

PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE:	3/26/2012				
INSPECTION END DATE:	3/27/2012				
OPERATOR ID:	1848				
OPERATOR NAME:	BUCKLEY GAS DEPT, CITY OF				
STATE/OTHER ID:	WA				
ACTIVITY RECORD ID NUMBER	2612				
COMPANY OFFICIAL:	Pat Johnson				
COMPANY OFFICIAL STREET:	PO Box 1960, 933 Main St.				
COMPANY OFFICIAL CITY:	Buckley				
COMPANY OFFICIAL STATE:	WA				
COMPANY OFFICIAL ZIP:	98321				
COMPANY_OFFICIAL_TITLE:	Mayor				
PHONE NUMBER:	(360) 829-1921				
FAX NUMBER:	(360) 829-2659				
EMAIL ADDRESS:	pjohnson@cityofbuckley.com				
WEB SITE:	www.cityofbuckley.com				
TOTAL MILEAGE:	37				
TOTAL MILEAGE IN HCA:	0				
NUMBER OF SERVICES (DISTR):	1402				
ALTERNATE MAOP (80% RULE):	0				
NUMBER OF SPECIAL PERMITS:	0				
INITIAL DATE OF PAP:	5/30/2006				
TITLE OF CURRENT PAP:	City of Buckley Natural Gas System Public Awareness Program				
CURRENT PAP VERSION:	Revision 12				
CURRENT PAP DATE:	3/22/2012				
DATE SUBMITTED FOR APPROVAL:	5/2/2012				
DIRECTOR APPROVAL:					
APPROVAL DATE:					
OPERATORS COVERED UNDER PROGRAM:	<table border="1"> <thead> <tr> <th>OPERATOR ID</th> <th>NAME</th> </tr> </thead> <tbody> <tr> <td>1848</td> <td>BUCKLEY GAS DEPT, CITY OF</td> </tr> </tbody> </table>	OPERATOR ID	NAME	1848	BUCKLEY GAS DEPT, CITY OF
OPERATOR ID	NAME				
1848	BUCKLEY GAS DEPT, CITY OF				

Jurisdictional to Part 195 (Hazardous Liquid) Mileage (Intrastate)

NAME	OPERATOR ID	PRODUCT TYPE	STATE	TRANSMISSION		REMARKS
				INTRASTATE		
BUCKLEY GAS DEPT, CITY OF	1848	Nat. Gas	WA		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:
 PAP administered from Buckley City Hall (same address as on page 1 of this form) by David Schmidt, City Administrator. He is system administrator and manages the program.
 Reviewed Clearinghouse Deficiencies were corrected and published on 05.30.06.
 Executiver management support - 05.27.07 Signed by Pat Johnson, Mayor
 Present version 03.22.12.
 MOC identified in 2006 by UTC: 3 revisions in 2007 in March 22, 2012 plan made per WA Docket PG-070144.

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

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

COMMENTS:

Buckley failed to provide evidence or indication of managements participation in the development and implementation of the PAP. Buckley's Plan Program Administration Appendix X Item B, lists Personnel names, titles, and responsibilities but fails to identify what PAP roles and responsibilities each has.

Written statement of management support reviewed - Resolution signed by Mayor Pat Johnson identifying both the Mayor and City Coucil desires to adopt a formal resolution through company policy, management participationand allocation of resources and funding. No line items in budget/PA showing expenditures. Nothing in PAP identifying roles by others.

David Schmidt is named to administer and manage program. API 2.5 requires full management support: "Management should demonstrate its support through company policy, management participation, and allocation of resources and funding. Rule and resolution states the mayor (mgmt) is required to demonstrate/show participation – No record of participation-None provided.

Data Bar (Utility Billing Co.): Mailings for Utility billing/stuffers is the only external support resource utilized. Buckley completed their own evaluation.

Annual mailing: Contractors breakfast & Fair in conjunction w/City of Enumclaw.

Have copies of: Resolution of Mgmt. Support and Data Bar contact info. Written on piece of paper by City Support Staff.

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

<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:

Buckley failed to define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities. Appendix "X" is the City PAP program. They identify their system but the physical attributes are not part of their plan such as pipe information PE & Steel. The plan presently discusses transmission, which the municipality does not have – address somewhere that you do not presently have any transmission. AOC. Gate sta. & structures ?

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

<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:

Emergency officials – page 229 identifies Local Emerg. Planning Commission (LEPC) but there isn’t one. No homeowners associations/groups. No neighborhood orgs. No sheriff department listed. Public officials - Buckley includes the City of Enumclaw under the Emergency contact/stakeholder group. Excavators – None listed in plan. It is in O&M manual page 106 Plan . In 2011 Buckley did not send out print material to excavators in print material form with the messages identified in their plan page 231. No tracking of targeted distribution of print materials. No excavators identified in plan or link to O&M Manual re: excavators. No Sheriff, local emergency planning commission (LEPC) but there isn’t one. No homeowners associations/groups and no neighborhood orgs. Lists.

