

PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE: 7/31/2012
 INSPECTION END DATE: 7/31/2012
 OPERATOR ID: 31096
 OPERATOR NAME: GEORGIA-PACIFIC CONSUMER PRODUCTS (CAMAS) LLC
 STATE/OTHER ID: Washington
 ACTIVITY RECORD ID NUMBER: 2615
 COMPANY OFFICIAL: Steve Ringquist
 COMPANY OFFICIAL STREET: 401 NE Adams Street
 COMPANY OFFICIAL CITY: Camas, WA 98607
 COMPANY OFFICIAL STATE: WA
 COMPANY OFFICIAL ZIP: 98607
 COMPANY_OFFICIAL_TITLE: Realibility Leader
 PHONE NUMBER: (360) 834-8166
 FAX NUMBER: (360) 834-8462
 EMAIL ADDRESS: steve.ringquist@gapac.com11
 WEB SITE:
 TOTAL MILEAGE: 1
 TOTAL MILEAGE IN HCA: 0.64
 NUMBER OF SERVICES (DISTR): 0
 ALTERNATE MAOP (80% RULE): na
 NUMBER OF SPECIAL PERMITS: 0
 INITIAL DATE OF PAP: 6/17/2006
 TITLE OF CURRENT PAP: GP Camas Public Awareness Plan
 CURRENT PAP VERSION: 5
 CURRENT PAP DATE: 8/1/2012
 DATE SUBMITTED FOR APPROVAL:
 DIRECTOR APPROVAL:
 APPROVAL DATE:

OPERATORS COVERED UNDER PROGRAM:

OPERATOR ID	NAME
31096	GEORGIA-PACIFIC CONSUMER PRODUCTS (CAMAS) LLC

UNITS COVERED UNDER PROGRAM:

UNIT ID	NAME
31096	Georgia Pacific Consumer Products Camas

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Steve Ringquist	Realiability Leader	(360) 834-8166	steve.ringquist@gapac.com
Ron Simmons	Manager of Energy Mea & Compliance	(404) 652-4608	ronald.simmons@gapac.com
Bob Cosentino	Cosentino Consultants	(530) 604-3868	www.cosentinoconsulting.com

ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
UNC-Utility Notification Center -811	Excavator mailing		
PAPA	Mailings		
Paradigm	Mailings		
Catholic Protection Eng.	Mailings		
Catholic Protection Eng.	Mailings		
Catholic Protection Eng.	Mailings		
Clark Utilities Coordinating Council	Mailings		

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	
GEORGIA-PACIFIC CONSUMER PRODUCTS (CAMAS) LLC	31096	natural gas	WA	0	1	0	total line is 1.7 miles

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. The plan is filed in the Camas mill pipeline files

Bullet 2. Both clearing house deficiencies were accepted by the WUTC on 12-27-2007

Bullet 3. It is administered onsite by Ron Simmons in Atlanta GA and plant coordination and program administrator is Steve Ringquist.

Bullet 4. Plan 6-19-2006

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. management support statement pg 7

Bullet 2. management's participation is in PAP but not detailed

Bullet 3. individual is not named however the job title is in the PAP.

PHMSA not consistently enforcing this so GP was told this is requirement but no AOC or probable violation would be written.

Camas did provide list of Key Resources:

Gary Kaiser, Vice President, Management Support

Nancy Viuhkola, Public Affairs Manager, Public Affairs Group

Steve Ringquist, Reliability Leader, Public Awareness

Coordinator/Operations/Row Personnel

Ron Simmons, GP Pipeline Manager, Public Awareness Administrator for all of GP

David Bascom, Emergency Response Manager

Bullet 4. See cover pages of this form

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 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. page 8

Bullet 2. Only 2 valves, Appendix drawing of system and valves (attributes)

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

<ul style="list-style-type: none"> <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. GP uses 1320 feet on either side of the entire jurisdiction line (same for HCAs)

Bullet 2. Paradigm is used for process and data source of stakeholder audiences

Bullet 3. Paradigm is part of new PAP and the first mailing was 6/12/2012. Reviewed it and 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

<ul style="list-style-type: none"> <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 10 for delivery frequencies

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. Page 18, Section 11

Bullet 2. Does 4 yr annually and uses it for annual. Every 4th yr called 4 year effectiveness evaluation.

Bullet 3. GP has 1 mile of line and uses 100% for sample size. Margin of error determined by feedback.

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:

Bullet 1. Based on the demographic composition of the Camas / Washougal, Clark county area Georgia Pacific, Camas has not presented its messages in languages other than English.

Bullet 2. Georgia-Pacific utilized the 2000 and 2010 census data to evaluate the percentages of potential non-English speaking groups in Camas, Washougal and Clark County. The percentages of potential non-English speaking groups were not greater than 5%.

Bullet 3. Demographics obtained from 2000 and 2010 US Census Bureau data. The data was pulled from websites in the 2nd Quarter of 2012.

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. new PAP 2012 table meets expectations

Bullet 2 - 4 information included

Bullet 5. first mailings in this new plan complete. Reviewed form titled Public Awareness communication. Form filled out every time an activity is done ie 811 events, car shows, city lunches etc

Bullet 6. called the phone number control room knowledgeable on all gas procedures

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 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. No schools on pipeline. Paradigm contract provides all lists including municipalities and schools.

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:

Bullet 1. Reviewed 2008 list and material for sample. No documentation of mailing but there are so few they buy stamps. New PAP has documentation method.

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:

GP has considered relevant factors. An example is conducting face to face meeting with the businesses adjacent to the pipeline r/w. Documented in binder. Attend one call meeting, include articles in Mill newsletter, survey cards.

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

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

COMMENTS:

Bullet 1 and 5. GP has annual meeting onsite with Mill Emergency Response Team and who they interact with. Meeting always successful since the Mill Emergency Response is a fire district and response to chemical and water emergencies in the area. The meeting includes near by towns, state patrol, police, public works. They review emergency response. For those who do not attend a packet is sent by certified mail. The UTC was invited and unable to attend and did receive a certified mail meeting packet. In this meeting what GP can do and what can be done for GP is discussed. A form is filled out by attendees at the end of the meeting 1. it includes emergency response capabilities of all and % of all who understand. Reviewed and all understood.

Bullet 2. the emergency response plan is available to all at above meeting and all emergency responders

Bullet 3 and 4. expectations is the same for all although some agencies capabilities are not the same. Mill team would handle initial gas emergency and are oqed for valves etc.

Bullet 4. see above

Bullet 5. see above

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

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

COMMENTS:

Bullet 1. In old plan, PAP was reviewed as part of the continuing surveillance done by the inspection contractor. Copies of these reports were available. They were not titled annual PA included information

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:

Bullet 1. page 18

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:

Bullet 1. In old plan, no changes were made to the PAP as result of internal audit. However, supplemental activities did happen and documented by involvement with different organizations.

Bullet 2. No written justification for no changes to PAP in old plan. Provision for this in new PAP

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

<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. An effectiveness evaluation was completed in June 2010 by a 3rd party, Cathodic Protection Engineering (CPE). It was the conclusion of CPE that the program was achieving the expected results and changes were not recommended at that time.

Bullet 3. 3rd party in 2010. In 2012 Cosentino Consultants completed annual and 4 yr evaluatios. This was 3rd party and in house methods

Bullet 4. Sample size is 100% of mailings

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

<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. 2012 used certified mailing lists and US postal and stakeholder list to track. Prior to 2012 reviewed the contact, mailing lists and 2011 PA contact list for 4 groups. All stakeholders are in the HCA

Bullet 2. 2012 questionairs, survey and mail and phone

Bullet 3. NA. Use 100% of mailing list for sample size.

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. 100% of stakeholders are sample size.
- Bullet 2. 100% reached nothing returned. Also spoke face to face with all business on line. Is 1 mile with only .64 miles with business and few residents

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

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COMMENTS:

- Bullet 1. In old PAP evaluation was based on the face to face conversations with the stakeholders , in the new PAP it is based on questionairs and return mail in cards.
- Bullet 2. With new PAP Paridigm set return calls with mailing, the cards are not yet avialable. GP has information from the emergencysy resonser meeting which will be included in Paridigms summary.
- Bullet 3. combination of pre tested and not tested material used

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

<ul style="list-style-type: none"> <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. In old PAP stakeholders have demonstrated the intended learned behaviors. No dig in, etc. New PAP not in place long enough to measure with it

Bullet 2. No damage has occurred. Messages 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

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

COMMENTS:

Bullet 1. In new PAP will use the following

- Number of excavation notifications/locate requests
- Number of ROW encroachments
- Number of Incidents of damage
- Number of Leaks
- For 2012 GP will use Paradigms survey results.

In old PAP only dig ins measured

Bullet 2. No third party incidents

Bullet 3. This will be done when all the mail back card time period is over with the new PAP. In old PAP no incidents was considered measure of bottom line results

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

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

COMMENTS:

Bullet 1. GP believes the old PAP program was and continues to be effective, Georgia-Pacific began comprehensively assessing the PAP and has engaged Paradigm to handle mailings and has implemented the CCI PAP for uniformity with other industrial pipelines in the region.

Bullet 2. New PAP has log for changes

Bullet 3. New PAP is GPs improvement to their old PAP

5. Inspection

SUMMARY:

FINDINGS: