

PUBLIC AWARENESS PROGRAM FIELD AUDIT - Insp. No. 6756

Audit Date: August 22, 2016	Name of Operator: BP Pipelines North America
H.Q. Address M.C. 9S 30S Wacker Drive Chicago, IL 60606	Company Official: Gerald Maret
	Title: President
	Phone number: 6307302866
	Fax Number:
Inspection Team:	Operator Personnel in Interview: (Name & Phone Number)
1. Dennis Ritter, WUTC	1. Larry Stansifer, Damage Prevention Program Coordinator
	2. Jim Fraley, Damage Prevention Team Lead
3.	3. John Newhouse, DOT Compliance Advisor

Instructions: Check (or mark) the appropriate box: “Yes,” “No” or “N/A.” If further comments are necessary, check (or mark) the comment box and write the comment in the “comments” section below the questions and/or attach a comments sheet when necessary. **These questions are to be verified in the field. Certain questions will have corresponding Desk Audit questions on a separate audit form.**

		Yes	No	N/A	Comment
1.	1162 Section 2: Management Commitment (Must be verified in field if no PHYSICAL copy included in plan)				
	a. Does the statement include the name and title of the appropriate authority (the person(s) with authority to authorize funding)? Gerald Maret, President signed Management Commitment and Support page of PAP	X			
	b. Does the statement include the signature of the appropriate authority (the person(s) with authority to authorize funding)? Gerald Maret, President signed Management Commitment and Support page of PAP	X			
	c. Are copies of approved city ordinances, etc., included where applicable none that operator is aware of.			X	
2.	1162 Section 4: Message Content (These are required in written plan. They will need verification in field) Reviewed PAP (revised 6/16/16) and actual brochures sent to affected public.				
Affected Public: Including customers & residents living along the pipeline route	a. pipeline purpose and reliability	X			
	b. hazards & prevention measures undertaken [192.616(d)(2)]	X			
	c. leak recognition and response [192.616(d)(3 &4)]	X			
	d. damage prevention awareness	X			
	e. how and where to get more information	X			
	f. One-call requirements [192.616(d)(1)]	X			
	g. Emergency communications [192.616(d)(5)]	X			
Emergency Officials	a. pipeline purpose and reliability	X			
	b. hazards & prevention measures undertaken [192.616(d)(2)]	X			
	c. leak recognition and response [192.616(d)(3 &4)]	X			
	d. emergency preparedness and response	X			
	e. how and where to get more information	X			
	f. emergency communications [192.616(d)(5)]	X			
	g. One-call requirements [192.616(d)(1)]	X			
Comments:					

		Yes	No	N/A	Com-ment
2. (Continued)	1162 Section 4: Message Content (These are required in written plan. They will need verification in field)				
Local Public Officials	a. pipeline purpose and reliability	X			
	b. hazards & prevention measures undertaken [192.616(d)(2)]	X			
	c. leak recognition and response [192.616(d)(3 &4)]	X			
	d. emergency preparedness and response	X			
	e. right-of-way encroachments	X			
	f. how and where to get more information	X			
	g. emergency communications [192.616(d)(5)]	X			
	h. construction/maintenance activities	X			
	i. One-call requirements [192.616(d)(1)]	X			
Excavators/ Contractors	a. pipeline purpose and reliability	X			
	b. hazards & prevention measures undertaken [192.616(d)(2)]	X			
	c. leak recognition and response [192.616(d)(3 &4)]	X			
	d. damage prevention awareness	X			
	e. pipeline location information	X			
	f. how and where to get more information	X			
	g. One-call requirements [192.616(d)(1)]	X			
	h. emergency communications [192.616(d)(5)]	X			
3.	1162 Section 4 (4.4.1): PRIORITY MESSAGE (Message should be written in plan and verified in Field) Does the program identify the message for Emergency and Public Officials as protecting people first and then property as the TOP priority message? Page 8, president signature page Pamphlet for Emergency Response and Public Officials, pg 5 bullet 5. Reviewed additional information provided by BP NA-Chicago showing brochures sent to first responders.	X			
Comments:					

		Yes	No	N/A	Comment
4.	1162 Section 5: Delivery Method				
Affected Public:	(From written plan – Does operator provide applicable documentation?)				
LDC Customers	1. Bill Stuffer – required minimum		x		Don't use
Baseline	1. Public service announcements		x		Don't use
	2. Paid Advertising		x		Don't use
	3. Other: targeted distribution of print materials to affected public every two years. Belong to local 811.	x			
Supplemental	1. Public service announcements		x		Don't use
	2. Paid advertising		x		Don't use
	3. Targeted distribution of print material see notes below	x			
	4. Newspaper and magazine advertisements		x		Don't use Don't use
	5. Community events BP will look into this		x		Don't use
	6. Community newsletters		x		Don't use
	7. Other: annual right of way visits, annual 811 dinner	x			
Emergency Officials:	(From written plan – Does operator provide applicable documentation?)				
Baseline:	1. Print Materials	x			
	2. Group Meetings				
	3. Other				
Supplemental:	1. Telephone calls				
	2. Personal contact	x			
	3. Videos and/or CDs				
	4. Other: Local emergency planning councils, annual 811 dinner,	x			
Local Public Officials:	(From written plan – Does operator provide applicable documentation?)				
Baseline:	1. Targeted distribution of printed materials	x			
	2. Other				
Supplemental:	1. Group meetings				
	2. Telephone calls				
	3. Personal contact				
	4. Other Local emergency planning councils, annual 811 dinner,	x			
Excavators/ Contractors	(From written plan – Does operator provide applicable documentation?)				
Baseline:	1. One-Call center outreach	x			
	2. Group meetings				
	3. Other				
Supplemental	1. Personal contact				
	2. Videos and/or CDs				
	3. Open houses				
	4. Targeted distribution of print materials	x			
	5. Other annual 811 dinner,				

