

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	8267 Georgia Pacific Public Awareness	Operator(s)	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted	01/13/2021
Status	PLANNED	Lead	Anthony DorrOUGH	Plan Approval	01/14/2021 by Joe Subits
Start Year	2021	Observer(s)	Reil Koizumi	All Activity Start	02/03/2021
System Type	GT	Supervisor	Joe Subits	All Activity End	02/03/2021
Protocol Set ID	GT.2020.02	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Scope and Summary:

This Public Awareness (PA) gas transmission inspection covered process and records review questions. The last PA inspection was performed on 4/12/2017 with no recommended follow up actions. A verbal exit interview was conducted on...

### Dates, Activities and Locations:

2/3- Georgia Pacific Consumer Products (Camas) LLC PA Inspection (904 NW Drake St. Camas WA 98607)

### Summary of Significant Findings:

No apparent violations of federal or state code  
No areas of concern identified

### Primary operator contacts/participants in the inspection:

Stephen Hernandez | Denver Operations Manager | The Compliance Group (318) 349-1952 Cell

Steve Ringquist | Project Engineer | Georgia-Pacific Camas Mill (360) 607-8713 Cell

Richard Simmons | Manager Operations | Georgia-Pacific (360) 834-8166 Office

### Recommended follow up actions for next inspection:

Staff recommends next inspector look into PA program efforts towards supplemental enhancements.

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	Georgia Pacific PA	Georgia Pacific Consumer Products (Camas) LLC	unit	86255	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	41	41	41	41	100.0%

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
					AMAOP CDA Abandoned					

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

## Plans

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

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Georgia Pacific P . A	--	02/03/2021	02/03/2021	n/a	all planned questions	all assets	all types	41	41	41	41	100.0%

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

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Georgia Pacific Camas PA	COMPLETED	02/04/2021	Georgia Pacific PA	Georgia Pacific PA

## Results (all values, 41 results)

47 (instead of 41) results are listed due to re-presentation of questions in more than one sub-group.

### EP.ERG: Emergency Response

1. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also 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 Georgia Pacific PA  
 Result Notes Need documentation for 2018 & 2019

### MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

2. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)  
 Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*  
 Assets Covered Georgia Pacific PA  
 Result Notes Section 7.1

3. Question Result, ID, References [Sat, MO.RW.PATROL.R, 192.709\(c\) \(192.705\(a\), 192.705\(b\), 192.705\(c\)\)](#) (also presented in: PD.RW)  
 Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*  
 Assets Covered [Georgia Pacific PA](#)
4. Question Result, ID, References [Sat, MO.RW.ROWMARKER.O, 192.707\(a\) \(192.707\(b\), 192.707\(c\), 192.707\(d\)\)](#) (also presented in: PD.RW)  
 Question Text *Are line markers placed and maintained as required?*  
 Assets Covered [Georgia Pacific PA](#)
5. Question Result, ID, References [Sat, MO.RW.ROWCONDITION.O, 192.705\(a\) \(192.705\(c\)\)](#) (also presented in: PD.RW)  
 Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
 Assets Covered [Georgia Pacific PA](#)
6. Question Result, ID, References [Sat, MO.RW.ROWMARKER.P, 192.707\(a\) \(192.707\(b\), 192.707\(c\), 192.707\(d\)\)](#) (also presented in: PD.RW)  
 Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
 Assets Covered [Georgia Pacific PA](#)  
 Result Notes [Section 18.2](#)

## PD.DP: Damage Prevention

7. Question Result, ID, References [Sat, PD.DP.PDPROGRAM.P, 192.614\(a\)](#)  
 Question Text *Is a damage prevention program approved and in place?*  
 Assets Covered [Georgia Pacific PA](#)  
 Result Notes [Section 18.2](#)
8. Question Result, ID, References [Sat, PD.DP.ONECALL.P, 192.614\(b\)](#)  
 Question Text *Does the process require participation in qualified one-call systems?*  
 Assets Covered [Georgia Pacific PA](#)  
 Result Notes [Section 18.1](#)
9. Question Result, ID, References [Sat, PD.DP.EXCAVATEMARK.P, 192.614\(c\)\(5\)](#)  
 Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*  
 Assets Covered [Georgia Pacific PA](#)  
 Result Notes [Section 18.5](#)
10. Question Result, ID, References [Sat, PD.DP.TPD.P, 192.614\(c\)\(1\)](#)  
 Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*  
 Assets Covered [Georgia Pacific PA](#)  
 Result Notes [Section 5.0](#)
11. Question Result, ID, References [Sat, PD.DP.TPDONECALL.P, 192.614\(c\)\(3\)](#)  
 Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*  
 Assets Covered [Georgia Pacific PA](#)  
 Result Notes [Section 18.11](#)
12. Question Result, ID, References [Sat, PD.DP.ONECALL.O, 192.614\(c\)\(3\)](#)  
 Question Text *Observe operator process a "One Call" ticket.*  
 Assets Covered [Georgia Pacific PA](#)  
 Result Notes [GP has converted from fax to email.](#)

