# PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

## **Control Information**

INSPECTION START DATE:	5/21/2012		
INSPECTION END DATE:	5/22/2012		
OPERATOR ID:	31049		
OPERATOR NAME:	MCCHORD PIPI	ELINE CO.	
STATE/OTHER ID:	WA		
ACTIVITY RECORD ID NUMBER	2583		
COMPANY OFFICIAL:	Al Cabodi		
COMPANY OFFICIAL STREET:	3001 Marshall	Ave	
COMPANY OFFICIAL CITY:	Tacoma		
COMPANY OFFICIAL STATE:	WA		
COMPANY OFFICIAL ZIP:	98421		
COMPANY_OFFICIAL_TITLE:	President		
PHONE NUMBER:	(253) 680-6653		
FAX NUMBER:			
EMAIL ADDRESS:	cgh@usor.com		
WEB SITE:	McChordpipeli	ne.com	
TOTAL MILEAGE:	14		
TOTAL MILEAGE IN HCA:	14.25		
NUMBER OF SERVICES (DISTR):	0		
ALTERNATE MAOP (80% RULE):	0		
NUMBER OF SPECIAL PERMITS:	0		
INITIAL DATE OF PAP:	6/6/2005		
TITLE OF CURRENT PAP:	McChord Pipeline Co Public Awareness Program		
CURRENT PAP VERSION:	3/16/2011		
CURRENT PAP DATE:	3/16/2011		
DATE SUBMITTED FOR APPROVAL:			
DIRECTOR APPROVAL:			
APPROVAL DATE:			
OPERATORS COVERED UNDER PROGRAM:	OPERATOR ID	NAME	
	31049	MCCHORD PIPELINE CO.	
UNITS COVERED UNDER PROGRAM:	UNIT ID	NAME	
	15635	MCCHORD PIPE LINE COMPANY	

PERSON INTERVIEWED	TITLE/O	RGANIZATION	F	PHONE NUMBER		EMAIL ADDRESS	
Corey Herrick	Chief En	ef Engineer		(253) 680-6653			
John P Williamson	Senior P	r Pipeline Engineer		(253) 377-0933			
Rich Smith	Enginee	ring Manager (253) 383-1651					
ENTITY NAME	PART OF	PLAN AND/OR EVAL	UATION	PHONE N	UMBER	EMAIL ADDRESS	
Pardigm	Affected	public mailing		(877) 477	-1162	www.pdigm.com	
Paridigm	Emerge	Emergency official mailing				www.pdigm.com	
Paridigm	Local pu	Local public official mailing				www.pdigm.com	
Paridigm	Mailings	Mailings				www.pdigm.com	
Paridigm	Pre-test	materials				www.pdigm.com	
INSPECTOR REPRESENTA	TIVE(S)	PHMSA/STATE	REGION	N/STATE	EMAIL	ADDRESS	LEAD
Pjohnson		State	WA		pjohnsc	on.utc.wa.gov	✓

## 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 195 (Hazardous Liquid) Mileage (Intrastate)

		TRANSMISSION		
NAME	OPERATOR ID PRODUCT	TYPE STATE	INTRASTATE	REMARKS
MCCHORD PIPELINE CO.	31049 jet fuel	WA	14.25	

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?

- DVerify the operator has a written public awareness program (PAP).
- DReview any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if

any, addressed in the operator's PAP.

- Ildentify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- <sup>2</sup>Verify the date the public awareness program was initially developed and published.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

○ N/A - Not Applicable (explain)

○ N/C - Not Checked (explain)

COMMENTS: Bullet 1. Written program, last date 4-23-12, Rev 4

Bullet 2. McChord has 9-21-2006 email to PHMSA

Bullet 3. 3001 Marshall, Tacoma (part of McChord Administravtive Manual) and Correy Herrick is administor or planner with John Williamson, senior engineer assistant section 3

Bullet 4. 6-6-2005 original date

#### 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)?

- DVerify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- DVerify that an individual is named and identified to administer the program with roles and responsibilities.
- 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.

