**National Transportation Safety Board**

Office of Railroad, Pipeline and Hazardous Materials Investigations
Human Performance and Survival Factors Division
Washington, DC. 20594

# Survival Factors[1] Factual Report – Addendum # 3

Exhibit 3.

"API - RP 1162 Public Awareness Programs for Pipeline Operators, December 2003" [2, 3]

Supporting Documentation – Emergency Preparedness / Response

July 16, 2008

*Failure of Dixie Pipeline Company Pressurized Underground Transmission Pipeline, and Subsequent Liquid Propane Release and Fire, near Carmichael, MS, on November 1, 2007*

NTSB Accident Number: DCA 08 MP 001

Compiled by: Richard M. Downs, Jr.
Mechanical Engineer (Crashworthiness)
Investigator / Survival Factors – Working Group Chairperson

[1] The scope of the Survival Factors Factual Report [in pipeline accident investigations] exclusively addresses the emergency preparedness and response, and injury causation aspects of the investigation.
[2] ref. Survival Factors Factual Report; see § 9.2.
[3] note – the document includes a citation "Copyright © 2003 American Petroleum Institute"

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[4] This transmittal is comprised of select pages of the identified publication, as deemed applicable to the topics / issues examined in the Survival Factors Investigation

[5] the supplied document, comprised of 64 total pages, contained information pages that addressed topics which wre extraneous to the focus of the Investigation, in which, for purposes of demonstrating exemplary document content, only the pages applicable to the Investigation [18 pages, total] are included in this report (e.g. as cited under this Attachment Title).

[cover page]

# Public Awareness Programs for Pipeline Operators

**Pipeline Segment**

API RECOMMENDED PRACTICE 1162
FIRST EDITION, DECEMBER 2003

American Petroleum Institute

**Helping You Get The Job Done Right.**℠

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## FOREWORD

This document is a Recommended Practice (RP) for pipeline operators to use in development and management of Public Awareness Programs. Pipeline Operators have conducted Public Awareness Programs with the affected public, government officials, emergency responders and excavators along their routes for many years. The goal of this RP is to establish guidelines for operators on development, implementation, and evaluation of Public Awareness Programs in an effort to raise the effectiveness of Public Awareness Programs throughout the industry.

Representatives from natural gas and liquid petroleum transmission companies, local distribution companies, and gathering systems, together with the respective trade associations, have developed this Recommended Practice. The working group was formed in early 2002. Additionally, representatives from federal and state pipeline regulators have provided input at each step of development and feedback from all interested parties has been solicited through a wide variety of sources and surveys.

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Suggested revisions are invited and should be submitted to API, Standards Department, 1220 L Street, NW, Washington, DC 20005

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pipelines in their communities and increase their understanding of the role of pipelines in transporting energy. A more informed public along pipeline routes should supplement an operator's pipeline safety measures and should contribute to reducing the likelihood and potential impact of pipeline emergencies and releases. Public Awareness Programs will also help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of transportation, that pipeline operators undertake a variety of measures to prevent pipeline accidents, and that pipeline operators anticipate and plan for management of accidents if they occur. Finally, a more informed public will also understand that they have a significant role in helping to prevent accidents that are caused by third-party damage and ROW encroachment.

- **Prevention and Response**

Public Awareness Programs should help the public understand the steps that the public can take to prevent and respond to pipeline emergencies. "Prevention" refers to the objective of reducing the occurrences of pipeline emergencies caused by third-party damage (versus other causes under the control of the operator) through awareness of safe excavation practices and the use of the One-Call System. "Response" refers to the objective of communicating to the public the appropriate steps to take into account in the event of a pipeline release or emergency.

These objectives, together with others that may be identified by individual pipeline operators, provide the foundation on which a pipeline Public Awareness Program is built. Two important objectives of this RP include:

- Assist each pipeline operator to develop a framework for managing its Public Awareness Program so that the quality of Public Awareness Programs can be continually improved throughout the pipeline industry and
- Provide the operator with considerations to determine how to enhance its program to provide the appropriate level of public awareness outreach for a given area and certain circumstances.

## 2.2 OVERVIEW FOR MEETING PUBLIC AWARENESS OBJECTIVES

In general, Public Awareness Programs should communicate relevant information to the following stakeholder audiences (as defined in Section 3):

### 2.2.1 The Affected Public

- Awareness that they live or work near a pipeline
- Hazards associated with unintended releases
- An overview of what operators do to prevent accidents and mitigate the consequences of accidents when they occur
- How to recognize and respond to a pipeline emergency
- What protective actions to take in the unlikely event of a pipeline release
- How to notify the pipeline operator regarding questions, concerns, or emergencies
- How to assist in preventing pipeline emergencies by following safe excavation/digging practices and reporting unauthorized digging or suspicious activity
- How community decisions about land use may affect community safety along the pipeline ROW
- How individuals can create undesirable encroachments upon a pipeline ROW
- How to contact the pipeline operator with questions or comments about public safety, additional overview information on Integrity Management Programs to protect High Consequence Areas located in their area, land use practices, emergency preparedness or other matters.

### 2.2.2 Local Public Officials

- Information regarding transmission pipelines that cross their area of jurisdiction
- Land use practices associated with the pipeline ROW that may affect community safety
- Hazards associated with unintended releases
- An overview of what operators do to prevent accidents and mitigate the consequences of accidents when they occur
- How to contact the pipeline operators with questions or comments about public safety, additional overview information on Integrity Management Programs to protect High Consequence Areas under their jurisdiction, land use practices, emergency preparedness or other matters.

### 2.2.3 Emergency Officials

- Location of transmission pipelines that cross their area of jurisdiction, and how to get detailed information regarding those pipelines
- Name of the pipeline operator and the emergency contact information for each pipeline
- Information about the potential hazards of the subject pipeline
- Location of emergency response plans with respect to the subject pipelines
- How to notify the pipeline operator regarding questions, concerns, or emergency
- How to safely respond to a pipeline emergency
- An overview of what operators do to prevent accidents and mitigate the consequences of accidents when they occur
- How to contact the pipeline operator with questions or comments about public safety, additional overview information on Integrity Management Programs to protect High Consequence Areas under their jurisdiction,

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pipelines in their communities and increase their understanding of the role of pipelines in transporting energy. A more informed public along pipeline routes should supplement an operator's pipeline safety measures and should contribute to reducing the likelihood and potential impact of pipeline emergencies and releases. Public Awareness Programs will also help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of transportation, that pipeline operators undertake a variety of measures to prevent pipeline accidents, and that pipeline operators anticipate and plan for management of accidents if they occur. Finally, a more informed public will also understand that they have a significant role in helping to prevent accidents that are caused by third-party damage and ROW encroachment.

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- How to safely respond to a pipeline emergency
- An overview of what operators do to prevent accidents and mitigate the consequences of accidents when they occur
- How to contact the pipeline operator with questions or comments about public safety, additional overview information on Integrity Management Programs to protect High Consequence Areas under their jurisdiction,

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land use practices, emergency preparedness or other matters.

### 2.2.4 Excavators

- Awareness that digging and excavating along the ROW may affect public safety, pipeline safety and/or pipeline operations
- Information about one-call requirements and damage prevention requirements in that jurisdiction
- Information about safe excavation practices in association with underground utilities
- How to notify the operator regarding a pipeline emergency or damage to a pipeline
- Hazards associated with unintended releases
- Name of the pipeline operator and who to contact for emergency or non-emergency information.

This RP focuses on those four segments of the public, as listed above, that are most directly affected by or could have the most affect on pipeline safety. The general public is a larger audience for general pipeline awareness information. General knowledge about energy pipelines is useful to the general public and may be obtained through a variety of sources, including the Office of Pipeline Safety, US Department of Transportation, pipeline industry trade associations and pipeline operators.

## 2.3 REGULATORY COMPLIANCE

This RP is intended to provide a framework for Public Awareness Programs designed to help pipeline operators in their compliance with federal regulatory requirements found in 49 *CFR* Parts 192 and 195.

The three principal compliance elements include:

### 2.3.1 Public Education (49 *CFR* Parts 192.616 and 195.440):

These regulations require pipeline operators to establish continuing education programs to enable the public, appropriate government organizations, and persons engaged in excavation-related activities to recognize a pipeline emergency and to report it to the operator and/or the fire, police, or other appropriate public officials. The programs are to be provided in both English and in other languages commonly used by a significant concentration of non-English speaking population along the pipeline.

### 2.3.2 Emergency Responder Liaison Activities (49 *CFR* Parts 192.615 and 195.402):

These regulations require that operators establish and maintain liaison with fire, police, and other appropriate public officials and coordinate with them on emergency exercises or drills and actual responses during an emergency.

### 2.3.3 Damage Prevention (49 *CFR* Parts 192.614 and 195.442):

These regulations require pipeline operators to carry out written programs to prevent damage to pipelines by excavation activities.

## 2.4 OTHER RESOURCES

In addition to operator personnel, various other resources are available to assist pipeline operators in developing their Public Awareness Programs and related informational materials. These resources can often shorten development time and reduce the implementation cost of an operator's Public Awareness Program. Some of these other resources are described below.

### 2.4.1 Trade Associations

The major pipeline industry trade associations take an active role in sponsoring various efforts that can help operators meet public awareness objectives. These trade associations include the:

- American Petroleum Institute (API)
- Association of Oil Pipe Lines (AOPL)
- American Gas Association (AGA)
- Interstate Natural Gas Association of America (INGAA) and
- American Public Gas Association (APGA).

The websites of these associations provide a wide range of information to assist operators in developing and managing Public Awareness Programs, and developing information to use in implementing those programs. The trade associations also undertake specific efforts in public outreach, such as:

- Printing of pipeline safety brochures that can be customized by the operator
- Development and distribution of pipeline safety decals and materials
- Development of videos and brochures to aid in the education of public officials regarding pipeline emergency response
- Development of website information specifically for pipeline public awareness
- Distribution of periodic newsletters that provide additional guidance and information to operators on issues related to Public Awareness Programs
- Development and sponsorship of television and radio public service announcements (PSA)
- Participation in appropriate trade shows to inform excavators, regulators, legislators, and others.

For additional information on these efforts, contact the trade associations directly. Contact information and website addresses are provided in Appendix A.

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### 3.2 EMERGENCY OFFICIALS

| Stakeholder Audience | Audience Definition | Examples |
|---|---|---|
| Emergency officials | Local, state, or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction along the pipeline route. | • Fire departments<br>• Police/sheriff departments<br>• Local Emergency Planning Commissions (LEPCs)<br>• County and State Emergency Management Agencies (EMA)<br>• Other emergency response organizations<br>• Other public safety organizations |

### 3.3 LOCAL PUBLIC OFFICIALS

| Stakeholder Audience | Audience Definition | Examples |
|---|---|---|
| Public officials | Local, city, county or state officials and/or their staffs having land use and street/road jurisdiction along the pipeline route. | • Planning boards<br>• Zoning board<br>• Licensing departments<br>• Permitting departments<br>• Building code enforcement departments<br>• City and county managers<br>• Public and government officials<br>• Public utility boards<br>• Includes local "Governing Councils" as defined by many communities<br>• Public officials who manage franchise or license agreements |

### 3.4 EXCAVATORS

| Stakeholder Audience | Audience Definition | Examples |
|---|---|---|
| Excavators | Companies and local/state government agencies who are involved in any form of excavation activities. | • Construction companies<br>• Excavation equipment rental companies<br>• Public works officials<br>• Public street, road and highway departments (maintenance and construction)<br>• Timber companies<br>• Fence building companies<br>• Drain tiling companies<br>• Landscapers<br>• Well drillers |
| Land developers | Companies and private entities involved in land development and planning. | • Home builders<br>• Land developers<br>• Real estate sales |
| One-Call Centers | Excavation One-Call Centers relevant to the area. | • Each state, region, or other organization established to notify underground facility owner/operators of proposed excavations. Excavation One-Call Centers relevant to the area. |

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## 4 Message Content

An operator should select the optimum combination of message, delivery method, and frequency that meets the needs of the intended audience. Information materials may also include supplemental information about the pipeline operator, pipeline operations, the safety record of pipelines and other information that an operator deems appropriate for the audience. The operator is reminded that communications materials should be provided in the language(s) spoken by a significant portion of the intended audience.

The basic message conveyed to the intended audience should provide information that will allow the operator to meet the program objectives. The communications should include enough information so that in the event of a pipeline emergency, the intended audience will know how to identify a potential hazard, protect themselves, notify emergency response personnel, and notify the pipeline operator. Several components of these messages are discussed in this section.

### 4.1 PIPELINE PURPOSE AND RELIABILITY

Operators should consider providing a general explanation of the purpose of the pipeline and/ or facilities and the reliability of pipelines to meet the energy needs of the region, even though this is not a primary objective of pipeline public awareness. Operators should provide assurances that security is considered.

### 4.2 HAZARD AWARENESS AND PREVENTION MEASURES

Operators should provide a very broad overview of potential hazards, their potential consequences and the measures undertaken by the operator to prevent or mitigate the risks from pipelines (including, at the operator's discretion, an overview of the industry's safety record). Additionally, operators should provide an overview of their preventative measures to help assure safety and prevent incidents. The scope of the hazard awareness and prevention message should be more detailed for the emergency responder audience than for other audiences, and should include how to obtain more specific information upon request from the operator.

### 4.3 LEAK RECOGNITION AND RESPONSE

The pipeline operator should provide information in the following key subject areas to the affected public and excavator stakeholder groups.

#### 4.3.1 Potential Hazards of Products Transported

Information about specific release characteristics and potential hazards posed by hazardous liquids or gases should be included.

#### 4.3.2 How to Recognize a Pipeline Leak

Information should address how to recognize a pipeline leak through the senses of sight, unusual sound, and smell and describe any associated dangers as appropriate to the product type.

#### 4.3.3 Response to a Pipeline Leak

Information should address an outline of the appropriate actions to take if a pipeline leak or release is suspected.

#### 4.3.4 Liaison with Emergency Officials

Information should describe the ongoing relationship between the operator and local emergency response officials to help prevent incidents and assure preparedness for emergencies.

### 4.4 EMERGENCY PREPAREDNESS COMMUNICATIONS

Communicating periodically with local emergency officials is an important aspect of all Public Awareness Programs. Operators should provide a summary of emergency preparedness information to local public officials and should indicate that detailed information has been provided to emergency response agencies in their jurisdictions. The following information should be provided to the emergency officials stakeholder audience.

#### 4.4.1 Priority to Protect Life

The operator's key messages to emergency officials should emphasize that public safety and environmental protection are the top priorities in any pipeline emergency response.

#### 4.4.2 Emergency Contacts

Contact information for the operator's local offices and 24-hour emergency telephone line should be shared with local and state emergency officials. Operators should also use the contacts with emergency officials to confirm that both emergency officials and the operators have the current, correct contact information and calling priorities.

#### 4.4.3 Emergency Preparedness Response Plans

Operators are required by federal regulations to have emergency response plans. These plans should be developed for use internally and externally, with appropriate officials, and in accordance with applicable federal and state emergency regulations. 49 *CFR* 192 and 195 and some state regulations outline the specific requirements for emergency response plans and who to contact for additional information. The operator should include information about how emergency officials

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can access the operator's emergency response plans covering their jurisdiction.

#### 4.4.4 Emergency Preparedness—Drills and Exercises

A supplemental means of two-way communication about emergency preparedness is to establish a liaison with emergency response officials through operator or joint emergency response drills, exercises or deployment practices. Information on "unified command system" roles, operating procedures and preparedness for various emergency scenarios can be communicated effectively and thoroughly through a hands-on drill or exercise.

### 4.5 DAMAGE PREVENTION

Because even relatively minor excavation activities can cause damage to a pipeline or its protective coating or to other buried utility lines, it is important that operators raise the awareness of the need to report any suspected signs of damage. Operators should keep their damage prevention message content consistent with the key "Dig Safely" messages developed by the Common Ground Alliance (CGA). CGA contact information is located in Appendix A.

The use of an excavation One-Call Notification system should be explained to the audience. Information on the prevalence of digging-related damage, also known as "third-party" damage, should be provided as appropriate. The audience should be requested to call the state or local One-Call System in their area before they begin any excavation activity. If the state or locality has established penalties for failure to use established damage prevention procedures, that fact may also be communicated, depending on the audience and situation. Additional information is located in Appendix C.

Additionally, third-party contractors are subject to the Occupational Safety and Health Administration's (OSHA) requirements. OSHA cites in its "General Duty Clause" possible regulatory enforcement action that could be taken against excavation contractors who place their employees at risk by not utilizing proper damage prevention practices. The lack of adequate damage prevention could subject the excavator to OSHA regulatory enforcement. OSHA contact information is located in Appendix A.

### 4.6 PIPELINE LOCATION INFORMATION

#### 4.6.1 Transmission Pipeline Markers

The audience should know how to identify a transmission pipeline ROW by recognition of pipeline markers—especially at road crossings, fence lines and street intersections. The operator's awareness communications should include information about what pipeline markers look like, and the fact that telephone numbers are on the markers for their use if an emergency is suspected or discovered. Communications should also be clear that pipeline markers do not indicate the exact location or depth of the pipeline and may not be present in certain areas. As such, use of the One-Call Notification system should be encouraged. Additional detail is located in Appendix C.

#### 4.6.2 Transmission Pipeline Mapping

Pipeline maps developed by transmission pipeline operators can be an important component of an operator's Public Awareness Program. The level of detail provided on the map should, at a minimum, include the line size, product transported and the approximate location of the pipeline, as well as any other information deemed reasonable and necessary by the operator. National energy infrastructure security issues should be considered in determining information and distribution related to pipeline maps. The public can also receive information about which pipelines operate in their community by accessing the National Pipeline Mapping System (NPMS). The NPMS will provide the inquirer a list of pipeline operators and operator contact information. Operators should include information on the availability of the NPMS within their public awareness materials. NPMS information is provided in Appendix A. Additional mapping information is provided in Appendix C.

### 4.7 HIGH CONSEQUENCE AREAS (HCAs) AND INTEGRITY MANAGEMENT PROGRAM OVERVIEW FOR TRANSMISSION OPERATORS

#### 4.7.1 Message Content for Affected Public within HCAs

Public awareness materials should include a general explanation that, in accordance with federal regulations, some segments along transmission pipelines have been designated as High Consequence Areas (HCAs) and that supplemental hazard assessment and prevention programs (called Integrity Management Programs) have been developed. Information provided to the affected public should indicate where an overview of the operator's Integrity Management Programs can be obtained or viewed upon request.

#### 4.7.2 Message Content for Emergency Officials within HCAs

For emergency official stakeholder audiences whose jurisdiction includes an HCA as defined by 49 *CFR* Parts 192 or 195, the operator should include an overview of the operator's Integrity Management Programs. Inclusion of this information during emergency official liaison interface will provide an opportunity for feedback from the emergency official on the operator's Integrity Management Programs.

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#### 4.7.3 Message Content for Public Officials within HCA's

For public official stakeholder audiences whose jurisdiction includes an HCA as defined by 49 *CFR* Parts 192 or 195, the operator should indicate where an overview of the operator's Integrity Management Programs can be obtained or viewed upon request.

### 4.8 CONTENT ON OPERATOR WEBSITES

Pipeline operators who maintain websites can include the following information (further examples of this information are provided in Appendix C):

- Company information
- General information on pipeline operations
- General or system pipeline map(s)
- Affected public information
- Emergency and security information
- Damage prevention awareness and One-Call Notification.

### 4.9 RIGHT-OF-WAY ENCROACHMENT PREVENTION

Pipeline operators should communicate that encroachments upon the pipeline ROW inhibit the operator's ability to respond to pipeline emergencies, eliminate third-party damage, provide ROW surveillance, perform routine maintenance, and perform required federal/state inspections. Stakeholder specific information is listed in Appendix D.

### 4.10 PIPELINE MAINTENANCE CONSTRUCTION ACTIVITIES

Pipeline maintenance-related construction activities should be communicated to the audience affected by the specific activity in a timely manner appropriate to the nature and extent of the activity.

### 4.11 SECURITY

Where applicable and in accordance with the national Homeland Security efforts, pipeline operators should communicate an overview pertaining to security of their pipelines and related facilities.

### 4.12 FACILITY PURPOSE

Where appropriate, communication with the affected public and emergency and public officials in proximity to major facilities (such as storage facilities, compressor or pump stations) should include information to promote understanding of the nature of the facility. Operators should communicate general information regarding the facility and product(s) stored or transported through the facility. Communication with emergency officials should also include emergency contact information for the specific facility.

## 5 Message Delivery Methods and/or Media

This section describes several delivery methods and tools available to pipeline operators to foster effective communications with the intended stakeholder audiences previously described. The operator is reminded that not all methods are effective in all situations. The content of the communication efforts should be tailored to:

- Needs of the audience
- Type of pipeline and/or facilities
- Intent of the communication, and
- Appropriate method/media for the content.

A more detailed discussion of the summary information below is provided in Appendix D.

### 5.1 TARGETED DISTRIBUTION OF PRINT MATERIALS

The use of print materials is an effective means of communicating with intended audiences. Because of the wide variety of print materials, operators should carefully select the type, language and formatting based on the audience and message to be delivered. Generally, an operator will use more than one form of print materials in its Public Awareness Program. While not all inclusive, several types are discussed below.

#### 5.1.1 Brochures, Flyers, Pamphlets, and Leaflets

Brochures, flyers, pamphlets and leaflets are probably the most common message delivery methods currently used by the pipeline industry. These print materials can convey important information about the company, the industry, pipeline safety, or a proposed project or maintenance activity and should provide contact information where the recipient can obtain further information. These print materials also afford an effective opportunity to communicate content in a graphical or pictorial way.

#### 5.1.2 Letters

Research has indicated that letters mailed to residents along the pipeline ROW are an effective tool to communicate specific information, such as how to recognize and what to do in the event of a leak, how to identify and report suspicious activity, and notification of planned operator activities.

#### 5.1.3 Pipeline Maps

Pipeline maps can be an important component of an operator's Public Awareness Program and should be considered where they can enhance the appropriate stakeholder(s) aware-

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ness of the operator's pipeline and facilities. Additional information regarding pipeline mapping is available in Appendix C.

#### 5.1.4 Response Cards

Often referred to as either bounce back cards or business reply cards, these preprinted, preaddressed, postage paid response cards are often mailed to the affected public as an integral part of, or as an attachment to, other items. The inclusion of a response card can be used in a variety of ways (refer to Appendix D).

#### 5.1.5 Bill Stuffers

Bill stuffers are printed brochures frequently used by local distribution companies (LDCs) in conjunction with customer invoices. Due to the nature of customers for transmission and gathering pipelines, bill stuffers are not considered an appropriate option. LDCs using bill stuffers can easily reach their customers with appropriate messages and can increase their effectiveness by using bill stuffers repeatedly. For those LDCs that are combined with other energy utilities such as electric or water systems, bill stuffers regarding pipeline safety and underground damage prevention can be delivered to virtually all surroundings residents, even those that may not be natural gas customers.

### 5.2 PERSONAL CONTACT

Personal contact describes face-to-face contacts between the operator and the intended stakeholder audience. This method is usually a highly effective form of communication and allows for two-way discussion. Personal contacts may be made on an individual basis or in a group setting. Some examples of personal contact communications are described further in Appendix D and include:

- Door-to-door contact along pipeline ROW
- Telephone calls
- Group meetings
- Open houses
- Community events
- Charitable contribution presentations by pipeline companies.

### 5.3 ELECTRONIC COMMUNICATION METHODS

#### 5.3.1 Videos and CDs

There are a variety of approaches operators may use to supplement their public awareness efforts with videos and CDs. While considered a supplement to the baseline components of an effective Public Awareness Program, videos and CDs may be quite useful with some stakeholders or audiences in some situations. These media can show activities such as construction, natural gas or petroleum consumers, pipeline routes, preventive maintenance activities, simulated or actual spills and emergency response exercises or actual responses in ways that printed materials cannot.

#### 5.3.2 E-mail

Electronic mail ("e-mail") can be a means of sending public awareness information to a variety of stakeholder audiences. The content and approach is similar to letters or brochures, but the information is sent electronically rather than delivered by postal mail or personal contact.

### 5.4 MASS MEDIA COMMUNICATIONS

#### 5.4.1 Public Service Announcements

Public Service Announcements (PSAs) can be an effective means for reaching a large sector of the public. Radio and television stations occasionally make some airtime available for PSAs. They are no longer required by law to donate free airtime and as a result, there is great competition from various public interest causes for the small amount of time made available. If the operator is an advertiser with the radio or television station, this might be leveraged to gain advantage in acquiring PSA time.

#### 5.4.2 Newspapers and Magazines

Newspaper and magazine articles don't have to be limited to the reactive coverage following an emergency or controversy. Pipeline companies can submit or encourage reporters to write constructive and informative articles about pipeline issues, such as local projects, excavation safety, or the presence of pipelines as part of the energy infrastructure.

#### 5.4.3 Paid Advertising

The use of paid advertising media such as television ads, radio spots, newspapers ads, and billboards can be an effective means of communication with an entire community.

#### 5.4.4 Community and Neighborhood Newsletters

Posting of pipeline safety or other information to community and neighborhood newsletters can be done in conjunction with other outreach to those communities and/or neighborhoods. This method can be particularly effective in reaching audiences near the pipeline, namely neighborhoods and subdivisions through which the pipeline traverses.

### 5.5 SPECIALTY ADVERTISING MATERIALS

Specialty advertising can be a unique and effective method to introduce a company or maintain an existing presence in a community. These materials also provide ways of delivering pipeline safety messages, project information, important phone numbers and other contact information. The main benefit of this type of advertising is that it tends to have a longer

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In addition, the operator should include in its Public Awareness Program Evaluation a periodic review and evaluation of its program (see Section 8), determine if supplemental public awareness efforts/activities are warranted and include those enhancements and related documentation into its program.

## 6.1 CONSIDERATIONS FOR SUPPLEMENTAL ENHANCEMENTS FOR THE BASELINE PROGRAM

This RP recognizes that there are differences in pipeline conditions, consequences, population, property development, excavation activities and other issues along pipeline systems. Accordingly, a "one-size-fits-all" Public Awareness Program across all pipeline systems would not be the most effective approach. This RP recommends that an operator enhance its baseline program with supplemental program components when conditions along the pipeline suggest a more intensive effort is needed.

Baseline program recommendations are established for each of the three pipeline categories. The following sections are provided for guidance when the operator's consideration of relevant factors along the pipeline route indicates that supplemental program enhancement is warranted. Three primary forms of enhancement are provided for consideration in the development and administration of each Public Awareness Program:

### 6.1.1 Increased Frequency (Shorter Interval)

Increased frequency refers primarily to providing communications to specific stakeholder audiences on a more frequent basis (shorter interval) than the baseline recommended components to reach the intended audience.

### 6.1.2 Enhanced Message Content and Delivery/ Media Efforts

Enhanced message content and delivery/media efforts refer to providing additional or supplemental communications activities beyond those identified in the baseline, using an enhanced or custom-tailored message content and/or different, or additional, delivery methods/media to reach the intended audience.

### 6.1.3 Coverage Areas

Coverage areas refer to broadening or widening the stakeholder audience coverage area beyond those contained in the baseline for delivery of certain communications messages. This can also be considered relative to widening the buffer distance for reaching the stakeholder audience along the pipeline route.

## 6.2 CONSIDERATIONS OF RELEVANT FACTORS

When the operator develops its Public Awareness Program and performs subsequent periodic program evaluations, it is recommended that a step for assessing relevant factors along the pipeline route be included to consider what components of the Public Awareness Program should be enhanced.

The operator should consider each of the following factors applied along the entire route of the pipeline system:

- Potential hazards
- High Consequence Areas
- Population density
- Land development activity
- Land farming activity
- Third-party damage incidents
- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements
- Results from previous Public Awareness Program evaluations
- Other relevant needs.

The presence of federally designated High Consequence Areas (HCAs) should prompt an operator to consider public awareness activity above the baseline level described in the RP. For natural gas transmission pipelines, 49 *CFR* Part 192.761 defines HCAs related to the population or places of congregation. For hazardous liquid transmission pipelines, 49 *CFR* Part 195.450 describes HCAs related to high population, Unusually Sensitive Areas (USAs) and navigable waterways.

Another factor to consider is the hazard associated with the pipeline as perceived by either the operator or the audience. For example, if a pipeline segment has experienced third-party damage, the operator could increase the frequency of messages to those third-parties and other relevant audiences. If the public's confidence in pipeline safety is undermined by a high profile emergency, even though an individual operator is experiencing no upward trend in incidents, that operator could consider expanding its public awareness communications to its public audiences to further increase awareness of its nearby pipeline system.

Further detail of considerations for program enhancement is discussed in the following sections.

## 6.3 HAZARDOUS LIQUID AND NATURAL GAS TRANSMISSION PIPELINE OPERATORS

Since Hazardous Liquids and Natural Gas Transmission pipelines are similar in many aspects with respect to public awareness, the two categories of pipelines have been combined.

Considerations for program enhancement for transmission pipelines could include, for example:

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### 6.3.1 The Affected Public

Consideration should be given to *supplemental program enhancement* where:

- The occurrences indicate an elevated potential for third-party damage. Examples include:
  - A mailing to farmers along the right-of-way just prior to the deep plowing season where deep till plow methods are used
  - An additional or interim mass mailing to or face-to-face communications with residents of new housing developments in areas along the pipeline route that may not have previously been reached
  - Increasing the frequency of baseline communication efforts
- The pipeline runs through heavily developed urban areas that are more likely to have a frequently changing population than a more stable, less dense suburban or rural areas. Frequently changing population in an identified audience area should be considered when determining supplemental efforts to:
  - Residents in areas such as multi-family developments or densely populated urban areas
  - Increase the frequency of communications to residents
- Right-of-way encroachments have occurred frequently. Examples of supplemental efforts include:
  - Enhanced mailings to, face-to-face communications with, or increasing the frequency of communications to residents/developers/contractors in areas of right-of-way encroachment
- The potential for concern about consequences of a pipeline emergency is heightened. Consideration should be given to widening the coverage area for:
  - HVL pipelines in high population areas, extend the coverage area beyond the $^{1}/_{8}^{th}$ mile minimum distance each side of the pipeline
  - Large diameter, high pressure, high volume pipelines where a pipeline emergency would likely affect the public outside of the specified minimum coverage area—extend the coverage area to a wider distance as deemed prudent.

### 6.3.2 Public Officials

Consideration should be given to *supplemental program enhancement* where:

- Heightened public sensitivity to pipeline emergencies exists in the area, independent of cause or which operator was involved
- Significant right-of-way encroachments (such as new construction developments) are occurring.

### 6.3.3 Emergency Officials

Consideration should be given to *supplemental program enhancement* where:

- Emergency officials have heightened sensitivity to pipeline emergencies
- After post-emergency review, or where there's potential for enhanced "liaison activities" between the operator and emergency officials that could have improved the emergency response to a pipeline emergency
- Requested by emergency officials to provide additional communications.

### 6.3.4 Excavators/Contractors and One-Call Centers

Consideration should be given to *supplemental program enhancement* where:

- There are instances that indicate an elevated potential for third-party damage
- Developers and contractors are performing a high number of excavations along a pipeline route in developing areas
- There are instances of problems identified with excavators' use or lack of use of the One-Call System. In those cases the operator should also request that the one-call Center perform additional public awareness outreach activities

## 6.4 LOCAL NATURAL GAS DISTRIBUTION COMPANIES (LDCs)

Many of the aspects of Public Awareness Programs for LDCs are similar to liquid and transmission pipeline operators. However, there are some differences because LDCs serve a different audience. Unlike transmission pipeline operators, LDCs have many more individual customers and have existing communication paths with those customers through monthly billing statements and other customer relationships. Table 2-2, for LDCs, in Section 2, provides baseline and supplemental communication recommendations for each of the different audiences.

Among LDCs there may be some variability in the frequency of communications with specific audiences. Public officials and emergency response personnel in a small rural city will likely be more accessible to the LDC pipeline operators than those in a major metropolitan area. Therefore, LDC operators should tailor their programs based on specific local considerations.

## 6.5 GATHERING PIPELINE OPERATORS

Gathering pipelines are usually small in diameter and operate at low pressures. In general, the audiences involved in public awareness communications for gathering pipelines tend to be in rural areas. The operator should tailor the spe-

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# APPENDIX C—DETAILED GUIDELINES FOR PUBLIC AWARENESS MESSAGES

Section 4 of this RP recommends that an operator should select the optimum combination of message, delivery method, and frequency that meets the needs of the intended audience. This appendix expands that recommendation by providing further explanation or examples of the content of messages to be communicated.

Information materials may include supplemental information about the pipeline operator, pipeline operations, the safety record of pipelines and other information that an operator deems appropriate for the audience. The operator is reminded that communications materials should be provided in the language(s) spoken by a significant portion of the intended audience.

The basic message is conveyed to the intended audience should provide information that will allow the operator to meet the program objectives set forth in Section 2. The communications should include enough information so that in the event of a pipeline emergency, the intended audience members will know how to identify a potential hazard, protect themselves, notify emergency response personnel, and notify the pipeline operator.

## C.1 Pipeline Purpose and Reliability

While not a primary objective, pipeline operators should consider providing general information about pipeline transportation, such as:

- The role of pipelines in U.S. energy supply
- Pipelines as part of the energy infrastructure
- Efficiency and reliability of pipelines
- Positive messages about the energy transportation pipeline safety record
- The individual operator's pipeline safety actions and environmental record.

For local distribution companies:

- Typical distribution network (stations, mains, services, meters)
- How to detect a natural gas leak (e.g., how natural gas smells)
- Who uses natural gas and why.

Many of these messages are available in print and videos from the pipeline industry trade associations listed in Section 2 and Appendix A.

The operator should describe the purpose and function of the pipeline and/or associated facilities and the nature, uses, and purposes of the products transported. Where practical, it might be helpful to communicate the benefit(s) of the pipeline to the community. Examples of "benefits" include:

- "This pipeline provides gasoline to motorists at X gas stations in the area of Y."
- "This natural gas pipeline network provides gas to X thousands of homes and businesses in Y city or Z state."

Pipelines are a safe and reliable means of transporting energy. Where appropriate, operators should describe how pipelines are a reliable means of transporting energy products and point out that they are extensively regulated by Federal and State regulations with regard to design, construction, operation and maintenance. Operators may also describe applicable operational activities that promote pipeline integrity, safety and reliability, which could include initial and periodic testing practices, internal inspections and their frequency, patrolling types and frequencies, and other such information. Operators may also reference the National Transportation Safety Board finding that pipelines provide the highest level of public safety as compared to other transportation modes.

## C.2 Hazard Awareness and Prevention Measures

### C.2.1 OVERVIEW OF POTENTIAL HAZARDS

General information about the nature of hazards posed by pipelines should be included in the message, while also assuring the stakeholder audience that accidents are relatively rare. The causes of pipeline failures, such as third-party excavation damage, corrosion, material defects, worker error, and events of nature can also be communicated.

### C.2.2 OVERVIEW OF POTENTIAL CONSEQUENCES

Information should identify the product release characteristics and potential hazards that could result from an accidental release of hazardous liquids or gases from the pipeline.

### C.2.3 SUMMARY OF PREVENTION MEASURES UNDERTAKEN

The potential hazard message should be coupled with a general overview of the preventative measures undertake by the operator in the planning, design, operation, maintenance, inspection and testing of the pipeline. This message should also reinforce how the stakeholder audience can play an important role in preventing third-party damage and right-of-way encroachments.

### C.2.4 OPTIONAL SUMMARY OF PIPELINE INDUSTRY SAFETY RECORD

Depending on the stakeholder audience and the delivery methods used, the operator may want to consider including a general overview of the industry's safety record.

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Communication materials should also convey the qualification that the information provided on hazards, consequences and preventative measures is very general and that more specific information could be obtained from the operator or other sources (noting phone or website(s) for contacts). Information communicated to emergency responders needs to be more specific, provide an opportunity for two-way feedback and include additional details on the products transported, facilities located within the jurisdiction and the local emergency planning liaison. Operators may want to consider referring to publications or websites produced by the trade associations listed in Appendix A for specific example language developed to provide overviews of hazards, consequences and preventative measures tailored to each stakeholder audience.

## C.3 Leak Recognition and Response

The pipeline operator should provide the following information to the affected public and excavator stakeholder groups. To accomplish this, operators may want to consider using generic or standard printed materials developed by trade associations as aides for their member companies. However, operators will need to ensure the materials used are specific to the type of pipeline and product(s) transported in their systems.

### C.3.1 POTENTIAL HAZARDS

Specific information about the release characteristics and potential hazards posed by the accidental release of hazardous liquids or gases from the pipeline should be included in the operator's communications.

### C.3.2 RECOGNIZING A PIPELINE LEAK

Operators should include in their communications information on how to recognize a pipeline leak through the senses of sight, unusual sound, and smell (as appropriate to the product type) and describe any associated dangers.

- By Sight—What to Look for...
- By Sound—What to Listen for...
- By Smell—What to Smell for...

### C.3.3 RESPONDING TO A PIPELINE LEAK

Operators should include in their communications an outline of the appropriate actions to take once a pipeline leak or release is suspected. This information should include:

- What to do if a leak is suspected
- What not to do if a leak is suspected.

It is especially important to include specific information on detection response if the pipeline contains product that, when released, could be immediately hazardous to health (e.g. high concentration of hydrogen sulfide).

### C.3.4 LIAISON WITH EMERGENCY OFFICIALS

This information should indicate that both the operator and the local emergency response officials have an ongoing relationship designed to prepare and respond to an emergency.

## C.4 Emergency Preparedness Communications

Communicating periodically with local emergency officials is an important aspect of all Public Awareness Programs. The following information should be provided to the emergency officials stakeholder audience. Local public officials should be provided a summary of the information that is available in more detail from the emergency response agencies in their jurisdictions.

### C.4.1 PRIORITY TO PROTECT LIFE

Operator emergency response plans and key messages relayed to emergency officials should emphasize that public safety and environmental protection are the top priorities in any pipeline emergency response.

### C.4.2 EMERGENCY CONTACTS

Contact information on the operator's local offices and 24-hour emergency telephone numbers should be communicated to local and state emergency officials. Operators should also use the public awareness contact opportunity to confirm the contact information for the local and state emergency officials and calling priorities.

### C.4.3 EMERGENCY PREPAREDNESS—RESPONSE PLANS

Operators are required by federal regulation to have emergency response plans. These plans should be developed for use internally and externally, with appropriate officials, and in accordance with applicable federal and state regulations. 49 *CFR* 192 and 194 and some state regulations outline the specific requirements for emergency response plans. In developing Emergency Response Plans, the operator should work with the local emergency responders to enhance communications and response to emergencies.

### C.4.4 EMERGENCY PREPAREDNESS—DRILLS AND EXERCISES

A very effective means of two-way communication about emergency preparedness is the liaison with emergency officials through operator or joint emergency response drills, exercises or deployment practices. Information on "unified command system" roles, operating procedures and preparedness for various emergency scenarios can be communicated effectively and thoroughly through a hands-on drill or exercise.

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# APPENDIX D—DETAILED GUIDELINES FOR MESSAGE DELIVERY METHODS AND/OR MEDIA

Section 5 describes the delivery methods and tools available to pipeline operators to foster effective communication programs with the stakeholder audiences previously described. This Appendix expands on those guidelines by providing further explanation or examples of delivery methods and/or media. This section does not imply that all methods are effective in all situations. The content of the communication efforts should be tailored to the needs of the audience and the intent of the communication. Refer to Section 4 for a detailed description of the message content that the following materials or delivery methods should contain for each intended audience.

## D.1 Print Materials

The use of print materials is an effective means of communicating with intended audiences. Because of the wide variety of print materials, operators should carefully select the type, language and formatting based on the audiences and the message to be delivered. Generally, an operator will use more than one form of print materials in its Public Awareness Program. While not all inclusive, several types are discussed here.

### D.1.1 TARGETED DISTRIBUTION OF PRINT MATERIALS

This is the most common message delivery mechanism currently used by the pipeline industry. Print materials can convey important information about the company, the industry, pipeline safety, or a proposed project or maintenance activity and should provide contact information where the recipient can obtain further information. Print materials also afford an effective opportunity to communicate content in a graphical or pictorial way. However, note that targeted distribution of print materials alone should not be considered effective communication with local emergency response personnel.

Consideration should be given to joining with other pipeline companies in a local, regional or national setting (including both the local distribution company and transmission pipelines) to produce common message materials that can be either jointly sponsored, (e.g., include all sponsors company names/logos) or used as a "shell" and then customized to each company's individual needs, to help ensure that a consistent message is being delivered. This approach can also effectively reduce the cost to individual operators.

Print materials can be mailed to residents or communities along the pipeline system or handed out at local community fairs, open houses, or other public forums. Operators can hire facilitators to organize mass mailings, using nine-digit zip codes or geo-spatial address databases; to designated residents in the community located along the pipeline, such as within an appropriate distance either side of the pipeline centerline. In this case it is often advisable to get information from the postal service or service provider on size, folding and closure requirements to minimize the postage costs for mass mailings. There are services that can handle the printing of materials, mailing address identification, mailing and documentation for the operator as a package.

### D.1.2 LETTERS

Research has indicated that letters mailed to residents along a pipeline system are an effective tool for the operator to use to communicate specific information, such as what to do in the event of a leak, identification of suspicious activity or notification of planned maintenance activities within the right-of-way.

Notification letters are usually effective where there is a high likelihood for third-party damage such as in agricultural areas, new developments and where other types of ground-disturbing activities may take place. Similar letters may also be send to contractors, excavators and equipment rental companies informing them of the requirement to use One-Call Systems and providing other important safety information for their workers and the public.

Letters, along with other print materials, should provide information about where the recipient can obtain further information (such as website address, e-mail address, local phone numbers and one-call numbers).

### D.1.3 PIPELINE MAPS

Pipeline maps can be presented as printed material and are an important component of an operator's Public Awareness Program. The operator should consider whether maps should be part of the communications to appropriate local stakeholder(s), and what type of maps should be used to accomplish the objective. See Appendix C.6.2 for further explanation of types and availability of maps.

### D.1.4 RESPONSE CARDS

Often referred to as either bounce back cards or business reply cards, these preprinted, preaddressed, postage paid response cards are often mailed to the affected public as an integral part of, or as an attachment to, other print materials. When delivering public awareness information to nearby resi-

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dents, public or emergency officials, the inclusion of response cards can be used in a variety of ways:

- To maintain/update current mailing lists. Response cards permit the recipients to notify the operator of any changes in address
- To provide a convenient venue for recipients to provide comments, request additional information, raise concerns or ask questions
- To help evaluate the effectiveness of the operator's Public Awareness Program.

### D.1.5 BILL STUFFERS

Bill stuffers are printed materials frequently used by local distribution companies (LDCs) in conjunction with invoice mailings to their customers. Due to the nature of their customers, these are not an appropriate option for transmission and gathering pipelines. LDCs using bill stuffers can increase the effectiveness of their programs by communicating to their active customers frequently through the repeated use of bill stuffers. For those LDCs that are combined with other energy utilities such as electric or water systems, bill stuffers regarding pipeline safety and underground damage prevention can be delivered to virtually all surroundings residents, even when some may not be natural gas customers.

## D.2 Personal Contact

Personal contact describes face-to-face contact between the operator and the intended stakeholder audience. This method is usually a highly effective form of communication, and it allows for two-way discussion. This may be done on an individual basis or in a group setting. Some examples of communications through personal contact are described below:

### D.2.1 DOOR-TO-DOOR CONTACT ALONG PIPELINE RIGHT-OF-WAY

This method is often used to make contact with residents along the pipeline right-of-way to relay pipeline awareness information or information on upcoming pipeline maintenance. This method can help to build stakeholder trust, which is an integral part of communication and an enhancement to the long-term Public Awareness Program. Operator representatives conducting door-to-door contact should be knowledgeable and courteous, be prepared for these types of communications and be able to discuss and respond to questions relating to the communication materials provided so that contact is meaningful and positive. They should provide the landowner/resident with basic pipeline safety information and a means for future contact.

If pipeline safety is to be discussed in this forum, the operator representative should be generally knowledgeable about the company's pipeline integrity program and emergency response procedures. In addition to the general information described in Section 4, the following additional information should also be considered:

a. Description of facilities on or near the property (i.e., pipelines, meter/regulator stations, compressor/pump stations, wellheads, treating facilities, tankage, line markers, cathodic protection, communication, etc.)
b. Description of easement and property owner's rights and limitations within the easement
c. Name and phone number of local contact within company for further information and the operator's emergency notification number to report emergencies or suspicious activity
d. Information on damage prevention and local "Call Before You Dig" programs
e. What to do in case of emergency (fire, leak, noise, suspicious person)
f. Informational items (i.e., calendar, magnetic card, pens, hats, etc.) to retain important telephone numbers
g. As appropriate, additional local information such as upcoming maintenance, projects, events and/or company community involvement such as United Way, other charities, environmental projects, etc.

### D.2.2 TELEPHONE CALLS

When the intended audience is small in number, the operator may find it effective to communicate by telephone. This personal form of contact allows for two-way discussion. The operator should decide which elements of their Public Awareness Program are suitable for conducting via telephone calls.

### D.2.3 GROUP MEETINGS

Group meetings can be an effective way to convey the messages to selected audiences. Meetings may be between the operator (or group of operators) and an individual stakeholder audience or between the operator (or group of operators) and a number of the stakeholder audience groups at one time.

For example, the operator could conduct individual meetings with emergency response officials, combined industry meetings with emergency response officials, and participation by emergency response officials and personnel in the operator's emergency response tabletop drills and deployment exercises. Meetings are particularly effective in conducting liaison activities with the emergency official stakeholder group.

Another example is group meetings conducted by the operator in classrooms and with educators at local schools. Informational materials can be presented to school administrators and students and can contain important public awareness messages for students to take home to their parents. This method of personal contact can readily reach a large number of people with the operator's public awareness messages and reinforce positive messages about the operator and/or the pipeline industry.

-- End of Report --