13. Question Result, ID, References **Sat, PD.DP.PDPROGRAM.R, 192.614(c)**  
 Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*  
 Assets Covered **Georgia Pacific PA**
14. Question Result, ID, References **Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))**  
 Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*  
 Assets Covered **Georgia Pacific PA**
15. Question Result, ID, References **Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))**  
 Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*  
 Assets Covered **Georgia Pacific PA**

## PD.PA: Public Awareness

16. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)**  
 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 **Georgia Pacific PA**  
 Result Notes **Section 4.1**
17. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 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 **Georgia Pacific PA**
18. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)**  
 Question Text *Does the operator's program documentation demonstrate management support?*  
 Assets Covered **Georgia Pacific PA**
19. Question Result, ID, References **Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))**  
 Question Text *Has the continuing public education (awareness) program been established as required?*  
 Assets Covered **Georgia Pacific PA**
20. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 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 **Georgia Pacific PA**
21. Question Result, ID, References **Sat, PD.PA.MESSAGES.P, 192.616(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 gas is transported?*  
 Assets Covered **Georgia Pacific PA**  
 Result Notes **Section 8.4**
22. Question Result, ID, References **Sat, PD.PA.SUPPLEMENTAL.P, 192.616(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, as described in API RP 1162?*

Assets Covered Georgia Pacific PA

Result Notes Newspaper public announcement/ advertisement - Yearly

23. Question Result, ID, References Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(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 gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?*

Assets Covered Georgia Pacific PA

Result Notes Viewed Clock Room training drill records.

24. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))

Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*

Assets Covered Georgia Pacific PA

25. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)

Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*

Assets Covered Georgia Pacific PA

26. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: EP.ERG)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered Georgia Pacific PA

Result Notes Need documentation for 2018 & 2019

27. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(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 Georgia Pacific PA

Result Notes Section 6.2

28. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(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 Georgia Pacific PA

29. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(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 Georgia Pacific PA

30. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered Georgia Pacific PA

31. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*

Assets Covered Georgia Pacific PA

Result Notes **Third Party**

32. Question Result, ID, References **Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)**  
Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*  
Assets Covered **Georgia Pacific PA**
33. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 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 **Georgia Pacific PA**
34. Question Result, ID, References **Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)**  
Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*  
Assets Covered **Georgia Pacific PA**
35. Question Result, ID, References **Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(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 **Georgia Pacific PA**
36. Question Result, ID, References **Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(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 **Georgia Pacific PA**
37. Question Result, ID, References **Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)**  
Question Text *Were bottom-line results of the program measured 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 **Georgia Pacific PA**
38. Question Result, ID, References **Sat, PD.PA.CHANGES.R, 192.616(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 **Georgia Pacific PA**

## **PD.RW: ROW Markers, Patrols, Monitoring**

39. Question Result, ID, References **Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c))** (also presented in: MO.RW)  
Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*  
Assets Covered **Georgia Pacific PA**  
Result Notes **Section 7.1**
40. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: MO.RW)  
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*  
Assets Covered **Georgia Pacific PA**
41. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: MO.RW)  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered **Georgia Pacific PA**

42. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))** (also presented in: MO.RW)  
 Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
 Assets Covered **Georgia Pacific PA**
43. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: MO.RW)  
 Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
 Assets Covered **Georgia Pacific PA**  
 Result Notes **Section 18.2**

## PD.SP: Special Permits

44. Question Result, ID, References **NA, PD.SP.REPAIR.P, 190.341(d)(2)**  
 Question Text *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*  
 Assets Covered **Georgia Pacific PA**  
 Result Notes **No such activity/condition was observed during the inspection.**
45. Question Result, ID, References **NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)**  
 Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*  
 Assets Covered **Georgia Pacific PA**  
 Result Notes **No such activity/condition was observed during the inspection.**
46. Question Result, ID, References **NA, PD.SP.REPAIR.R, 190.341(d)(2)**  
 Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*  
 Assets Covered **Georgia Pacific PA**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
47. Question Result, ID, References **NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)**  
 Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*  
 Assets Covered **Georgia Pacific PA**  
 Result Notes **No such activity/condition was observed during the inspection.**

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Report Parameters: Results: all

Except as required to be disclosed by law, any 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.