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CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

	COMMENTS:
S - Satisfactory (explain)	Bullet 1: page 1 has names and is up to date
$^{igodoldoldoldoldoldoldoldoldoldoldoldoldol$	
$^{\bigcirc}$ N/A - Not Applicable (explain)	Bullet 2. pg 1, Al Cabodi, President, is involved. Receives copies of all
$^{\bigcirc}$ N/C - Not Checked (explain)	memo, budget and paradigm contractor information

Bullet 3. Page 1 section 3a says manage all phases of PAP, responsibilities are not listed

Bullet 4. Correy and John plus three other employees, titles vary Diana, senior process engineed: DJ safety and security assistant and : Steve pipeline inspector invovle

Bullet 5. Previously McChord used County Auditor, title company, etc. McChord switched to Paradigm Contractors for mailing list, mailing, some suvery and evaluation of program

## 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?

• 2Verify the PAP includes all of the operator's system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).

• Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

- N/A Not Applicable (explain)
- $^{\bigcirc}$  N/C Not Checked (explain)

COMMENTS:

Bullet 1 and 2. Operators system types/assets and unique attributes and characteristics are not in PAP but the PAP states where to find the information and it is available for inspection upon request. McChord is the sole jet fuel provided to McChord Airforce base and does not want the information in the public's hands.

## 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?

- Ildentify 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.

• 2 Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

[] Affected public

[] Emergency officials

- [] Public officials
- [] Excavators

CODE REFERENCE: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f), API RP 1162 Section 2.2 and Section 3

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

## COMMENTS:

Bullet 1 and 2. page 5, 660 feet either side of line and whole 14.5 miles is HCA

Affected Public: page 5, 4.B.2 c Paradigm. McChord did previously

Emergency officials: page 7, 4.C.2 Pariadigm, McChord did previously

Public Officials: 4.E.2 pg9 Paradigm does, McChord did preeviously.

Excavators page 4.D.2 Paradigm, McChord did preeviously

Bullet 3. Reviewed map and google map. Have distance measure as well as overhead. Excellent

### 1.05 Message Frequency and Message Delivery

Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

• Identify where in the operator's PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

[] Affected public

[] Emergency officials

[] Public officials

[] Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

 $\bigcirc$  N/A - Not Applicable (explain)

○ N/C - Not Checked (explain)

COMMENTS:

Bullet 1.

Affected Public:

\*\*delivery methods-mail, affected public have individual mailings

\*\*delivery frequencies-annually

Emergency officials:

\*\*delivery methods-mail, emergency officials have individual mailings. When state patrol, Lakewood police, McChord fire dept, Pierce Sheriff, Midland requests individual presentations, FBI, Homeland security and organigations Documented on sign in sheets

\*\*delivery frequencies-annually

Public Officials: see emergency officials

\*\*delivery methods-mail, public official have individual mailings, personal contact

\*\*delivery frequencies-2 years

Excavations:

\*\*delivery methods-1.mail, excavators have individual mailings 2. pipeline markers page 4 section 41,

\*\*delivery frequencies-annual

Called emergency number 253-593-6085, operator gave correct procedure. Mailers also include Correy and Johns individual numbers for general questions.

### 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?

- 2Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate selfassessments (annual audits) and effectiveness evaluations.
- Diverify the operator's evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).

• Ildentify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences surveys and feedback.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

○ N/A - Not Applicable (explain)

○ N/C - Not Checked (explain)

COMMENTS:

Bullet 1 and 2 Annual section7A program implementation

Reviewed 2011 annual audit. Section 7.A

Reviewed 4 year audit documentation, section 7.B.

Bullet 3. Paradigm provides the statical sample size and margin of error for McChord. PAP updated.

Annual audit curently includes suppliemental but does not include all additionals items that were completed. The annual audit is used as the 4 year evaluation because it includes all necessary information.

McChord shows Continuing imporvement.

## 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.
- Ildentify 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)
- $\bigcirc$  N/A Not applicable (explain)
- N/C Not Checked (explain)

#### COMMENTS:

Bullet 1 - 3. Engilish only language used. Based on 2010 demographic report provided by Paradigm based on US Bureau of census 2006 estimates and projections. 85.8 % speak english.

