



What Regulators Look For To Demonstrate Liaison

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What we will cover

- Why have Liaison?
- Requirements
- Guidance material
- Typical Violations
- Records





The Need

- San Bruno, California
- Marshal, Michigan
- Bellingham, WA






49 CFR 192.615 (a)

- (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
- (2) Establishing and maintaining adequate means of communication with appropriate fire, police and other public officials
 - (8) Notifying appropriate fire, police and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.





49 CFR 192.615 (c) Emergency Plans

(c) Each operator shall establish and maintain liaison with appropriate fire, police and other public officials to:

- (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline pipe line emergency
- (2) Acquaint the officials with the operators ability in responding to a gas pipeline emergency
- (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and
- (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.





Guidance for conducting inspections

– Procedures

- Is there procedure describing how liaison with fire, police, other public officials and utility owners is established and maintained?
- Is the procedure followed?





Guidance for Conducting Inspections– Establishing Liaison

- Is the operator periodically communicating with local emergency officials?
- Is there documentation that liaison with all necessary emergency and other public officials are established?
- Determine how liaisons are made
- Does the operator have contact information for appropriate officials?





Guidance for conducting inspections – identification of emergency types

- Have the various types of emergencies for which the various officials be notified been identified and communicated?





Guidance for conducting inspections – Emergency Response Plans

Does the emergency plan address:

- Making emergency response plans available as appropriate to affected emergency response officials?
- A process to identify and document the emergency response responsibilities, capabilities and resources of each jurisdiction?
- How the operator determines that affected emergency response organizations have adequate and proper resources to respond?
- Capabilities to carry out the emergency response plan?





Guidance for conducting inspections – Emergency Plan implementation

- Has operators emergency response plans been available as appropriate to affected emergency response officials?
- Has the operator identified and documented the emergency response responsibilities, capabilities and resources of each jurisdiction?
- How did the operator determine the affected emergency response organizations have adequate and proper resources to respond?
- Are the capabilities considered in the emergency response plan?





Guidance For conducting inspections –Emergency Response Messaging

Does the emergency plan/summary and message material address:

- Does operator include information on how emergency officials can access the operators emergency response plans covering their jurisdiction?
- Verify where operators emergency plan is located.





Guidance for conducting inspections

– Records of Response Capabilities

- Do records indicate the same capability and resource assumptions for all jurisdictions or are jurisdiction-specific differences accounted for?





Guidance for Conducting Inspections – Mutual Response Coordination

- Is mutual response and assistance coordinated with each affected jurisdiction?





Guidance for Conducting Inspections

– Training

- Have training sessions been conducted for emergency responders?
- How did operator communicate the information to responders who did not attend the training?





Guidance for Conducting Inspections - Type Communication with Parties

- Do records include the type of information that is provided to other parties and what was communicated to ensure that every party knows what is expected of each other during the emergency?





Guidance for conducting Inspections

- Liaison with Utilities

- Does emergency response training include liaison with the owners of electric and other utilities in the vicinity of the pipeline system in order to pre-plan and coordinate response to pipeline emergencies?



Violations / Areas of Concern

- Operator did not maintain liaison with emergency response officials
- Operators external resources held information and /or public meetings but the pipeline operator did not attend the session
- Operators message and materials did not contain information about how emergency response officials can get access to emergency plans/summaries as appropriate or necessary
- Emergency information provided to emergency response officials failed to provide operator specific information



Examples of Relevant Evidence

- Emergency response plan or summary
- Copies of operators Public Awareness Program
- Copies of presentations, attendees list, agenda, letters, brochures, flyers, evaluations, meeting notes, follow up activities
- Emergency representative contact list
- Documented statements from operator personnel
- Public meeting list
- Emergency exercise or drill list (w/notes)



Questions

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