Comments:

Checked 2015 Version/Insert Drop Report (Paradigm's mailing receipts based on target audience and includes all of BP laterals. Checked zip codes for 98134, 98108, 98188—Seattle and SeaTac, 98421 Tacoma, 98501 Olympia, 98660 Vancouver

**The laterals are included in bulk mailing for mainline interstate line.
Checked mailing receipts to confirm mailings went out but cannot sort by zip code.**

		Yes	No	N/A	Comment		
5.	1162 Section 5: Delivery Frequencies (These are required in the written plan)						
Affected Public:							
LDC Customers?	Does documentation show at least twice per year?			x	Not an LDC		
Residents along the LDC system?	Does documentation show at least once per year?			x	Not an LDC		
Emergency Officials	Does documentation show at least once per year?	x					
Local Public Officials	Does documentation show at least once every three years?	x					
Excavators/ Contractors	Does documentation show at least once per year? 2015-Over 1500 excavators in Whatcom County	x					
6.	1162 Section 6: Supplemental messages: Does the plan consider whether supplemental messages are necessary for special circumstances and explain why or why not? (These will need to be verified in field where applicable)	x					
Circle the examples below that apply:							
	1. Large excavator projects						
	2. Non-resident business owners (i.e., just workers occupy buildings(s) - owner that receives bill is in another location and/or state and tenant farmers)						
	3. Farming activities						
	4. Railroads						
	5. Other south King County emergency response group training						
7.	1162 Section 7: Program Implementation						
	Is there documentation verifying the program has been implemented? Cover page to Plan with implementation/revision dates, records, mailings, etc.	x					
8.	1162 Section 7: Recordkeeping	LDC Public	Emer. Ofcs	Pub. Ofcs	Excavator/ Contractor	N/A	Comment
Can the Operator Document the following: (Write "Y" for Yes" and "N" for No under each applicable stakeholder audience)							
a.	Lists, Records and other documentation of stakeholder audiences?		x	x	x		Farmer s, school district s
b.	Copies of all materials used?		x	x	x		
c.	Records of payments for mailings, advertisements, printing and other expenditures indicating the program was implemented?		x	x	x		
d.	Records of effectiveness assessments? 2014 effectiveness review by Cyera.		x	x	x		
e.	Records of annual assessments and/or audits?		x	x	x		
f.	Any record of feedback received and collected from audiences in response to the program?		x	x	x		
g.	Records of follow-up actions and expected results						
h.	Have records been maintained for five (5) years?		x	x	x		
Comments:							

		Yes	No	N/A	Com- ment
9.	1162 Section 8: ANNUAL REVIEW (This is required in the written plan – needs field documentation.)				
	a. Does the annual audit ensure the Plan meets the minimum requirements of the regulation?	X			
	b. Does the annual audit ensure all actions called for in the Plan have been carried out as specified in the Plan?	X			
	c. Are records of the annual audit maintained by the Program Administrator?	X			
10.	1162 Section 8: Evaluation Results				
	Has the operator issued the results of the evaluation (review), shared it with upper management and sought internal feedback?	X			
11.	1162 Section 8: Continuous Improvement Conducted:	X			
	a. Has the operator modified its program based on its evaluation? Major no, minor clarity changes	X			
	b. Are these changes documented?	X			
	c. Have these changes been implemented?	X			
	COMMENTS: PSAP-911 folks-making sure all are ready and available for all BP pipelines.				
12.	1162 Section 8: Effectiveness Assessment (This is required upon design or re-design of materials and/or messages)				
	a. Pre-tested Materials: Paradigm did this.				
	b. Date Pre-test conducted: 2010-2012 Paradigm Pre test focus groups conducted in Denver, Baton Rouge.	X			
13.	1162 Section 8: Effectiveness Assessment (Required to be done no more than FOUR years apart)				
	a. Last Survey of Targeted Audiences: 2013, next scheduled in 2017				
	b. Date of last effectiveness assessment: June 30, 2014 (published date) for the 2010-2013 Program years				
	c. Has the operator documented the results of evaluating the program for effectiveness?	X			
	Explain: Effectiveness review was conducted by Cyera. Summary page notes: New or additional public awareness activities may be needed to impact a reduction in key bottom line results metrics in the near future.” Now mail to farmers annually (reviewed list). Also looked at how reaching out to landowners annually during right of way activities.				

	<p>Additionally, from an annual program review perspective, the following was noted: “Processes in place are resulting in documentation collection and retention in compliance with the company’s written plan.”</p>	
<p>Comments:</p>		