Inspection Output (IOR)

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Inspection Information

Inspection Name	8282 NWN- HQ - PA - Public Awareness	Operator(s)	NORTHWEST NATURAL GAS CO (13840)	Plan Submitted	04/13/2021
Status	PLANNED	Lead	David Cullom	Plan Approval	04/14/2021 by Joe Subsits
Start Year	2021	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity Start	04/14/2021
System Type	GT	Supervisor	Joe Subsits	All Activity End	04/15/2021
Protocol Set ID	GT.2021.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This Public Awareness program inspection was performed remotely using MS-Teams. Darren Tinnerstet assisted with the inspection. The inspection consisted of records and a plan review. The operator demonstrated results of the recent effectiveness review and the lessons learned from the review. The areas of improvement and action plan in the attached 2020 Public Awareness Safety Plan Review document details what areas the operator will be focusing on to improve the program.

These improvement measures are:

Increase awareness of what natural gas smells like with Affected Public.

Strengthen messaging awareness with Fire Departments and Public Officials.

Decrease dig-in damages from contractors/excavators.

Improve perceptions about natural gas safety.

Improve knowledge/awareness of natural gas safety with younger audience.

The previous inspection (7268) was performed by UTC staff on 4-25-2017. No probable violations or areas of concern as a result of that inspection were noted or required follow-up during this review.

Facilities visited and Total AFOD

This inspection was 1 AFOD Day (Remote MS Teams Meeting)

Summary of Significant Findings

There were no probable violations or areas of concern noted as a result of this inspection.

Primary Operator contacts and/or participants

Please review the Attendance Sheet under "Forms"

Operator executive contact and mailing address for any official correspondence

Jon G. Huddleston

Vice President of Engineering and Utility Operations

Northwest Natural

250 Southwest Taylor Street

Portland, Oregon 97204

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88965 (1,826)	Northwest Natural-HEADQUARTERS	unit	88965	GOM OCS Offshore Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA	41	41	41	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88965 (1,826)	n/a	PD	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	HQ PA	--	04/14/2021 04/15/2021	n/a	all planned questions	all assets	all types	41	41	41	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	HQ PA	COMPLETED	04/22/2021	HQ PA	88965 (1,826)

Results (all values, 41 results)

47 (instead of 41) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERG: Emergency Response

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

Question Text: *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered: 88965 (1,826)

Result Notes: **Emergency Preparedness Communications**

A series of statements encompassing the following:

- Priority to protect life
- Emergency contacts
- Emergency preparedness response plans.

Emergency preparedness drills and exercises

NW Natural offers information and training for emergency response officials, and participates in appropriate or relevant tabletop exercises conducted by emergency response agencies. Emergency preparedness response plans Documents prepared for internal and external use in accordance with 49 CFR Part 192 and contact information for local emergency officials to obtain additional information.

Liaison with emergency officials

Description of the ongoing relationship that NW Natural maintains with local emergency officials to help response to incidents and outreach programs, such as:

- Documented Emergency Preparedness Plan and Disaster Recovery Plan
- Invitations to emergency officials for onsite visits as appropriate
- Training on locations of critical equipment
- Training on appropriate emergency response procedures
- Training on product hazards
- Attendance at Local Emergency Planning Committees (LEPC).

Training is conducted monthly for the Incident Command Team. Training for the Command Team (Table Top Exercise) is performed each December.

Emergency Officials Training/Personal Contact

Police/Fire Departments and Utilities Training (in-person) Fire Departments Training (video) These are performed monthly.

A letter titled "NWN Public Official Letter 2020" was provided and reviewed:

Mailing receipts were provided for: October 2020 all exec the FRs and Excavators. The 2020 list of mailing was reviewed and the date was 10/29/2020.

The 2019 list was mailed on 8/5/2019. Postage was reviewed for that as well.

The 2018 (9/10/2018) list was also reviewed.

