvements

- Changes/documentated tracked?
- Implemented changes in next 4-year cycle
- Verified adequate resources were available
- Updated written plan
- Obtained current management support
- Reviewed supplemental enhancements
- Changes to print material



## Conclusion

- Most operators putting forth effort and improving programs with creative approaches
- Process/methodology improvements are needed with annual audits/effectiveness evaluations
- Motivating stakeholders to stop, listen, and change
- Balancing information overload with specific messages

Continuous Improvement Efforts  
Are Not In Vain!



## Next Steps

- Completed PAP Inspections (end of 2012)
- Public Awareness Workshop (Planning stages)
  - Summer 2013 (Date & Location TBD)
  - Bringing stakeholders together
  - Inspection Analysis
  - Advancing Public Awareness (improvements)
- Recommend path for forward:
  - Federal regulations
  - API RP 1162





# Stakeholder Communications Site

PHMSA Stakeholder Communications: Land Use ...

## Stakeholder Communications

Home | General Public | Local Officials | State Regulators | Federal Agencies | Emergency Officials | Advocates | Industry | Excavators

Print

### Public Awareness Programs

**PHMSA, the pipeline industry and other stakeholders continue working to improve the outreach and effectiveness of public awareness programs.**

Federal pipeline safety regulations require pipeline operators to conduct continuing public awareness programs to provide pipeline safety information to four stakeholder audiences, including:

- affected public,
- emergency officials,
- local public officials, and
- excavators.

#### Regulatory Requirements

Federal pipeline safety regulations (49 CFR 192.616 and 49 CFR 195.440) require pipeline operators to develop and implement public awareness programs that follow the guidance provided by the American Petroleum Institute (API) "Public Awareness Programs for Pipeline Operators" (incorporated by reference in federal regulations). [More...](#)

#### API Recommended Practice 1162

API RP 1162 is an industry consensus standard that provides guidance and recommendations to pipeline operators for enhanced public awareness programs. It addresses various elements of such programs, including the intended audience, frequencies and methodologies for communicating the information, and evaluation of the programs for effectiveness.

#### Public Awareness Program Workshops

PHMSA sponsored a public workshop on effectiveness evaluations of pipeline operator public awareness programs in February 2008 and co-sponsored workshops in 2005 and in 2003 to help pipeline operators develop more effective public awareness programs. [More...](#)

#### Inspection and Enforcement Documents

As part of our continuous improvement approach for inspecting pipeline operator public awareness program effectiveness...

**Public Awareness**  
Regulatory Requirements

**API Recommended Practice**  
API RP 1162  
API RP 1162 Summary Tables

**Briefing Sheet**

**Workshops**

**Inspection Observations**

**FAQs**

**Downloads**  
API RP 1162  
Inspection Form  
Enforcement Guidance (Gas, 49 CFR 192)  
Enforcement Guidance (Liquid, 49 CFR 195)

**Site Pages**  
Pipeline Basics  
Safety Standards  
Inspection  
Enforcement (PHMSA)  
Enforcement (States)

<https://primis.phmsa.dot.gov/comm/>



# Questions



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**Thank you!**



# Thank You

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