



March 18, 2024

Steven Andrews
Pipeline and Hazardous Materials Administration
Department of Transportation
1200 New Jersey Ave., SE
Room E34-455
Washington, DC 20590-001

SUBMITTED VIA THE FEDERAL E-RULEMAKING PORTAL AT REGULATIONS.GOV

Re: Notice and Request for Comments: Hazardous Materials, Information Collection Activities

Dear Mr. Andrews:

The National Propane Gas Association (NPGA) respectfully submits this comment in response to the Pipeline and Hazardous Materials Administration (PHMSA) Notice and Request for Comments: Hazardous Materials, Information Collection Activities (“HMR ICR”).¹ PHMSA proposed the HMR ICR in response to legislative requirements under the hazardous material regulations.² PHMSA is required to conduct the HMR ICR to understand the burden of reporting on cargo tank specifications, testing, inspection, and marking of cylinders, and container certification statements.³

NPGA is the national trade association of the propane industry with a membership of about 2,400 companies, and 36 state and regional associations that represent members in all 50 states. Membership in NPGA includes retail marketers of propane gas who deliver the fuel to the end user, propane producers, transporters and wholesalers, and manufacturers and distributors of equipment, containers, and appliances. Propane gas fuels millions of installations nationwide for home and commercial heating and cooking, in agriculture, industrial processing, and as a clean air alternative engine fuel for both over-the-road vehicles and industrial lift trucks. Roughly 75% of NPGA’s members have fewer than 100 employees, and are considered small businesses. NPGA members utilize products covered by the ICR, and are reporters under the proposed information collection.

NPGA POSITION ON THE HMR ICR

NPGA supports the extension of OMB Control Numbers 2137-0014, 2137-0022, and 2137-0582, the subjects of this ICR.⁴ NPGA believes the burden of reporting in each of the control numbers is acceptable and not unduly onerous, and provides insight into safe handling of hazardous materials. NPGA further commends PHMSA for its work in cylinder marking clarification and its interpretation of the relevant regulations on cylinder marking.

CONCLUSION

Thank you for your consideration of these comments.

¹ Notice and Request for Comments: Hazardous Materials, Information Collection Activities, 89 Fed. Reg. 3494 (Jan. 18, 2024) (hereinafter, “HMR ICR”).

² *Id.* at 3495.

³ *See generally, id.*

⁴ *Id.*



A handwritten signature in black ink, appearing to read "Ben Nussdorf", is enclosed within a light gray rectangular border.

Benjamin Nussdorf
Vice President, Regulatory & Industry Affairs
National Propane Gas Association
1140 Connecticut Ave., NW
Suite 1075
Washington, DC 20036
(202) 355-132
bnussdorf@npga.org