



# Public Awareness and Damage Prevention Program Requirements

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# Overview



- Damage prevention program requirements
- Public awareness program requirements
- Q&A

# Damage prevention Requirements



- Notification Center
  - all pipeline operators must participate in a qualified, one-call notification center. Inspector will verify.
  - Example: Texas811

# Texas Damage Reporting From (TDRF)



- each operator of an underground pipeline shall report to the Commission all damage to its pipelines caused by an excavator. Within 30 days of the damage incident or of the operator's actual knowledge of the damage incident, an operator shall submit the information to the Commission through TDRF, which may be accessed through the Commission's online reporting system using its assigned operator identification code.
- inspectors will verify that all incidents caused by excavation been reported to the commission via the operator's annual report.

# Identification of Excavators



- The Operator must identify, on a current basis, persons who normally engage in excavation activities in the area in which the operator's pipeline is located, and what frequency is the identification updated.
- Inspector will verify the method used by the operator to identify persons involved in excavation activities in proximity of their pipeline as well as verify that the method used by the operator to verify the excavator list is current.

# Notification to the Public



- An operator must provide notification to the public in the vicinity of the pipeline as well as notification to the persons who normally engage in excavation activities near the pipeline as often as needed to make them aware of the damage prevention program: this notice must include.
  - (i) The program's existence and purpose; and
  - (ii) How to learn the location of underground pipelines before excavation activities are begun

# Receiving and Recording



- the operator must have methods that they use for receiving notices of planned excavation, the operator will have to provide the method they are using to track excavation activities.
- the operator must retain records of all notifications of planned excavation activities and positive responses for at least four years.  
inspectors will verify via online database, one-call center, etc.

# Operator Obligations Positive Response



- the operator must provide positive response within 48 hours.
- the location must either be marked or a notification to the excavator must be given that there is not underground pipelines in the vicinity if the proposed excavation area.
- The operator must make record of positive response for each line locate ticket received.

# Temporary pipeline markings



- An operator must verify that temporary markings at a minimum, conform to the requirements of American Public Works Association (APWA) Uniform Color Code (ANSI Standard Z535.1, Safety Color Code).
- Operator must ensure that they are following TAC 18.8 regarding marking requirements. This will include a field inspection of a locate ticket request by the inspector.

# Life of Temporary line markigs



- The operator's program must include a statement that indicates that all Markings shall be valid for an excavation site for 14 days from the time a positive response is given, unless the markings were placed in response to an emergency and the emergency condition has ceased to exist.
- If a line locate ticket has been refreshed, then the operator shall either ensure that markings are still visible and valid or shall re-mark.
- If the use of line marking may permanently damage property (driveways, landscaping, historic locations to the extent boundaries are known), a locator shall use spot marking or another suitable marking method or methods.

# Protocols for an excavation site



- If the operator establishes protocols with an excavator for managing excavation site. The operator must make sure that the agreed tolerance zone is not less than half the nominal diameter plus 18 inches on either side of the outer edge of the underground pipeline per TAC 18.9(a)(8).
- If an excavator and an operator jointly establish protocols pursuant to this section, both the excavator and the operator shall make and retain a record of the agreement.

# Inspection of potential damage



- If an operator believes a pipeline to be damaged due to excavation activities, they must provide inspections to verify the integrity of pipeline during and after activity has concluded.
- In the case of any blasting activities the inspections must include a leak survey.

# Public Awareness Requirements



- Management Support
  - An Operator's Public awareness program must have a written statement that demonstrates management support.
  - What does this include? the paragraph should include how management participates in public awareness program. The inspector will verify that there is an individual named and identified to administer the program with roles and responsibilities other things included would be the number of employees involved in the public awareness program and if any external support resources are used for implementation or evaluation efforts.

# Asset identification



- an operator's program must clearly identify an operator's pipeline systems, facilities and unique characteristics that may be included in the program. The inspector will verify that the Public awareness program includes all the operator's system types/assets this would include any gas liquid, HVL, storage fields, gathering lines, Etc.
- unique attributes and characteristics would include Compressor stations, valves, breakout tanks, Odorizer.

# Audience Identification



- An operator's program must establish methods to identify the individual stakeholders. these are broken into 4 audience groups.
  1. Affected public
  2. Emergency officials
  3. Local public officials and
  4. Excavators

As well as school districts, businesses, affected municipalities and residents.
- Inspectors will verify that an operator program includes how do they determine stakeholder notification areas and distance on either side of the pipeline.
- The operator must also provide the process or data source used to identify each stakeholder audience.
- The inspector will select a random location of the system and verify that a list of stakeholders is listed according to the requirements listed on the program. some of the records reviewed included but is not limited to mail-outs, flyers, meeting sign-ins, Bill stuffers Etc.

# Consideration of Relevant Factors (1 of 3)



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 should be included to consider what components the Public Awareness Program should be enhanced.

## Consideration of Relevant Factors (2 of 3)



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

# Consideration of Relevant Factors (3 of 3)



- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements
- Results from previous Public Awareness Program evaluations
- Other relevant needs

# Education Provisions



The inspector will verify that the delivered messages include the following information:

1. Use of a one call system before excavation.
2. Listing of possible hazards associated with the unintended release from a gas or liquid facility.
3. Listing of physical indications of a possible release
4. Listing of steps to be taken for public safety in the event of a release.
5. Listing of procedures to report a release.

# Message on pipeline facility locations



Messages developed for affected municipalities, school districts, businesses, and residents must include a description of the pipeline facilities' location.

# Baseline Message Delivery Frequency



- The operator must list the frequency at which baseline messages must be delivered in accordance with API RP 1162 , table 2-1 through table 2.3.
- if the operator fails to meet the requirements, they must provide justification in their program or procedures manual.
- The inspector will verify that baseline messages for the stakeholder audiences are sent according to requirements or that a justification is in place if the operator fails to meet these requirements.

# Liaison With Public Officials (1 of 2)



- The operator must establish and maintain Liaison with fire, police, public officials. Operator must include 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.
- An inspector will Verify the operator communicated and conducted liaison activities at intervals not exceeding 15 months, but at least once each calendar year.

# Liaison With Public Officials (2 of 2)



- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator
- Verify operator maintains records of attendance and acknowledgment of receipt by emergency response officials. Records should be retained for five years per TAC 8.235(e) / TAC 8.310(d)

# Other Languages



- The operator's program must require that material and messages be provided in other languages where there is a significant concentration of non-English-speaking people along the pipeline.
- An inspector will verify that the materials delivered were developed in other languages for non-English speaking populations in the operator's areas
- An inspector will also review 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.

# Evaluation Plan (1 of 2)



- The overall written plan for the Public Awareness Program should

include a section describing the operator's evaluation program that includes the baseline elements described in the following paragraphs.

-PURPOSE AND SCOPE OF EVALUATION

-ELEMENTS OF EVALUATION PLAN

-MEASURING PROGRAM IMPLEMENTATION- annual review of PAP.

-MEASURING PROGRAM EFFECTIVENESS- 4-year effectiveness review

# Evaluation Plan (2 of 2)



Measure 1—Outreach: Percentage of Each Intended Audience Reached with Desired Messages.

Measure 2—Understandability of the Content of the Message.

Measure 3—Desired Behaviors by the Intended Stakeholder Audience.

Measure 4—Achieving Bottom-Line Results.

## **SUMMARY OF BASELINE EVALUATION PROGRAM**

The results of the evaluation need to be considered, and revisions/updates made in the public awareness program plan, implementation, materials, frequency and/or messages accordingly.

# Contact Information



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