A list of agencies contacted was reviewed for 2020. 483 public officials were reached in Washington in 2020 and 260 were contacted in 2019. In 2018, 260 mailings to public officials were sent out.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

2. Question Result, ID, References: NC, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text: *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 88965 (1,826)

Result Notes Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

3. Question Result, ID, References NC, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered 88965 (1,826)

Result Notes Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

4. Question Result, ID, References NC, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 88965 (1,826)

Result Notes Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

5. Question Result, ID, References NC, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered 88965 (1,826)

Result Notes Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

6. Question Result, ID, References NC, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 88965 (1,826)

Result Notes Procedures, records, and observations for markers were addressed during the NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

PD.DP: Damage Prevention

7. Question Result, ID, References Sat, PD.DP.PDPROGRAM.P, 192.614(a)

Question Text *Is a damage prevention program approved and in place?*

Assets Covered 88965 (1,826)

Result Notes SP 605 contains the reference to Damage Prevention program.

SP 619 Covers PA

SP 605 3.3 covers blasting.

NWN 2020 PAP 1.3 Compliance with Regulations and Standards

NWN 2020 PAP 1.5. Commitment from Management

NWN 2020 PAP 1.5.2. Management Participation states:

"NW Natural management is fully committed to compliance with the company's Public Awareness Program and the requirements of API RP 1162 and 49 CFR 192.616. Management has committed to providing resources and funding for program development and implementation."

NWN 2020 PAP 3.4.1. Determining and Maintaining Lists of Excavators

NW Natural partners with Culver Company to identify excavators. Culver is responsible for ensuring the lists are updated, and that the mailing is documented.

Lists are sourced through Culver Company using SIC codes for contractor and excavation companies.

See list addendum for more detail

8. Question Result, ID, References: Sat, PD.DP.ONECALL.P, 192.614(b)

Question Text: *Does the process require participation in qualified one-call systems?*

Assets Covered: 88965 (1,826)

Result Notes: This is in SPW 605 3.1 Rev 12 2/15/19

5.4.1. One-Call Centers (Targeting Excavator Audience)

In accordance with 49 CFR Part 192, NW Natural is a member of a One-Call Center in each state in which it operates pipelines. NW Natural updates the One-Call Centers with pipeline notification information as required. NW Natural also participates in supplemental communications with the One-Call Centers, such as a joint TV PSA campaign to raise awareness of the law that requires consumers to contact the One-Call Centers prior to digging or excavation around underground utilities. Additionally, NW Natural participates in the Pipeline Association for Public Awareness annual mailings to the counties NW Natural serves. In spring 2020, NW Natural will launch new Spanish language radio ads.

9. Question Result, ID, References: Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)

Question Text: *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*

Assets Covered: 88965 (1,826)

Result Notes: SP 605 3.2 contains the policy.

The FOM was reviewed to check marking guidelines for NWN projects.

10. Question Result, ID, References: Sat, PD.DP.TPD.P, 192.614(c)(1)

Question Text: *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*

Assets Covered: 88965 (1,826)

Result Notes: ****Reviewed samples of TPD excavators to ensure names were in the annual mail outs***** For example, Fettig Construction had damages in 2020 and they are on the 2020 list. **The purchased list does include all licensed contractors.**

TPD parties will be provided Damage Prevention Brochure

Section 8.2 Process Evaluation:

Each year when NW Natural performs an evaluation of the company's Public Awareness Program, the company will consider the following factors along its pipeline system:

• Potential hazards

• High Consequence Areas

• Third-party damage incidents

• Environmental considerations

• Pipeline history (in an area)

• Specific local situations

• Regulatory requirements, and

• Results from previous Public Awareness Program evaluations.

NW Natural's evaluation will determine if supplemental communication or increased outreach by individual stakeholder audience is appropriate. In considering the factors listed above, NW Natural will make enhancements to its Plan when changes or issues necessitate an increased emphasis.

11. Question Result, ID, References: Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)

Question Text: *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered: 88965 (1,826)

Result Notes: When the investigation of TPD damage occurs, NWN responds and interviews personnel on site. There is a flow chart that determines what steps to take. Linking 3rd party damages back to the One Call is done through the locates web app that links it to the locate ticket.

Scott Gallegos Supervisor, Damage Prevention

- Subject Matter Expert for damage prevention
- Subject Matter Expert for information provided to public and other stakeholders, and review Plan for consistency and compliance relative to NW Natural's Pipeline Safety Programs
- Contractor and utility training
- Liaison to One-Call System/Contractor Network
- **Track third-party damages**

12. Question Result, ID, References: Sat, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text: *Observe operator process a "One Call" ticket.*

Assets Covered: 88965 (1,826)

Result Notes: The NWN system analyzes the request to determine if it is HP or Transmission pipeline. The information is sent to the locate contractor or if it is an HP or Transmission the locate is done by the locating contractor. If it is an emergency locate it goes to another group. This was difficult to evaluate due to the process being automated and the remote nature of the inspection due to COVID-19, but the operator was able to describe the process and show the steps on MS Teams.

13. Question Result, ID, References: Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text: *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered: 88965 (1,826)

Result Notes: Report of Damage. Several events were looked at including several that UTC staff responded to from 4/25/2017 to the present.

14. Question Result, ID, References: Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text: *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered: 88965 (1,826)

Result Notes: The Patrolling SPW is 703 Section 3.1

The PA manual has some additional patrolling and surveillance procedures in:

4.5.1.1. Right-of-Way Encroachment Prevention To perform critical activities, NW Natural maintenance personnel must be able to access its pipelines. Key activities performed by NW Natural include:

- Conducting federal- and state-required pipeline safety inspections
- Conducting Right-of-Way surveillance
- Performing routine maintenance

Educating residents, businesses, excavators, and landowner/developers is a priority for NW Natural. NW Natural includes advice on the public's obligation to respect the pipeline easement. This includes keeping the pipeline ROW free of:

- Trees
- Shrubs

- Buildings
- Fences And, any other structure or encroachment that would obstruct NW Natural's ability to perform its pipeline safety responsibilities.

15. Question Result, ID, References: Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text: *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered: 88965 (1,826)

Result Notes: The patrol records were reviewed during the Clark County inspection completed on 3/23/2021.

PD.PA: Public Awareness

16. Question Result, ID, References: Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)

Question Text: *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered: 88965 (1,826)

Result Notes: PAP Manual 2020 Program Assets 2.1. Asset Identification

NW Natural assets included in this plan are:

- Existing pipeline routes
- Transmission and local distribution pipelines
- LNG and MIST Storage facilities

17. Question Result, ID, References: Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text: *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*

Assets Covered: 88965 (1,826)

Result Notes: (1) affected public, (NWN contacts customers within in the service area using its billing system. The advertising component of the PA program reaches folks who does not have gas service)

(2) emergency officials, (Culver)

(3) local public officials, and (purchased list)

(4) excavators (Culver)

This information is contained in Appendix A of NWN's PA plan.

18. Question Result, ID, References: Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text: *Does the operator's program documentation demonstrate management support?*

Assets Covered: 88965 (1,826)

Result Notes: NWN 2020 PAP 1.5. Commitment from Management

NWN 2020 PAP 1.5.2. Management Participation

Per the manual:"NW Natural management is fully committed to compliance with the company's Public Awareness Program and the requirements of API RP 1162 and 49 CFR 192.616. Management has committed to providing resources and funding for program development and implementation."

1.6. Responsibilities and Key Personnel, and Budget (Page 7)

Page 8 (Other Plan resources)

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

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

Assets Covered: 88965 (1,826)

Result Notes: The program has been established by the dates required in .616(h) The UTC has a current copy of the plan Rev. 2/2020. The program documentation has several references to API RP 1162.

The first plan was developed in 2006. It is reviewed every year for changes. The last full 4 yr effectiveness review was completed in 2016. NWN performs an condensed effectiveness review annually during the annual plan review.

20. Question Result, ID, References: Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text: *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*

Assets Covered: 88965 (1,826)

Result Notes: Records indicate school districts fall under the public officials mailing. The HCA list is a separate list and includes all 4 groups.

