

Public Awareness Programs for Pipeline Operators

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Introduction

Pipeline operators' public awareness programs help raise awareness of pipelines and associated facilities that exist in or near communities and provide information to stakeholder groups to help keep communities safe.

This recommended practice provides guidance for operators of regulated transmission, distribution, gathering pipeline, and underground storage systems to develop and manage public awareness programs tailored to meet the needs of communities. This recommended practice is supplemented by a guidance website hosted by API that provides additional information for operators that supplements the guidance in this recommended practice.

This document is intended to help operators determine program objectives that are appropriate for their company's pipeline system and to create processes to identify their stakeholder audiences, determine whether and when supplemental efforts are needed to support ongoing baseline program activities, and evaluate the effectiveness of their programs and identify program changes or adjustments, as needed.

Plan–Do–Check–Act

This recommended practice is organized around a Plan–Do–Check–Act (PDCA) program implementation cycle.

At its core, the PDCA cycle is a four-step model for carrying out continuous assessment and improvement and can be applied to a public awareness program as well as to individual elements and processes within the program. The PDCA cycle is useful when starting a new public awareness program; when developing a new or improved design of a process, product, or service; or when defining a repetitive work process.

Figure 1 provides an overview of the PDCA cycle.

The components of the PDCA cycle are as follows.

Plan: This step entails establishing the objectives and processes necessary to deliver results in accordance with the organization's policies and the expected goals. By establishing output expectations, the completeness and accuracy of the process is also a part of the targeted improvement.

Relevant sections within this recommended practice that focus on “Plan” include the following:

- Program Establishment (see Section 4);
- Messages (see Section 5).

Do: This step is the execution of the plan designed in the previous step.

Relevant sections within this recommended practice that focus on “Do” include the following:

- Delivery Frequencies and Methods (see Section 6);
- Program Implementation and Supplements (see Section 7).

Check: This step entails the review of the results compared with established objectives.

Compare those results to the expected goals to ascertain any differences, looking for deviation in implementation from the plan.

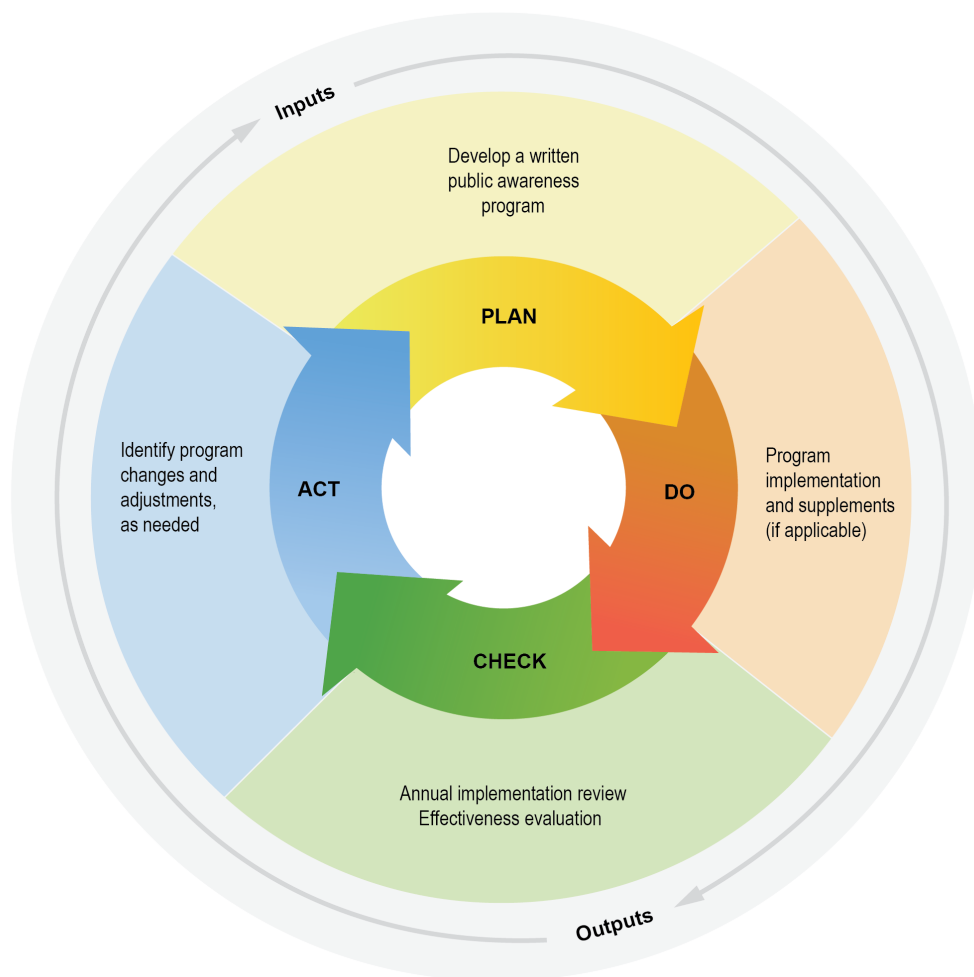
Relevant sections within this recommended practice that focus on “Check” include the following:

- Public Awareness Program Evaluation (see Section 8).

Act: This step is where a pipeline operator takes actions to improve process performance or determines where to apply changes that will include improvement of the process or program effectiveness.

Relevant sections within this recommended practice that focus on “Act” include the following:

- Any/all sections of an operator’s program where changes are made based on results of a prior annual implementation review or program effectiveness evaluation.



Key

Plan = strategic planning activity

Check = evaluation and quality assurance/quality control activity

Do = implementation activity

Act = program updates and adjustment activity

Figure 1—Plan–Do–Check–Act (PDCA) Cycle

Reflecting the cyclical nature of PDCA and the dynamic/evolutionary nature of the public awareness program, the entire process begins again from the start. Each cycle through PDCA produces opportunities for improvement. The application of PDCA logic to individual elements within the process can provide similar insights and opportunities for improvement within that element.

Public Awareness Programs for Pipeline Operators

1 Scope

This document addresses the development, implementation, evaluation, and documentation of pipeline public awareness programs associated with distribution, regulated transmission, gathering pipeline, and underground storage systems in the United States that are required under federal or state pipeline safety regulations to have a public awareness program.

NOTE The U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) Advisory Bulletin “Pipeline Safety: Clarification of Terms Relating to Pipeline Operational Status” (PHMSA-2016-0075) describes which regulated pipeline systems may be required to have a public awareness program.

