Public Awareness Program (PAP)

By

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PHMSA (Training and Qualifications)
Agenda

• What is PAP?
• Stakeholder Audience
• Why have a PAP?
• Management Involvement
• Implementing PAP
• Liaison: Operator and Stakeholder Audience
• PAP Evaluation
• Continuous Improvement for PAP
• Conclusions
What is PAP?

• 192.616 and 195.440
  – Operators’ are required to have one
  – Master meters are also required, but have a different requirement

• According to code the program must follow the guidance from API RP 1162
What is PAP?

Public Awareness Program (PAP)

• An important factor in establishing communications and providing information
What is PAP?

- It is necessary to help the public understand that pipelines are the major transportation system for petroleum products and natural gas in the United States,
What is PAP?

- Describing how pipelines function, and the public’s responsibilities to help prevent damage to pipelines.
What is PAP?

§192.616; §195.440 – Public Awareness

• Continuous public education program that follows API RP 1162
What is PAP?

§192.616; §195.440 – Public Awareness

- Integrates the unique attributes and characteristics of the pipeline and facilities
What is PAP?

Written Program

• Baseline and Supplemental requirements of API 1162

• Table 2-1 - Summary Public Awareness Communications for Hazardous liquids and natural Gas Transmission Pipeline Operators
  – Provides guidance on requirements
Stakeholder Audiences

- Affected public
- Emergency officials
- Local public officials
- Excavators.
## Stakeholder Audiences

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<thead>
<tr>
<th>Stakeholder Audience</th>
<th>Message Type</th>
<th>Delivery Frequency</th>
<th>Delivery Method and/or Media</th>
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</table>
| **2-1.1 Affected Public** | **Baseline Messages:**  
- Pipeline purpose and reliability  
- Awareness of hazards and prevention measures undertaken  
- Damage prevention awareness  
- One-call requirements  
- Leak recognition and response  
- Pipeline location information  
- How to get additional information  
- Availability of list of pipeline operators through NPMS | **Baseline** - 2 years | **Baseline Activity:**  
- Targeted distribution of print materials  
- Pipeline markers |
| Residents Located along transmission pipeline ROW And Places of Congregation | **Supplemental Message:**  
- Information and/or overview of operator’s Integrity Management Program  
- ROW encroachment prevention  
- Any planned major maintenance/construction activity | **Supplemental Frequency:** Additional frequency and supplemental efforts by specifics ... | **Supplemental Activity:**  
- Print materials  
- Personnel contact  
- Telephone calls  
- Group meetings  
- Open houses |
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| **2-1.2 Emergency Officials** | **Baseline Messages:**  
• Pipeline purpose and reliability  
• Awareness of hazards and prevention measures undertaken  
• Emergency Preparedness Communications  
• Potential Hazards  
• Pipeline location information and availability of NPMS  
• How to get additional information | **Baseline**  
- Annual | **Baseline Activity:**  
• Personal contact (generally preferred)  
OR  
• Targeted distribution of print materials  
OR  
• Group meetings  
OR  
• Telephone calls with targeted distribution of print materials |

| **Supplemental Message:**  
• Provide information and/or overview of Integrity Management Program  
• Maintenance construction activity | **Supplemental Frequency:**  
Additional frequency and supplemental efforts by specifics... | **Supplemental Activity:**  
• Emergency tabletop, deployment exercises  
• Facility tour  
• Open house |
# Stakeholder Audiences

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| **2-1.3 Public Officials** | **Baseline Messages:**  
- Pipeline purpose and reliability  
- Awareness of hazards and prevention measures undertaken  
- Emergency preparedness communications  
- One-call requirements  
- Pipeline location information and availability of NPMS  
- How to get additional information  | **Baseline**  
= 3 years |  |  |
| Public Officials | **Supplemental Message:**  
- If applicable, provide information about designation of HCA (or other factors unique to segment) and summary of Integrity Mgt taken.  
- ROW encroachment prevention  
- Maintenance construction activity  | **Supplemental Frequency:**  
- If in HCA, then annual contact to appropriate public safety officials  
- Otherwise, as appropriate to level of activity or upon request | **Supplemental Activity:**  
- Personal Contacts  
- Telephone calls  
- Video and CDs |  |
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<td>2-1.4 Excavators</td>
<td><strong>Baseline Messages:</strong></td>
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<td></td>
<td>• Pipeline purpose and reliability</td>
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<td><strong>Supplemental Message:</strong> Pipeline purpose, prevention measures and reliability</td>
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<td><strong>Supplemental Frequency:</strong> Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment</td>
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<td><strong>Baseline Activity:</strong></td>
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<td>• Targeted distribution of print materials</td>
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<td>• One-Call Center outreach</td>
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Why have a PAP?

• 192.616
  – a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see § 192.7).

• 195.440
  – For the Liquid code: this applies to **All Pipeline operators** (No exceptions)
Why have a PAP?

• 192.616; 195.440
  – (i) The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.
Why have a PAP

• Bad things happen all the time
  – The more we can help prevent it, the better
Management Involvement

• Management involvement provides the following essentials for the success of the PAP:
  • **Budget**
  • **Overview**
  • **Active**
  • **Responsibility**
  • **Directives**
Implementing PAP

• 192.616
  (b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.
Implementing PAP

• 192.616
  – (c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162,
Implementing PAP

• 192.616(d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities 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 that such a release may have occurred;
  • (4) Steps that should be taken for public safety in the event of a gas pipeline release; and
  • (5) Procedures for reporting such an event.
Implementing PAP

• (1) Use of a one-call notification system prior to excavation and other damage prevention activities;
  – Are you tied in with the one-call system?
  – Do all excavation activities have a one-call ticket?
  – Are there any challenges?
  – Are these challenges documented?
  – Are continuous activities in place to address these challenges?
Implementing PAP

• (2) Possible hazards associated with unintended releases from a gas pipeline facility;
  – What are the steps to address the above?
  – Are these steps communicated to the stakeholder audiences?
  – Is the communication and behavior required verified?
  – What is in place to address continuous improvement?
Implementing PAP

• (3) Physical indications that such a release may have occurred;
  – Are these indications understood by the stakeholder audiences?
Implementing PAP

• (4) Steps that should be taken for public safety in the event of a gas pipeline release; and

• (5) Procedures for reporting such an event.
Implementing PAP

• 192.616
  – (e) The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.
Implementing PAP

• 192.616
  – (f) The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.
Implementing PAP

- 192.616
  - (g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.
Implementing PAP

192.615(j) ... the operator of a master meter or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of this section. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually. If the master meter or petroleum gas system is located on property the operator does not control, the operator must provide similar messages twice annually to persons controlling the property. The public awareness message must include:

1. A description of the purpose and reliability of the pipeline;
2. An overview of the hazards of the pipeline and prevention measures used;
3. Information about damage prevention;
4. How to recognize and respond to a leak; and
5. How to get additional information.
Liaison

• Does the operator know:
  – Responsibilities and Resources of the Responders

• Has the operator shared:
  – There abilities to respond adequately to an emergency with the Responders
Liaison

• Has the Operator identified:
  – The different emergency scenarios and the notification of the appropriate Responder?
Liaison

• Has the operator discussed and Planned:
  – How they and the Responders can engage in mutual assistance to minimize hazards to life and property?
Liaison

• Are emergency plans readily available to the emergency responder?
Liaison

• Are the operators’ expectation for response covered in all locations along the pipeline system?
Liaison

Meetings:

• Communicating with emergency responders that do not come to training/information sessions.
• Shedding more light on the brochures
• Addressing the unique attributes of the pipeline
Liaison

Meetings:

• Discussing adequacy of behavior
  – How to respond to specific situations
  – What to do
  – Who to call

• Team response to continuous improvement
  – Behavior
    • Is this captured, is this being communicated
Liaison

Meetings:
• Team response to continuous improvement
  – Perception of the safety of pipelines
    • Is this captured, is this being communicated
    • One-Call’s effectiveness
Liaison

• Emergency Response Plan
  – Its availability
Liaison

- Notification of Construction activities
  - Supplemental PAP opportunities
Liaison

• Relationships with Stakeholder Audience
  – Responsible person or position
  – Availability
  – Response to request
  – Voice of the Operator
PAP Evaluation

Program Evaluation & Continuous Improvement (Annual Audits)

• Perform an audit or review of the program’s implementation.

• What method was used to perform the audit?
  – Internal
  – 3rd party
  – Regulatory inspections
PAP Evaluation

• What were the analysis of the annual audit?
  – What were the goals?
  – Were they achieved?
  – If not, what is the Action plan?
  – Are there any other improvements or needed techniques?
PAP Evaluation

Program Evaluation & Continuous Improvement (Effectiveness) – No more than 4 years

• Measure Program Outreach
• Measure Percentage Stakeholders Reached
• Measure Understandability of Message Content
• Measure Stakeholder behavior
• Measure Bottom-line results
PAP Evaluation

• Continuous Improvement to the program due to the results of the annual audit.
  – Database to implement the action plan
    • Who is responsible
    • What will be done
    • When will it be done
Conclusions

• PAP needs to be a policy of the operator
• PAP is required per code
• Management is necessary and important for success
• Evaluations are important to have annually and every four years for the effectiveness requirement
Questions?

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