



# Public Awareness Program For Pipeline Operators



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# Overview

- Purpose
- Public Awareness Objective
- Public Awareness Background
- API RP 1162, 1<sup>st</sup> Edition – Federal Regulations
- Clearinghouse
- Inspection
- Effectiveness Evaluations
- RP 1162, 2<sup>nd</sup> Edition
- Public Awareness Workshop





# Purpose

**“Pipeline operators’ public awareness programs provide safety information to stakeholders to help keep communities near pipelines safe.”**





# Public Awareness Program Objectives

- Promote the use of one-call notification system prior to excavation
- Educate stakeholders about:
  - Possible hazards associated with unintended releases from pipeline facility
  - Physical indications of a pipeline release
  - Public safety measures in the event of a pipeline release
  - Procedures to reporting a pipeline release





# Significant Incidents Caused by Excavation Damage

(2000 thru 2009)

- Gas Distribution Pipelines
  - 32% of Significant Incidents
  - 19% of Fatalities and 29% Injuries
- Gas Transmission Pipelines
  - 14% of Significant Incidents
  - 38% of Fatalities and 21% Injuries
- Hazardous Liquid Pipelines
  - 16% of Significant Incidents
  - 32% of Fatalities and 22% Injuries





# Background

- Pipeline safety regulations long required:
  - Damage prevention awareness for excavators (192.614 and 195.442)
  - Emergency plans for fire, police, and public officials (192.615 and 195.402)
  - Public education (192.616 and 195.440)
- API RP 1162 Committee formed in January 2002
- 1<sup>st</sup> Edition of API RP 1162 published in December 2003
- Operator public awareness workshops held in 2003 and 2005





# Background

- Final rule in May 2005 (Docket 15852)
  - Incorporated by reference the guidelines in API RP 1162, Public Awareness Programs for Pipeline Operators, 1<sup>st</sup> Edition
    - 192.616 for Natural Gas Pipelines
    - 195.440 for Hazardous Liquids Pipelines
- Advisory bulletin in June 2005 that required operators to complete written program by June 20, 2006
- In 2005, Congress directed DOT to create a clearinghouse for the initial review of these programs
- Amendment effective January 14, 2008 relaxed rules for master meter and some LPG operators
- Operators must conduct an evaluation of effectiveness by June 2010





# RP 1162

- 49 CFR 192.616 and 49 CFR 195.440 require operators to:
  - Follow the general program recommendations, including baseline and supplemental requirements of RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.
  - Unless written program justifies why compliance with RP 1162 is not practicable and not necessary for safety
  - Operators must also address specific educational requirements included in both regulations





# RP 1162 - Supplemental Program

- When conditions along the pipeline suggest a more intensive effort is needed:
  - Potential hazards
  - High Consequence Areas
  - Land development activity
  - Third-party damage incidents
  - Environmental considerations
  - Pipeline history
  - Results from previous evaluations
  - Regulatory requirements
- Complete list of considerations in Section 6.2 of RP 1162





# RP 1162 - Supplemental Program

- Forms of supplemental enhancements
  - Increased frequency of communications
  - Enhanced message content
  - Additional delivery method and/or media
  - Widening stakeholder audience coverage area beyond baseline program
- Written program must describe the process for determining whether supplemental enhancements are warranted
- Implementation records must document areas along the pipeline route where supplemental elements have been implemented





# Clearinghouse

- In 2005, Congress directed DOT to create a clearinghouse for the initial review of these programs
- Advisory Bulletin published in June 2006, requesting submission of written programs by October 2006
- Review criteria for programs jointly established and adopted by OPS & NAPSRS
- Submittal information stored in Public Awareness Program Database (PAPD)
- Addressed completeness of written program and minimal adequacy





# Clearinghouse

- Aspects of written program that differed from recommendations in RP 1162 recorded as a deviation in the database
- Recorded implemented supplemental elements
- Generated summary of deviations and supplementals implemented
- OPS CATS Managers worked with operators to resolve deviations
- State pipeline safety offices determined actions to take for their jurisdictional operators with respect to deviations





# Inspection

- Looking for compliance with regulations in 49 CFR 192 (Gas) and 49 CFR 195 (Liquid), as well as following API RP 1162 (1<sup>st</sup> Edition)
  - Deviations must be justified
- States are conducting inspections for their operators
- Focus has been on:
  - Does the plan exist?
  - Is it tailored to the specific pipeline?
  - Is the program being implemented?





# Effectiveness Evaluations

- Regulations currently require operators to perform a public awareness program self-evaluation of effectiveness at four-year intervals, June 2010
- State and federal inspection programs will be expanded to include review of operator effectiveness evaluations, beginning second half of 2010
- Evaluation of effectiveness focus will be:
  - Did the operator implement based on written program?
  - Did operators evaluate program for effectiveness?
  - What evaluation methods/processes used? Results documented?
  - What knowledge was gained? Documented?





# RP 1162, 2<sup>nd</sup> Edition

- Focus on clarification and streamlining
- Essential elements of 1<sup>st</sup> edition retained
- Revision focus:
  - Align baseline messages with core safety messages
  - Requires formal process for considering enhancements
  - Non-safety messages shifted to enhanced category
    - Pipeline purpose and reliability
    - How to get additional information
    - Availability of a list of pipeline operators through NPMS
  - Increased discretion for baseline delivery methods; identifies potentially inappropriate methods





# RP 1162, 2<sup>nd</sup> Edition

- API's Operations and Technical Committee plan to have revision consensus and acceptance by (tentatively Spring 2010)
- Finalize 2<sup>nd</sup> Edition (tentatively Summer 2010)
- API members and others in industry may voluntarily adopt
- Operator is still required to comply with the 1<sup>st</sup> version currently referenced in the regulation
- If PHMSA determines that the revision is appropriate to incorporate into regulation, may incorporate into rule at a later date





# Public Awareness Workshop

- PHMSA and NAPSRS Co-Sponsoring a Public Awareness 1- Day Workshop
  - June 2010, Location TBD
  - Stakeholders from various industries will share lessons learned
  - Review implementation progress, identify what is working and not working, and jointly identify the key components of a successful public awareness program
- PHMSA will use results from the workshop and effectiveness inspections to further develop the public awareness program





# Public Awareness Workshop Draft Agenda

- Chronology of Public Awareness – PHMSA/State Partners
- PHMSA observations based on Clearinghouse
- NAPSR, (update on state public awareness activities, evaluation plans)
- Public Perspective
- Pipeline Trade Association Observations (Industry-wide challenges and successes with current regulations, PHMSA transparency and timing associated with effectiveness evaluations)
- Lessons Learned Panel Discussion, Pipeline Operators (What's working, what's not working from operator experience)
- Group Discussion: Identifying key components of successful public awareness programs
- PHMSA/State Partner timeline for conducting effectiveness evaluations





Thanks for your time and consideration

**Steve Fischer**

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**Questions?**



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