

**PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION
SPECIFIC INFORMATION**

Control Information

Inspection Start Date*:	October 22, 2015	
Inspection End Date*:	October 22, 2015	
OpID:	570	
Parent Operator Name:	Ferndale Pipeline System	
Unit ID (s):	Ferndale Pipeline System	
State/Other ID:		
Activity Record ID No.		
Address of Company Official*: 14789 Ovenell Road Mount Vernon, WA 98273	Company Official*:	Jim Bruen
	Title*:	DOT Team Leader - Programs
	Phone Number*:	(630) 536-2535
	Fax Number:	(630) 420-5519
	Email Address*:	Jim.bruen@bp.com
Web Site:		
Total Mileage (from page 3)*:	36 miles	
Total Mileage in HCA:		
Number of Services (For Distribution):	Ferndale Pipeline System (FPS) has no Services	
Alternate MAOP (80% Rule):	FPS has no Alternative MAOP	
No. of Special Permits:	0	

Initial Date of Public Awareness Program*:	June 20, 2006
Title of Current PAP*:	BP Pipelines (North America) Inc. Public Awareness Program
Current PAP Version*:	
Current PAP Date*:	

Post Inspection Information	
Date Submitted for Approval:	
Director Approval:	
Approval Date:	

* Required field

PHMSA Form 21 Public Awareness Program Effectiveness Inspection, July 21, 2011, Rev 0

Persons Interviewed*	Title/Organization*	Phone Number	Email Address
Jim Bruen	DOT Team Leader - Programs	(630) 536-2535	Jim.bruen@bp.com
John Newhouse	DOT Compliance Advisor	(630) 536-2549	John.newhouse@bp.com
Larry Stansifer			

To add rows, press TAB with cursor in last cell.

External Support Entity Name*	Part of Plan and/or Evaluation*	Phone Number	Email Address

To add rows, press TAB with cursor in last cell.

Inspector Representative(s)*	PHMSA/State*	Region/State*	Email Address	Lead*
Anthony Dorough		WUTC	adorrough@utc.wa.gov	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N

To add rows, press TAB with cursor in last cell.

** Required field*

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 are both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

Jurisdictional to Part 192 (Gas) Mileage (Interstate)

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Interstate Gathering Mileage*	Interstate Transmission Mileage	Interstate Distribution Mileage [^] *	Remarks (new or in HCA)

(To add rows, press TAB with cursor in last cell.)

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Intrastate Gathering Mileage*	Intrastate Transmission Mileage*	Intrastate Distribution Mileage [^] *	Remarks (new or in HCA)
Ferndale Pipeline System	570		WA		36 miles		

(To add rows, press TAB with cursor in last cell.)

Jurisdictional to Part 195 (Hazardous Liquid) Mileage (Interstate)

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Interstate Transmission Mileage*	Remarks (new or in HCA~)

(To add rows, press TAB with cursor in last cell.)

Jurisdictional to Part 195 (Hazardous Liquid) Mileage (Intrastate)

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Intrastate Transmission Mileage*	Remarks (new or in HCA~)

(To add rows, press TAB with cursor in last cell.)

Total Mileage:	
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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, e.g., TX for Texas.
 4. Enter number of applicable miles in applicable columns. (Only positive values. No need to enter 0 or N/A.)
- [^] Please do not include Service Line footage. This should only be MAINS.
^{*} Required Field
[~] Use Total HCA as reported on annual reports.

Please provide a comment or explanation for each inspection 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?

(Reference: § 192.616 (h); § 195.440 (h))

- Verify the operator has a written public awareness program (PAP).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator's PAP.
- Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- Verify the date the public awareness program was initially developed and published.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Staff verified -BP Pipelines (North America) Inc. Public Awareness Program (PAP) issue date: Jun 20, 2006 Revision date: Feb 26, 2016
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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)?

(Reference: § 192.616 (a); § 195.440 (a); API RP 1162 Section 2.5 and 7.1)

- Verify the PAP includes a written statement of management support. – **Staff verified -See Pg.8**
- Determine how management participates in the PAP. –**See Section 3**
- Verify that an individual is named and identified to administer the program with roles and responsibilities. – **Staff verified -See Section 3**
- Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are. – **Staff verified -See Section 3**
- Determine if the operator uses external support resources for any implementation or evaluation efforts. –**See Section 3**

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Tulsa Control Center Damage Control Group Bobby Roy – Functional Manager Larry Stansifer - Standards
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (b); § 195.440 (b); API RP 1162 Section 2.7 and Section 4)

- Verify the PAP includes all of the operator’s system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc). – **Staff verified -See Section 4 – Table 3 – Pipeline/Assests**
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor station, valves, breakout tanks, odorizer). –**See Table 3**

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

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

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline. –**See Section 5 – Baseline Public Awareness Program Buffers**
- Determine the process and/or data source used to identify each stakeholder audience. –**See Section 6 – Stake Holder Identification Process**
- 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. –**Staff verified the location (addrs) 2225 Badger Custer**

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Sections 3-5)

- Identify where in the operator’s PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: –**See Table 6 – Stakeholder Audiences, Message Type, Frequency & Media Table**

- Affected public

- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: The list is broken out per. group
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c), (i); § 195.440 (c), (i))

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations. – **Staff verified - See Section 10 – Program Evaluations**
- Verify the operator’s evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart). – **Staff verified -See Section 11 – Effectiveness Evaluation**
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences’ surveys and feedback. –**See Section 11.2 – Public Awareness Programs Effectiveness Research Survey (PAPERS) PAPERS Methodology**

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (g); § 195.440 (g); API RP 1162 Section 2.3.1)

- Determine if the operator delivers material in languages other than English and if so, what languages. –**See Section 7 – Message Type, Frequency & Delivery Methods**
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience. –**See Section 7 – 10% Threshold**
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected. –**See Section 7**

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Bulk Materials
<input type="checkbox"/> U - Unsatisfactory (explain)*	

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<input type="checkbox"/> N/A - Not Applicable (explain)*	-Primarily in both English & Spanish -Based upon demographic studies done every (4) years
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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:

- Use 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;
- Steps 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)?

(Reference: § 192.616 (d); (f); § 195.440 (d), (f))

- Verify all required information was delivered to each of the primary stakeholder audiences. – **Staff verified - See Table 6**
- Verify the phone number listed on message content is functional and clearly identifies the operator to the caller. – **Staff verified - See handout, pamphlet and pipeline markers**

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Also see brochures for this info.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (e), (f); § 195.440 (e), (f))

- Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations. - **Staff verified – See pamphlets & cover letters**

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c))

- Identify message delivery (using the operator’s last five years of records) for the following stakeholder audiences: **-See Table 6**

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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? **(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 6.2)**

- Determine if the operator has considered and/or included other relevant factors for supplemental enhancements. **-See Section 8 – Supplemental Enhancements – Tables 6 & 7**

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 4.4)

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify 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.
- 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.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: FPS & BP sends letter & Pamphlets annually -FPS & BP hosts contractor dinners where FPS & BP representatives and locals attend -Joe Fraley attends LEPC Committee meetings for FPS & BP -Invitations go out to locals for Emergency Response Drills
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

3. Program Evaluation & Continuous Improvement (Annual 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?

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

- Verify the operator performed an annual audit or review of the PAP for each implementation year.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: - Staff verified – Annual Self Assessment Process Documentation
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

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

- Determine how the operator conducts annual audits/reviews of its PAP. – See Section 11.4 – Review Process

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.3)

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result. –See Program Revision Log – Pages 45 thru 52
- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed. –See Revision Details and Locations

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4. Program Evaluation & Continuous Improvement (Effectiveness)

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4)

- Verify the operator conducted an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation). – Staff verified -Jun 2010/ June 2014
- 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).
- Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation. –See Section 11.2 – Sample Size pg. 20

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: FPS & BP uses third party contractor: Cyera Strategies
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.1)

- Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group. –Conducted every (2) years
- Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc). –FPS had no incidents

- 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

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: -Contractor Conflict forms are available but FPS has not had to use them. -FPS & BP hosts annual Public Awareness Coordinators meetings
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.1)

- Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences. –See (4) year Effectiveness Survey
- Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group. - Staff verified – Outreach Charts

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: FPS & BP holds meetings through POPPA Program – See Paradigm pg. 31 FPS & BP had (334) (2013)
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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)

- Examine 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.
- Verify 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

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: -Staff verified- In (2013) - 90% Affected public - 89% Public officials - 95% Emergency Approximately 4 out of 10 emergency officials were extremely confident
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.3)

- Examine the operator’s evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- Verify 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

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: See (4) year Effectiveness Report which contains survey – Sections 7 & 8 pg. 26
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.4)

- Examine the operator's process for measuring bottom-line results of its program.
- 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.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: -Data covers entire BP system but they can break-out BP and Ferndale separately if needed. -Yes, total incidents can be found on Pg. 11 & Pg. 32 -Strikes (2010)-3 / (2011)-2 / (2012)-3 / (2013)-2 -Contractors 44% / Farmers 33% -When there was no One-call – 75% -With One-Call 25%
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 2.7 Step 12 and 8.5)

- Examine the operator's program effectiveness evaluation findings.
- Identify if the operator has a plan or procedure that outlines what changes were made.
- Verify the operator identified and/or implemented improvements based on assessments and findings.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Staff verified -See end of Survey for Recommended Changes -See Supplemental Documents for Implemented/Identified Improvements
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

5. Inspection Summary & Findings

5.01 Summary

Staff was impressed with the extremely efficient electronic system FPS & BP have put together to review & query these documents. Staff would suggest that the Commission take advantage of FPS & BP's offer to look into conducting future inspections of this type utilizing SKYPE technology. Commission staff have been encouraged to contact Jim Bruen if the Commission is interested in exploring that effort.

5.02 Findings

Staff found no apparent violations at this time.