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:

Buckley's PAP reference to language in Frequency of supplemental message "as necessary" uses the language "Examples" in Section #2 - these are not examples. Buckley identified that this is what they are going to - if so, they need to review each on an annual basis. Buckley includes information on their website but has not included this method in their plan for any of the stakeholder audiences. The following stakeholder audience records were checked for delivery method and delivery frequencies:

Affected public - no records tracked with the message type, frequency, or delivery method. No records of completion of supplemental activity.

Emergency officials - no records of print materials being sent and no record of addressing supplemental activity

Public officials - no records

Excavators - no records tracked with message type, frequency and method. No supplemental activity records. Method of excavators identifies "maps as required" - Buckley should identify what "as required" means in this instance.

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)
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 - N/A - Not Applicable (explain)
 - N/C - Not Checked (explain)

COMMENTS:

No documented statistical sample size and margin-of-error for stakeholder audiences surveys and feedback for vaseline or effectiveness evaluation. Missing procedures.

No records. No documentation regarding continual improvements as result of self-assessment tasks.

No records of annual audits.

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

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

COMMENTS:

PAP delivered in English only. But, no method to determine threshold of change defined where new language would be required.

City of Buckley failed to identify a process used to determine the need for additional languages for each stakeholder audience.

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 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:
 2009 Records not available for group meeting of excavator stakeholder. No Public official records retained. No emergency officials stakeholder records for sheriffs department are available. Buckley failed to provide evidence that all required information was delivered to each of the primary stakeholder audiences.

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:
 City of Buckley failed to provide evidence that they delivered Buckley's emergency plan to the school districts as identified in their plan.

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)

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

COMMENTS:

City of Buckley failed to maintain records identifying that they met or exceeded the baseline frequencies for message delivery of all stakeholder audiences. All stakeholder items identified in PAP were not addressed with the required frequency regarding "Annual and/or at permit issuance".

Affected public: No records of targeted distribution of print materials on annual frequency. Also, Buckldy Natural Gas System Customers did NOT receive informaiton semi-annually in 2010 and 2011.

Emergency officials: No records for all delivery methods in PAP.

Public officials: No records that all delivery methods in PAP addressed all Section #@ items and all identified methods and supplemental activity frequency.

Excavators: Language for frequency of this stakeholder group needs to be changed.

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

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

COMMENTS:

City of Buckley failed to provide records that supplemental activities/enhancements were addressed/considered with the frequency identified in their supplemental program enhancements.

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 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:

City of Buckley failed to provide records that Public Officials received copies of Buckley's Emergency Plan.
 Buckley failed to provide records that show they learned the responsibility and resources of each of each government organization that may respond to an emergency.
 No mutual assistance information noted.
 No records maintained showing City of Enumclaw attended Buckley's emergency coordination meetings.

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 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:

Buckley failed to provide records/documentation with enough detail to determine what was reviewed in their annual audit.

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

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

COMMENTS:

City of Buckley failed to identify the method used to complete the annual audit or review of its program implementation.

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

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

COMMENTS:

City of Buckley failed to maintain records of their annual PAP audit/review and failed to make changes to improve their program and/or implementation process based upon the results and findings of the annual audit.

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 (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:

City of Buckley failed to address sample size and percentage in their response in their evaluation. They failed to compare their baseline evaluation to the effectiveness evaluation and/or did not identify why they did not or were not able to make the comparison.
 City of Buckley failed to assess progress on the following measures to determine whether the actions undertaken in implementation are achieving the intended goals and objectives: Whether the information is reaching the intended stakeholder audience; If the recipient audiences understands the messages delivered; Whether the recipients are motivated to respond appropriately in alignment with the information provided; If the implementation of the PAP is impacting bottom-line results.

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:

Buckley failed to track actual program outreach for each stakeholder audience within all areas along all assets and systems in its program. The did not show the number/percentage of stakeholders in both their baseline and effectiveness plan. Additionally, this measure should estimate the percentage of the stakeholders actually reached within the target geographic region along the pipeline. The operator did not prove how they determined the statistical sample size and margin-of-error (or that their was a margin of error) for each of the 4 stakeholder audiences.

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

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

COMMENTS:

The operator did not show how they determined the statistical sample size and margin-of-error (or that there was a margin of error) for each of the 4 stakeholder audiences.
 No record or documentation of how Buckley estimated the percentage of individuals actually reached within each intended stakeholder audience group.

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

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

COMMENTS:

Buckley failed to provide records/documentation of the percentage of individuals actually reached within each intended stakeholder audience group. None of the results and data appear to have been assessed regarding the percentage of the intended stakeholder audiences.

