



Agrium US Inc.  
Kennewick Fertilizer Operations  
227515 E Bowles Road  
Kennewick WA 99337  
USA

Don G. LaRue  
Plant Manager

February 29, 2008

Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. S.W  
P.O. Box 47250  
Olympia WA 98504-7250

RECEIVED  
RECORDS MANAGEMENT  
2008 MAR -3 PM 2:47  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

RE: Docket No. PG-071145 later changed to PL-080189

Dear Ms. Washburn:

This letter is in response to your letter of January 29, 2008 to Mr. Stephen Dyer, Vice President of Manufacturing concerning your review of Agrium U.S Inc. Public Awareness Plans for Agrium's natural gas and anhydrous ammonia pipelines in Benton County.

The originally submitted Public Awareness Programs were prepared as part of the existing pipeline Operating and Maintenance Manuals. (The programs were electronically submitted without attachments as requested. Many of the federal clearinghouse review comments were addressed in the attachments that were not submitted.) As you are aware, Agrium is reconfiguring its Operating and Maintenance Manuals as stand alone documents and has done the same with the public awareness programs.

Enclosed for your review are the revised Public Awareness Programs with appendices. Also included are copies of the information sheets for the ammonia and natural gas pipelines sent out to stakeholders. I believe the revised programs and supplemental information provided will address all of the comments raised in the earlier program review.

Sincerely,

Enclosures: (4)  
Public Awareness Program-Natural Gas Pipeline  
Stakeholder Information Sheet - Natural Gas  
Public Awareness Program-Ammonia Pipeline  
Stakeholder Information Sheet-Ammonia Pipeline

## **PUBLIC AWARENESS PROGRAM**

### **Agrium Finley to Kennewick Liquid Ammonia Pipeline**

#### **REFERENCES**

49 CFR 195.440

API Recommended Practice 1162-Public Awareness Programs for Pipeline Operators.

#### **PURPOSE**

The purpose of this program is to reduce the likelihood of injury to personnel and the environment potentially resulting from an uncontrolled release from Agrium's liquid anhydrous ammonia pipeline and to comply with the requirements of 49CFR Sections 195.440 by developing a written public awareness program that follows the guidance provided in American Petroleum Institute (API) Recommended Practice (RP) 1162.

#### **OVERVIEW OF PIPELINE**

The 3" liquid anhydrous ammonia pipeline between Agrium's Finley and Kennewick facilities is less than one mile long and is located entirely within the state of Washington on lands leased from the United States Army Corps of Engineers (COE) or owned by Agrium. The pipeline crosses under a small Columbia Irrigation District waste water ditch just south of the Kennewick facility.

Liquid anhydrous ammonia is supplied to the pipeline from a line branching off of the discharge header of the ammonia loading pumps at the Finley facility. Normal pipeline operating pressure is 300 to 320 psi. Maximum pump discharge pressure is 352 psi.

The ammonia pipeline is about 0.8 miles long. About 0.5 miles of the pipeline is located on land owned by Agrium of which 0.1 miles is under farmed fields and the remainder is under fenced industrial plant sites, or vacant ground. The remaining 0.3 miles is on land owned by the COE. About two thirds of the pipeline on COE land is located above ground.

There are no habitable structures, other than Agrium's industrial facilities within 660 feet of the pipeline.

Because liquid releases from a small portion of the pipeline may flow to a COE drain ditch which is pumped into the Columbia River, and ammonia is toxic to fish, including endangered salmon, a portion of the pipeline is considered to be located in an unusually sensitive area (USA)(Ref. 49CFR195.6) and consequently a high consequence area (HCA)(Ref. 49CFR195.450). A portion of the pipeline is considered as being in a high consequence area because of its close proximity to a navigable waterway, the Columbia River (Ref. 49CFR195.450).

The ammonia pipeline is regulated as a Hazardous Liquids Pipeline under WAC 480-75 which includes most of 49CFR195 by reference.

## **RESPONSIBILITIES**

The Agrium Kennewick Plant Manager has overall responsibility for regulatory compliance and is responsible to provide adequate personnel and funding to carry out this public awareness program.

The Pipeline Coordinator has overall responsibility for the performance of this program.

The Pipeline Coordinator shall develop and implement or cause to be implemented a public awareness program that meets the requirements of this program.

## **PROCEDURE**

### **1. IDENTIFICATION OF STAKEHOLDERS:**

The Pipeline Coordinator will identify the affected public, appropriate local government officials, emergency officials and persons or organizations who may be involved in excavation activities in the vicinity of Agrium's ammonia pipeline. Guidance for defining stakeholder audiences is given in Section 3 of API RP1162.

Potential affected public stakeholders will be defined by physical survey of the area within 660 ft. of the pipeline. Changes to occupancy or activities within 660 ft. of the pipeline or changes to pipeline operations may require changes to the stakeholder list.

#### **Stakeholder Identification Criteria:**

**Affected Public-** Persons living or spending significant time within 660 feet of the pipeline. This category potentially includes occupants, residents, tenants, farmers, businesses, industrial facilities, schools, places of worship, hospitals and other medical facilities, playgrounds, and similar situations.

**Emergency Officials-** Local, state, or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction along the pipeline route. This category potentially includes fire departments, police/sheriff departments, local emergency planning commissions (LEPCs), county and state emergency management agencies, and other emergency response and public safety organizations.

**Local Public Officials-** Local, city, county or state officials and/or their staffs having land use and street/road jurisdiction along the pipeline route. This category potentially includes planning boards, zoning boards, licensing departments, permitting departments, building code enforcement departments, city and county managers, public and government officials, public utility boards, local "governing councils" as defined by many communities, and public officials who manage franchise or license agreements.

**Excavators-** Persons or organizations, including government agencies, involved in any form of excavation activities near the pipeline. This category potentially includes

construction companies, excavation equipment rental companies, public works officials, public street, road and highway departments, timber companies, fence building companies, drain tiling companies, landscapers, well drillers, home builders, land developers, utility companies and similar organizations. The excavator category includes the one-call center.

For Agrium's ammonia pipeline, excavation near the pipeline will be performed by landowners or contractors working for the landowners. These include the COE and Columbia Irrigation District. Mass mailing to local excavation contractors should not be done as it will draw unnecessary attention to the pipelines and increase the potential for vandalism. Agrium's primary method of warning excavation contractors of the presence of the pipeline is to mark it with closely spaced markers.

**Stakeholder List:** The current list of stakeholders and their contact information is included as Appendix A. The Pipeline Coordinator will physically review the area within 660 feet of the pipeline and determine if there have been significant changes to pipeline operations annually. The Pipeline Coordinator shall review the stakeholder list for accuracy and update the stakeholder list accordingly.

**Foreign Language Requirement:** The Pipeline Coordinator shall determine if a significant number or concentration of non-English speaking population exists along a pipeline, and shall review individual situations to determine if communication media in languages other than English are needed. Previous evaluations have shown no need to communicate in languages other than English.

## 2. MESSAGE DEVELOPMENT

**Affected Public:** The Pipeline Coordinator will develop the following baseline information to be included in an information sheet to be distributed to the affected public. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards and prevention measures undertaken
- c) Damage prevention awareness
- d) One-call requirements
- e) Leak/release recognition and response
- f) Leak/release reporting procedures
- g) How to get additional information
- h) Availability of list of pipeline operators through National Pipeline Mapping System (NPMS)

**Emergency Officials:** The Pipeline Coordinator will develop the following baseline information to be distributed to emergency officials. Items "a" through "f" will be included in an information sheet. Item "g", the material safety data sheet (MSDS), will be a separate document. Item "h" will be accomplished by Agrium's normal

participation in the LEPC, Benton County Emergency Services. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards and prevention measures undertaken
- c) Potential hazards associated with unintended releases
- d) Leak/release reporting procedures
- e) Pipeline location information and availability of NPMS
- f) How to get additional information
- g) Anhydrous Ammonia MSDS
- h) Emergency preparedness communications

**Local Public Officials:** The Pipeline Coordinator will develop the following information to be included in an information sheet to be distributed to local public officials. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards and prevention measures undertaken
- c) Emergency preparedness communications
- d) One-call requirements
- e) Pipeline location information and availability of NPMS
- f) How to get additional information

**Excavators:** The Pipeline Coordinator will develop the following information to be included in an information sheet to be distributed to excavators. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards and prevention measures undertaken
- c) Damage prevention awareness
- d) One-call requirements
- e) Leak/release recognition and response
- f) Leak/release reporting procedures
- g) How to get additional information

**One-Call Center:** The Pipeline Coordinator will develop the following information to be distributed to the one-call center. Information is generally described in API RP1162 Section 2. The Pipeline Coordinator shall confirm that Agrium continues as a member of the local one-call center.

- a) Pipeline location information
- b) Other requirements of the applicable one-call center

### **3. MESSAGE DELIVERY METHOD AND FREQUENCY OF DISTRIBUTION**

Messages to the Affected Public will be delivered in person or by US mail every two years. Date and content of personally delivered information shall be documented and filed.

Messages to the Emergency Officials will be delivered annually by US mail, by personal delivery or by presentation at LEPC meetings.

Messages to Local Public Officials will be delivered by US mail every three years.

Messages to Excavators will be delivered by US mail annually.

Pipeline information changes will be provided to the one-call center as they occur and in a manner acceptable to the one-call center.

See Appendix B for the summary of information to be delivered to stakeholders.

### **4. SUPPLEMENTAL ENHANCEMENTS:**

The pipeline is less than one mile long and is mostly on land controlled by Agrium. Most of the remainder is on land controlled by the United States government. A very short section crosses under a small concrete lined waste water ditch operated by Columbia Irrigation District. About 0.3 miles is in an unusually sensitive/high consequence area. There are no residents within ¼ mile. There have been no accidental third party damage incidents or unintended releases in the 50 plus year history of the pipeline. There has been one release resulting from intentional attack. A hole was drilled in the pipeline presumably to get ammonia for illegal methamphetamine production. Underground portions of the pipeline are marked at much more frequent intervals than required by the regulation. A review of the relevant factors for evaluating the need for supplemental enhancements to the public awareness program given in API RP1162 Section 6.2 show that under current conditions no supplemental actions are necessary at this time. The Pipeline Coordinator shall review the need for supplemental enhancements every three years.

### **5. RECORDS**

The Pipeline Coordinator is responsible for collecting the following records and maintaining them for at least 5 years.

- a) Annual pipeline classification and stakeholder reevaluation documentation
- b) Stakeholder list and contact information
- c) Information packets and correspondence delivered to stakeholders
- d) Documentation of personal presentations to affected public
- e) Results of annual program audits

- f) Copies of correspondence with stakeholders
- g) Statement of management commitment of support
- h) Documentation of evaluation of need for Supplemental Enhancements

## 6. PROGRAM EVALUATION

The Engineering Supervisor shall conduct an audit of this Public Awareness Program Annually.

**Measuring Program Implementation:** The Engineering Supervisor shall conduct or cause to be conducted an annual audit of this pipeline Public Awareness Program. The audit shall evaluate:

- 1) The extent to which the Public Awareness Program been developed and written to address the objectives, elements and baseline schedule as described in API RP1162.
- 2) The extent to which the Public Awareness Program been implemented and documented according to the written program.

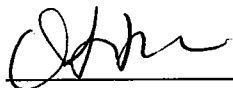
Guidance for developing audit protocols and conducting audits is found in API RP1162, Appendix E.

**Measuring Program Effectiveness:** There are fewer than 20 stakeholders for this pipeline. The only “affected public” is a local farmer who leases some of Agrium’s land. The pipeline crosses land owned by the US Army Corps of Engineers (COE) and the Columbia Irrigation District who are the only parties likely to be conducting activities near the pipelines. Agrium and its predecessors have had a long and incident free working relationship with both of these entities and their onsite personnel are familiar with the pipeline. The pipeline is very well marked on either side of the CID waste ditch which is concrete lined and does not require periodic cleaning. Most of the pipeline on COE land is above ground. It is unlikely that surveys of the stakeholder audience will contribute measurably to the increased safety of persons or the environment. Because of the foregoing, Agrium does not believe it is necessary to conduct periodic evaluations of the effectiveness of the Public Awareness Program.

## 7. MANAGEMENT STATEMENT OF SUPPORT

It is Agrium policy to “conduct every aspect of our business in conformance with applicable laws, regulations, and industry standards.” Agrium Kennewick Fertilizer Operations is committed to establishing and maintaining a program that ensures effective public/community awareness is achieved.

APPROVED BY:



D. G. LaRue,  
Plant Manager

DATE: February 28, 2008

## Appendix A - Public Awareness Program Stakeholders Ammonia and Natural Gas Pipelines

| Category | Description                     | Name & Title  | Address 1   |                 | Address 2                     |                 | Phone                                     |
|----------|---------------------------------|---|---|-----------------|-------------------------------|-----------------|---|
|          |                                 |   | Affected Public   | Affected Public | Affected Public               | Affected Public |   |
| <b>A</b> | <b>Affected Public</b>          | <b>Affected Public</b>  |   |                 |                               |                 |   |
| A4       | Farmers                         | Mr. Kenneth Cook<br>Benton PUD, Attn: Mr. Gary Long, Supervisor of Operations | 233104 Lechelt Road   |                 | Kennewick, WA 99336           |                 | 586-3920 cell: 302-1120                   |
| A7       | Industrial Facilities           |   | P.O. Box 6270   |                 | Kennewick, WA 99336           |                 | 509-582-2175                              |
| <b>B</b> | <b>Emergency Officials</b>      | <b>Emergency Officials</b>  | <b>Emergency Officials</b>  |                 | <b>Emergency Officials</b>    |                 | <b>Emergency Officials</b>                |
| B1       | Fire Departments                | Benton County Fire District No. 1   | 144610 East Law Lane  |                 | Kennewick, WA 99336           |                 | 509-734-9100                              |
| B2       | Police/Sheriff Dept.            | Benton County Sheriff, Attn: Capt. Keane                                      | 7122 West Okanogan Place  |                 | Kennewick, WA 99336           |                 | 509-628-0333                              |
| B3       | LEPC                            | Benton County Emergency Services, Attn: Mr. Jim Duncan                        | 651 Truman  |                 | Richland, WA 99352            |                 | 509-628-2600 or 800-841-7953              |
| B5       | State Emergency Management      | Ron Wilson, SERC/LEPC Program Coordinator                                     | Washington Military Department, Emergency Response Division, Building 20, MS: TA-20 |                 | Camp Murray WA 98430          |                 | Phone: 253-512-7069,<br>Fax: 253-512-7207 |
| <b>C</b> | <b>Local Public Officials</b>   | <b>Local Public Officials</b>   | <b>Local Public Officials</b>   |                 | <b>Local Public Officials</b> |                 | <b>Local Public Officials</b>             |
| C1       | Planning boards                 | Benton County Planning Department, Attn: Mr. Terry Marden, Director           | 1002 Dudley Avenue  |                 | Prosser, WA 99350             |                 | 509-736-3086                              |
| C7       | Public and Government Officials | US Coast Guard, Attn: Officer in Charge                                       | 434 Clover Island Drive   |                 | Kennewick, WA 99336           |                 | 509-586-0978                              |
| C8       | Public and Government Officials | Benton County Commissioners   | P.O. Box 190  |                 | Prosser, WA 99350             |                 | 509-786-5600                              |
| <b>D</b> | <b>Excavators</b>               | <b>Excavators</b>   | <b>Excavators</b>   |                 | <b>Excavators</b>             |                 | <b>Excavators</b>                         |
| D1       | Construction Companies          | Ray Poland & Sons, Attn: Mr. Dennis Poland                                    | 525 W. Grand Ronde Avenue   |                 | Kennewick, WA 99336           |                 | 509-586-2158                              |
| D1       | Utilities-Gas Transmission      | Williams-Northwest Pipeline, Attn: Mr. Marc Edwards                           | 606 S. Oregon Avenue  |                 | Pasco, WA 98301               |                 | 509-544-9216                              |