### 2.02 Message Type and Content

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

• Duse 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;
- DSteps 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)?
- DVerify all required information was delivered to each of the primary stakeholder audiences.
- DVerify the phone number listed on message content is functional and clearly identifies the operator to the caller.

[] Affected public

[] Emergency officials

• S - Satisfactory (explain)

 $\bigcirc$  U - Unsatisfactory (explain)

 $\bigcirc$  N/A - Not applicable (explain)

 $\bigcirc$  N/C - Not Checked (explain)

[] Public officials

[] Excavators

### CODE REFERENCE: § 192.616 (d), (f); § 195.440 (d), (f)

COMMENTS:
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Bullet 1 - 5. Affected Public, Emergency officials, Public officials and Excavators Reviewed Brocedure and letters

Bullet 6. Reviewed mailing reports and post office certification of bulk mailings, bussiness reply card (BRC) mailing,

Bullet 7. Called emergency number 253-593-6085, operator gave correct procedure. Mailers also include Correy and Johns individual numbers for general questions.

#### 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?

• Diverify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

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

#### COMMENTS:

Bullet 1. Schools in mailing 660 feet, made personal contact (doc can be improved), dropped off calendars emphasised pipeline next to right way -don't want kids standing on pipeline during an evacuation of the school building. Meet with municipalities ie public works. Municipalities mayor etc part of public officials.

#### 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:

[] Emergency officials

[] Public officials

[] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c)

#### COMMENTS:

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

 $\bigcirc$  N/A - Not applicable (explain)

 $\bigcirc$  N/C - Not Checked (explain)

Bullet 1 - Review last 5 years Affected Public annual more stringent

Emergency Officials- call emergency officials annually, have documentation (make 3 attempts), have set questions, talked to FBI regarding Homeland security on McChord and pipeline facility facility.

Public Officials more stringent Excavators Conduct table top with Dept of Ecology, US Coast Gurard, MSRS Contractor, US OIL and Tacoma Fire Dept. NOTE: McChord sends 2-3 Tacoma Fire Fighters to chemical fire fighting school annually, they have bought a foam truck for all liquid incidents. Tacoma Fire Fighters would handle fire with equipment provided by McChord and US Oil.

#### 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)

 $\bigcirc$  N/A - Not applicable (explain)

○ N/C - Not Checked (explain)

#### COMMENTS:

Relevant factors considered along pipeline. McChord updated PAP with documentation methods for all supplemental enhancements. Supplemental enhancements were reviewed.

### 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?

• DExamine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.

• 2Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.

• Ildentify 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.

• Ildentify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.

• Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

 $\bigcirc$  N/A - Not applicable (explain)

 $\bigcirc$  N/C - Not Checked (explain)

## COMMENTS:

McChord updated PAP with details. Section 4.C.3, and mutual agreement with WSPA (refineries).

Stephanie Arnold, safety and security manager takes care liason responders etc.

Bullet 1. Reviewed documtation for maintaining the relationsip with emergency officials. Stephanie does safety for US Oil which includes emergency plan to Tacoma Fire, scheduling Tacoma fire fighters to chemical fire fighting school in Texas, annual joint training on site and the communication program with the smaller cities.

Bullet 2. Emergency response plan is available on US Oil website (McChord owned by US OIL)

Bullet 3. 1. identify operators expectations

Bullet 4. McChord purchases required response equipment for emergency organization

Bullet 5. McChord calls all emergency organizations once annually, answers questions and offers presentations.

## 3. Program Evaluation & Continuous Improvement (Annual Impplementation 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?

• Derify the operator performed an annual audit or review of the PAP for each implementation year.

CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

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

## COMMENTS:

Bullet 1. reviewed for each year. Currently McChord has summary memo and interanl audit form, they are planning on combining the 2 documents.

## 3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

• Determine how the operator conducts annual audits/reviews of its PAP.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

• S - Satisfactory (explain)

- U Unsatisfactory (explain)
- $\bigcirc$  N/A Not applicable (explain)
- $\bigcirc$  N/C Not Checked (explain)

## COMMENTS:

Bullet 1. accomplished with interanal assessment with 3rd party assistance.

## 3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual? •Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.

• If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

• S - Satisfactory (explain)

- U Unsatisfactory (explain)
- $\bigcirc$  N/A Not applicable (explain)
- $\bigcirc$  N/C Not Checked (explain)

## COMMENTS:

Bullet 1. Changes were made based on the annual audit. McChord made changes based on Paradigm information and from field information such as noticing that fencing contractors were not on the excavator mailing list.

## 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?

• 2 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).

• Didentify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation. CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

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

COMMENTS:

McChord updated its PAP with more detail regarding 4 year evaluations.

Bullet 1 and 2. McChord conducted effectiveness evaluation in timely manner.

Bullet 3. In house with 3rd party contractor assist

Bullet 4. Paridigm determined sample size and margin of error. PAP updated to reflect information.

## 4.02 Measure Program Outreach

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

• Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.

• Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).

• Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

[] Affected public

[] Emergency officials

- [] Public officials
- [] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

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

## COMMENTS:

Bullet 1 pradigm tracks numbers for each group,

Bullet 2. McChord used questionairs business reply cards (BRC) and telephone survey.

Bullet 3. Pardigm provided sample size and margin of error

#### 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

 $\bigcirc$  U - Unsatisfactory (explain)

 $\bigcirc$  N/A - Not Applicable (explain)

 $\odot$  N/C - Not Checked (explain)

#### COMMENTS:

Reviewed items mailed by us post office, and by business reply card (usually get 3 or 4% back in returned mail).

Bullet 1. five year span average is used for sample size and margin of error for each group

bullet 2. for affected public and public officials by bussiness card response reply, emergency responsders phone calls, for excavators returned mail (also McChord stands by during any construction near their pipeline)

#### 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)

•DExamine 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.

• 2Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.

• Determine if the operator pre-tests materials.

[] Affected public

[] Emergency officials

[] Public officials

[] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

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

#### COMMENTS:

Bullet 1. understaning message is by test on bussiness rely card. Pardigm says with affected public 77.95% understand, emergency officials 92.37% understand, excavators 57.68 understand and public officials 66.67% understand.;

Bullet 2. see above

Bullet 3. Pamphlet are pre tested but McChord's letter not tested.

#### 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?

• DExamine the operator's evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.

• DVerify 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)
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 $\bigcirc$  U - Unsatisfactory (explain)

 $\bigcirc$  N/A - Not Applicable (explain)

 $^{\bigcirc}$  N/C - Not Checked (explain)

COMMENTS:

Bullet 1; over 86% answered correctly indicating intended learned behaviors

bar graph indicates that more know and understand from paridgm 2011 report.

Bullet 2. McChord updated documentation detail in PAP. Reviewd 2-1-10 email regarding lady who reported a scheen on puddle. McChord checked out, conducted leak survey checked, notified lady it was road oil.

#### 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.

• <sup>®</sup>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)
- $\bigcirc$  N/A Not Applicable (explain)
- N/C Not Checked (explain)

### COMMENTS:

McChords tracts the following and there were no 3rd party damages, no near msises, part of intregrity review check list .

Bullet 1. Maintaining zero incidents is considered part of McChord's continous improvement

Bullet 2. no 3rd party incidents and consequence because McChords stand by dig sites during excavation. Occossionally has problems with some excavators not digging safetly and ignoring McChord personal. Improved by meeting one on one with municipalities' public works departments and excavators knowing the police or sheriff can shut down job for pipeline safety.

Bullet 3. McChord considered and attempted to measure bottom line with bussiness response cards. Ques 9 on card is open ended question about what McChord could do to be a good (better) neighbor, responses are very positive.

## 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?

• DExamine the operator's program effectiveness evaluation findings.

• Identify if the operator has a plan or procedure that outlines what changes were made.

• <sup>2</sup>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)

 $\bigcirc$  N/C - Not Checked (explain)

### COMMENTS:

Bullet 1. effectiveness evalution showed continued improvement by numbers.

Bullet 2. audit caught fencing contractors being misssed

Bullet 3. updated mailing to included fencing contractors, give money and prizes for calls reporting concerns and for helpfulness, take donuts to contractors etc.

## 5. Inspection

### SUMMARY:

McChord's PAP manual lacked clarity and procedural details in several areas. Changes to the PAP manual were made during the inspection

#### FINDINGS: