BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.

Pipeline Safety: Information Collection Activities regarding PHMSA F 7000-1 Accident Report	]	Docket No. PHMSA-2019-0141

COMMENTS ON PROPOSED REVISIONS TO PHMSA F 7000-1 ACCIDENT REPORT

FILED BY:
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I. INTRODUCTION

The American Petroleum Institute (API)[1] and the Association of Oil Pipe Lines (AOPL)[2] (jointly "the Associations") submit these comments for consideration by the Pipeline and Hazardous Material Safety Administration ("PHMSA") concerning the proposed revisions to PHMSA F 7000-1 ("the Form") Accident Report – Hazardous Liquid Pipeline Systems under OMB Control No. 2137-0047.[3]

The Associations support revisions to the Form, reorganizing the existing questions and adding more detailed questions about accident response, accident consequences, operating conditions, cause, and contributing factors.[4] Data mining is a practice operators use to examine large databases in order to proactively analyze incident root causes and trends within our industry. The Associations rely on data collection activities, such as PHMSA's Form 7000-1, to assist in this analysis. Ultimately, the Associations use such data to develop strategies and priority actions to address risks within pipeline systems and reduce the overall number of pipeline incidents. The Associations believe that revisions to the Form will enhance pipeline safety and help advance our industry's efforts to achieve a perfect safety record for our nation's liquid pipelines.

[1] API is the national trade association representing all facets of the oil and natural gas industry, which supports 9.8 million U.S. jobs and 8 percent of the U.S. economy. API's more than 625 members include large integrated companies, as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. They provide most of the nation's energy and are backed by a growing grassroots movement of more than 25 million Americans.

[2] AOPL promotes responsible policies, safety excellence, and public support for liquids pipelines. We represent pipelines transporting 97 percent of all hazardous liquids barrel miles reported to the Federal Energy Regulatory Commissions (FERC). Our diverse membership includes large and small pipelines carrying crude oil, refined petroleum products, NGLs, and other liquids.

[3] Pipeline Safety: Information Collection Activities, 85 Fed. Reg. 13700 (proposed Mar. 9, 2020).

[4] *Id.*

II. SUMMARY OF PROPOSED REVISIONS TO PHMSA F 7000-1 ACCIDENT REPORT

PHMSA proposes the following revisions to the Form: (1) changing the Form's name; (2) adding time zones and a daylight savings status; (3) adding an operational status; (4) adding questions about accident response; (5) including multiple national response center reports; (6) flow control and valve closure reporting; (7) adding the area of accident; (8) date of water crossing evaluation; (9) adding outer continental shelf regions; (10) adding the item involved and the age of the failed item; (11) adding details about consequences; (12) establishing maximum pressure and flow reversals; (13) including the length of the segment isolated; (14) external corrosion and stray current; (15) natural force damage; (16) excavation details for all excavation damage; (17) state damage prevention law exemptions; (18) material failure cause changes; (19) additional integrity inspection data; (20) and contributing factors.[5]

In preparing these comments, the Associations repeatedly ask PHMSA to provide clarification or additional information to better explain their proposed collection activities. Thus, in addition to the comments below, the Associations recommend that PHMSA also update and make corresponding changes to the instructions for completing the Form. The most recent version of the Form is dated December 2015 and should be similarly updated to reflect modifications to the underlying Form.

[5] *Id.*

III. API/AOPL COMMENTS TO PROPOSED REVISIONS

1. Change Form Name

The Associations do not object to changing the Form's name.

2. Time Zone and Daylight Savings

PHMSA proposes adding the time zone and daylight savings status at the location and time of the accident. This data would help PHMSA correlate their accident investigation findings with the form.[6]

The Associations do not object to PHMSA's proposal, associating the time zone and daylight savings status to the location where the accident occurred. This would minimize confusion and potential miscalculations based on time zones and daylight savings status.

3. Operational Status

PHMSA proposes collecting the operational status of the pipeline system at the time the operator identified the failure. On the current form, there is an assumption that the pipeline was in service at the time the operator identified the failure, but this is often not the case. This change would help stakeholders understand the status of the pipeline and clarify the pipeline shutdown data.[7]

The Associations believe that further clarification is needed concerning the phrase "operational status." This phrase could refer to regulations that classify a pipeline as either

[6] *Id.*
[7] *Id.*

"active" or "abandoned," or could refer to the mode of operation, which includes start-up, shutdown, steady-state, transient, and shut-in.[8]

Further, the Associations believe that PHMSA should promulgate a rulemaking recognizing an "idle" pipeline status, allowing operators to defer certain maintenance activities for pipelines that are purged of combustibles. In a 2016 Advisory Bulletin titled "Pipeline Safety: Clarification of Terms Relating to Pipeline Operational Status," PHMSA recognizes an "idle" pipeline status and states that a purged pipeline presents different, lesser risks than those that are active.[9] As such, different regulatory treatment may be appropriate, including the deferral of certain maintenance activities. PHMSA subsequently published an FAQ concerning the Safety of Hazardous Liquid Pipelines final rule, which states ". . . pipelines that are not currently in use must meet all the requirements of the Federal pipeline safety regulations." Additionally, "[b]ecause operators can restart 'idle' lines and transport product later, it is important that operators maintain these lines to the same level of safety and standards as an active, in-service line."[10] The FAQ makes no mention of the 2016 Advisory Bulletin.

This contradiction creates confusion as to "operational status" and PHMSA's recognition of "idle" pipelines. The Associations urge PHMSA to retract the idle pipe FAQ and promulgate an idle pipe rulemaking consistent with the 2016 advisory bulletin, taking into consideration industry standards and recommended practices – such as API RP 1181 ("Pipeline Operational

[8] *See* 49 C.F.R. § 195.2. *See also* 49 C.F.R. § 195.727.
[9] Pipeline Safety: Clarification of Terms Relating to Pipeline Operational Status, 81 Fed. Reg. 54512 (proposed Aug. 16, 2016).
[10] Pipeline Safety: Public Meeting on Implementing the Recently Published Gas Transmission and Hazardous Liquid Final Rules, 85 Fed. Reg. 5168 (proposed Jan. 29, 2020).

Status Determination"). If incorporated, the Form instructions could refer to this RP as the basis for defining "operational status."

4. Part A Reorganization and Detailed Questions About Accident Response

PHMSA proposes reorganizing existing questions to help detail the sequence of operator actions and interactions as the accident proceeds. For example, how the operator first learned of the pipeline failure is currently collected in part E. PHMSA proposes to move this item to Part A. PHMSA also proposes adding new items to build a complete timeline including interactions with emergency responders, spill response resources, and details about ignition. This data would help stakeholders develop a more thorough understanding of the accident.[11]

The Associations generally support reorganizing Part A but recommend PHMSA clarify the term "identified," which is used in Part E. Responses to questions regarding the "identification" of a pipeline failure are not uniform given the lack of guidance and definition of the term. PHMSA should align the term with "confirmed discovery," as defined in the Code of Federal Regulations (CFR),[12] which "means when it can be reasonably determined, based on information available to the operator at the time a reportable event has occurred, even if only based on a preliminary evaluation."[13] Alignment with the CFR will eliminate operator confusion or misinterpretation when completing the Form.

5. Multiple National Response Center Reports

When responding to pipeline accidents, operators often submit multiple reports to the National Response Center (NRC). In these instances, PHMSA proposes collecting each NRC

[11] Pipeline Safety: Information Collection Activities, 85 Fed. Reg. 13700 (proposed Mar. 9, 2020).
[12] *See* 49 C.F.R. § 195.2
[13] *Id.*

report number. This change would help PHMSA correlate their accident investigation findings with the Form.[14]

The Associations propose that PHMSA require one master NRC report that is linked to multiple NRC reports, arising from a single accident. Alternatively, the Associations propose that PHMSA collect all the NRC report numbers for one incident in Part A6, allowing multiple numbers to be entered in one box, rather than create an additional question. The Associations also propose that PHMSA provide instructions or guidance, informing operators that this question includes the initial report and all subsequent reports.

6. Flow Control and Valve Closures

PHMSA proposes adding questions about initial actions taken by the operator to control the flow of products to the failure location. When valves are used, PHMSA proposes collecting the date and time of the valve closure. This change would implement a Government Accountability Office (GAO) recommendation from GAO-13-168 "Pipeline Safety: Better Data and Guidance needed to Improve Pipeline Operator Accident Response." PHMSA believes that this change would allow stakeholders to understand the actions taken by the operator to control the flow of product during accident response and collect data about the elapsed time to valve closure.[15]

The current Form provides adequate details on valve closures and shut-in response to an accident. Each incident/accident is unique, and response actions to address them may vary widely based on the pipeline system, the individual line affected, pipeline ROW versus facility release, etc. It will be difficult to represent all of the possible scenarios on one Form – the

[14] Pipeline Safety: Information Collection Activities, 85 Fed. Reg. 13700 (proposed Mar. 9, 2020).
[15] *Id.*

addition of the request for this information on the Form will likely result in several "Other" selections, which PHMSA is trying to avoid.