A public awareness program is not required for abandoned pipeline systems. An operator can choose to use this recommended practice for nonregulated transmission, local distribution, and gathering pipeline systems.

Communications occurring prior to or during new pipeline construction are not covered by this recommended practice. Communications related to offshore operations and abnormal operations and during or related to emergencies are not covered by this recommended practice.

This recommended practice provides minimum requirements and offers guidance to operators to develop public awareness programs that take into account the differences and similarities in pipeline types, release characteristics, stakeholder audiences, operator activities, and other factors that can influence the program’s development and implementation.

This recommended practice provides operators with public awareness program elements and illustrates the process for establishing, implementing, measuring, and adjusting a program, in alignment with the Plan–Do–Check–Act (PDCA) process for managing programs. This recommended practice addresses certain operational changes requiring additional communication based on the introduction of new hazards.

NOTE At the time of this publication, certain nonregulated Class I and Class II rural gas gathering lines in the United States, as defined in 49 *CFR* Part 192, are not required by federal regulation to have a public awareness program. Annex F outlines the provisions of this recommended practice that may apply to operators following API 1182, *Construction, Operation, and Maintenance of Large Diameter Rural Gas Gathering Lines*.

2 Normative References

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any addenda) applies.

U.S. DOT Title 49 ¹, *CFR* Part 192, *Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards*

U.S. DOT Title 49, *CFR* Part 195, *Transportation of Hazardous Liquids by Pipeline*

3 Terms, Definitions, Acronyms, and Abbreviations

3.1 Terms and Definitions

For the purposes of this document, the following terms and definitions apply.

3.1.1

811

In the United States, a federally designated “Call Before You Dig” telephone number.

¹ U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, www.transportation.gov.

3.1.2**analysis**

To examine data to determine their component parts to better understand those data.

3.1.3**assessment**

The action or an instance of making a judgment about something.

3.1.4**baseline public awareness program**

Minimum requirements of a pipeline operator's public awareness program.

3.1.5**behavioral intent**

The likelihood that a person will engage in a given behavior.

3.1.6**census**

An attempt to gather information from every member of the population.

3.1.7**confidence level**

A determination indicating the probability a survey outcome will fall within a specified range of values if conducted again among a similar population.

3.1.8**damage**

Anything that results in the need to repair or replace a pipeline due to a weakening, or the partial or complete destruction, of the pipeline or facility, including, but not limited to, the pipe, appurtenances to the pipe, protective coatings, support, cathodic protection, or protective coating.

3.1.9**encroachment**

Unauthorized activity onto or within the operator's right of way (ROW).

3.1.10**high consequence area****HCA**

An area where pipeline releases could have greater consequences to health, safety, or the environment as defined in applicable pipeline safety regulations.

NOTE See 49 *CFR* § 192.903 and 49 *CFR* § 195.450.

3.1.11**liaison****liaise**

Communication and coordination to facilitate mutual understanding and cooperation among people or organizations.

3.1.12**margin of error**

The possible range difference between the responses of the true, or actual, population and the sample population, or those surveyed.

3.1.13**one-call center**

A qualified entity that administers a system through which a person can notify its member operators of lines or facilities of proposed excavations.

3.1.14**operator**

Entity that operates a regulated pipeline or facility.

3.1.15**pipeline****pipeline system**

Please refer to 49 *CFR* 192.3 for natural and other gas transmission, gathering, and distribution pipeline systems and 195.2 for hazardous liquid and carbon dioxide pipeline systems, as well as related statutes and interpretations at both the state and the federal levels.

3.1.16**population**

The entire pool from which a statistical sample is drawn.

3.1.17**qualitative research**

A research method used to collect non-numerical data/information from which meaning might be interpreted and analyzed.

3.1.18**quantitative research**

A research method used to collect numerical data/information such that the results and findings may be expressed and analyzed statistically and mathematically.

3.1.19**radius of exposure**

Distance from possible point of release to where H₂S concentration in air will dilute to below 100 PPM.

3.1.20**random sample**

A subset of a statistical population in which each member of the subset has an equal probability of being chosen.

3.1.21**response rate**

The number of responses to a survey divided by the survey sample size.

3.1.22**right of way****ROW**

Defined land or water on which an operator has the rights to construct, operate, and/or maintain one or more pipelines.

NOTE A ROW may be owned outright by the operator, or an easement may be acquired for its specific use.

3.1.23**sample**

A part of a population selected to represent a larger population of interest.

3.1.24**stakeholder reach**

The effectiveness measure used by an operator to estimate the percentage of the population for each stakeholder audience exposed to specific public awareness program messages.

3.1.25**supplemental**

Additional public awareness efforts beyond the baseline public awareness program.

NOTE See 7.3 for additional information on program supplements.

3.1.26**third-party damage**

Damage to pipelines or facilities that is not caused by the operator (first-party) or their contractor (second-party).

