



Homeland
Security

1 July 2016

Mr. Robin Rorick
Group Director, Midstream and Industry Operations
1220 L Street, NW
Washington, D.C. 20005-4070

Dear Mr. Rorick:

The Office of Information and Regulatory Affairs (OIRA) of the Office of Management and Budget (OMB) has forwarded to the Department of Homeland Security your May 2016 letter regarding the April 2016 Chemical Security Assessment Tool (CSAT) Revised Information Collection Request (ICR).

Thank you for your thoughtful input. The Department would like to take this opportunity to address the specific comment you raised in your May 2016 letter:

The American Petroleum Institute members have identified language in the Top-Screen Tool requiring clarity. The Department's proposed language has the potential to significantly increase not only the regulated entities' burden, but also DHS's burden in analyzing the data provided. Due to the absence of explanatory information relating to specific questions and proposed forms within the CSAT, affected operators will be unable to provide feedback on the quality of proposed estimates of the burden of hours for using these tools.

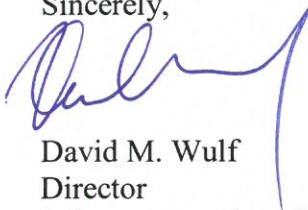
When a user logs into the revised CSAT system to enter data in the new Top Screen and opens the Appendix A list screen, a drop down list with the Chemical Abstract Service (CAS#) identifiers provides a simple, rapid method of locating the Appendix A listed Chemicals of Interest (COI). This is a great new feature and we appreciate its addition to the Top-Screen Tool. However, the wording within the tool (Question 1.30.010 COI at the Facility) states, "Select all of the CFATS Appendix A chemicals at the facility." API and our members are concerned that users of the tool will interpret this language as a requirement to report all COIs present at the facility (including those below the screening threshold quantity). API is concerned that without clarifying that facilities must report only COIs that are present at the facility above the screening threshold quantity, facilities will erroneously report all chemicals that are on the Appendix A list to DHS regardless of their quantity.

The Department appreciates your comment and has updated the language to clarify that when completing the Top-Screen, a facility is to "Select all of the CFATS Appendix A chemicals at or above the Screening Threshold Quantity that the facility possesses or plans to possess." The

Department believes that this language clarification will address your concerns about the scope of the chemicals to be reported.

You and the American Petroleum Institute have been leaders in furthering the overall objectives of the CFATS program, and the Department is appreciative of your continuing efforts to secure America's highest-risk chemical facilities - efforts that are essential to the Nation's critical infrastructure security and resilience.

Sincerely,



David M. Wulf
Director
Infrastructure Security Compliance Division