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

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

COMMENTS:

Buckley compiles data but does not track near misses and excavation damage that does not result in pipeline failures for trends over their system for the evaluating PAP effectiveness. Buckley's plan states their supplemental measures are optional for monitoring and assessing the public's perception of the safety of pipelines to determine effectiveness.

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

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

COMMENTS:

Buckley considered but failed to attempt to measure bottom-line results of its program.

Buckley's language for evaluating PAP effectiveness and the measurement of bottom-line results fails to address a trigger to causing action of the supplemental measure for monitoring and assessing the public's perception.

Language in bottom line results uses the word "may" - the City Administrator states the "may" will be changed to "shall".

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

- | | |
|--|---|
| <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) | <p>COMMENTS:</p> <p>Buckley failed to identify the procedure for implementation of changes and has no implementation plan.</p> <p>Buckley failed to address why no improvements for the stakeholder groups is not included in bottom line results for changes.</p> <p>Buckley's plan fails to identify a definition or procedure associated with "Targeted distribution of print materials".</p> |
|--|---|

COMMENTS:

Buckley failed to identify the procedure for implementation of changes and has no implementation plan.

Buckley failed to address why no improvements for the stakeholder groups is not included in bottom line results for changes.

Buckley's plan fails to identify a definition or procedure associated with "Targeted distribution of print materials".

5. Inspection

SUMMARY:

Overall, Buckley failed to effectively administer, monitor, and manage their Public Awareness Program.

FINDINGS:

1.☑49 CFR §192.616 Public Awareness.

(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).

a.☑Finding(s) - Management Support:

Buckley failed to identify the implementation roles of employees listed in the PAP.

b.☑Finding(s) – Management Support:

Buckley failed to provide evidence or indication of management participation in the development and implementation of the PAP.

c.☑Finding(s) – Management Support:

Buckley failed to provide oversight of external support resources regarding implementation and evaluation efforts of PAP.

2.☑49 CFR §192.616 Public Awareness.

(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.

a.☑Finding(s) - Unique Attributes and Characteristics:

Buckley failed to define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities.

b. Finding(s) - Unique Attributes and Characteristics:

Buckley's PAP includes transmission pipeline. Buckley's system does not contain transmission pipeline at the present time.

1. 49 CFR §192.616 Public Awareness.

(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.

a. Finding(s) - Stakeholder Audience Identification:

Buckley's Program Administration failed to provide evidence of a plan that effectively identifies stakeholder audiences including recordkeeping and oversight.

b. Finding(s) - Stakeholder Audience Identification:

Buckley's failed to provide comprehensive records used to determine each stakeholder audience.

c. Finding(s) - Stakeholder Audience Identification:

Buckley's Buckley failed to verify and review the accuracy of their stakeholder audience lists.

1. Emergency Officials

i. Local Emergency Planning Commission (LEPC) but there is no LEPC organization identified in this list.

ii. List includes Homeowners Associations/Groups but there are no Homeowners Associations/Groups identified in this list

iii. Neighborhood Organizations but there are no Neighborhood Organizations identified in this list

iv. Sheriff's Department is not included as a stakeholder in this list

v. City of Enumclaw is considered an emergency official by Buckley but it is not identified as a stakeholder in this list

2. Public Officials – Buckley identified that the neighboring City of Enumclaw was included in their public officials stakeholder audience but PAP did not identify as such.

2. 49 CFR §192.616 Public Awareness.

(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.

a. Finding(s) - Message frequency and message delivery:

Buckley failed to implement and deliver their baseline and supplemental message information in accordance with their written program for all stakeholder audiences.

b. Finding(s) - Message frequency and message delivery:

Buckley failed to define the combination of message, delivery method, and delivery frequency to comprehensively reach all stakeholders. Buckley failed to remove template language from their PAP, such as reference to language in Frequencies of Supplemental Message "as necessary" uses the language "Examples" in Section #2. audiences.

c. Finding(s) - Message frequency and message delivery:

Buckley failed to provide records for delivery method and delivery frequencies for:

1. Affected Public
2. Public Officials
3. Excavators

3. 49 CFR §192.616 Public Awareness.

(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.

(i) The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.

Finding(s) - Written Evaluation Plan:

Buckley failed to evaluate their program implementation and effectiveness and with the required frequency.

a. Buckley failed to provide records showing completion of annual evaluations.

b. Buckley's written program evaluation plan is ineffective and missing procedures for completion of activities. Buckley does not have a process to complete recordkeeping and oversight activities in their plan.

c. Buckley failed to document their sample size and margin-of-error for stakeholder audience surveys and feedback for baseline and effectiveness evaluations.

d. Buckley failed to provide records regarding continual improvements as a result of their self-assessment tasks.

4. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – English and other languages:

Buckley's plan failed to identify the threshold and frequency process by which they will determine the need for an alternate language review.