3.2 Acronyms and Abbreviations

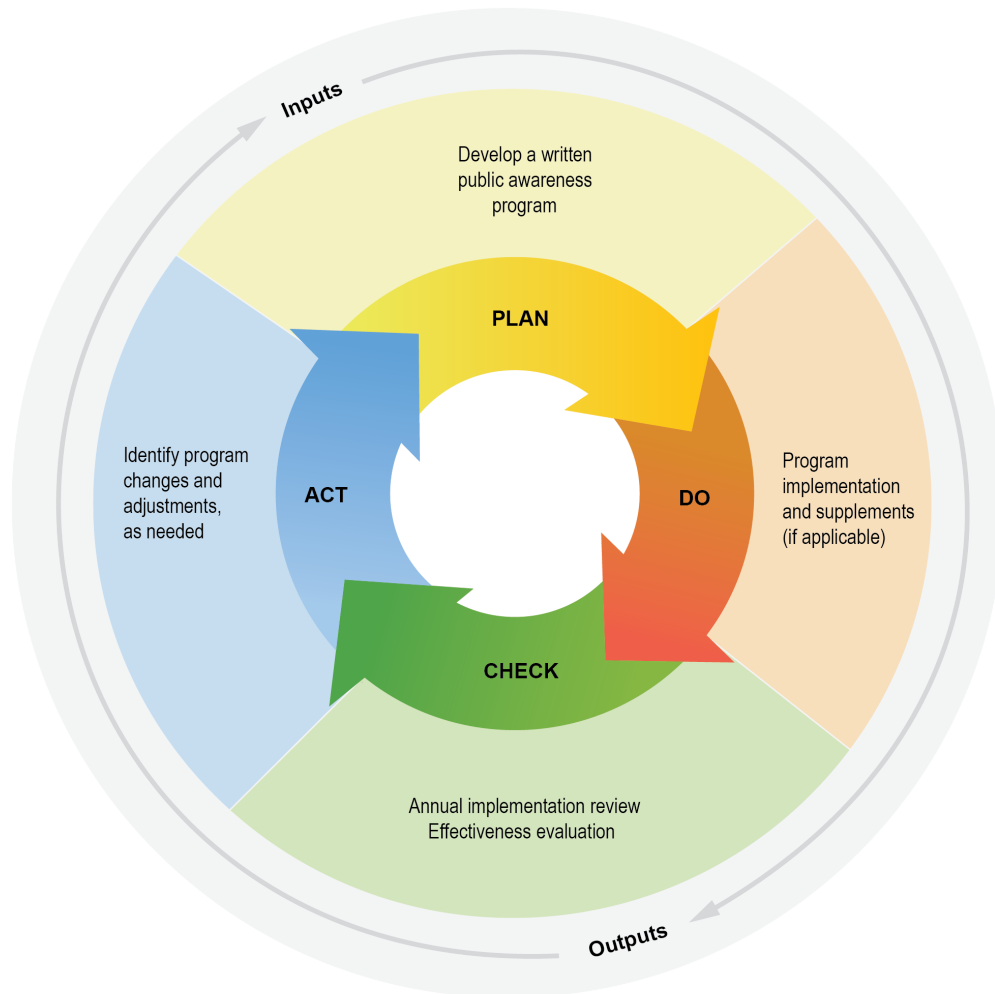
For the purposes of this document, the following acronyms and abbreviations apply.

<i>CFR</i>	<i>Code of Federal Regulations</i>
GIS	geographic information system
HCA	high consequence area
IDLH	immediately dangerous to life and health
LEPC	Local Emergency Planning Committee
NAICS	North American Industry Classification System
NAPSR	National Association of Pipeline Safety Representatives
NPMS	National Pipeline Mapping System
PDCA	Plan–Do–Check–Act
PHMSA	Pipeline and Hazardous Materials Safety Administration
PIMMA	Pipeline Information Mapping Management Application
PSA	public service announcement
ROW	right of way
SDS	safety data sheet
SIC	Standard Industrial Classification
USPS	United States Postal Service

4 Program Establishment**4.1 Overview**

Public awareness programs vary because of differences in pipeline systems, stakeholder audiences, and potential hazards associated with a release.

Figure 2 illustrates the process for establishing, implementing, measuring, and adjusting a public awareness program and aligns with an iterative four-step approach—PDCA—used to manage processes and programs.



Key

Plan = strategic planning activity

Do = implementation activity

Check = evaluation and quality assurance/quality control activity

Act = program updates and adjustment activity

Figure 2—Public Awareness Programs

4.2 Public Awareness Program Components

A public awareness program shall be written and include the following components:

- program objectives (see 4.3);
- program administration (see 4.4);
- pipeline systems covered by the public awareness program (see 4.5);
- a process for identifying stakeholder audiences (see 4.6);

- baseline messaging, frequencies, and methods (see Section 5 and Section 6);
- a process for identifying program supplements beyond the baseline program (see 7.3);
- a process for program evaluation (see Section 8);
- documentation requirements (see Section 9).

Program establishment is part of the “Plan” phase of an iterative four-step PDCA approach used to manage processes and programs.

4.3 Program Objectives

4.3.1 General

Operators shall develop a public awareness program based on the following objectives. Operators may choose to add additional objectives.

4.3.2 Awareness

Public awareness programs should enhance stakeholder audience awareness of the presence of pipelines in their communities and the potential hazards that unintended releases may pose.

4.3.3 Prevention

Public awareness programs should enhance the stakeholder's awareness of their role in preventing pipeline emergencies.

4.3.4 Recognition and Response

Public awareness programs should help stakeholder audiences understand how to recognize and respond to potential pipeline damage and/or a pipeline emergency.

4.4 Program Administration

The written public awareness program shall describe how the program will be administered, including a program administrator (department, or title, or name) and an overview of the roles and responsibilities of personnel administering the program.

4.5 Pipeline Systems

The public awareness program may be a single program for all pipeline assets or may be divided into individual, asset-specific programs for one or more specific pipeline systems, one or more pipeline segments, one or more facilities, or one or more geographic areas. Operators shall document whether the public awareness program covers all their pipeline systems or which pipeline systems it covers. Public awareness programs shall be developed in consideration of a pipeline system's unique characteristics.

4.6 Identify Stakeholder Audiences

4.6.1 General

Stakeholder audiences are comprised of four categories: the affected public, emergency officials, public officials, and excavators.

Operators shall have a method(s) to identify the stakeholder audiences for their public awareness program. Operators should document the method(s) used and the stakeholder audiences identified.

Operators can utilize internal or external resources to develop lists. Examples of list development methodology can be found in 4.6.3.

4.6.2 Coverage Area

The coverage area is a geographic area surrounding the pipeline that identifies the stakeholders within that area to be targeted through public awareness outreach efforts.

An operator shall define coverage areas in their program. See Table 1 for this recommended practice's baseline coverage areas. For further information for each of these stakeholder audiences, see the relevant sections below.

Table 1—Baseline Coverage Areas

Stakeholder Audience	Baseline Coverage Area
Affected public	Geographically defined (see 4.6.4.2)
Emergency officials	Having jurisdiction (see 4.6.5)
Public officials	Having jurisdiction (see 4.6.6)
Excavators	Normally operating in the pipeline's operating area (see 4.6.7)

NOTE Operators may be asked by authorities having jurisdiction to explain their coverage areas.

Table 2 through Table 5 identify the stakeholder audiences impacted by this document.

4.6.3 Develop Stakeholder Audience Contact Lists

4.6.3.1 General

Some delivery methods require an operator to develop stakeholder audience contact lists that include contact information for stakeholder audiences. Some media delivery methods, including, but not limited to, mass and electronic methods, do not require lists of stakeholder audiences. To develop stakeholder contact lists, operators may use internal or external data utilizing a variety of sources (e.g. one-call ticket data, commercially available contact lists, professional association directories, contact information available through public sources, etc.). Accuracy of contact or mailing lists can assist in reaching stakeholders identified in a baseline public awareness program. An operator should have a process or method to develop stakeholder audience contact or mailing lists that are used to implement their baseline public awareness program.

