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CHEMICAL FACILITY SECURITY NEWS

NEWS AND VIEWS ABOUT CHEMICAL FACILITY SECURITY, TRANSPORTATION OF
HAZARDOUS CHEMICALS, AND THE FEDERAL LAWS AND RULES GOVERNING THE SAME.

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TSA Errors in ICR Notice

In regards to my earlier blog post about the TSC TWIC ICR Renewal notice posted in today's Federal Register, I ignored an obvious administrative error in the notice; I was sure that anyone reading the document would have figured out what was going on. It has been brought to my attention, however, that at least one industry reporting organization misread the mistake as a statement of current fact. So I feel bound to point out the error so that TSA can correct the misinformation.

Cut and Paste at Your Own Risk

In the Summary section of the notice (76 FR 23326) it states: "OMB approved the collection of information for six months and TSA now seeks the maximum three-year approval." Anyone with a modicum of sense would realize that the TWIC program has been around for much longer than 'six months'.

The 'emergency six-month approval' was granted for this ICR back in October of 2007. In April of 2008 TSA filed for a standard 3 year ICR approval that was granted by OMB in July of that year. That standard three-year ICR expires this year and that is the reason that TSA has come back to start the process for re-approving the ICR for another standard 3-year approval.

What obviously happened is that the action officer for this notice took the Federal Register Notice for the 60-day notice for the second ICR (72 FR 67945) and played cut and paste to make this notice. This is a common technique for bureaucratic publications and would have been fine except that the initial ICR was an emergency 6-month ICR that had to be mentioned in the second ICR. It obviously should have been deleted from this request.

NTAS

National Terrorism Advisory System

CFATS OVERVIEW FOR LAW ENFORCEMENT

Chemical Facility Anti-Terrorism Standards Overview for Law Enforcement. There are many peculiarities of chemical facility security that LEAs must understand to be able to protect their citizens from the results of a successful terrorist attack. This program provides an overview in layman's terms. Special, 30 minutes. LEAPS.TV

Program is available on DVD (Full Disclosure: I receive a portion of the proceeds from the sales of these DVD's).

CHEMICAL SECURITY CONSULTING

Burden Information

It is interesting what you find when you start to dig through records. To go back and document the obvious I had to look at the RegInfo.gov historical site on the first and second ICR requests. There is an interesting discrepancy between the burden data in the 2008 request and this request

- 2008 Hours: 1,018,277; Cost: \$109,242,010
- 2011 Hours: 2,630,719; Cost: \$57,002,236

Now I have no problems with the change in the number of hours involved in the collection though it would have been nice for TSA to tell us if this was due to changes in the survey or the number of expected responses (923,457 quoted in the earlier ICR record; no data on the number of expected responses in this ICR notice). What would be really interesting to see explained is how TSA expects to better than double the number of hours spent collecting the data while almost halving the cost of the collection. If true, this increase in efficiency needs to be duplicated throughout the government.

Perhaps it would just be best if TSA started this over with a new and more appropriately prepared 60-day notice.

BTW: I will be submitting a copy of this blog to the TSA PRA Officer as outlined in the notice.

POSTED BY PJCOYLE AT 10:08 PM ☐

LABELS: CHEMICAL FACILITY SECURITY, TSA TWIC ICR

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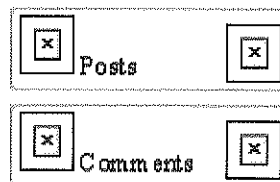
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