

Commenter:

Association of Oil Pipe Lines (AOPL) and American Petroleum Institute (API)

The following is a summary of the AOPL/API comments to OMB regarding the proposed changes to the Hazardous Liquids Accident Report.

Instructions for Volume Spilled (Part A9) and Volume Recovered (Part A11)

Comment: Including volumes recovered in a controlled manner (such as product collected in a drum or pan, or removed directly from the pipe by a vacuum truck, drained into a sump, vented off to a different area, or flared) as Volume Spilled would run contrary to PHMSA's objective of attaining an accurate characterization of environmental consequences.

Response: Volumes recovered in a controlled manner are to be reported in Volume Recovered as well as Volume Spilled. The environmental consequences are calculated by subtracting Volume Recovered from Volume Spilled

Comment: Reiterates claim that reporting the time an accident is "discovered" is better than the time "identified" since PHMSA has established a policy that "discovered" means "when an operator's representative has adequate information from which to conclude the probable existence" of an accident.

Response: As clearly stated in the instructions, PHMSA desires to obtain the time when the operator is first aware of a pipeline system failure. PHMSA has no interest in collecting the time of "discovery", which would depend on "adequate" information and concluding the "probable" existence of an accident. Adding more undefined terms does not create a better information collection.

Comment: An NRC report may not be required at the time of release but issues may arise later that would require an NRC notification. AOPL/API propose an additional option under NRC Report # - "NRC Notification was not required at the time of the release."

Response: Under the scenario described by the commenters, the operator makes an NRC report at some time after the release. This NRC report number is to be entered and there is no data field available for "NRC Notification was not required at the time of the release."