Further, the Associations disagree that adding more questions will allow stakeholders to understand the actions taken by the operator to control the flow of products while responding to an accident. Additional questions may unintentionally cause confusion regarding which valve information to report. For instance, should operators report the valves closest to the accident location, valves further downstream, or valves inside of a facility? Also, depending on the accident and/or pipeline system, valves may be required to stay open. Finally, PHMSA should distinguish between manual and remote-operated valves.

7. <u>Area of Accident</u>

PHMSA proposes adding "exposed due to loss of cover" as a selection for the area of accident when "Underground" is selected. For pipelines installed underground and eventually exposed, the current form is not clear about whether "Underground" or "Aboveground" should be selected. Adding "exposed due to loss of cover" as an underground option clarifies how to report the accident. This change would improve the consistency of reports.[16]

The Associations believe clarity is needed regarding the term "underground." PHMSA's proposal may not accurately capture operators' current processes. For instance, there may be locations on a pipeline that were originally buried but have become exposed over time – such as stream and ditch crossings – of which the operator is aware and manages as aboveground piping. PHMSA should further clarify the difference between underground and aboveground piping as it relates to an unforeseen loss of cover.

[16] *Id.*

The definition of underground should refer to the overall condition of the pipeline segment and not only the location where the accident occurred. Adding a drop-down box that clarifies that the pipeline was exposed due to erosion or other causes is appropriate. The Form instructions should be updated to provide clarity and definitions.

8. <u>Date of Water Crossing Evaluation</u>

PHMSA proposes adding a question to collect the date of the most recent evaluation of the water crossing. These formal evaluations can provide information critical to protecting the integrity of water crossings. This change would provide stakeholders with visibility of this critical information.[17]

The Associations believe that more clarification is needed regarding the term "evaluation." The Associations request that PHMSA be consistent with regulatory language in the Code of Federal Regulations (C.F.R.). In 49 C.F.R. 195.412, there is reference to "a navigable waterway," but no reference to "water crossing."[18] Further, it appears that PHMSA is using the terms evaluation and inspection interchangeably. There is currently no separate inspection requirement for "water crossings" other than those that cross "navigable waterways."

The Associations request that PHMSA clarify whether these terms are interchangeable, or otherwise provide a definition for water crossing. PHMSA should further clarify whether a "water crossing" evaluation applies to offshore pipelines or requirements under 49 C.F.R. 195.413(b).[19] Further, if the intent is to ask for the date under 49 C.F.R. 195.412(b), then the

[17] *Id*. at 13702.
[18] *See* 49 C.F.R. § 195.412(b).
[19] *See* 49 C.F.R. § 195.412(b) (Regarding underwater inspection and reburial of pipelines in the Gulf of Mexico and its inlets).

Associations ask that PHMSA be direct with the question, such as 'provide the date of inspection under 49 C.F.R. 195.412(b) and 49 C.F.R. 195.413(b), as applicable.'

9. Outer Continental Shelf Regions

PHMSA proposes collecting the Outer Continental Shelf (OCS) region when an accident occurs on the OCS. This change would provide stakeholders with a more precise location of the accident.[20]

The Associations are unclear as to what exactly will be required, as this information appears to currently be captured in Part B14 of the Form. Part B14 currently asks operators to specify the OCS Area and Block Number. The Associations ask for further guidance regarding this proposed revision, as not to create duplicative sections within the Form.

10. Item Involved and Age of Failed Item

PHMSA proposes modifying the selections for the item that failed. These modifications would reduce the number of times "Other" is selected and allow a more meaningful analysis of the data. PHMSA proposes collecting both the date of manufacture and the date of installation for the failed item. This would allow stakeholders to understand both the age of the failed item and how long it had been in service.[21]

The Associations do not object to PHMSA modifying the Form to include the item that failed. This will allow PHMSA and operators to consider the age of the failed item and how long it was in service. The Associations ask, however, that PHMSA retain the selection of "unknown" for items of which age cannot be ascertained and provide more details as to what will be added.

[20] Pipeline Safety: Information Collection Activities, 85 Fed. Reg. 13700, 13702 (proposed Mar. 9, 2020).
[21] *Id.*

Further, the Associations are unclear as to what additional fields the Form will request – e.g. MTRs, manufacturing specification sheets for components, etc. The Associations are also unclear as to what other parameters will be added to strengthen the accident reporting process, helping stakeholders learn from past incidents. The "Other" category should be changed to "Unknown" or "Data not Available." As indicated in the Federal Register notice, PHMSA recognizes that data gaps can exist, but there is no clarity on what PHMSA expects for reporting if the data in not available. The key parameters are manufacture date, construction date, and in-service date.