Stakeholder contact lists may be developed and maintained by the operator or a third party. Operators should make a reasonable effort to identify the targeted stakeholders within an identified coverage area. Stakeholder audience information can be restricted or limited due to privacy laws and change frequently. As a result, lists are often not completely accurate.

Activities to develop contact lists can include, but are not limited to, the following:

- North American Industry Classification System (NAICS);
- Standard Industrial Classification (SIC);
- privately developed lists, whether internally or externally developed;

- consultation with individuals who have knowledge regarding stakeholders in their community or jurisdiction (i.e. local emergency officials, internal subject matter experts);
- comparison of multiple lists created using different sources or methodology;
- rooftop count analysis using geographic information system (GIS) data and software;
- comparison to contact lists included within operator's emergency response plans or managed by operator's dispatch function;
- walking or driving within randomly selected areas to physically collect addresses for validation;
- internet research, websites, phone calls to all or a random sample of contacts;
- comparison to directory list provided by stakeholder representatives (i.e. homeowners' associations, state fire agency organizations, mayoral associations, the American Planning Association, the National Emergency Number Association, and the Federal Communications Commission);
- title or role-based review for selected communities or titles.

See Section 9 for documentation requirements.

4.6.3.2 Addresses for Mailings

In circumstances where an operator chooses to communicate using direct mail, the operator shall determine addresses near the pipeline within a specified coverage area.

Examples of how an operator can identify addresses for a stakeholder can include, but are not limited to, the nine-digit United States Postal Service (USPS) zip code address database or geospatial address database. For multifamily dwellings, individual apartment unit addresses should be used, not just the address of the apartment building or complex.

A local distribution operator may use its customer list for identifying that portion of the affected public who are its customers.

4.6.4 Affected Public

4.6.4.1 General

The affected public stakeholder audience is defined in Table 2.

4.6.4.2 Affected Public Baseline Coverage Areas

4.6.4.2.1 General

Table 1 defines baseline coverage areas for specified commodity groups. For commodities transported not listed in Table 1, operators should develop coverage areas based on the potential impact of a release.

In establishing the coverage area where baseline messages shall be communicated, an operator shall use, at a minimum, the distance from the pipeline system listed below in Table 3 or calculate an appropriate baseline coverage area for the pipeline (see 4.6.4.2.2 for an example). An operator may voluntarily extend the baseline coverage area.

Table 2—Stakeholder Audience—Affected Public

Stakeholder Audiences	Audience Definition	Examples
Residents	People who live within the coverage area ^a of: — transmission pipelines — gathering lines, or — major facilities such as tank farms, storage fields, and pump/compressor stations	— Tenants — Farmers
People near local distribution systems	People who live, work, or congregate within the coverage area of a local distribution system	— Customers — Noncustomers
Places of congregation	Places where people congregate or work on a regular basis within the coverage area of: — transmission pipelines — gathering lines, or — major facilities such as tank farms, storage fields, and pump/compressor stations	— Businesses — Schools and school districts ^b — Childcare and senior care facilities — Places of worship — Medical facilities ^c — Parks and recreational areas — Military installations — Correctional facilities
^a See Table 1. ^b Schools within the coverage area and their affiliated school districts are both included in the affected public stakeholder audience. ^c Can include long-term care facilities and assisted living facilities.		

Table 3—Affected Public Baseline Coverage Areas

Commodity Group	Baseline Coverage Area
Natural gas liquids or highly volatile liquids	660 ft on either side of pipeline
Natural gas (transmission and gathering)	660 ft on either side of pipeline
Natural gas (distribution)	Area served or 300 ft on either side of pipeline ^a
Hazardous liquids	660 ft on either side of pipeline
Carbon dioxide	330 ft on either side of pipeline
Hydrogen sulfide (H ₂ S or sour gas)	Radius of exposure ^b
^a As selected by the operator. ^b Defined in 3.1.19.	

4.6.4.2.2 Potential Impact Radius

As an alternative to using the baseline coverage area in Table 1, operators can calculate potential impact radius for their transmission and gathering pipelines transporting natural gas and some other gases. Potential impact radius is described in 49 *CFR* 192.903.

4.6.4.3 Languages Other Than English

Public awareness baseline programs shall be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

Operators shall identify a process to determine languages other than English that are commonly understood by a significant number and concentration of the non-English speakers in the operator's area and are part of the affected public stakeholder audience. The program should include the operator's determination of significant number and concentration and provide data source(s) used in identifying appropriate languages. Some commonly used data sources include census data, the American Community Survey, and consumer demographic data. Local knowledge of an operator's area may also be used.

4.6.5 Emergency Officials

The emergency officials stakeholder audience is defined in Table 4.

Table 4—Stakeholder Audience—Emergency Officials

Stakeholder Audience	Audience Definition	Examples
Emergency officials	Local, city, municipal, county, state, tribal, or regional officials, agencies and organizations with the role and responsibility of emergency preparedness and response, having jurisdiction in the pipeline system's operating area	— Fire departments — Police/sheriff departments — Local Emergency Planning Committees (LEPCs) — Local, city, municipal, county, state, or regional emergency management agencies and coordinators — 911 centers and/or emergency dispatch — Military installations — Emergency medical services — Hazardous materials response teams

4.6.6 Public Officials

The public officials stakeholder audience is defined in Table 5. Operators should define "tribal government" in their public awareness plan as applicable.

Table 5—Stakeholder Audience—Public Officials

Stakeholder Audience	Audience Definition	Examples
Public officials	Local, city, municipal, county, state, regional, tribal, and other officials or agencies with the role and responsibility of planning, land use, environmental protection, or street management, having jurisdiction in the pipeline system's operating area	— Planning and zoning boards — Licensing, planning, and permitting departments — Building code enforcement departments — City and county managers — Local governing councils — Military officials — Tribal government — Municipal government officials

4.6.7 Excavators

The excavators stakeholder audience is defined in Table 6.

Table 6—Stakeholder Audience—Excavators

Stakeholder Audience	Audience Definition	Examples
Excavators	Companies and government agencies who are engaged in earth moving, ground disturbing, or digging activities in the pipeline system's operating area	— Utility companies — Railroads — Construction and drilling companies — Excavation companies — Public works departments — Public street, road, and highway departments (maintenance and construction) — State Departments of Transportation — Timber companies — Fence installers — Drain tiling companies — Landscapers — Well drillers — Land developers — Home builders — Plumbers — Dredging companies — Demolition contractors

5 Messages

5.1 General

Messages are information that operators provide to stakeholder audiences to improve awareness of pipelines and pipeline safety, help prevent damage to pipelines, and communicate actions to take during a pipeline emergency. Message content is divided by stakeholder audience into two main categories: baseline and supplemental messages. Baseline messages are essential safety messages and vary depending on stakeholder audience and type of pipeline. Supplemental messages are additional messages that operators can choose to include in their public awareness programs.