## Appendix A - Public Awareness Program Stakeholders Ammonia and Natural Gas Pipelines

| Category | Description                                 | Name & Title  | Address 1                    | Address 2           | Phone        |
|----------|---|---|------------------------------|---------------------|--------------|
| D1       | Utilities-Phone                             | Verizon, Attn: Ms. Diana Anderson, Local Manager              | 420 North Quay Street        | Kennewick, WA 99336 | 888-483-2600 |
| D1       | Utilities-Electric                          | Benton PUD, Attn: Mr. Gary Long, Supervisor of Operations     | P.O. Box 6270                | Kennewick, WA 99336 | 509-582-2175 |
| D1       | Businesses                                  | Port of Kennewick, Attn: Mr. Tim Artzen, Executive Director   | 350 Clover Island Drive      | Kennewick, WA 99336 | 509-586-1186 |
| D1       | Utilities-Irrigation                        | Columbia Irrigation District, Mr. Larry Fox, District Manager | 10 East Kennewick Ave.       | Kennewick, WA 99336 | 509-586-6118 |
| D3       | Public Works Officials                      | US Army Corps of Engineers, Attn: Mr. Robert Hayes            | 1215 East Ainsworth Street   | Pasco, WA 99301     | 509-547-5751 |
| D4       | Public Street, Road and Highway Departments | Benton County Public Works, Attn: Mr. Ross Dunfee             | P.O. Box 1001                | Prosser, WA 99350   | 509-736-3084 |
| D14      | One-Call                                    | Washington One Call, Attn: Mr. Frank Planton, General Manager | 305 NE 102nd Ave., Suite 300 | Portland, OR 97220  | 503-232-1987 |

## Appendix B - Summary of Stakeholder Information Delivery Requirements

### Ammonia Pipeline

| Stake Holder Group     | Message/Media                             | Delivery Method               | Frequency Ammonia Pipeline (years) |
|------------------------|---|-------------------------------|------------------------------------|
| Affected Public        | Information Sheet                         | Personal Visit                | 2                                  |
| Emergency Officials    | Cover Letter<br>Information Sheet<br>MSDS | US Mail<br>US Mail<br>US Mail | 1                                  |
| Local Public Officials | Cover Letter<br>Information Sheet         | US Mail<br>US Mail            | 3                                  |
| Excavators             | Cover Letter<br>Information Sheet         | USMail<br>USMail              | 1                                  |

# ...Underground Pipelines

*The Safest Way to Move Natural Gas...*

*YOU Can Help Keep It That Way!*

**Agrium's** Natural gas pipeline is constructed, operated and maintained to rigorous safety standards. It is constantly monitored and frequently checked for leaks. But your help is needed to avoid the most common cause of damage and leaks ---- DIG-INS.

## ***BEFORE YOU...***

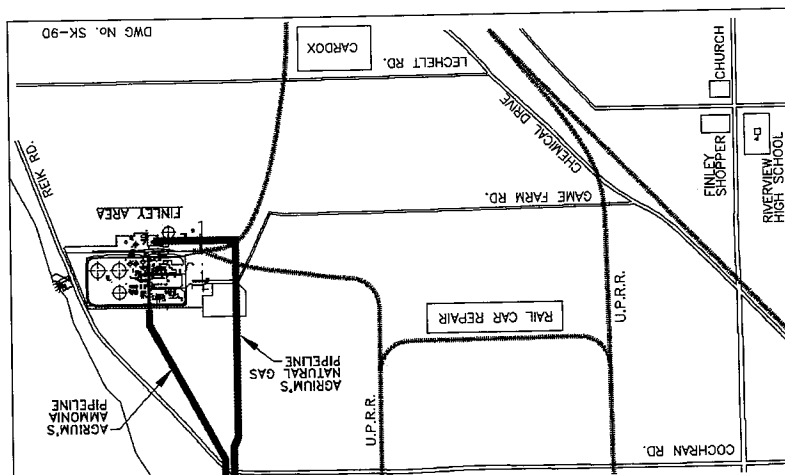
Excavate, Auger, Plow, Grade, Trench or Blast--Find out if a pipeline is buried in your path. DIAL 811 AT LEAST 48 hours BEFORE you plan to begin your work-IT'S THE LAW!!!

***Don't Disrupt the Ground 'Til Our Pipeline is Found***

**BEFORE YOU DIG  
CALL**



Our pipeline is marked with a sign like this to identify the



[www.npms.phmsa.dot.gov](http://www.npms.phmsa.dot.gov)

# ... For Safety's Sake

*You Should Know More About Natural Gas and Our High-Pressure Underground Gas Pipelines:*

Natural gas is transported in high-pressure pipelines that can be located across farms, along roadways, under rivers or streams, or through your yard.

Natural gas is odorless, colorless, and lighter than air, and if released will rise and diffuse rapidly.

Natural gas is neither toxic nor poisonous, but in a confined space can cause suffocation since it replaces oxygen.

Natural gas used by residents or commercially, including the gas in Agrium's pipeline, has a chemical added that gives off the odor of rotten eggs.

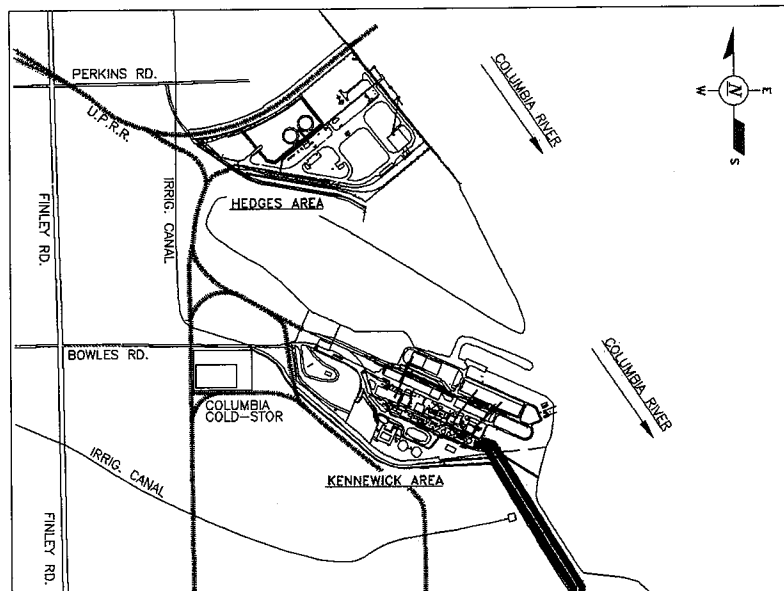
Natural gas will burn if it escapes the pipeline and mixes with air and is ignited by open flames, or sparks from motors, mechanical equipment or electrical switches.

Natural gas pipeline leaks can be detected by dying vegetation on or near the right-of-way, blowing dirt or water, a hissing or roaring sound, or by the smell associated with it.

If you discover or think you have discovered escaping gas: shut off and abandon any equipment that is in use, extinguish any open flames, leave the area, and call our office at 509-586-5500 immediately.

For additional information contact **Agrium** at 509-586-5500 or the Public Safety Tab at [www.wutc.wa.gov](http://www.wutc.wa.gov)

For additional information about pipeline operators and pipeline locations visit



## **PUBLIC AWARENESS PROGRAM**

### **Agrium Finley to Kennewick Natural Gas Pipeline**

#### **REFERENCES**

49 CFR 192.614(b)(2) and 192.616.

API Recommended Practice 1162-Public Awareness Programs for Pipeline Operators.

#### **PURPOSE**

The purpose of this program is to reduce the likelihood of injury to personnel and the environment potentially resulting from an uncontrolled release from Agrium's natural gas pipeline and to comply with the requirements of 49CFR Sections 192.614(b)(2) and 192.616 by developing a written public awareness program that follows the guidance provided in American Petroleum Institute (API) Recommended Practice (RP) 1162.

#### **OVERVIEW OF PIPELINE**

The 3" natural gas pipeline between Agrium's Finley and Kennewick facilities is about one mile long and is located entirely within the state of Washington on lands leased from the United States Army Corps of Engineers (COE) or owned by Agrium. The pipeline crosses under a small Columbia Irrigation District waste water ditch just south of the Kennewick facility.

Gas is supplied to the Finley facility by Williams/Northwest at a pressure of 250 psi and enters the Finley in-plant piping system. The Finley to Kennewick pipeline branches off of the Finley in-plant piping system. Gas flowing through the pipeline is reduced at the Finley facility to 200 psi before it enters the pipeline.

The natural gas pipeline is about 0.9 miles long. About 0.6 miles of the pipeline is located on land owned by Agrium of which 0.2 miles is under farmed fields and the remainder is under parking lots, fenced industrial plant sites, or vacant ground. The remaining 0.3 miles is on land owned by the COE. About two thirds of the pipeline on COE land is located above ground.

There are no habitable structures, other than Agrium's industrial facilities within 660 feet of the pipeline.

No portion of the pipeline is considered to be in a high consequence area (HCA) (Ref. 49CFR192.903).

The gas pipeline is regulated under WAC 480-93 which includes most of 49CFR192 by reference. The pipeline is considered a distribution line but has no customers or branches; it supplies gas to only the Kennewick plant.

## **RESPONSIBILITIES**

The Agrium Kennewick Plant Manager has overall responsibility for regulatory compliance and is responsible to provide adequate personnel and funding to carry out this public awareness program.

The Pipeline Coordinator has overall responsibility for the performance of this program.

The Pipeline Coordinator shall develop and implement or cause to be implemented a public awareness program that meets the requirements of this program.

## **PROCEDURE**

### **1. IDENTIFICATION OF STAKEHOLDERS:**

The Pipeline Coordinator will identify the affected public, appropriate local government officials, emergency officials and persons or organizations who may be involved in excavation activities in the vicinity of Agrium's natural gas pipeline. Guidance for defining stakeholder audiences is given in Section 3 of API RP1162.

Potential affected public stakeholders will be defined by physical survey of the area within 660 ft. of the pipeline. Changes to occupancy or activities within 660 ft. of the pipeline or changes to pipeline operations may require changes to the stakeholder list.

#### **Stakeholder Identification Criteria:**

**Affected Public-** Persons living or spending significant time within 660 feet of the pipeline. This category potentially includes occupants, residents, tenants, farmers, businesses, industrial facilities, schools, places of worship, hospitals and other medical facilities, playgrounds, and similar situations.

**Emergency Officials-** Local, state, or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction along the pipeline route. This category potentially includes fire departments, police/sheriff departments, local emergency planning commissions (LEPCs), county and state emergency management agencies, and other emergency response and public safety organizations.

**Local Public Officials-** Local, city, county or state officials and/or their staffs having land use and street/road jurisdiction along the pipeline route. This category potentially includes planning boards, zoning boards, licensing departments, permitting departments, building code enforcement departments, city and county managers, public and government officials, public utility boards, local "governing councils" as defined by many communities, and public officials who manage franchise or license agreements.

**Excavators-** Persons or organizations, including government agencies, involved in any form of excavation activities near the pipeline. This category potentially includes

construction companies, excavation equipment rental companies, public works officials, public street, road and highway departments, timber companies, fence building companies, drain tiling companies, landscapers, well drillers, home builders, land developers, utility companies and similar organizations. The excavator category includes the one-call center.

For Agrium's natural gas pipeline, excavation near the pipeline will be performed by landowners or contractors working for the landowners. These include only the COE and the Columbia Irrigation District. Mass mailing to local excavation contractors should not be done as it will draw unnecessary attention to the pipelines and increase the potential for vandalism, particularly to the above ground portions of the pipeline. Agrium's primary method of warning excavation contractors of the presence of the pipeline is to mark it with closely spaced markers.

**Stakeholder List:** The current list of stakeholders and their contact information is included as Appendix A. The Pipeline Coordinator will physically review the area within 660 feet of the pipeline and determine if there have been significant changes to pipeline operations annually. The Pipeline Coordinator shall review the stakeholder list for accuracy and update the stakeholder list accordingly.

**Foreign Language Requirement:** The Pipeline Coordinator shall determine if a significant number or concentration of non-English speaking population exists along a pipeline, and shall review individual situations to determine if communication media in languages other than English are needed. Previous evaluations have shown no need to communicate in languages other than English.

## 2. MESSAGE DEVELOPMENT

**Affected Public:** The Pipeline Coordinator will develop the following baseline information to be included in an information sheet to be distributed to the affected public. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards if there is a release and prevention measures undertaken
- c) Damage prevention awareness
- d) Use of one-call center prior to excavation
- e) Leak/release recognition and response
- f) Leak/release reporting procedures
- g) How to get additional information

**Emergency Officials:** The Pipeline Coordinator will develop the following baseline information to be distributed to emergency officials. Items "a" through "g" will be included in an information sheet. Item "h", the materials safety data sheet (MSDS), will be a separate document. Item "i" will be accomplished by Agrium's normal participation in the LEPC, Benton County Emergency Services. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards if there is a release and prevention measures undertaken
- c) Damage prevention awareness
- d) Use of one-call center prior to excavation
- e) Leak/release recognition and response
- f) Leak/release reporting procedures
- g) How to get additional information
- h) Natural Gas MSDS
- i) Emergency preparedness communications

**Local Public Officials:** The Pipeline Coordinator will develop the following baseline information to be included in an information sheet to be distributed to local public officials. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards if there is a release and prevention measures undertaken
- c) Damage prevention awareness
- d) Use of one-call center prior to excavation
- e) Leak/release recognition and response
- f) Leak/release reporting procedures
- g) How to get additional information

**Excavators:** The Pipeline Coordinator will develop the following baseline information to be included in an information sheet distributed to excavators. Guidance for message development is found in API RP1162 Sections 2 and 4.

- a) Pipeline purpose and reliability
- b) Awareness of hazards if there is a release and prevention measures undertaken
- c) Damage prevention awareness
- d) Use of one-call center prior to excavation
- e) Leak/release recognition and response
- f) Leak/release reporting procedures
- g) How to get additional information

**One-Call Center:** The Pipeline Coordinator will develop the following information to be distributed to the one-call center. Information is generally described in API RP1162 Section 2. The Pipeline Coordinator shall confirm that Agrium continues as a member of the local one-call center. Pipeline location information has been provided to the one-call center.

- a) Pipeline location information
- b) Other requirements of the applicable one-call center



### **3. MESSAGE DELIVERY METHOD AND FREQUENCY OF DISTRIBUTION**

Messages to the Affected Public will be delivered in person annually. There are NO customers for this pipeline. Date and content of personally delivered information shall be documented and filed.

Messages to the Emergency Officials will be delivered by US mail or by presentation at LEPC meetings annually.

Messages to Local Public Officials will be delivered by US mail every three years.

Messages to Excavators will be delivered by US mail annually.

Pipeline information changes will be provided to the one-call center as they occur and in a manner acceptable to the one-call center.

See Appendix B for the summary of information to be delivered to stakeholders.

### **4. SUPPLEMENTAL ENHANCEMENTS:**

The pipeline is very short and mostly on land controlled by Agrium. Most of the remainder is on land controlled by the United States government. A short section crosses under a small concrete lined waste water ditch operated by Columbia Irrigation District. There are no high consequence areas. There are no residents within ¼ mile. There have been no third party damage incidents in the 20 plus year history of the pipeline. Underground portions of the pipeline are marked at much more frequent intervals than required by the regulation. A review of the relevant factors for evaluating the need for supplemental enhancements to the public awareness program given in API RP1162 Section 6.2 show that under current conditions no supplemental actions are necessary at this time. The Pipeline Coordinator shall review the need for supplemental enhancements every three years.

### **5. RECORDS**

The Pipeline Coordinator is responsible for collecting the following records and maintaining them for at least 5 years.

- a) Annual stakeholder reevaluation
- b) Stakeholder list and contact information
- c) Information packets and correspondence delivered to stakeholders
- d) Documentation of personal presentations to affected public
- e) Results of annual program audits
- f) Copies of correspondence with stakeholders
- g) Statement of management commitment of support
- h) Documentation of review of need for Supplemental Enhancements

## 6. PROGRAM EVALUATION

The Engineering Supervisor shall conduct an audit of this Public Awareness Program Annually.

**Measuring Program Implementation:** The Engineering Supervisor shall conduct or cause to be conducted an annual audit of this pipeline Public Awareness Program. The audit shall evaluate:

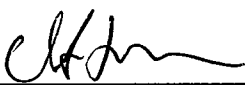
- 1) The extent to which the Public Awareness Program has been developed and written to address the objectives, elements and baseline schedule as described in API RP1162.
- 2) The extent to which the Public Awareness Program has been implemented and documented according to the written program.

Guidance for developing audit protocols and conducting audits is found in API RP1162, Appendix E.

**Measuring Program Effectiveness:** There are fewer than 20 stakeholders for this pipeline. The only "affected public" is a local farmer who leases some of Agrium's land. The pipeline crosses land owned by the US Army Corps of Engineers (COE) and the Columbia Irrigation District who are the only parties likely to be conducting activities near the pipelines. Agrium and its predecessors have had a long and incident free working relationship with both of these entities and their onsite personnel are familiar with the pipeline. The pipeline is very well marked on either side of the CID waste ditch which is concrete lined and does not require periodic cleaning. Most of the pipeline on COE land is above ground. It is unlikely that surveys of the stakeholder audience will contribute measurably to the increased safety of persons or the environment. Because of the foregoing, Agrium does not believe it is necessary to conduct periodic evaluations of the effectiveness of the Public Awareness Program.

## 7. MANAGEMENT STATEMENT OF SUPPORT

It is Agrium policy to "conduct every aspect of our business in conformance with applicable laws, regulations, and industry standards." Agrium Kennewick Fertilizer Operations is committed to establishing and maintaining a program that ensures effective public/community awareness is achieved.

APPROVED BY:   
D. G. LaRue  
Plant Manger

DATE: February 28, 2009

## Appendix A - Public Awareness Program Stakeholders Ammonia and Natural Gas Pipelines

| Category | Description                     | Name & Title  | Address 1   |                 | Address 2                     |                 | Phone                                     |
|----------|---------------------------------|---|---|-----------------|-------------------------------|-----------------|---|
|          |                                 |   | Affected Public   | Affected Public | Affected Public               | Affected Public |   |
| <b>A</b> | <b>Affected Public</b>          | <b>Affected Public</b>  |   |                 |                               |                 |   |
| A4       | Farmers                         | Mr. Kenneth Cook<br>Benton PUD, Attn: Mr. Gary Long, Supervisor of Operations | 233104 Lechelt Road   |                 | Kennewick, WA 99336           |                 | 586-3920 cell: 302-1120                   |
| A7       | Industrial Facilities           |   | P.O. Box 6270   |                 | Kennewick, WA 99336           |                 | 509-582-2175                              |
| <b>B</b> | <b>Emergency Officials</b>      | <b>Emergency Officials</b>  | <b>Emergency Officials</b>  |                 | <b>Emergency Officials</b>    |                 | <b>Emergency Officials</b>                |
| B1       | Fire Departments                | Benton County Fire District No. 1   | 144610 East Law Lane  |                 | Kennewick, WA 99336           |                 | 509-734-9100                              |
| B2       | Police/Sheriff Dept.            | Benton County Sheriff, Attn: Capt. Keane                                      | 7122 West Okanogan Place  |                 | Kennewick, WA 99336           |                 | 509-628-0333                              |
| B3       | LEPC                            | Benton County Emergency Services, Attn: Mr. Jim Duncan                        | 651 Truman  |                 | Richland, WA 99352            |                 | 509-628-2600 or 800-841-7953              |
| B5       | State Emergency Management      | Ron Wilson, SERC/LEPC Program Coordinator                                     | Washington Military Department, Emergency Response Division, Building 20, MS: TA-20 |                 | Camp Murray WA 98430          |                 | Phone: 253-512-7069,<br>Fax: 253-512-7207 |
| <b>C</b> | <b>Local Public Officials</b>   | <b>Local Public Officials</b>   | <b>Local Public Officials</b>   |                 | <b>Local Public Officials</b> |                 | <b>Local Public Officials</b>             |
| C1       | Planning boards                 | Benton County Planning Department, Attn: Mr. Terry Marden, Director           | 1002 Dudley Avenue  |                 | Prosser, WA 99350             |                 | 509-736-3086                              |
| C7       | Public and Government Officials | US Coast Guard, Attn: Officer In Charge                                       | 434 Clover Island Drive   |                 | Kennewick, WA 99336           |                 | 509-586-0978                              |
| C8       | Public and Government Officials | Benton County Commissioners   | P.O. Box 190  |                 | Prosser, WA 99350             |                 | 509-786-5600                              |
| <b>D</b> | <b>Excavators</b>               | <b>Excavators</b>   | <b>Excavators</b>   |                 | <b>Excavators</b>             |                 | <b>Excavators</b>                         |
| D1       | Construction Companies          | Ray Poland & Sons, Attn: Mr. Dennis Poland                                    | 525 W. Grand Ronde Avenue   |                 | Kennewick, WA 99336           |                 | 509-586-2158                              |
| D1       | Utilities-Gas Transmission      | Williams-Northwest Pipeline, Attn: Mr. Marc Edwards                           | 606 S. Oregon Avenue  |                 | Pasco, WA 98301               |                 | 509-544-9216                              |

## Appendix A - Public Awareness Program Stakeholders Ammonia and Natural Gas Pipelines

| Category | Description                                 | Name & Title  | Address 1                    | Address 2           | Phone        |
|----------|---|---|------------------------------|---------------------|--------------|
| D1       | Utilities-Phone                             | Verizon, Attn: Ms. Diana Anderson, Local Manager              | 420 North Quay Street        | Kennewick, WA 99336 | 888-483-2600 |
| D1       | Utilities-Electric                          | Benton PUD, Attn: Mr. Gary Long, Supervisor of Operations     | P.O. Box 6270                | Kennewick, WA 99336 | 509-582-2175 |
| D1       | Businesses                                  | Port of Kennewick, Attn: Mr. Tim Artnzen, Executive Director  | 350 Clover Island Drive      | Kennewick, WA 99336 | 509-586-1186 |
| D1       | Utilities-Irrigation                        | Columbia Irrigation District, Mr. Larry Fox, District Manager | 10 East Kennewick Ave.       | Kennewick, WA 99336 | 509-586-6118 |
| D3       | Public Works Officials                      | US Army Corps of Engineers, Attn: Mr. Robert Hayes            | 1215 East Ainsworth Street   | Pasco, WA 99301     | 509-547-5751 |
| D4       | Public Street, Road and Highway Departments | Benton County Public Works, Attn: Mr. Ross Dunfee             | P.O. Box 1001                | Prosser, WA 99350   | 509-736-3084 |
| D14      | One-Call                                    | Washington One Call, Attn: Mr. Frank Planton, General Manager | 305 NE 102nd Ave., Suite 300 | Portland, OR 97220  | 503-232-1987 |

## Appendix B - Summary of Stakeholder Information Delivery Requirements

### Natural Gas Pipeline

| Stake Holder Group            | Message/Media                             | Delivery Method               | Frequency<br>Natural Gas Pipeline<br>(years) |
|-------------------------------|---|-------------------------------|--|
| <b>Affected Public</b>        | Information Sheet                         | Personal Visit                | 1  |
| <b>Emergency Officials</b>    | Cover Letter<br>Information Sheet<br>MSDS | US Mail<br>US Mail<br>US Mail | 1  |
| <b>Local Public Officials</b> | Cover Letter<br>Information Sheet         | US Mail<br>US Mail            | 3  |
| <b>Excavators</b>             | Cover Letter<br>Information Sheet         | USMail<br>USMail              | 1  |