11. <u>Details About Consequences</u>

The Form currently collects the number of injured persons requiring in-patient overnight hospitalization. PHMSA proposes adding two less severe categories to the forms; (1) injuries treated in a medical facility, and (2) injuries treated on-site. This data would enable a more thorough determination of the benefit of proposed regulations. PHMSA further proposes to collect information on the volume of product consumed by fire. While PHMSA already collects data about the volume of product released and whether ignition occurred, PHMSA cannot identify the volume of product burned. This data would allow PHMSA to more accurately determine the social cost of carbon and benefit of future proposed regulations. PHMSA also proposes to collect data on the number of buildings affected by the accident. On the current Form, the property damage values do not include any details about the type of property damaged. This data would provide more details about the consequences of the accident and enable a more thorough determination of the benefit of future proposed regulations.[22]

[22] *Id.*

Other injuries not requiring in-patient overnight hospitalization. The Associations do not object to PHMSA adding two less severe categories to the Form – (1) injuries treated in a medical facility, and (2) injuries treated on-site. The Associations recommend, however, that PHMSA provide the definition of injuries treated on-site, or clarify whether operators should defer to the Occupational Safety and Health Administration's (OSHA) definition. The Associations seek further clarity as to whether these treatments will be classified as "Impacting People or the Environment" (IPE). Finally, the Associations request PHMSA review this proposed collection to ensure that it is not duplicating existing external regulations.

Volume of Product consumed by fire. The Associations disagree with PHMSA's proposal to collect the unintentional volume of product consumed by fire. From the unintentional volume released, operators are unable to accurately determine or differentiate between the volume of product burned from the volume of product that evaporated as a result. As this proposal seeks to quantify air emissions, the Associations recommend that PHMSA not duplicate oversight and defer to the EPA's jurisdiction under the Clean Air Act regarding these emissions.

The number of buildings affected by the accident. The Associations do not object to PHMSA collecting data on the number of buildings. Further, the Associations request that PHMSA use the same classification/definition of buildings as prescribed in 49 C.F.R. 192.[23]

12. <u>Establishing Maximum Pressure and Flow Reversals</u>

PHMSA proposes adding methods used by the operator to establish the maximum pressure for the pipeline system and the date the maximum pressure was established. Operators would choose from the six methods listed in 49 CFR 195.406. While each of the methods for

[23] *See* 49 C.F.R. § 192.903 (definitions applicable to this subpart).

establishing the maximum pressure meet the regulatory requirement, safety factors may differ between the methods. This data would help stakeholders identify the pipeline's maximum pressure methods with the specific safety factor. PHMSA also proposes adding a question about flow reversals. This data would help stakeholders have a better understanding of whether a flow reversal may have impacted the maximum pressure.[24]

The Associations ask that PHMSA rephrase the term "maximum pressure" to "Maximum Operating Pressure (MOP)" in accordance with 49 C.F.R. 195.406.[25] The Associations further request that PHMSA revise the Form to ask whether the MOP was exceeded – if not, the MOP should be presumed valid. PHMSA's proposed revision to the Form should not seek MOP validity, which is required by regulation. Rather, the form should simply determine whether MOP was exceeded at the time of the accident.

The Associations believe that this information is more appropriate in the National Pipeline Mapping System (NPMS) or Form F 7000-1.1. The Associations ask that PHMSA reconsider collecting this information in the Form 7000-1.

13. <u>Length of Segment Isolated</u>

PHMSA proposes modifying the question about the length of pipeline isolated during accident response. In the current Form, an assumption is made that valve closures will always be used to initially control flow to the failure location. This change would clarify the length to be reported when valves are not used to initially control flow to the failure location.[26]

[24] Pipeline Safety: Information Collection Activities, 85 Fed. Reg. 13700, 13702 (proposed Mar. 9, 2020)
[25] *See* 49 C.F.R. § 195.406
[26] Pipeline Safety: Information Collection Activities, 85 Fed. Reg. 13700, 13702 (proposed Mar. 9, 2020)

The Associations believe that more clarification is needed regarding the term "isolated." The Associations are unsure whether this refers to the segment holding product or the segment empty of product. The Associations also ask PHMSA to clarify whether the intent is to gather information about the segment initially isolated during an operators' response or the segment isolated for pipeline repair (response vs. repair). Non-HVL liquid pipelines may effectively isolate themselves at each peak elevation point (liquids will not flow over the hill), and the peak elevation points may cause a much shorter segment to effectively be isolated than valve-to-valve distances. The Associations thus ask for further clarity regarding these isolated segments and the underlying purpose of the proposed amendment to the Form. The definition of isolated should also be covered in the revisions to the Form instructions.

