

PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE: 5/15/2012
 INSPECTION END DATE: 5/15/2012
 OPERATOR ID: 22515
 OPERATOR NAME: WEYERHAEUSER PAPER CO
 STATE/OTHER ID: na
 ACTIVITY RECORD ID NUMBER: 2614
 COMPANY OFFICIAL: Tim Haynes
 COMPANY OFFICIAL STREET: 3401 Industrial Way
 COMPANY OFFICIAL CITY: Longview,
 COMPANY OFFICIAL STATE: WA
 COMPANY OFFICIAL ZIP: 98632
 COMPANY_OFFICIAL_TITLE: Vice President/Mill Mgr
 PHONE NUMBER: (360) 636-6540
 FAX NUMBER:
 EMAIL ADDRESS: ron.kosloski@weyerhaeuser.co
 WEB SITE: na
 TOTAL MILEAGE: 9
 TOTAL MILEAGE IN HCA: 9
 NUMBER OF SERVICES (DISTR): 0
 ALTERNATE MAOP (80% RULE): 0
 NUMBER OF SPECIAL PERMITS: 0
 INITIAL DATE OF PAP: 9/1/2011
 TITLE OF CURRENT PAP: Weyerhaeuser Paper Co
 CURRENT PAP VERSION: Revision 1
 CURRENT PAP DATE: 5/14/2012
 DATE SUBMITTED FOR APPROVAL: 7/2/2012
 DIRECTOR APPROVAL:
 APPROVAL DATE:

OPERATORS COVERED UNDER PROGRAM:

OPERATOR ID	NAME
22515	WEYERHAEUSER PAPER CO

UNITS COVERED UNDER PROGRAM:

UNIT ID	NAME
22515	Weyerhaeuser Paper Co

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Bob Cosentino	Cosentino Consulting	(360) 200-4959	bob@cosentinoconsulting.com

ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
Consentino Consulting	Affected public mailing	(360) 200-4959	bob@cosentinoconsulting.com
Consentino Consulting	Emergency official mailing	(360) 200-4959	bob@cosentinoconsulting.com
Consentino Consulting	Evaluations	(360) 200-4959	bob@cosentinoconsulting.com
Consentino Consulting	Excavator mailing	(360) 200-4959	bob@cosentinoconsulting.com
Consentino Consulting	Implementation	(360) 200-4959	bob@cosentinoconsulting.com
Consentino Consulting	Local public official mailing	(360) 200-4959	bob@cosentinoconsulting.com
Consentino Consulting	Message content development	(360) 200-4959	bob@cosentinoconsulting.com
Consentino Consulting	Plan development	(360) 200-4959	bob@cosentinoconsulting.com
GAS Line Services Co	Implementation		

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
Patti Johnson	State	WA	pjohnson@utc.wa.gov	<input checked="" type="checkbox"/>

Mileage Covered by Public Awareness Program (by Company and State)

Based on the most recently submitted annual report, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	GATHERING	TRANSMISSION	DISTRIBUTION*	REMARKS (new?)
				INTRASTATE	INTRASTATE	INTRASTATE	
WEYERHAEUSER PAPER CO	22515	Natural Gas	WA	0	9	0	

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. *Please do not include Service Line footage. This should only be MAINS.

Please provide a comment or explanation for inspection results for each question.

1. Administration and Development of Public Awareness Program

1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute’s (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system

operators?

- Verify the operator has a written public awareness program (PAP).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator’s PAP.
- Identify the location where the operator’s PAP is administered and which company personnel is designated to administer and manage the written program.
- Verify the date the public awareness program was initially developed and published.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

- Bullet 1. Weyerhaeuser has written plan
- Bullet 2. No Clearing House information, however there is a copy of closure letter from UTC to Weyerhaeuser dated 6-11-07
- Bullet 3. PAP is administered at plant and Ron Kosloski is the manager.
- Bullet 4. Plan DATE 11-14-2007,

1.02 Management Support

Does the operator’s program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

- Verify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- Verify that an individual is named and identified to administer the program with roles and responsibilities.
- Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
- Determine if the operator uses external support resources for any implementation or evaluation efforts.

CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

- Bullet 1 and 2. Weyerhaeuser has a signed Management Support letter in PAP. Going forward to verify managements participation Weyerhaeuser management will sign bottom of quarterly audit along with Ron Kosloski to document participation.
- Bullet 3. Ron Kosloski is Program Manager his responsibilities are listed
- Bullet 4 and 5. Management committed to funding resources. In addition to Ron Kosloski, the employees of Gas Line Services Co work and Cosentino Consultants.

1.03 Unique Attributes and Characteristics

Does the operator's program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

- Verify the PAP includes all of the operator's system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Bullet 1 and 2. Are identified in new PAP.

1.04 Stakeholder Audience Identification

Does the operator's 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?

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience.
- Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

Affected public

Emergency officials

Public officials

Excavators

CODE REFERENCE: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f), API RP 1162 Section 2.2 and Section 3

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Bullet 1. Weyerhaeuser uses 660 feet either side of pipeline. Cosentino currently determining stakeholder, plan for Celeritas to do in future.

Bullet 2. Weyerhaeuser currently uses Delorme maps, Yellow pages and County Contacts (commissioner). At this point Weyerhaeuser will be going back to Celeritas.

Bullet 3. REVIEW MAP

1.05 Message Frequency and Message Delivery

Does the operator’s program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

- Identify where in the operator’s PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Probable Violation: Stakeholders Letter instructions are to call 911, letter does not have Weyerhaeuser emergency or informational phone number. They will restructure letter to include emergency number and general information number.

1.06 Written Evaluation Plan

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Verify the operator’s evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences surveys and feedback.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Bullet 1. operator's program includes a written evaluation process. page 11.

Bullet 2. pg 12, correct for annual review

Bullett 3. Correct in new PAP

2. Program Implementation

2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator’s areas?

- Determine if the operator delivers material in languages other than English and if so, what languages.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date

the information was collected.

CODE REFERENCE: § 192.616 (g); § 195.440 (g), API RP 1162 Section 2.3.1

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COMMENTS:
 Bullet 1 and 2. reviewed in new PAP

2.02 Message Type and Content

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- Use of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
- Physical indications of a possible release;
- Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
- Procedures to report such an event (to the operator)?

- Verify all required information was delivered to each of the primary stakeholder audiences.
- Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

- [] Affected public
- [] Emergency officials
- [] Public officials
- [] Excavators

CODE REFERENCE: § 192.616 (d), (f); § 195.440 (d), (f)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 Bullet 1. ok
 Bullet 2. ok
 Bullet 3. ok
 Bullet 4. ok
 5. procedure revised PAP,
 Bullet 6. Although emergency and information phone numbers not in letters they are in PAP.

2.03 Messages on Pipeline Facility Locations

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

- Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Probable Violation: Weyerhaeuser failed to contact Public Officials.

2.04 Baseline Message Delivery Frequency

Did the operator’s delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

- Identify message delivery (using the operator’s last five years of records) for the following stakeholder audiences:

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1. pg 7 delivery frequency is ok

Verified mailing lists for last 5 years. Reviewed list, reviewed bulk mailing sales receipt for \$687.00

2.05 Considerations for Supplemental Program Enhancements

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

- Affected public
- Emergency officials
- Public officials
- Excavators

Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 6.2

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Weyerhaeusaer participants in all natural gas programs they are asked to support

2.06 Maintaining Liaison with Emergency Response Officials

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator’s ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify the operator’s expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 Bullets 1 - 5. Weyerhaeuser adopted a new PAP. Information found in Emergency manual Section 6, O&M and PAP are incorporated together.

3. Program Evaluation & Continuous Improvement (Annual Implementation Audits)

3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator performed an annual audit or review of the PAP for each implementation year.

CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 Bullet 1. Had annual audit. From project review, apparent all requirements were done and some had poor documentation. Annual program evaluation form in new manual is ok

3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

- Determine how the operator conducts annual audits/reviews of its PAP.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Bullet 1 . Yes, Used internal and for external used Cosentino Consultants and Gas Services Co

3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.

- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

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COMMENTS:

Bullet 1. Did annual assessment, reviewed, developed and implemented changes as result

Bullet 2. NA

4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)

4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator conducted an effectiveness evaluation of its program program (or no more than 4 years following the effective date of program implementation).

- Document when the effectiveness evaluation was completed.

- Determine what method was used to perform the effectiveness evaluation (in-house, by 3rd party contractor, participation in and use the results of an industry group or trade association).

- Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not Applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

Probable Violation: Weyerhaeuser failed to complete a four year effectiveness evaluation

4.02 Measure Program Outreach

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.
- Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).
- Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not Applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

Bullet 1-3. Ok, and new PAP addresses in more detail

4.03 Measure Percentage Stakeholders Reached

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- ☑ Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- ☑ Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

- [] Affected public
- [] Emergency officials
- [] Public officials
- [] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

- Bullet 1. Used 100% for sample.
- Bullet 2. Determined number reached by number mailed vs number returned, drawing and phone survey.

4.04 Measure Understandability of Message Content

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual? (Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2)

- ☑ Examine the operator’s evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.
- ☑ Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.
- ☑ Determine if the operator pre-tests materials.

- [] Affected public
- [] Emergency officials
- [] Public officials
- [] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

- No dig ins no close calls.
- Bullet 1: all understood no incidents
- Bullet 2: same as above
- Bullet 3. No pretested material but Consentino consultant has used similar material and found same good results.

4.05 Measure Desired Stakeholder Behavior

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

- ☑Examine the operator’s evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- ☑Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

- [] Affected public
- [] Emergency officials
- [] Public officials
- [] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 No digs in or near misses.

 Bullet 1. have demonstrated intend results

 bullett 2. material understood.

4.06 Measure Bottom-Line Results

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program 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? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

- ☑Examine the operator’s process for measuring bottom-line results of its program.
- ☑Verify the operator measured bottom-line results by tracking third-party incidents and consequences.
- ☑Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public’s perception of the safety of the operator’s pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.4

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COMMENTS:
 Bullet 1. measure bottom line by number of dig ins and near missses and that is 0

 Bullet 2. no 3rd party damages because of location of line, no near misses

 Bullet 3. Stakeholder contact is other measure of bottom line.

4.07 Program Changes

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

- ☑Examine the operator’s program effectiveness evaluation findings.
- ☑Identify if the operator has a plan or procedure that outlines what changes were made.
- ☑Verify the operator identified and/or implemented improvements based on assessments and findings.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 2.7 Step 12 and 8.5

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COMMENTS:

Bullet 1 - 3. no changes found to be needed in PAP. During an in house PAP inspection prior to this PAP inspection, Weyerhaeuser found the same probable violaitons as this inspector. As a result, Weyerhaeuser adopted their Consultants PAP.

5. Inspection

SUMMARY:

At the inspsection, staff was informed that Weyerhaeuser would be using their new PAP and not the one they had originally used or was on file with the UTC.

FINDINGS: