Inspection Output (IOR)

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Inspection Information

Inspection Name	8269 JR Simplot Public Awareness	Operator(s)	J.R. SIMPLOT COMPANY (32395)	Plan Submitted	06/29/2021
Status	PLANNED	Lead	Anthony Dorrough	Plan Approval	06/29/2021 by Sean Mayo
Start Year	2021	Observer(s)	Rell Koizumi	All Activity Start	07/07/2021
System Type	GT	Supervisor	Joe Subsits	All Activity End	07/07/2021
Protocol Set ID	GT.2020.02	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Scope and Summary:

This Public Awareness (PA) gas transmission inspection covered process and records review questions. The last PA inspection was performed on 8/23/2016 with no recommended follow up actions. A verbal exit interview was conducted on 07/28/21.

Dates, Activities and Locations:

7/28- J.R. Simplot PA Inspection conducted online via a Microsoft Teams Meeting; records and inspection documents were emailed to staff for review prior to the inspection.

Summary of Significant Findings:

No apparent violations of federal or state code
No areas of concern identified

Primary operator contacts/participants in the inspection:

Stephen Hernandez/Gas Compliance/The Compliance Group

Recommended follow up actions for next inspection:

There were no recommended follow actions.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	J.R. Simplot PA	J.R. Simplot Company	unit	86257	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned	23	23	23	100.0%

Report Filters: Results: all

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	J.R. Simplot PA	n/a	PD.PA	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.	J.R. Simplot PA	--	07/07/2021 07/07/2021	n/a	all planned questions	all assets	all types	23	23	23	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	J.R. Simplot PA	COMPLETED	07/28/2021	J.R. Simplot PA	J.R. Simplot PA

Results (all values, 23 results)

24 (instead of 23) 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: J.R. Simplot PA

PD.PA: Public Awareness

2. 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: J.R. Simplot PA
   - Result Notes: Located in PAP and O&M: sections 3.1 & 4.1

3. 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: J.R. Simplot PA
   - Result Notes: Located in PAP, Section 5.2

4. 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 J.R. Simplot PA

Result Notes Located in the PAP; Sections 1.5 and 3

5. 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 J.R. Simplot PA

Result Notes May 19, 2020 - Aug 14 2012 older PAP started

6. 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 J.R. Simplot PA

7. 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 J.R. Simplot PA

Result Notes Located in PAP; Section 8

8. 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 J.R. Simplot PA

Result Notes Located in PAP; Section 9.8

9. 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 J.R. Simplot PA

Result Notes Staff reviewed public awareness brochures

10. 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 J.R. Simplot PA

11. 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 J.R. Simplot PA

12. 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 J.R. Simplot PA

13. 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: J.R. Simplot PA

Result Notes: Located in PAP; Section 6.2

14. 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: J.R. Simplot PA

Result Notes: Staff reviewed public awareness brochures.

15. 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: J.R. Simplot PA

Result Notes: Located in PAP; Sections 2.1, 2.2 and 9.11

16. 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: J.R. Simplot PA

17. 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: J.R. Simplot PA

18. 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: J.R. Simplot PA

Result Notes: There were no changes per. this inspection cycle.

19. Question Result, ID, References: NA, 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: J.R. Simplot PA

Result Notes: Not due until 2024.

20. 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: J.R. Simplot PA

Result Notes:

1. There was a record for CY 2020. This was the first year with The Compliance Group's program. Prior to 2020 there is no record.

21. 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: J.R. Simplot PA

Result Notes

1. There was a record for CY 2020. This was the first year with The Compliance Group's program. Prior to 2020 there is no record.

22. 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 J.R. Simplot PA

Result Notes

1. There was a record for CY 2020. This was the first year with The Compliance Group's program. Prior to 2020 there is no record.

23. 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 J.R. Simplot PA

Result Notes

1. There was a record for CY 2020. This was the first year with The Compliance Group's program. Prior to 2020 there is no record.

24. 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 J.R. Simplot PA

Result Notes

1. All changes to the actual implementation of the program are located in the annual report on the bottom of page two under "Supplemental Enhancements". There are supplemental enhancements put into place every year that will be documented annually. Any changes made to the manual are outlined in PAP, Section 10 - Form 2.

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.