

NAPSR SWOT Perspective



*Public Awareness Workshop
Chicago, Illinois
July 13, 2016*

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Chief Compliance Inspector
RIDPUC*



Welcome Back!

- Dallas, Texas
- June 19, 2013
- 1,119 days ago

Welcome Back!

- Dallas, Texas
- June 19, 2013
- **1,119 days ago**

266 days after the Dallas Meeting

March 12, 2014

East Harlem, NY, 8 Deaths





National Transportation Safety Board

- **Accident Report**
- NTSB/PAR-15/01
- PB2015-104889

Appendix B. Timeline



- Time

- Event

9:06 a.m. **Resident** of 1652 Park Avenue called Con Edison to **report smelling gas that morning and the night before.**

- 9:30 a.m. An explosion destroyed Buildings 1644 and 1646 Park Avenue, resulting in loss of eight lives and multiple injuries.

The Con Edison **mechanic was en route...**



Abstract:

On March 12, 2014, about 9:30 a.m. eastern daylight time, two adjacent multiuse five-story buildings were destroyed by a natural gas-fueled explosion and resulting fire. The buildings were situated on the west side of Park Avenue between East 116th Street and East 117th Street in the East Harlem district of the Borough of Manhattan in New York City. The violent explosion damaged buildings on the east and west sides of Park Avenue and along East 116th and East 117th Streets. Eight people died, more than 50 people were injured, and more than 100 families were displaced from their homes as a result of this accident. **The accident investigation focused on** the following safety issues: the adequacy of Consolidated Edison's (Con Edison) quality assurance and quality control procedures for joining plastic pipes, **the effectiveness of** Con Edison's **public awareness program**, the adequacy of Con Edison's gas odor report response, the effectiveness of the New York City Department of Environmental Protection sewer integrity program, and the effectiveness of federal and state oversight. Safety recommendations are made to the New York State Public Service Commission, the City of New York, and Con Edison.

