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Chris Nelson, Vice Chairperson
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South Dakota

PUBLIC UTILITIES COMMISSION

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February 21, 2013

The Honorable Ritchy Gripp
Mayor, City of Humboldt
404 S. Madison
Humboldt, SD 57035

RE: South Dakota 2013 Public Awareness Inspection of Humboldt Natural Gas Facilities

Dear Mayor Gripp:

This letter and attachments summarize the findings of the public awareness inspection conducted in reference to the Humboldt natural gas facilities. I would like to thank Kristie Ellis for meeting with Mary Zanter and I and providing the required information.

I am pleased to report that there were no enforceable issues found during the inspection. No response to this report is required since there are no enforceable issues.

Please note the inspection conducted is limited to the specified code sections in the attached inspection forms. The South Dakota Public Utilities Commission (SDPUC) did not examine overall system condition or operability and does not warrant the same under any condition. Other system or code compliance issues may exist. Failure to include such items in this report does not prohibit future SDPUC action nor limit applicability in future inspections.

Please do not hesitate to contact me with any questions or concerns regarding this inspection.

Sincerely,

Nathan D. Solem

Nathan D. Solem

Pipeline Safety Program Manager

Cc: Ms. Kristie Ellis, Finance Officer, City of Humboldt, finance@humboldtsd.com
Mary Zanter, SDPUC, mary.zanter@state.sd.us

Attachments

**2013 South Dakota Pipeline Safety Inspection
Summary of Deficiencies**

Operator: Humboldt Municipal Gas Utilities
Inspection Types: Public Awareness Inspections
Inspection Dates: February 5, 2013

Notices of Probable Violation

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
		None.				

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
		None		

Notices of Concern

Code Section	Code Description	Comment
PAPE Protocol 1.05	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.	CO safety and safety near gas meters added to LDC baseline messages. Recommend removing extra items from table to avoid enforcement on those items.
PAPE Protocol 2.05	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?	Recommend that a note added to file or in the change log that identifies review of the effectiveness no supplemental messages were necessary.

Notices of Concern

Code Section	Code Description	Comment
PAPE Protocol 3.01	<p>3.01 Measuring Program Implementation</p> <p>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?</p> <ul style="list-style-type: none"> • Verify the operator performed an annual audit or review of the PAP for each implementation year. 	<p>Recommend using a change log to show changes.</p>
PAPE Protocol 3.03	<p>3.03 Program Changes and Improvements</p> <p>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?</p> <ul style="list-style-type: none"> • 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. 	<p>Minor changes to the plan made, but not well documented. Suggest implementing a log sheet that shows all changes to the program.</p>

PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE: 02/05/2013
 INSPECTION END DATE: 02/05/2013
 OPERATOR ID: 30964
 OPERATOR NAME: HUMBOLDT MUNICIPAL GAS, CITY OF
 STATE/OTHER ID: SD
 ACTIVITY RECORD ID NUMBER
 COMPANY OFFICIAL: Ritchy Griep
 COMPANY OFFICIAL STREET: 100 S Main
 COMPANY OFFICIAL CITY: Humboldt
 COMPANY OFFICIAL STATE: SD
 COMPANY OFFICIAL ZIP: 57035
 COMPANY OFFICIAL TITLE: Mayor
 PHONE NUMBER: (605) 363-3789
 FAX NUMBER:
 EMAIL ADDRESS: finance@humboldtsd.com
 WEB SITE:
 TOTAL MILEAGE: 12
 TOTAL MILEAGE IN HCA: 0
 NUMBER OF SERVICES (DISTR): 265
 ALTERNATE MAOP (80% RULE): 0
 NUMBER OF SPECIAL PERMITS: 0
 INITIAL DATE OF PAP: 01/25/2006
 TITLE OF CURRENT PAP: Humboldt Municipal Gas Utility Public Awareness Plan
 CURRENT PAP VERSION: 05/30/2012
 CURRENT PAP DATE: 05/30/2012
 DATE SUBMITTED FOR APPROVAL:
 DIRECTOR APPROVAL:
 APPROVAL DATE:
 OPERATORS COVERED UNDER PROGRAM:

OPERATOR ID	NAME
30964	HUMBOLDT MUNICIPAL GAS, CITY OF

 UNITS COVERED UNDER PROGRAM:

UNIT ID	NAME
1	Humboldt Municipal Gas

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Kristie Ellis	Finance Officer	(605) 363-3789	finance@humboldtsd.com

ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
Pipeline Association for Public Awareness	Mailings	(719) 375-3837	jeff.ferrells@pipelineawareness.org

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
Nathan Solem	State	SD	nathan.solem@state.sd.us	<input checked="" type="checkbox"/>
Mary Zanter	State	SD	mary.zanter@state.sd.us	<input 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	
HUMBOLDT MUNICIPAL GAS, CITY OF	30964	natural gas	SD	0	0	12	

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)

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

COMMENTS:

Original public awareness plan dated 10/25/06.
 Kristie Ellis identified as responsible person.
 Established in accordance with API RP 1162.
 Records retained for 5 years.

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:

Statement of support on page 2. Statement comes from Humboldt's Utility Board.
 Funding provided thru city council.

Invoices for magnets - telephone shaped magnet and envelope sized calendar magnet in December 2012. Invoice for trifold brochures March 2012.
 PAPA invoice paid 1/9/12 and 3/12/12.

Brochures are sent with utility bill so no additional cost.

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

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

COMMENTS:

Section 2 on page 3 identifies the affected facilities.

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

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

COMMENTS:

stake holder audience is identified in section 3, page 3.

Buffer zone of 1/2 mile of the pipeline is identified.

Demonstrated map of pipeline showing buffer zone.

Undelivered mail is followed-up on with getting correct information.

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:

Table on message type, content and frequency shows correct information.

NOC: CO safety and safety near gas meters added to LDC baseline messages. Recommend removing extra items from table to avoid enforcement on those items.

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:

Section 8 of the plan has the information for an annual compliance audit and the effectiveness assessment to be completed at least every four years.

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:

Less than 2% of residents are hispanic per census. Written materials are provided only in English.

Each new customer needs to go in person to the Humboldt office to get service set up. They have not had anyone that doesn't speak English.

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)

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

COMMENTS:

Brochures used as bill stuffers contain all of the necessary information.

PAPA message OK.

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)

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

COMMENTS:

Distribution only -no transmission.

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:

Bill stuffers issued in April 2012 and October 2012, June 2011 and November 2011. Includes residents (affected public), public officials.

PAPA provides the other message deliveries.

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:

Magnets (telephone and calendar), pens, and phone list sent in the utility bills. These items were additional. Nothing suggested additional messages were necessary.

Recommend that a note added to file or in the change log that identifies review of the effectiveness no supplemental messages were necessary.

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:

Records showing liaison with Humboldt fire, Hartford fire, county sheriff and FEMA. Including providing a emergency plan.

Shared contact information and response capability but no documentation.

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:

A log showing annual review for years 2009 thru 2012 was provided.

NOC: Recommend using a change log to show changes.

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:

Audits done internally. Regulatory audit used also.

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:

NOC: Minor changes to the plan made, but not well documented. Suggest implementing a log sheet that shows all changes to the program.

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:

Survey was completed in 2009. Due this year.

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:

Survey was completed in 2009. Due this year.

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:

Survey was completed in 2009. Due this year.

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:

Survey was completed in 2009. Due this year.

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:

Survey was completed in 2009. Due this year.

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:

Survey was completed in 2009. Due this year.

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:

Survey was completed in 2009. Due this year.

5. Inspection

SUMMARY:

FINDINGS: