

Inspection Output (IOR)

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Inspection Information

Inspection Name	Swissport PA Inspection	Operator(s)	SWISSPORT FUELING INC (32517)	Plan Submitted	01/23/2018
Status	PLANNED	Lead	Scott Anderson	Plan Approval	01/23/2018 by Joe Subits
Start Year	2018	Observer(s)	Denise Crawford	All Activity Start	04/16/2018
System Type	HL	Supervisor	Joe Subits	All Activity End	04/16/2018
Protocol Set ID	HL.2017.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

This was an inspection of the Public Awareness plan for Swissport Fueling, Inc. The Swissport terminal is used to deliver jet fuel to SeaTac Airport. Swissport is the operator of the terminal. One probable violation was found as a result of this inspection. The probable violation was due to Swissport not providing any record that the company has performed an effectiveness evaluation since the implementation of the public awareness plan. In Swissport's Public Awareness manual in section 7.0 it states that Swissport will contract third party, Burns and McDonnell, to conduct an effectiveness evaluation every 4 years, the plan was implemented in 2013 and Swissport could not provide any record of an effectiveness evaluation.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	Swissport PA	Swissport PA	other	Swissport PA	BOT/RT Pump Stations Onshore Offshore GOM Crosses Nav. HVL CO2 Biofuels Abandoned	23	23	21		91.3%

a. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Swissport PA	n/a	PD.PA	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Swissport PA Inspection	--	04/16/2018	n/a	all planned questions	all assets	all types	23	23	21	91.3%

- a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
- b. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Swissport PA Inspection	COMPLETED	05/15/2018	Swissport PA Inspection	Swissport PA

Results (all values, 21 results)

22 (instead of 21) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERL: Emergency Response Liquids

1. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also References presented in: PD.PA)
 Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
 Assets Covered **Swissport PA**
 Result Notes **Reviewed records having liaison names and addresses**

PD.PA: Public Awareness

2. Question Result, ID, Sat, PD.PA.PROGRAM.P, 195.440(a) (195.440(h))
 References
 Question Text *Has the continuing public education (awareness) program been established as required?*
 Assets Covered **Swissport PA**
 Result Notes **Swissport PA manual section 1.1 and 1.2**
3. Question Result, ID, Sat, PD.PA.MGMTSUPPORT.P, 195.440(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)
 References
 Question Text *Does the operator's program documentation demonstrate management support?*
 Assets Covered **Swissport PA**
 Result Notes **Swissport PA plan section 2.4. Section 2.4 was updated on-site to change the facilities General Manager Dean Williams name to Jay Long.**
4. Question Result, ID, Sat, PD.PA.ASSETS.P, 195.440(b) (API RP 1162, Section 2.7 Step 4)
 References
 Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*
 Assets Covered **Swissport PA**
5. Question Result, ID, Sat, PD.PA.AUDIENCEID.P, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP1162
 References Section 3)
 Question Text *Does the 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?*
 Assets Covered **Swissport PA**
 Result Notes **Swissport PA manual section 3.0-3.4**
6. Question Result, ID, Sat, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 Section 2.2, API RP 1162
 References Section 3)
 Question Text *Do records 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 to which it sends public awareness materials and messages?*
 Assets Covered **Swissport PA**
 Result Notes **Reviewed documentation identifying addresses and names of the 4 affected stakeholder audiences.**

7. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 195.440(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)**
 Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where hazardous liquid or carbon dioxide is transported?*
 Assets Covered **Swissport PA**
 Result Notes **Swissport PA manual section 5.0, letters are delivered annually**
8. Question Result, ID, References **NA, PD.PA.SUPPLEMENTAL.P, 195.440(c) (API RP 1162 Section 6.2)**
 Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience along all pipeline systems, as described in API RP 1162?*
 Assets Covered **Swissport PA**
 Result Notes **No such requirement existed in the scope of inspection review.**
9. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 195.440(d) (195.440(f))**
 Question Text *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a hazardous liquid or carbon dioxide pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a hazardous liquid or carbon dioxide pipeline release; and (5) Procedures to report such an event?*
 Assets Covered **Swissport PA**
 Result Notes **Reviewed mailer sent to stakeholder audiences. No issues**
10. Question Result, ID, References **Sat, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f))**
 Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?*
 Assets Covered **Swissport PA**
 Result Notes **Reviewed mailer sent out. also see Swissport PA manual 3.1-3.4. No issues**
11. Question Result, ID, References **Sat, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 Table 2-1)**
 Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1?*
 Assets Covered **Swissport PA**
 Result Notes **Swissport exceeds baseline delivery method by delivering annually**
12. Question Result, ID, References **Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4) (also presented in: EP.ERL)**
 Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
 Assets Covered **Swissport PA**
 Result Notes **Reviewed records having liaison names and addresses**
13. Question Result, ID, References **Sat, PD.PA.LANGUAGE.P, 195.440(g) (API RP 1162 Section 2.3.1)**
 Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
 Assets Covered **Swissport PA**
 Result Notes **Swissport PA manual section 4.0.**
14. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 Section 2.3.1)**
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
 Assets Covered **Swissport PA**
 Result Notes **Swissport message is delivered in English because the half mile radius is mostly business establishments, this has been confirmed with the City of SeaTac.**

15. Question Result, ID, References **Sat, PD.PA.EVALPLAN.P, 195.440(i) (195.440(c), API RP 1162 Section 8, API RP 1162 Appendix E)**
Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*
Assets Covered **Swissport PA**
Result Notes **Swissport PA manual section 7.0**

16. Question Result, ID, References **Unsat, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 Section 8.3)**
Question Text *Has an audit or review of the public awareness program implementation been performed annually since the program was developed?*
Assets Covered **Swissport PA**
Result Issue Summary **49 CFR 195.440(c)** The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

API RP 1162 2003 Edition

Section 8.3 Measuring Program Implementation

The operator should complete an annual audit or review of whether the program has been developed and implemented according to the guidelines in this RP. The purpose of the audit is to answer the following two questions:

- Has the Public Awareness Program been developed and written to address the objectives, elements and baseline schedule as described Section 2 and the remainder of this RP?
- Has the Public Awareness Program been implemented and documented according to the written program?

Appendix E includes a sample set of questions that will aid an operator in auditing the program implementation process.

The operator should use one of the following three alternative methodologies when completing an annual audit of program implementation.

- Internal self-assessments using, for example, an internal working group, or
- Third-party audits where the evaluation is undertaken by a third-party engaged to conduct an assessment and provide recommendations for improving the program design or implementation, or
- Regulatory inspections, undertaken by inspectors working for federal or state regulators who inspect operator pipeline programs subject to pipeline safety regulations.

Standard Issues **C (Documentation/administrative - no significant impact) : 195.440(c) : No record/documentation.**
Result Notes **In section 7.0 of Swissport's Public Awareness manual it states that Swissport will contract third party, Burns and McDonnell, to conduct effectiveness evaluation every 4 years. Swissport could not provide records that this effectiveness evaluation was performed.**

17. Question Result, ID, References **NA, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 Sections 8.4)**
Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*
Assets Covered **Swissport PA**
Result Notes **Due to Swissport not having records regarding an annual audit or review of the public awareness program implementation since the program was developed, effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program**

18. Question Result, ID, References **NA, PD.PA.MEASUREOUTREACH.R, 195.440(c) (API RP 1162 Section 8.4.1)**
Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
Assets Covered **Swissport PA**

Result Notes Due to Swissport not having any records in evaluating effectiveness of the PA plan there was no program outreach for each stakeholder audience tracking

19. Question Result, ID, References NA, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(c) (API RP 1162 Section 8.4.2)

Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered Swissport PA

Result Notes Due to Swissport not having any records in evaluating effectiveness of the PA plan there was no percentage of each stakeholder audience that understood and retained the key information from the messages

20. Question Result, ID, References NA, PD.PA.MEASUREBEHAVIOR.R, 195.440(c) (API RP 1162 Section 8.4.3)

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered Swissport PA

Result Notes Due to Swissport not providing any record of evaluating program effectiveness there was no evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited

21. Question Result, ID, References NA, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 Section 8.4.4)

Question Text *Did the operator attempt to measure bottom-line results of the 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?*

Assets Covered Swissport PA

Result Notes Due to Swissport not providing any record regarding program effectiveness evaluations, there has been no needed changes and/or modifications to the program identified and documented based on the results and findings.

22. Question Result, ID, References NA, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered Swissport PA

Result Notes Due to Swissport not providing any record regarding program effectiveness evaluations, there has been no needed changes and/or modifications to the program identified and documented based on the results and findings.

Report Parameters: Results: all

Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.