

PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE: 11/22/2013
 INSPECTION END DATE: 11/22/2013
 OPERATOR ID: 32147
 OPERATOR NAME: MARATHON PIPE LINE LLC
 STATE/OTHER ID:
 ACTIVITY RECORD ID NUMBER
 COMPANY OFFICIAL: Craig Potts
 COMPANY OFFICIAL STREET: 700 S. 6th Street
 COMPANY OFFICIAL CITY: Wood River
 COMPANY OFFICIAL STATE: IL
 COMPANY OFFICIAL ZIP: 62095
 COMPANY_OFFICIAL_TITLE: Public Awareness Coordinator
 PHONE NUMBER: (419) 421-3260
 FAX NUMBER: (419) 421-3601
 EMAIL ADDRESS: CAPotts@marathonpetroleum.com
 WEB SITE:
 TOTAL MILEAGE: 1
 TOTAL MILEAGE IN HCA:
 NUMBER OF SERVICES (DISTR): 0
 ALTERNATE MAOP (80% RULE):
 NUMBER OF SPECIAL PERMITS:
 INITIAL DATE OF PAP: 10/5/2006
 TITLE OF CURRENT PAP: Public Awareness Program
 CURRENT PAP VERSION: 25
 CURRENT PAP DATE: 11/8/2013
 DATE SUBMITTED FOR APPROVAL:
 DIRECTOR APPROVAL:
 APPROVAL DATE:

OPERATORS COVERED UNDER PROGRAM:

OPERATOR ID	NAME
32147	MARATHON PIPE LINE LLC

UNITS COVERED UNDER PROGRAM:

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Craig Potts	Public Awareness Coordinator	(419) 421-3601	capotts@marathonpetroleum.com
Richard A. Abraham	Gas Pipeline Safety Coordinator	(419) 421-2290	raabraham@marathonpetroleum.com

ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
Paradigm	Implementation		
Paradigm	Mailings		
Southern Illinois Pipeline Association	Public meetings		

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
Kevin Hecker	State	IL	khecker@icc.illinois.gov	<input checked="" 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	
MARATHON PIPE LINE LLC	32147	Natural Gas	IL	0	0	0.5	

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)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

The operator has a well documented PAP including clearinghouse submission data, with no deficiencies that needed to be addressed.

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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

See Section 2, Page 3 of the PAP.

It states that Marathon is committed to provided all necessary resources, including funding to implement and manage the plan.

Marathon utilizes Paradigm for the mailing of their PA message. They also utilize SIPA to conduct the emergency official meetings.

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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

The operator maintains a complete list of all facilities that shows:

- System name
- System type
- System stage
- Ownership/co-ownership
- Who operates the line

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

<ul style="list-style-type: none"> <input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

The operator's PAP identifies the state holders as:

- Affected Public
- Public Officials
- Emergency Officials
- Excavators/Contractors

The operator uses a 1/4 mile buffer and coordinates with Paradigm who utilizes multiple data sources to identify each stakeholder audience.

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

<ul style="list-style-type: none"> <input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

The operator carefully tracks the message frequency for all states in which they operate.

Affected Public - every 2 years; annual for distribution pipelines.

Emergency Officials - Annual

Local Public Officials - every 3 years

Excavators - Annual

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)

<ul style="list-style-type: none"> <input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

See Section 10, Page 13, of the PAP.

This section outlines:
 The purpose of the evaluations
 How the implementation will be measured
 Measuring the Program Effectiveness
 How Annual audits will be conducted
 and the "triggers" for supplemental action

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:

MPL's message is currently delivered in English and Spanish. Paradigm (utilizing multiple data sources) provides MPL a ZIP code demographic report detailing the percentage of non-English speaking people by county.

If the percentage of non-English speaking individuals by county is 5% or greater, the message will be delivered in that language, in addition to English and Spanish.

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)

<ul style="list-style-type: none"> <input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 The mailer sent out by Paradigm for MPL, includes information for recognizing and responding to leaks for both liquid gas and natural gas.