5. 49 CFR §192.616 Public Awareness.

(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.

(f) The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.

a. Finding(s) – Message type and content:

Buckley failed to provide records to verify all information was delivered to each of the stakeholder audiences.

b. Finding(s) – Message type and content:

Buckley failed to provide evidence that all required message type and content were delivered to each of the primary stakeholder audiences.

6.49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Messages on pipeline facility locations:

Buckley failed to provide evidence that they delivered Buckley's emergency plan to Public Officials, Emergency Officials (incl. Sheriff's Department), and Excavator stakeholders as identified in the PAP.

7.49 CFR §192.616 Public Awareness.

(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.

a. Finding(s) - Baseline Message Delivery Frequency:

Buckley failed to provide records evidencing what they provided to all stakeholders in each and every message they identified they were to deliver.

b. Finding(s) - Baseline Message Delivery Frequency:

Buckley failed to provide records evidencing when they provided information to all stakeholders in each and every message they identified they were to deliver.

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8.49 CFR §192.616 Public Awareness.

(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.

Finding(s) - Considerations for Supplemental Program Enhancements:

Buckley considered relevant factors for supplemental enhancements but failed to effectively address them.

a. Buckley failed to provide documentation that audiences were provided all of the information content described in their plan.

b. Buckley failed to address supplemental messages and activities with the required frequency for all stakeholders.

9.49 CFR §192.616 Public Awareness.

(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.

c. Finding(s) - Maintaining Liaison with Emergency Response Officials:

Buckley's plan failed to identify how they will maintain their liaison relationship with all required emergency officials. (Buckley identifies the City of Enumclaw as a Public Official stakeholder – if Enumclaw complete emergency response for the City of Buckley, they should be added to Buckley's emergency response officials stakeholder listing.)

d. Finding(s) - Maintaining Liaison with Emergency Response Officials:

Buckley failed to provide records evidencing the maintaining of a liaison relationship with all required emergency officials.

e. Finding(s) - Maintaining Liaison with Emergency Response Officials:

Buckley failed to provide records evidencing what/whether emergency response organizations have adequate and proper resources to respond. Buckley's PAP does not include any mutual assistance information.

10. 49 CFR §192.615 Emergency plans.

(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:

- (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
- (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
- (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,
- (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

f. Finding(s):

Buckley failed to provide records evidencing they have established and maintained liaison with appropriate fire, police, and other public officials.

g. Finding(s):

Buckley failed to provide records evidencing that they learned the responsibility and resources of each government organization that may respond to a gas pipeline emergency. (Buckley's PAP identifies they will also provide a copy of their emergency plan to public officials.)

11. 49 CFR §192.616 Public Awareness.

(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.

(i) The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.

a. Finding(s) – Measuring program implementation:

Buckley failed to include a process for the completion of self-audits.

b. Finding(s) – Measuring program implementation:

Buckley's PAP failed to include a methodologies used to measure their program implementation.

12. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Acceptable methods for program implementation audits:

Buckley failed to identify the method used to complete the PAP annual audit/review of its program implementation.

13. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Program Changes and Improvements:

Buckley failed to develop and implement changes in its program as a result of their annual assessment audit.

Finding(s) – Program Changes and Improvements:

Buckley's plan fails to identify timeframe for changes/improvements/corrective action documented in their annual audit/review.

14. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Evaluating program effectiveness:

Buckley failed to complete an effectiveness evaluation of their program that meets with regulatory requirements.

15. 49 CFR §192.616 Public Awareness.

(b) 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.

Finding(s) – Measure program outreach:

Buckley failed to measure program outreach by tracking actual program outreach for each stakeholder audience within all areas along all assets and systems covered by their program.

16. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Measure percentage stakeholder reached:

Buckley failed to demonstrate how they measure percentage of stakeholders reached.

17. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Measure understandability of message content:

Buckley failed to evaluate effectiveness and assess the percentage of intended stakeholder audiences that understood and retained the key information in the messages received, within all assets and systems covered by its program.

18. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Measure Desired Stakeholder Behavior:

Buckley failed to evaluate effectiveness and examine results to determine if the stakeholders have demonstrated the intended learned prevention behaviors.

19. 49 CFR §192.616 Public Awareness.

(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.

Finding(s) – Measure Bottom-Line Results:

Buckley considered but failed to evaluate effectiveness and examine bottom-line results of its program.

20.49 CFR §192.616 Public Awareness.

(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.

a. Finding(s) – Program changes:

Buckley's PAP failed to include procedures for implementation of program changes.

b. Finding(s) – Program changes:

Buckley failed to address why no improvements for stakeholder groups are included in bottom line results for changes.

c. Finding(s) – Program changes:

Buckley's PAP fails to include a definition, recordkeeping, and procedure associated with the program language "Targeted distribution of print materials".