

Inspection Output (IOR)

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Inspection Information

Inspection Name	Cascade Natural Gas Public Awareness Inspection	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	10/09/2019
Status	PLANNED	Lead	David Cullom	Plan Approval	10/10/2019 by Joe Subsits
Start Year	2019	Team Members	Darren Tinnerstet	All Activity Start	11/13/2019
System Type	GD	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Derek Norwood, Scott Anderson, Rell Koizumi	All Activity End	11/14/2019
Protocol Set ID	GD.2019.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

The Public Awareness (PA) Program inspection occurred on November 13 and 14, 2019. The inspection included a program, procedure, and records review. The previous UTC inspection occurred in 2014. No probable violations were noted as result of the inspection.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	HQ PA	HQ PA	other	--	--	25	25	25	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	HQ PA	n/a	MISCTOPICS.PUBAWARE	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	PA HQ Inspection	--	11/13/2019	Public Awareness Program Effectiveness (Form 21)	MISCTOPICS.PUBAWARE	HQ PA	all types	25	25	25	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	New Attendance Form	COMPLETED	11/20/2019	PA HQ Inspection	HQ PA

Results (all values, 25 results)

30 (instead of 25) results are listed due to re-presentation of questions in more than one sub-group.

PRO.SUBLPUBAWARE: Public Awareness Program

- Question Result, ID, References **NA, PD.PA.MSTRMETER.P, 192.616(j) (192.616(h))** (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Does the public awareness program for a master meter or petroleum gas system meet the requirements of Part 192?*

Assets Covered **HQ PA**

Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Not master meter or LPG.**

PRR.OM: Operations And Maintenance

- Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)** (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*

Assets Covered **HQ PA**

Result Notes **Reviewed Public Awareness Emergency Responder Form (CNG #1001) for the following districts: Kennewick, Walla Walla, and Bellingham. Forms contained contact information for local fire, police, and emergency responder communications.**
- Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)** (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered **HQ PA**

Result Notes **Census Data from 2011-2015 was used for CNGC's 2017 study. English, Spanish, Vietnamese, Tagalog, Korean, Japanese are represented.**
- Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)** (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered **HQ PA**

Result Notes **Data from 2014-17 was used to complete the 2018 report. Several portions of the Culver study dated August 21, 2018 were reviewed. No significant takeaways are noted from the Culver report.**
- Question Result, ID, References **NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)** (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*

Assets Covered **HQ PA**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Not master meter or LPG.**

MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

- Question Result, ID, References **Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))**

Question Text *Has the continuing public education (awareness) program been established as required?*

Assets Covered **HQ PA**

Result Notes **CP 500w as established on 8/7/2005. RP 1162 is addressed in 2. References (External References)**

7. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)**
 Question Text *Does the operator's program documentation demonstrate management support?*
 Assets Covered **HQ PA**
 Result Notes **Reviewed management statement of support (Appendix 4, CP 500)**
- Lynsay Demko, Public Awareness and Damage Prevention Coordinator, is sole company representative for both Oregon and Washington.**
- Annual budget allocation for program is provided.**
- Reviewed external support resources (Appendix 2, CP 500).**
8. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)**
 Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*
 Assets Covered **HQ PA**
 Result Notes **CP 500 Section 8.2 contains this.**
9. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**
 Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*
 Assets Covered **HQ PA**
 Result Notes **This is in CP 500 8.3. PAPA is used to update stakeholder audiences.**
10. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**
 Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*
 Assets Covered **HQ PA**
 Result Notes **Section 8.4.4 PAPA excavator data was spot checked for several operators in Benton County.**
11. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)**
 Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*
 Assets Covered **HQ PA**
 Result Notes **Affected Public (Semi Annually), Section 8.4.1.7**
- Emergency Responders (annually) , Section 8.4.2.5**
- Public Officials (every three years), Section 8.4.3.4**
- Excavators Section (annually), Section 8.4.4.4**
12. Question Result, ID, References **Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)**
 Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*
 Assets Covered **HQ PA**
 Result Notes **Section 8.6, CP 500**
- Supplemental programs are implemented based on data analysis of specific areas and characteristics.**
13. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))**

Question Text *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators 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?*

Assets Covered HQ PA

Result Notes Reviewed "Excavation and Safety Guide Directory" publication that is distributed by PAPA to stakeholders.

Verified phone number and email for operator.

14. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))

Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*

Assets Covered HQ PA

Result Notes Reviewed multiple brochures and bill inserts that are mailed out to affected parties.

Material is sent out to both customers and non-customers (especially along transmission lines)

Damage Prevention education pamphlet contains 2017 damage statistics to show where most damages occur.

15. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)

Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*

Assets Covered HQ PA

Result Notes Radio advertisement was done for the affected public Jan 7-19, 2019 in English and Spanish. Several online ads are run and CNGC uses geofencing to target ads.

16. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: PRR.OM)

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*

Assets Covered HQ PA

Result Notes Reviewed Public Awareness Emergency Responder Form (CNG #1001) for the following districts: Kennewick, Walla Walla, and Bellingham. Forms contained contact information for local fire, police, and emergency responder communications.

17. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered HQ PA

Result Notes This is contained in CP 500 Section 8.5.

18. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: PRR.OM)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered HQ PA

Result Notes Census Data from 2011-2015 was used for CNGC's 2017 study. English, Spanish, Vietnamese, Tagalog, Korean, Japanese are represented.

19. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered HQ PA

- Result Notes This is contained in CP 500 Section 8.7. Effectiveness is done every 4 years. Surveys are sent out and the results are collected and analyzed by a third party.
20. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)
 Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*
 Assets Covered HQ PA
 Result Notes CNG uses Form 1004 We reviewed 2017 and 2018 (2019).
21. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)
 Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*
 Assets Covered HQ PA
 Result Notes Internal assessment is used for the annual audits.

 A 3rd Party contractor review is used for 4 year implementation effectiveness.
22. Question Result, ID, References Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)
 Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*
 Assets Covered HQ PA
 Result Notes Quarterly reports, for example, are not being completed by the region directors anymore. Data is compiled by Lynsay for Oregon and Washington. Washington currently has two regions. West and Central
23. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: PRR.OM)
 Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*
 Assets Covered HQ PA
 Result Notes Data from 2014-17 was used to complete the 2018 report. Several portions of the Culver study dated August 21, 2018 were reviewed. No significant takeaways are noted from the Culver report.
24. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)
 Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
 Assets Covered HQ PA
 Result Notes CNGC uses a 3 step process for mailing. They use postal verification. They also have a statistical data point from the PAPA effectiveness survey. CX Solutions were retained to develop surveys, mail them out, and to conduct the surveys. CX collected all the data for the report. The CX data was sent to Culver to create the (4) reports. CNGC didn't simply use the PAPA surveys but conducted their own study.
25. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)
 Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*
 Assets Covered HQ PA
 Result Notes Effectiveness is summarized in all reports. The Culver and CX reports contain questions to evaluate effectiveness.
26. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)
 Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*
 Assets Covered HQ PA
 Result Notes Pipeline Safety Staff reviewed effectiveness analysis for each stakeholder group in Program Effectiveness Assessment (CNG 1005) Page 45 of 47.

27. Question Result, ID, References **Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)**
 Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*
 Assets Covered **HQ PA**
 Result Notes **Pipeline Safety Staff reviewed effectiveness analysis for each stakeholder group in the Program Effectiveness Assessment document (CNG 1005) CNGC does not split these out by damages that do not result in pipeline failure, but considering to do so for the 2020 program change (i.e. Facility damages without a leak)**
28. Question Result, ID, References **Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)**
 Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*
 Assets Covered **HQ PA**
 Result Notes **CNGC 1005 Page 40 of 47 has summary outcomes and page 46 of 47 has additional recommendations.**
29. Question Result, ID, References **NA, PD.PA.MSTRMETER.P, 192.616(j) (192.616(h)) (also presented in: PRO.SUBLPUBAWARE)**
 Question Text *Does the public awareness program for a master meter or petroleum gas system meet the requirements of Part 192?*
 Assets Covered **HQ PA**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. Not master meter or LPG.**
30. Question Result, ID, References **NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) (also presented in: PRR.OM)**
 Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*
 Assets Covered **HQ PA**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Not master meter or LPG.**

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.