Operators shall provide appropriate baseline messages to each stakeholder audience.

Operators shall determine if supplemental messages are necessary for achieving their program objectives (see 4.3).

Each of the following sections includes a table of baseline and supplemental message topics for each stakeholder audience and type of pipeline. This recommended practice provides a general description of the messages. Operators should develop the content for each message based on this recommended practice and what is appropriate for their pipeline assets and program objectives. Messages should be focused and concise.

Operators may pre-test public awareness messages for clarity and understandability. Operators may also pre-test materials for design and appeal. A pre-test can be performed using a representative audience, such as a small group of operator employees not involved in developing the public awareness program or a sample of the intended stakeholder audiences.

Message development is part of the “Plan” phase of an iterative four-step PDCA approach used to manage processes and programs.

See Table 11 for delivery frequencies.

5.2 General Pipeline Awareness

5.2.1 General

Table 7 lists general pipeline awareness message topics for each stakeholder audience, type of pipeline, and whether the messages are baseline or supplemental.

Table 7—General Pipeline Awareness Message Topics

Message Topic	Type of Pipeline	Baseline or Supplemental	Stakeholder Audience
Obtaining additional information (see 5.2.2)	Transmission Distribution Gathering	Baseline	Affected public Emergency officials Public officials Excavators
Commodity types transported and possible hazards for unintended releases (see 5.2.3)	Transmission Distribution Gathering	Baseline	Affected public Emergency officials Public officials Excavators
Pipeline purpose and reliability (see 5.2.4)	Transmission Distribution Gathering	Supplemental	Affected public Emergency officials Public officials Excavators
Facility purpose (see 5.2.5)	Transmission Distribution Gathering	Baseline	Affected public Emergency officials Public officials
Sharing pipeline safety information (see 5.2.6)	Transmission Distribution Gathering	Supplemental	Affected public Emergency officials Public officials Excavators
ROW/easement/land use (see 5.2.7)	Transmission Distribution Gathering	Supplemental	Affected public Emergency officials Public officials Excavators
Pipeline maintenance construction activities (see 5.2.8)	Transmission Gathering	Supplemental	Affected public Emergency officials

The information below provides guidance for the general pipeline awareness topics for operators.

5.2.2 Obtaining Additional Information

Operators shall inform all stakeholder audiences about how to get additional pipeline-related information. Examples of operator contact information can include the following:

- website address;
- nonemergency telephone number;
- email address;
- organizational contacts:
 - a) specific department contact information (for example, the ROW department, the public awareness group, etc.);
 - b) specific personnel contact information;
 - c) local contact information;
- other means to secure information.

5.2.3 Commodity Types and Possible Hazards from Unintended Releases

5.2.3.1 General

The ability of stakeholder audiences to appropriately take action to an unintended pipeline release is an objective of public awareness programs.

Communicating information about commodities transported, batched, or stored in an operator's pipeline system raises the awareness of stakeholders of the possible hazards from an unintended release and may also prompt them to seek additional information.

Operators shall provide stakeholder audience groups an overview of the commodity types (see Table 3) transported, batched, or stored in an operator's pipeline system(s). Messages should include the release characteristics and possible hazards from an unintended release. Real-time product-specific information for batching operations is not required to be communicated to stakeholders.

This information can be communicated through a single or multiple delivery methods (see 6.4 for a list of potential delivery methods).

5.2.3.2 Additional Information on Commodity Types and Possible Hazards

Operators may provide guidance to stakeholder audience groups on how or where they can learn more about the hazards associated with commodity types in portions of the operator's system near the stakeholder's home, business, or community. Some commodities have similar hazards or release characteristics.

Best practices in risk communication demonstrate that stakeholders who seek such information are more likely to retain that information and take desired actions if needed to protect themselves, their family, or community.

5.2.4 Pipeline Purpose, Reliability, and Safety Record

Operators may provide general information about pipeline transportation. Operators may also direct stakeholder audiences to regulator-provided pipeline safety compliance records, if publicly available. Messages can include:

- the role, purpose, and function of pipelines in energy supply;
- efficiency and reliability of pipelines;
- the pipeline industry's safety record;
- the benefits of pipelines to the community;
- state and federal regulations about pipeline design, construction, operation, and maintenance;
- operational activities that promote pipeline integrity, safety, and reliability (e.g. testing practices, inspections, patrolling, monitoring, etc.);
- operator-specific compliance records, if publicly available.

NOTE PHMSA maintains a compliance database for the pipelines they regulate. At the time of this publication, it can be found on the U.S. Department of Transportation enforcement transparency web page. Some states also maintain publicly available compliance information.

5.2.5 Facility Purpose

Where appropriate, communication with the affected public and emergency and public officials in proximity to major facilities (such as storage facilities, compressor, or pump stations) should include information to promote understanding of the nature of the facility. Operators should communicate general information regarding the facility and product(s) stored or transported through the facility. Communication with emergency officials should also include emergency contact information for the specific facility.

5.2.6 Sharing Pipeline Safety Information

Operators may encourage stakeholder audiences to share received pipeline safety messages with others. Some examples of sharing messages with other stakeholders can include:

- excavators sharing messages with field personnel and contractors;
- emergency officials sharing messages with other persons in their organization;
- affected public sharing messages with other persons in their home, business, or place of congregation;
- public officials sharing messages with other persons in their organization.

5.2.7 Right of Way/Easement/Land Use

Operators may communicate with stakeholders regarding land-use requirements or governmental or legal restrictions that protect pipelines. Some examples of messages to stakeholders can include:

- awareness of easements and other agreements;
- the potential impacts of land-use decisions regarding pipeline safety.

5.2.8 Pipeline Maintenance Construction Activities

Pipeline maintenance-related construction activities should be communicated to the stakeholder audience affected by the specific activity in a timely manner appropriate to the nature and extent of the activity.

5.3 Damage Prevention

5.3.1 General

Table 8 lists baseline and supplemental damage prevention message topics for each stakeholder audience and type of pipeline.

Table 8—Damage Prevention Message Topics

Message Topics	Type of Pipeline	Baseline or Supplemental	Stakeholder Audience
Damage prevention importance (see 5.3.2)	Transmission Distribution Gathering	Baseline	Affected public Excavators Public officials
		Supplemental	Emergency officials
Damage prevention steps (see 5.3.3)	Transmission Distribution Gathering	Baseline	Affected public Excavators Public officials
		Supplemental	Emergency officials
Damage reporting (see 5.3.4)	Transmission Distribution Gathering	Baseline	Affected public Excavators Public officials Emergency officials
Encroachments, threats, or suspected damage to a pipeline (see 5.3.5)	Transmission Distribution Gathering	Baseline	Affected public Excavators Public officials Emergency officials

The information below provides guidance for the damage prevention topics for operators.

5.3.2 Damage Prevention Importance

Excavation damage is one of the leading factors for fatalities, injuries, and property damage from pipeline incidents. Pipeline operators, industry associations, and federal and state partners manage robust damage prevention programs to mitigate one of the most critical threats to pipeline safety through increased public awareness and the improved use of 811/one-call systems, where applicable. Affected public, excavators, and public officials stakeholder audiences should be cognizant of damage prevention importance and the necessary steps to prevent excavation damage to pipelines. Although supplemental, ER stakeholder audiences have the potential to damage a pipeline during necessary activities such as cutting firebreaks or utilizing equipment and may also benefit from damage prevention awareness.

Excavation activities such as installing mailboxes, fences, or flag poles, performing landscaping, constructing storage facilities, or installing or maintaining below ground utilities or pipelines can damage the pipeline or other buried utilities. Damages to pipelines are a safety concern for the excavator and individuals near the pipeline. Damaged pipelines also impact the ability for operators to maintain service to their customers and may impact system reliability, even if there is no immediate release.

Operators shall convey to affected public, excavators, and public officials stakeholder audiences the importance of damage prevention.

5.3.3 Damage Prevention Steps

Operators shall provide damage prevention messages to stakeholder audiences (affected public, excavators, and public officials). These messages can include the following.

- Always call 811 or contact the one-call center before digging.
- Wait for the required time for site to be marked or, where required by state law, for a response from the operator.

NOTE States have varying requirements regarding one-call procedures. Operators are advised to verify those requirements and align their public awareness messages with those requirements.

- Respect the marks.
- Dig, excavate, move, or disturb earth with care.

Operators shall inform stakeholder audiences (affected public, excavators, and public officials) that it is the audience's responsibility to understand state damage prevention laws and local ordinances where they excavate. Operators can refer stakeholders to additional resources, for example:

- 811 websites;
- state one-call centers;
- state or industry associations.

Operators may provide information regarding private facilities and the need to confirm that private facilities, which are not included in the one-call system, have been marked.

5.3.4 Damage Reporting

Operators shall inform all stakeholder audiences that any damage to a pipeline (e.g. dents, nicks, or damage to the coating) must be reported to the operator promptly. Operators shall inform stakeholder audiences that any damage resulting in a release must be reported to 911 immediately and then reported to the operator. Operators shall inform all stakeholder audiences of a 24-hour emergency response number.

5.3.5 Encroachments, Threats, or Suspected Damage to a Pipeline

All stakeholder audiences shall be directed to report suspected damage to the pipeline system, observed threats, and suspicious activity on or near a pipeline system to the operator. Excavation activities (e.g. installing mailboxes, privacy fences and flag poles, performing landscaping, constructing storage buildings, placing signs, etc.) can damage the pipeline or other buried utilities.

- encroachments inhibit the operator's ability to perform critical activities, including:
 - a) conducting surveillance, routine maintenance, and inspections;
 - b) access to the pipeline system during emergencies;
- the importance of the ROW area being clear of trees, shrubs, buildings, fences, structures, or any other encroachments that could affect the integrity of the pipeline;
- encroachments can contribute to increased damage to pipelines.

Examples of threats and suspicious activity can include:

- unauthorized or unmarked excavation activity (e.g. lack of flags, marks, paint, etc.);
- conditions that may impact the pipeline (e.g. exposed pipe, subsidence or erosion, sink holes, or unstable soil);
- observed suspicious activity on or near pipeline infrastructure (e.g. cutting locks or fences, turning valves, vandalism, or trespassing);
- suspected damage to a pipeline (e.g. dents, nicks, leaking fluid or gas, hissing noises, etc.).

5.4 Emergency Awareness and Response

5.4.1 General

Table 9 lists baseline and supplemental emergency awareness and response message topics for each stakeholder audience and type of pipeline.

These messages are part of liaison with the emergency officials, including 911 emergency call and dispatch centers. Liaison with emergency officials activities are further discussed in 6.4.5.

Table 9—Emergency Awareness and Response Message Topics

Message Topics	Type of Pipeline	Baseline or Supplemental	Stakeholder Audience
Public safety priority (see 5.4.2)	Transmission Distribution Gathering	Supplemental	Affected public Excavators Public officials Emergency officials
Emergency response plans (see 5.4.3)	Transmission Distribution Gathering	Baseline	Emergency officials
Emergency drills and exercises (see 5.4.4)	Transmission Distribution Gathering	Baseline	Emergency officials
		Supplemental	Public officials
Leak recognition and response (see 5.4.5)	Transmission Distribution Gathering	Baseline	Affected public Excavators Emergency officials Public officials
Special emergency response (see 5.4.6)	Transmission Distribution Gathering	Supplemental	Emergency officials

The information below provides guidance for the emergency awareness and response topics for operators.

5.4.2 Public Safety Priority

Operators may emphasize the priority to protect life, the environment, and property in any pipeline emergency response to stakeholder audiences.

5.4.3 Emergency Response Plans

Emergency response plans are utilized in the event of an emergency and to coordinate responses with emergency officials. Operators should communicate the availability of information from their emergency response plans to emergency officials to increase awareness of pipelines and response to emergencies. This communication applies only to operators who are required to have emergency response plans. Operators should determine what portions, if any, of their emergency response plans are available to emergency officials. The appropriate elements of the emergency response plan may be shared during liaison activities such as emergency response exercises.

See 6.4.5 for more information on liaison activities.

5.4.4 Emergency Drills and Exercises

Operators shall communicate to emergency officials and may communicate to public officials that drills and exercises are conducted as part of their emergency preparedness. Operators should also communicate to emergency officials and public officials if there is an opportunity for them to participate in the operator's emergency drills and exercises.

See 6.4.5 for more information on liaison activities.

5.4.5 Leak Recognition and Response

Operators shall provide information on how to recognize and respond to a suspected pipeline leak or a release to all stakeholder audiences.

Messages about recognizing the physical indications of pipeline leak should include the following:

- sights;
- sounds;
- smells.

Messages about responding to a suspected pipeline leak should include the following:

- what to do if a leak is suspected, including contacting 911 and the operator from a safe location;
- what not to do if a leak is suspected.

5.4.6 Special Emergency Response

If the pipeline contains commodity types that, when released, could be immediately dangerous to life and health (IDLH), the operator should communicate detection and response information to the emergency officials stakeholder audience.

IDLH is an atmosphere that poses an immediate threat to life, would cause irreversible adverse health effects, or would impair an individual's ability to escape from a dangerous atmosphere.

NOTE 1 IDLH information can be found in safety data sheets (SDS) for particular commodities.

NOTE 2 See 29 *CFR* 1910.134 for additional information on IDLH.

If the pipeline contains commodity types that, when released, behave in an atypical manner, operators should communicate necessary detection and response information to all stakeholder audiences. Examples of these commodities can include diluted bitumen, nonfloating oils, and natural gas liquids.

NOTE 3 State regulations may have additional communication requirements including notification and evacuation information.

5.5 Pipeline Location

5.5.1 General

Table 10 lists baseline and supplemental pipeline location message topics for each stakeholder audience and type of pipeline.

The information below provides guidance for the pipeline location topics for operators.

Table 10—Pipeline Location Message Topics

Message Topic	Type of Pipeline	Baseline or Supplemental	Stakeholder Audience
Pipeline markers (see 5.5.2)	Transmission Gathering	Baseline	Affected public Emergency officials Excavators Public officials
	Distribution	Supplemental	
National Pipeline Mapping System (see 5.5.3)	Transmission	Baseline	Affected public Emergency officials Public officials
Pipeline maps (see 5.5.4)	Transmission Distribution Gathering	Supplemental	Affected public Emergency officials Excavators Public officials

5.5.2 Pipeline Markers

Transmission and gathering pipeline operators shall communicate to all stakeholder audiences that permanent pipeline markers:

- indicate the presence of a pipeline;
- vary in shapes, colors, and sizes;
- identify the commodity group(s) transported;
- provide the name of the pipeline operator;
- provide the operator's telephone number (including the area code) where the operator can be reached at all times.

Public awareness materials should include an example(s) or illustration(s) of a pipeline marker(s).

Transmission and gathering operators can include information about other above-ground indicators of pipeline facilities, such as meters or regulators, in their messages.

Distribution operators may include information about pipeline markers and other above-ground indicators of pipeline facilities, such as meters or regulators, in their messages.

5.5.3 National Pipeline Mapping System

Transmission operators shall provide information about the National Pipeline Mapping System (NPMS) to (affected public, emergency officials, and public officials) stakeholder audiences.

The NPMS is a geographic database and map viewer that depicts natural gas, natural gas liquid, and hazardous liquid transmission pipeline systems in the United States and is available at www.npms.phmsa.dot.gov. Stakeholder audiences can obtain pipeline location, mapping information, general commodity types transported, and operator contact details from NPMS.

NOTE Distribution and gathering lines are not included in NPMS.

5.5.4 Pipeline Maps

Operators may provide system maps, local maps, or service area maps to stakeholder audiences.

System maps provide general depiction of a pipeline shown on a state, regional, or national scale. This type of map is often used by operators in publications available to the industry and public. These maps provide a high-level overview of the pipeline route.

Local maps depict assets in a local area and typically do not show the entire pipeline system.

Service area maps depict distribution operator service territories and can be provided to affected stakeholders. They generally do not show specific pipeline locations but depict the general areas in which the distribution operator operates pipelines.

The level of detail in maps may vary and takes security of the energy infrastructure into consideration.

See the Transportation Security Administration (TSA) *Pipeline Security Guidelines* for more information, which can be accessed at www.tsa.gov.

6 Delivery Frequencies and Methods

6.1 General

Delivery frequencies and methods refer to how often and in what ways public awareness information is communicated to stakeholder audiences. While this recommended practice does not mandate a specific baseline delivery method, it does identify baseline delivery frequencies. Collaborative programs are discussed in 6.5.

Message delivery is part of the “Do” phase of an iterative four-step PDCA approach used to manage processes and programs.

6.2 Delivery Frequencies

Table 11 establishes the baseline delivery frequencies by which operators shall communicate with stakeholder audiences. Delivery frequencies may be increased based on other factors such as stakeholder audience, program effectiveness evaluation outcomes, or pipeline type. An increased delivery frequency constitutes a supplement to the program.

Refer to Section 7 for supplements to pipeline awareness programs.

Table 11—Baseline Delivery Frequencies

Stakeholder Audience	Type of Pipeline	Minimum Frequency
Affected public	Transmission Gathering	Every 2 calendar years, not to exceed 27 months
Affected public (noncustomers)	Distribution	Each calendar year, not to exceed 18 months
Affected public (local distribution company customers)	Distribution	Twice annually within each calendar year, not to exceed 8 months
Emergency officials	Transmission Distribution Gathering	Each calendar year, not to exceed 18 months
Public officials	Transmission Distribution Gathering	Every 2 calendar years, not to exceed 27 months
Excavators	Transmission Distribution Gathering	Each calendar year, not to exceed 18 months
NOTE Some jurisdictions have more stringent requirements for message delivery frequencies.		

6.3 Communication due to New Emergency Contact Information and Introduction of New Hazards

New contact information shall be communicated to affected stakeholders (affected public, emergency officials).

Certain operational changes initiated by the operator can introduce new hazards that have not been previously communicated to affected stakeholders.

Operators shall communicate this new emergency contact information or messages on how to recognize and respond to those new hazards to affected stakeholders (affected public, emergency officials).

Messages shall be delivered when the following new hazards are introduced due to operational changes:

- change in operator's emergency contact information (e.g. change to 24-hour emergency number);

NOTE Changes in contact information are a common occurrence when pipeline assets are acquired.

- initial operation of a newly commissioned pipeline introduces a new release hazard (e.g. installing another pipeline within the ROW transporting a different commodity type that introduces new release hazards that have not previously been communicated or installing another pipeline that increases the coverage area to include people not previously included in an operator's program);
- introducing different commodity groups through existing pipelines that require different leak recognition and response than previously communicated;
- initial operation of a distribution pipeline outside existing baseline coverage area established in accordance with 4.6.2.

Operators should communicate these new hazards to appropriate stakeholder audiences prior to the introduction of the new hazards. Communications shall be completed no later than 18 months after the new hazards are introduced. If the operator is unable to complete the communication prior to the change, the operator shall document why a longer time period was required to implement the communication and when the communication occurred.

Examples of operational changes when a communication is not expected:

- batching (e.g. recognition/response generally the same across commodity types);
- newly commissioned pipelines within an existing coverage area that do not introduce a new release hazard;
- normal operational changes (e.g. operating pressure changes that do not expand the coverage area, including, but not limited to, bidirectional flow, idling or restarting a line, and pressure changes);
- newly commissioned pipelines within an existing baseline coverage area that do not introduce new hazards or expand the coverage area;
- new distribution pipelines within an existing baseline coverage area.

6.4 Delivery Methods

6.4.1 General

An operator's program shall identify the delivery method or combination of methods used to deliver baseline messages to stakeholders. Operators should select delivery methods for messages that support the objectives of their public awareness program.

Some of the factors that can assist in the identification of delivery methods include the following:

- the stakeholder audience being targeted;
- needs of the stakeholder audience;
- intent of the communication;
- whether the method(s) will reach the desired stakeholders;
- documentation necessary to prove the effort was deployed;
- data necessary to support effectiveness measurement.

For more information, reference 9.2 on documentation.

This section describes several delivery methods and tools available to pipeline operators to communicate with the affected stakeholder audiences previously described. The operator is reminded that not all methods are effective in all situations.

Examples of delivery methods are described below.

6.4.2 Printed Materials

Public awareness messages may be communicated using printed materials.

Examples of printed materials can include the following:

- brochures, bill stuffers, flyers, booklets, or pamphlets;
- letters;
- door hangers;
- maps;
- postcards;
- promotional items;
- fact sheets;
- training materials.

6.4.3 Mass Media Communications

Media or mass media is a form of communication that can be used to reach a broad audience.

Examples of media communications can include the following:

- public service announcements (PSAs);
- news media coverage;
- community and neighborhood newsletters;
- advertising (e.g. billboards, TV, radio, newspaper, electronic media);
- editorials and/or submitted articles;
- social media.

6.4.4 Personal Contact

Personal contact with stakeholder audiences can provide the opportunity for interaction and can be a highly effective communication method. This may be done on an individual basis or in a group setting.

Examples of personal contact can include the following:

- face-to-face interaction;
- door-to-door contacts;
- meetings, virtual, or other;
- open house events;
- facility tours;
- telephone calls;
- community events.

6.4.5 Liaison with Emergency Officials

6.4.5.1 General

Operators can liaise with appropriate emergency officials as part of their public awareness program. Liaison can be considered a delivery method for emergency officials and public officials.

Some operators conduct liaison activities with emergency officials as part of their public awareness program, whereas other operators may elect to conduct liaison activities separately. If liaison activities are performed as part of an operator's baseline public awareness program, liaison activities shall be documented.

NOTE Federal regulation requires operators to liaise with emergency officials for emergency response planning. See 49 *CFR* 192.615I and 195.402I(12).

Examples of emergency official liaison activities can include the following:

- learning the responsibility and resources of each government organization that may respond to a pipeline emergency;
- acquainting the officials with the operator's ability to respond to a pipeline emergency;
- describing the types of pipeline emergencies and hazards to which emergency officials may be asked to respond;
- planning how the operator and officials can engage in mutual assistance to minimize hazards to life, public safety, the environment, and property.

Additional information that can be provided during liaison activities includes the following:

- availability of information from emergency response plan(s);
- high consequence area (HCA) maps, where applicable;
- asset location(s) within jurisdiction;
- commodity types and associated SDS, if requested;
- contact information, such as local operator personnel contacts and/or operator emergency response team(s);
- response strategy and capabilities.

6.4.5.2 Emergency Drills, Exercises, and Trainings

Operators may use emergency response drills, exercises, and trainings to liaise with emergency officials because they can be an effective means of facilitating two-way communication about emergency preparedness. Involving emergency officials in operator or joint emergency response drills, exercises, and training can be effective in promoting awareness, prevention, and response because they provide an opportunity for each party to directly experience how organizations will respond and cooperate in an emergency.

6.4.6 Excavation Notification or Response

Operators may choose to deliver additional messages through one-call or other excavation notification systems. These notification systems provide a platform for operators to deliver messages to stakeholder audiences.

6.4.7 Community Investments

Operator investment in the community may provide opportunities to convey public awareness safety messages.

Examples of opportunities to deliver public awareness safety messages can include the following:

- facilitating training for emergency response organizations;
- donations to emergency response organizations;
- sponsorship of community events;
- support of scholarships.

6.4.8 Digital Platforms

Targeted communication to stakeholder audiences may be conducted using digital content. Operators may consider the use of other emerging technologies.

Examples of digital delivery methods can include the following:

- text messaging;
- social media;
- apps;
- videos/recorded content;
- email;
- websites;
- virtual meetings;
- online training.

6.4.9 Pipeline Markers

Pipeline markers inform stakeholder audiences about the presence of a pipeline or pipelines, operator name, 24-hour contact number, and commodity transported.

NOTE For more information on pipeline markers, see 49 *CFR* Parts 192 and 195 and API RP 1109.

6.5 Collaborative Programs

6.5.1 General

Collaborative programs can offer multiple pipeline operators a means of coordinating public awareness activities for common stakeholder audiences in a local, regional, or national setting. Collaborative efforts can offer a number of benefits, including improving efficiencies, consistent messaging, and more comprehensive efforts than a single operator effort can provide.

Operators using collaborative programs for baseline activities should confirm that the effort aligns with their public awareness program in the following ways: (1) conveys the required messages, (2) delivers messages at the specified intervals/frequencies, and (3) meets their public awareness program objectives (see 4.3).

For example, distribution operators can deliver baseline messages to noncustomers through collaborative programs.

Collaborative programs may also be used to deliver supplemental messages.

Operators can add information specific to their system to messages delivered through a collaborative program.

Examples of collaborative delivery methods can include the following:

- drills and exercises;
- liaison with emergency officials;
- training programs;
- education programs;
- industry and trade organization efforts;
- one-call center outreach programs;
- mailings;
- mass media efforts;
- digital media;
- surveys and research;
- other public awareness initiatives.

6.5.2 Collaborative Messages

Operators using common messages may use collaborative messaging opportunities because of the broad-based applicability to common stakeholder audiences.

Examples of collaborative messages can include the following:

- damage prevention;
- 811 and safe digging practices;
- leak recognition and response;
- other common public awareness messages.