 It includes:
 Information on 811
 A listing of websites for additional information
 How to recognize a pipeline leak
 What to do/not to do in the event of a leak
 How to identify a pipeline
 What an operator will do in the event of a leak
 Transmission pipeline mapping
 Potential hazards
 What to do if a pipeline is damaged or disturbed
 Explanation of right-of-way
 Listing of One-Call centers and State Agencies

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)

<ul style="list-style-type: none"> <input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 MPL's Public Awareness message includes graphics showing different styles of pipeline markers and explains what information a pipeline marker shows/does not show.

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:

The operator satisfied the requirements of API 1162 as it pertains to message frequency.

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:

See Section 10, Page 14, "Trigger for Supplemental Activity"

This section outlines how effectiveness evaluations will be compared against industry measurements after completing an effectiveness matrix. If MPL is found to be below those measurements in any aspect, then supplemental activity will occur within the next year.

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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

The operator utilizes SIPA to conduct their Emergency Responder meetings. On 3/28/13, Paradigm conducted a dinner meeting for emergency responders in Wood River. Emergency officials from Bond, St. Clair, Madison and Clinton Counties were invited.

Paradigm provided a summary of all people invited to the group and how many attended by stakeholder audience. Paradigm utilizes SIC codes (similar to how they conduct mailings) to identify public officials, emergency officials, excavators, and media. If an invited party doesn't attend, then a separate mailer is sent to them.

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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

The operator conducts annual reviews of the PAP as required in API 1162.

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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

MPL utilizes self-assessment to conduct the annual reviews, and was able to provide documentation dating back to the program inception in 2006.

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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

See PAP, Section F, Enhancements

The operator maintains documentation on the results of Effectiveness Research Surveys (PAPERS). These results are broken down by stakeholder and identify areas for improvement. Also documented is the program enhancements that were implemented clearly outlining:

- Objective
- Target Audience
- Key Messages
- Supplemental Activity
- Effectiveness Measurement

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 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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

While MPL's PAP specifies the 4-year requirement, Effectiveness Evaluations are actually conducted annually.

Effectiveness evaluations are conducted in-house, utilizing the data from the Public Awareness Program Effectiveness Research Survey (PAPERS) as well as return data from Paradigms questionnaire cards

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

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

MPL utilizes 4 separate tracking methods to determine program outreach.

- Evaluation of return data from Paradigm's questionnaires
- Questionnaires from Public Awareness meetings
- Results from PAPERS (uses direct mail with web option and telephone surveys)
- Data from internal Hits and Near Misses

Margin of error is established by the American Research Group.

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

<ul style="list-style-type: none"> <input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 The results of the Public Awareness Program Effectiveness Research Survey (PAPERS) shows sample size, margin of error and how the data from the MPL respondents compares to the Aggregate total. This data is broken down by stakeholder audience and includes all of the questions asked to each audience with results given as a percentage.

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

<ul style="list-style-type: none"> <input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 The understandability of the message can be determined by the results of the Public Awareness Program Effectiveness Research Survey (PAPERS). This data is broken down by stakeholder audience and includes all of the questions asked to each audience with results given as a percentage.

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:

Desired Stakeholder Behavior can be determined by the results of the Public Awareness Program Effectiveness Research Survey (PAPERS). This data is broken down by stakeholder audience and includes all of the questions asked to each audience with results given as a percentage. The operator also carefully tracks hit and near miss data along the pipelines. This is broken down by:

- 3rd party near misses
- 3rd party damage events
- 3rd party release events
- Damage caused by no one-call
- Damage caused by excavation without a monitor on site
- Damage caused by mechanical equipment in tolerance zone
- Other

Near misses are identified as any unauthorized digging that occurs within 50 feet of the pipeline.

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:

The operator also tracks hit and near miss data along the pipelines.
This is broken down by:

- 3rd party near misses
- 3rd party damage events
- 3rd party release events
- Damage caused by no one-call
- Damage caused by excavation without a monitor on site
- Damage caused by mechanical equipment in tolerance zone
- Other

Near misses are identified as any unauthorized digging that occurs within 50 feet of the pipeline.

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:

See PAP, Section F, Enhancements

The operator maintains documentation on the results of Effectiveness Research Surveys (PAPERS). These results are broken down by stakeholder and identify areas for improvement. Also documented is the program enhancements that were implemented clearly outlining:

- Objective
- Target Audience
- Key Messages
- Supplemental Activity
- Effectiveness Measurement

5. Inspection

SUMMARY:

FINDINGS: