

# Kansas Public Awareness Program

API RP 1162

*and*

49 CFR Part 192.616

# Why Public Awareness

**Example from Topeka**

**Capitol Journal**

**August 2007**

# Why Public Awareness

- **The Upstage Gallery building was only about 15 feet from where the pipe had been breached, and Johnson said he could smell a gas odor while he was inside.**

# Why Public Awareness

- The Upstage Gallery building was only about 15 feet from where the pipe had been breached, and Johnson said he could smell a gas odor while he was inside.
- **"I noticed the smell at about 2 o'clock,"  
... "I thought it was the sewer."**

# Why Public Awareness

- The Upstage Gallery building was only about 15 feet from where the pipe had been breached, and Johnson said he could smell a gas odor while he was inside.
- "I noticed the smell at about 2 o'clock," said Johnson, 30. "I thought it was the sewer."
- **But after going outside for a walk at about 2:15 p.m., Johnson said he heard a loud whistling noise from the leak.**

# Why Public Awareness

- The Upstage Gallery building was only about 15 feet from where the pipe had been breached, and Johnson said he could smell a gas odor while he was inside.
- "I noticed the smell at about 2 o'clock," said Johnson, 30. "I thought it was the sewer."
- But after going outside for a walk at about 2:15 p.m., Johnson said he heard a loud whistling noise from the leak.
- **In spite of the noise and the pressure of the gas being forced upward out of the pipe, people continued to walk past it for several minutes until the fire department was called.**

# Why Public Awareness

- The Upstage Gallery building was only about 15 feet from where the pipe had been breached, and Johnson said he could smell a gas odor while he was inside.
- "I noticed the smell at about 2 o'clock," said Johnson, 30. "I thought it was the sewer."
- But after going outside for a walk at about 2:15 p.m., Johnson said he heard a loud whistling noise from the leak. In spite of the noise and the pressure of the gas being forced upward out of the pipe, people continued to walk past it for several minutes until the fire department was called.
- **"You could feel it brushing on your legs," Johnson said of the gas leak. "Everybody kept walking by it."**

# Why Public Awareness

- The Upstage Gallery building was only about 15 feet from where the pipe had been breached, and Johnson said he could smell a gas odor while he was inside.
- "I noticed the smell at about 2 o'clock," said Johnson, 30. "I thought it was the sewer."
- But after going outside for a walk at about 2:15 p.m., Johnson said he heard a loud whistling noise from the leak. In spite of the noise and the pressure of the gas being forced upward out of the pipe, people continued to walk past it for several minutes until the fire department was called.
- "You could feel it brushing on your legs," Johnson said of the gas leak. "Everybody kept walking by it."
- **We didn't know anything was wrong."**

# Kansas Pipeline Safety 2007 Review

- Public Awareness Inspections
  - PHMSA clearinghouse audits
  - Kansas audit forms based on PHMSA form
  - Notice of Amendment
  - *Consider:* *To think carefully about*

# Post-Clearinghouse Actions by OPS

- OPS/States Coordinate Revisions With Operators
- OPS Considering Formal Enforcement Actions Against Jurisdictional Non-submitting Operators
- States Have Independent Authority to Enforce
- Developing Field Implementation Inspection Forms
- Proposing a Public Meeting in Spring 2008
  - Clearinghouse findings
  - Operator Learning from nearly 3 cycles
  - Recommendations for 2<sup>nd</sup> Edition RP 1162

# PAP: Case Studies

Kansas Inspection Results



# PAP: Case Studies

- Management Commitment (*RP1162 Sec 2.5*)
  - From person with authority to provide funding.
    - Manager
    - City council; (resolution; meeting minutes).
    - System owner.

# PAP: Case Studies

- Message Content: Emergency Officials
  - 4.4.1 – Priority message of public safety–  
*protect life then property*
  - 4.4.2 – *CONFIRM* emergency officials have current contact info and calling priorities.

# PAP: Case Studies

- Message Content: Emergency Officials
  - 192.615 (c)(1): Learn resources of emergency responders. Requires feedback.
  - 192.615 (c)(4): Plan for mutual assistance. Requires feedback.
  - 2.4.7 & 192.615(a)(2): Adequate means of communication between operator's personnel and appropriate fire, police, etc... Know who to call.

# PAP: Case Studies

## ➤ LDC Baseline Message

- Residents along the LDC System, (2-2.1; 3.1)
  - Who **LIVE** on or adjacent to the land where distribution pipelines are buried.
- Places of Congregation, (3.1)
  - Where people assemble or work on a regular basis

# PAP: Case Studies

- Are Places of Congregation a baseline audience for LDC's??
  - *Answer: It Depends...*
  - 192.616(e): The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations. (PSIA 2002)

# PAP: Case Studies

## ➤ Places of Congregation

- 192.616(e): The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.
- RP 1162 Sec. 3: The operator should consider tailoring its communication to fit its particular pipeline location.
  - *Are you getting the message to the right person?*

# PAP: Case Studies

## ➤ Places of Congregation

- Is the message getting to the right people?
  - Bill staffers to accountant or to plant manager?
  - Hospitals, nursing homes, day care, prisons, other places with limited mobility.
  - *DIMP Implications*

# Places of Congregation: Kansas Conclusion

- KCC staff interpretation:  
Places of congregation specifically need to be considered for a supplemental delivery method of the baseline message.
- REASONS:
  - Baseline Delivery method for LDC's is public service announcement or bill stuffer, **BUT**
  - Must Consider tailoring communication to fit particular audience.
  - 616(e) requires "activities" to identify pipeline locations for places of congregation.

# Places of Congregation: Kansas Conclusion

## ➤ HOW???

- Bill stuffer sent to physical address not corporate offices.
- Instructions to deliver message to maintenance department.
- Coordinate with person responsible for fire drills; *(Required by fire marshal)*.
- Personal visits to schools, plants, hospitals, etc...

# PAP: Due Dates

- Pre-Test Effectiveness
  - Due June 2006
- Annual Review of Program
  - First one was due June 2007
  - Can use KCC audit to meet this requirement.
- Evaluation of Program Effectiveness
  - Due June 2010.
  - Consider APGA GOAL program?