I checked a couple of addresses during the inspection to spot check the mailing list.

12921 Rockwell Drive, Vancouver - No active gas service.

Vancouver FD#5 at 7110 NE 63rd St, Vancouver - It was contained in the records.

21. Question Result, ID, References: Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)

Question Text: *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*

Assets Covered: 88965 (1,826)

Result Notes: This is contained in the plan in Appendix B.

22. Question Result, ID, References: Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)

Question Text: *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*

Assets Covered: 88965 (1,826)

Result Notes: These factors are contained in the NWN PA plan in sections 4.1, 4.4, 6.3, 6.4, 7, and 8.2.

23. Question Result, ID, References: Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))

Question Text: *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?*

Assets Covered: 88965 (1,826)

Result Notes: I reviewed the mailings for the other groups in the pre-inspection documents provided by the operator. The First Responder mailing for Police departments was reviewed during the MS Teams inspection.

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

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

Assets Covered: 88965 (1,826)

Result Notes: The message content and delivery interval was sufficient.

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

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

Assets Covered: 88965 (1,826)

Result Notes: The messages are delivered every year for all audiences. Mailing receipts for several years were reviewed.

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

Question Text: *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered: 88965 (1,826)

Result Notes: **Emergency Preparedness Communications**

A series of statements encompassing the following:

- Priority to protect life
- Emergency contacts
- Emergency preparedness response plans.

Emergency preparedness drills and exercises

NW Natural offers information and training for emergency response officials, and participates in appropriate or relevant tabletop exercises conducted by emergency response agencies. Emergency preparedness response plans Documents prepared for internal and external use in accordance with 49 CFR Part 192 and contact information for local emergency officials to obtain additional information.

Liaison with emergency officials

Description of the ongoing relationship that NW Natural maintains with local emergency officials to help response to incidents and outreach programs, such as:

- Documented Emergency Preparedness Plan and Disaster Recovery Plan
- Invitations to emergency officials for onsite visits as appropriate
- Training on locations of critical equipment
- Training on appropriate emergency response procedures
- Training on product hazards
- Attendance at Local Emergency Planning Committees (LEPC).

Training is conducted monthly for the Incident Command Team. Training for the Command Team (Table Top Exercise) is performed each December.

Emergency Officials Training/Personal Contact

Police/Fire Departments and Utilities Training (in-person) Fire Departments Training (video) These are performed monthly.

A letter titled "NWN Public Official Letter 2020" was provided and reviewed:

Mailing receipts were provided for: October 2020 all exec the FRs and Excavators. The 2020 list of mailing was reviewed and the date was 10/29/2020.

The 2019 list was mailed on 8/5/2019. Postage was reviewed for that as well.

The 2018 (9/10/2018) list was also reviewed.

A list of agencies contacted was reviewed for 2020. 483 public officials were reached in Washington in 2020 and 260 were contacted in 2019. In 2018, 260 mailings to public officials were sent out.

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

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

Assets Covered: 88965 (1,826)

Result Notes: NWN PAP Section 5.1.2.1. Message in Native Languages Upon request, through direct mail and advertising NW Natural will provide safety information in English and Spanish. Additionally, contact information is provided in Russian, and Asian languages on main safety materials. The determination of which non-English languages to represent is made by analyzing demographics from the U.S. Census Report and media trends in the markets NW Natural serves.

28. Question Result, ID, References: Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

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

Assets Covered: 88965 (1,826)

Result Notes: Reviewed several samples of materials sent out to various audiences such as excavators, developers, public close to the ROW, multifamily properties, and public officials. All materials were multilingual.

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

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

Assets Covered: 88965 (1,826)

Result Notes: PAP Section 8 - Program Evaluation

Section 8.3 is 4 year interval for effectiveness evaluations.

Margin or error is +/ - 5%.

30. Question Result, ID, References: Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text: *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered: 88965 (1,826)

Result Notes: NWN has conducted annual plan reviews since 2006.

Reviewed 2017 and 2019 Public Safety Awareness Plans during this inspection.

31. Question Result, ID, References: Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text: *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*

Assets Covered: 88965 (1,826)

Result Notes: PAP Section 1.6 - list of internal assessment personnel.

Reviewed 2017 and 2019 internal assessments.

Primarily use internal assessment.

32. Question Result, ID, References: Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)

Question Text: *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*

Assets Covered: 88965 (1,826)

Result Notes: 2020 Public Awareness Safety plan - areas for improvement with action plans

Improve knowledge / awareness of natural gas safety with younger audience.

Increase awareness of what natural gas smells like with affected public.

Strengthen messaging awareness with Fire Departments and Public Officials.

Decrease dig-in damages from contractors / excavators.

Improve perceptions about natural gas safety.

2017 Public Awareness Safety Plan - areas for improvement

Improvement in overall awareness

Improve message for the "leave" message.

33. Question Result, ID, References: Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)

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

Assets Covered: 88965 (1,826)

Result Notes: An effectiveness evaluation was conducted in 2020. The previous effectiveness evaluation was last performed on 2019.

Reviewed effectiveness evaluations for affected public, HCA/ROW, Contractors & Excavators, Emergency Officials, and Public Officials. Most had positive trends and feedback results. The only targeted group with slightly negative trends was public officials.

34. Question Result, ID, References: Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)

Question Text: *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*

Assets Covered: 88965 (1,826)

Result Notes: Reviewed Appendix A which tracks outreach for each individual stakeholder group

35. Question Result, ID, References: Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)

Question Text: *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered: 88965 (1,826)

Result Notes: Reviewed 2020 Fire Department Survey results

Survey results also available for HCA/ROW, Multi family, Public officials, and Utilities.

General survey results also available for excavators, customers, and non-customers.

36. Question Result, ID, References: Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)

Question Text: *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered: 88965 (1,826)

Result Notes: Trends measured in Call Before You Dig, targeted stakeholders (individually evaluated), and general public.

37. Question Result, ID, References: Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)

Question Text: *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*

Assets Covered: 88965 (1,826)

Result Notes: Reviewed damage prevention data - Two major damage categories were 41% excavation practices not sufficient, and 38% One-Call notification practices not sufficient.

38. Question Result, ID, References: Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text: *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered: 88965 (1,826)

Result Notes: Reviewed improvement recommendation of adding more Hispanic radio spots in specified areas (2020 program evaluation)

Reviewed contract agreement for Lara Media Services for 9 weeks on Bustos media (Portland /Vancouver markets) in May 2021.

Total of 230 radio spots .

Spanish Social media as well (Facebook).

PD.RW: ROW Markers, Patrols, Monitoring

39. Question Result, ID, References: NC, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text: *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered: 88965 (1,826)

Result Notes: Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

40. Question Result, ID, References: NC, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text: *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered: 88965 (1,826)

Result Notes: Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

41. Question Result, ID, References: NC, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text: *Are line markers placed and maintained as required?*

Assets Covered: 88965 (1,826)

Result Notes: Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

42. Question Result, ID, References: NC, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)

Question Text: *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered: 88965 (1,826)

Result Notes: Procedures, records, and observations for markers were addressed during the 2021 NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

43. Question Result, ID, References: NC, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text: *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered: 88965 (1,826)

Result Notes: Procedures, records, and observations for markers were addressed during the NWN Clark County Standard inspection that had an exit interview date of 3/23/2021.

PD.SP: Special Permits

44. Question Result, ID, References: NA, PD.SP.REPAIR.P, 190.341(d)(2)

Question Text: *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*

Assets Covered: 88965 (1,826)

Result Notes: No such relevant facilities/equipment existed in the scope of inspection review.

45. Question Result, ID, References NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*

Assets Covered 88965 (1,826)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

46. Question Result, ID, References NA, PD.SP.REPAIR.R, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*

Assets Covered 88965 (1,826)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

47. Question Result, ID, References NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*

Assets Covered 88965 (1,826)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Report Parameters: Results: all

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