Section 3. Conclusions

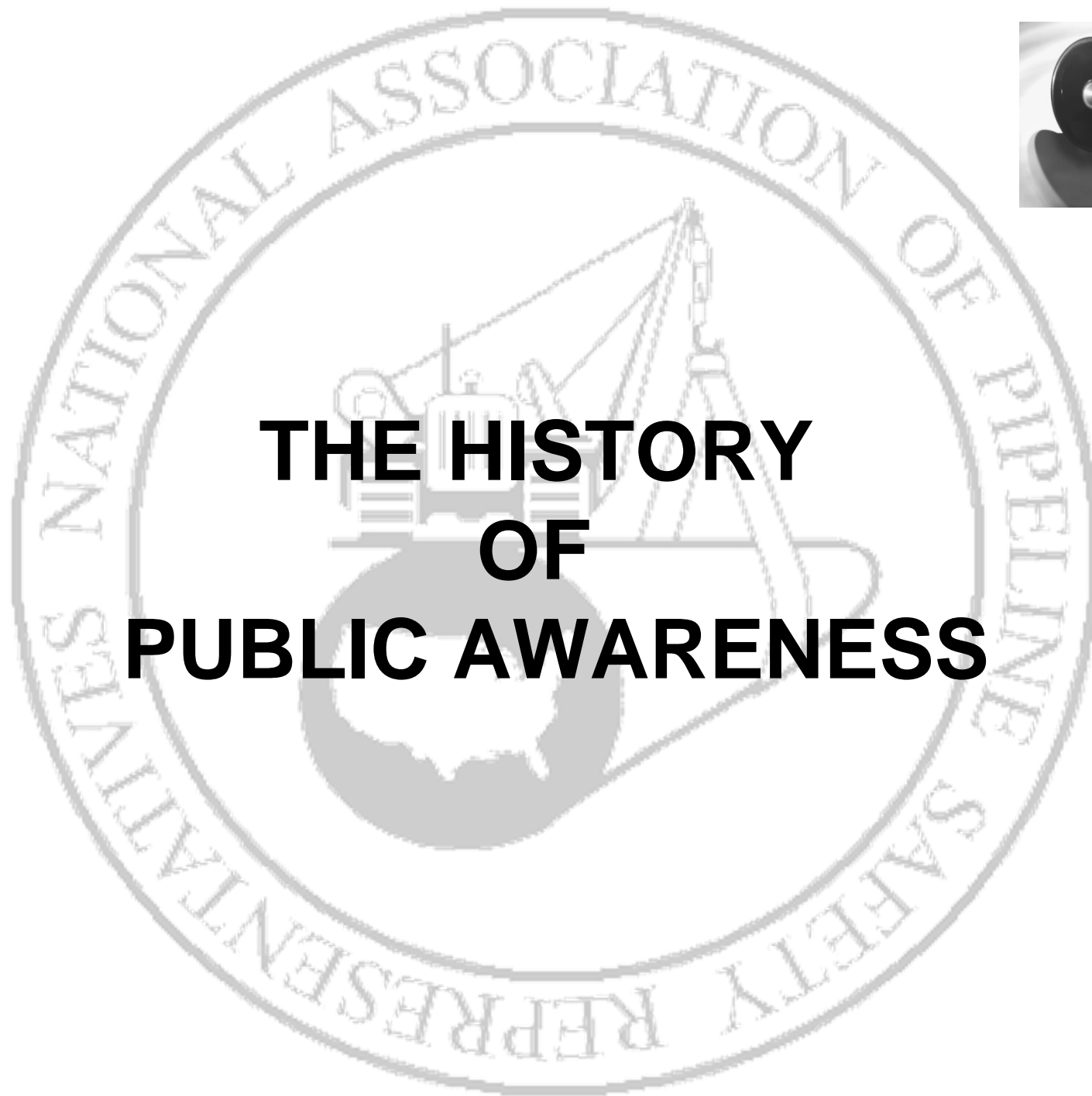


- **3.1 Findings**

- 15. **The** Consolidated Edison Company of New York, Inc., **public awareness and education programs did not effectively inform customers and the public about both the importance of reporting a gas odor and the number to call to report a gas odor.**

**SMELL GAS ?
CALL FREE
0800 111 999**





THE HISTORY OF PUBLIC AWARENESS



Amdt. 192-24

March 25, 1976

Emergency Plan §192.615(d)

- (d) Each operator shall **establish a continuing educational program** to enable customers, the public, appropriate government organizations, and persons engaged in excavation related activities to **recognize a gas pipeline emergency** for the purpose of **reporting it** to the operator or the appropriate public officials. The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas. The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

17 Years later...

PIPELINE SAFETY ADVISORY BULLETIN

ADB-93-02

Date: 04/05/1993

In 1988 and 1989, a series of five gas explosions in the Kansas City, Missouri, and Topeka, Kansas, resulted in 4 deaths...



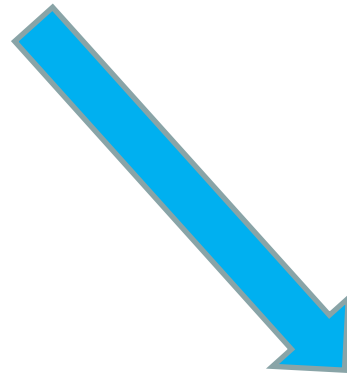
National Transportation Safety Board

- **Accident Report**
- PB90-916501

Gas odor detected long before ignition, but in both cases had gone unreported.

March 14, 1994 Amendment #71

- **§192.615(d) Emergency plan.**



§192.616 Public education.

8 Years later...

Pipeline Safety Improvement Act of 2002

.....training for and outreach to emergency response agencies

ADVISORY BULLETIN

03-04

- Required operators to review their existing public education program for effectiveness, and modify as necessary.
- ...complete a self assessment of your public education program submit results by December 17, 2003

§192.616 May 5, 2005 Amendment #99

- (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).
- (b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.
- (c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.
- (d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:
- (1) Use of a one-call notification system prior to excavation and other damage prevention activities;
 - (2) Possible hazards associated with unintended releases from a gas pipeline facility;
 - (3) Physical indications that such a release may have occurred;
 - (4) Steps that should be taken for public safety in the event of a gas pipeline release; and
 - (5) Procedures for reporting such an event.
- (e) The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.
- (f) The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.
- (g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.
- (h) Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. The operator of a master meter or petroleum gas system covered under paragraph (j) of this section must complete development of its written procedure by June 13, 2008. Upon request, operators must submit their completed programs to PHMSA or, in the case of an intrastate pipeline facility operator, the appropriate State agency.
- (i) The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.
- (j) Unless the operator transports gas as a primary activity, the operator of a master meter or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of this section. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually. If the master meter or petroleum gas system is located on property the operator does not control, the operator must provide similar messages twice annually to persons controlling the property. The public awareness message must include:
- (1) A description of the purpose and reliability of the pipeline;
 - (2) An overview of the hazards of the pipeline and prevention measures used;
 - (3) Information about damage prevention;
 - (4) How to recognize and respond to a leak; and
 - (5) How to get additional information.



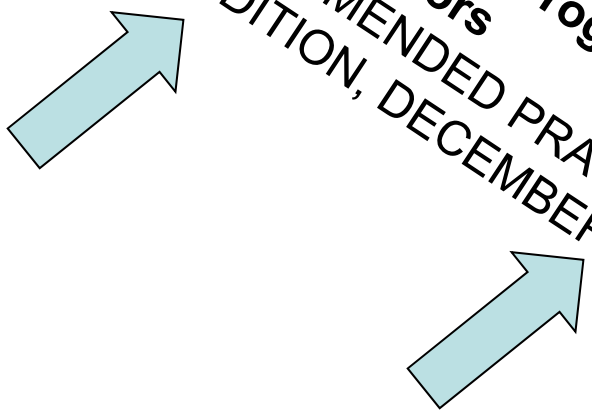
API RP 1162

American Petroleum Institute

Recommended Practice

58 pages long

Public Awareness Programs for
Pipeline Operators
API RECOMMENDED PRACTICE 1162
FIRST EDITION, DECEMBER 2003



29 pages of body

29 pages of Appendixes

229 “Should” statements...

API RP 1162 Message Delivery

Table 2-1 - Summary Public Awareness Communications for Hazardous Liquids and Natural Gas Transmission Pipeline Operators

Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method and/or Media
2-1.1 Affected Public			
Residents located along transmission pipeline ROW and Places of Congregation	Baseline Messages: <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures undertaken • Damage prevention awareness • One-call requirements • Leak recognition and response • Pipeline location information • How to get additional information • Availability of list of pipeline operators through NPMS 	Baseline Frequency = 2 years	Baseline Activity: <ul style="list-style-type: none"> • Targeted distribution of print materials • Pipeline markers
	Supplemental Message: <ul style="list-style-type: none"> • Information and/or overview of operator's Integrity Management Program • ROW encroachment prevention • Any planned major maintenance/construction activity 	Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	Supplemental Activity: <ul style="list-style-type: none"> • Print materials • Personal contact • Telephone calls • Group meetings • Open houses
Residents near storage or other major operational facilities	Supplemental Message: <ul style="list-style-type: none"> • Information and/or overview of operator's Integrity Management Program • Special incident response notification and/or evacuation measures <i>if</i> appropriate to product or facility • Facility purpose 	Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	Supplemental Activity: <ul style="list-style-type: none"> • Print materials • Personal contact • Telephone calls • Group meetings • Open houses

Dec.13, 2007 Amendment #105

Master meter or Petroleum gas system



Dec.13, 2007 Amendment #105

(j) Unless the operator transports gas as a primary activity, the operator of a master meter or petroleum gas system is **not required to develop a public awareness program** as prescribed in paragraphs (a) through (g) of this section. Instead the operator must **develop and implement a written procedure** to provide its **customers** public awareness **messages twice annually**. If the master meter or petroleum gas system is located on property the **operator does not control**, the operator must **provide similar messages twice annually to persons controlling the property**. The public awareness message must include:

- (1) A description of the purpose and reliability of the pipeline;
- (2) An overview of the hazards of the pipeline and prevention measures used;
- (3) Information about damage prevention;
- (4) How to recognize and respond to a leak; and
- (5) How to get additional information.

19 Years since Kansas...

Carmichael, Mississippi

November 1, 2007

Liquid Propane, 1405 psi, 2 Deaths, 7 injuries



3 days after the accident, it was discovered that 10 addresses were missing from the mailing list, 2 of those homes included the fatalities.

NTSB Recommendation

Initiate a program for pipeline operators' to self-evaluate the **effectiveness** of their public education programs.



PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)			S	U	N/A	N/C
.605(a)	.616	Public Awareness Program also in accordance with API RP 1162 (Amdt 192-99 pub. 5/19/05 eff. 06/20/05 and Amdt 192-not numbered pub 12/13/07 eff. 12/13/07).				
	.616(d)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:				
		(1) Use of a one-call notification system prior to excavation and other damage prevention activities;				
		(2) Possible hazards associated with unintended releases from a gas pipeline facility;				
		(3) Physical indications of a possible release;				
	(4) Steps to be taken for public safety in the event of a gas pipeline release; and					
	(5) Procedures to report such an event (to the operator).					
	.616(e)	The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.				
	.616(f)	The operator's program and the media used must be comprehensive enough to reach all areas in which the operator transports gas.				
	.616(g)	The program must be conducted in English and any other language(s) only understood by a significant number of the population in the operator's area?				
	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 .				
	.616(j)	Operators of a master meter or petroleum gas systems (unless the operator transports gas as a primary activity) must implement a written procedure to provide its customers public awareness messages twice annually that includes: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. (See this subpart for requirements for master meter or petroleum gas system operators not located on property controlled by the operator.)				

PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)			S	U	N/A	N/C
.605(a)	.616	Public Awareness Program also in accordance with API RP 1162 (Amdt 192-99 pub. 5/19/05 eff. 06/20/05 and Amdt 192-not numbered pub 12/13/07 eff. 12/13/07).	✓			
	.616(d)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:	✓			
		(1) Use of a one-call notification system prior to excavation and other damage prevention activities;	✓			
		(2) Possible hazards associated with unintended releases from a gas pipeline facility;	✓			
		(3) Physical indications of a possible release;	✓			
		(4) Steps to be taken for public safety in the event of a gas pipeline release; and	✓			
	(5) Procedures to report such an event (to the operator).	✓				
	.616(e)	The operator's program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.	✓			
	.616(f)	The operator's program and the media used must be comprehensive enough to reach all areas in which the operator transports gas.	✓			
	.616(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area?	✓			
	.616(h)	I AW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. For operators in existence on June 20, 2005, who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 .	✓			
	.616(j)	Operators of a master meter or petroleum gas systems (unless the operator transports gas as a primary activity) must develop/implement a written procedure to provide its customers public awareness messages twice annually that includes: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. (See this subpart for requirements for master meter or petroleum gas system operators not located on property controlled by the operator.)			✓	

PHMSA Form - 21

2. Program Implementation

2.01 English and other Languages

1.05 Message Frequency and Message Delivery

4.03 Measure Percentage Stakeholders Reached

1.03 Unique Attributes and Characteristics

3.01 Measuring Program Implementation

1.02 Management Support

4.05 Measure Desired Stakeholder Behavior

X	S – Satisfactory (explain)*	Comments: Yes the company has a written plan in place that complies with RP 1162.
	U - Unsatisfactory (explain)*	
	N/A - Not Applicable (explain)*	
	N/C – Not Checked (explain)*	
Check exactly one box above. * Required field		

Pipeline Public Awareness

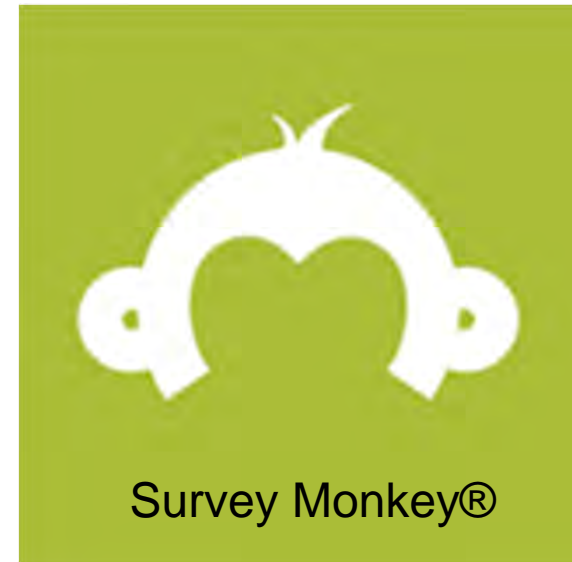
Strengths, Weaknesses, Opportunities, and Threats (SWOT)

Public Awareness Program Working Group

40 Years Later

May 16, 2016

I surveyed NAPSR



27

Responses.

11

states did not read the SWOT
report.

11

states read portions of the
SWOT report.

Question 1.

Key takeaways from the SWOT analysis report.



- 1. Pipeline operators are required to have plans and present them to public officials, the officials are not required to listen or participate.



- 2. Establish a method of sharing nationally the “best of the best” public awareness practices.

Improve Inspection Form - 21

- 3. Inspection questions in Section 4 of Form 21 (Program Evaluation & Continuous Improvement) need clarification (ties to Section 8 of API RP 1162), Inspection form imposes standards that are not spelled out in regulation or API RP 1162, Inspection form does not provide for §192.616(f) and § 195.440(f), Although form used in inspections was the same, the process of inspection varied among states relative to time and complexity.

Improve Regulations 192/195

- 4. Vague common understanding of “educate the public...” and “advise school districts of pipeline facility locations” in the code. See: (§192.616(d) and (e), and §195.440(d) and (e))
- Need common understanding of “commonly understood by a significantly number and concentration of the non-English speaking population....” See: (§192.616(g))



- 5. Need requirements for Operators to directly meet with emergency responders.

Question 2.

Ways states have supported public awareness (looking beyond compliance and focusing on outreach)



“Going beyond compliance”

- 1. Local Common Ground Alliance CGA groups are very active, national recognition of 811.



“Going beyond compliance”

- 2. Texas Regulation: §8.235 Natural Gas Pipelines Public Education and Liaison a) Liaison activities required.

Each operator of a natural gas pipeline or natural gas pipeline facilities or the operator's designated representative shall communicate and conduct liaison activities at intervals not exceeding 15 months, but at least once each calendar year with fire, police, and other appropriate public emergency response officials.

“Going beyond compliance”

- 3. Mail-outs being sent more frequently than required.



“Going beyond compliance”

- 4. A robust damage prevention outreach program that includes working with all stakeholders on a regular basis. A few of the unique efforts include **mandatory training after a damage**, **CBT training**, **train the trainer** program, **phone Apps** to put the information at the finger tip of those engaged in excavation activity, **school children education** programs...



“Going beyond compliance”

- 5. The State Gas Association performs a state-wide survey on public awareness effectiveness and then shares the results with its membership.

Question 3.

Future actions states will take to advance public awareness.



- 1. Implement a National Ad campaign to educate the public, similar to 811.

Leverage a consolidated generic message

Corporate social responsibility

- 2. Implement the “Opportunities” found in the SWOT report.





- 3. Combine messages for corridors with multiple pipelines ROW to reduce mail/information overload...

- 4. 4-year effectiveness evaluation period is too long. Recommend every 2 years.

Require annual emergency responder coordination meetings.



- 5. Leave everything the same, do nothing...

Its just a matter of time...



Do you want your name on the next NTSB report?



National Transportation Safety Board

- **Accident Report**
- NTSB/PAR-.....
- PB2016, 2017, 2018...