14. <u>External Corrosion and Stray Current</u>

PHMSA proposes collecting additional details when stray current is the cause of external corrosion. PHMSA also proposes to clarify the conditions under which external corrosion cathodic protection is expected. This data would help stakeholders better understand the cause of external corrosion.

The Associations do not object to additional details regarding stray current. However, this information is generally not available within the 30-day requirement for accident report. Further, an accident investigation is not the correct place to clarify the conditions for which external corrosion cathodic protection is expected.

15. Natural Force Damage Additional Sub-Cause

PHMSA proposes adding tree root damage as a sub-cause in the natural force damage cause category. This addition would reduce the number of accidents reported with a cause listed as "Other Accident Cause."[27]

The Associations are continuously and proactively investigating data attributed to "Other Accident Cause," namely in Part G8. This data indicates that tree root damage is a *de minimus* cause, requiring operators to select "Other Accident Cause" when completing the Form. As such, the Associations do not believe that adding tree root damage to the Form will significantly reduce the number accidents reported as "Other Accident Cause."

16. Excavation Details for All Excavation Damage

In the current form, when a third party causes the excavation damage, PHMSA collects details about the excavation work. PHMSA proposes collecting further details about the excavation work to determine whether the cause is first-, second-, or third-party damage. When pipeline operators are excavating and damage their own pipeline, the damage is considered first-party. When an excavator is working for the pipeline operator and damages the pipeline, they are considered a second party. First and second party excavation details would allow stakeholders to understand the type of excavation work being performed when excavation damage occurs. The Common Ground Alliance recently changed the data structure for its Damage Information Reporting Tool (DIRT). PHMSA proposes updating the revised DIRT data structure.[28]

The Associations are unclear as to what additional information will be collected for first- and second-party excavators that is not currently being collected in the Form. The Associations

[27] *Id.*
[28] *Id.*

do not object, however, to PHMSA updating the Form to reflect changes in the Damage Information Report Tool (DIRT).

17. State Damage Prevention Law Exemptions

PHMSA proposes adding information about exemptions from state damage prevention laws when the cause of the accident is excavation damage. This data would help stakeholders identify states in which damage prevention law exemptions may be associated with more frequent excavation damage to pipelines.[29]

The Associations recommend that PHMSA keep the excavation questions consistent with the information collected on the DIRT form.

18. Material Failure Cause Changes

When material failure of a pipe or weld causes the accident, a sub-cause must be chosen. Errors in the design of pipeline facilities cause some accidents, but currently, design is not included in any sub-cause. PHMSA proposes adding design to the "Construction-, Installation-, or Fabrication-related" sub-cause. This change would reduce the number of reports with a cause of "Other."[30] PHMSA also proposes adding "Hard Spot" as another environmental cracking option. This is another type of environmental cracking that should be available for selection. This change would reduce the number of reports with a cause of "Other."[31] Finally, PHMSA proposes adding a question to collect the post-construction pressure test value. When the pipe or a weld fails, the value of the post-construction pressure test is important to determining if the cause of

[29] *Id.*
[30] *Id.*
[31] *Id.*

the failure might have been present since original construction. This change would provide additional data to determine the cause of the pipe or weld failure.[32]

The Associations do not object to adding the term "Design" as a sub-cause category, along with the current terms "Construction," "Installation," and "Fabrication-related," Additionally, the Associations do not object to including the term "Hard Spot" as an environmental cracking option.

The Associations object, however, to adding a question that collects post-construction pressure test values. Presumably, PHMSA considers a post-construction hydrotest to be the original test before putting the pipeline into service – not any hydrotest that occurred after construction, superseding the original test. The Associations object to providing original pressure test information because often times the original hydrotest data is missing or unavailable. Further, without more information, the Associations do not see the value in providing this data.

A distinction should be made between original construction hydrotest to establish MOP (more commonly referred to as pre-commissioning hydrotest) and post-construction hydrotest, which can be applied to replacement sections and used for integrity management. Adding information in Part E on the date of a pre-commissioning hydrotest may be useful. Part G asks for information on the most recent hydrostatic pressure (if performed) and the date of the most recent test. As proposed in the modifications to the Form, the two most recent pressure tests would be included in the revised Form.

[32] *Id.*

The post-construction data being requested in the current and revised Form, requests a generic "test pressure," which can vary at different locations and times and adds no information regarding spike testing if performed – %SMYS, etc. Hydrotest conditions vary widely and simplifying the data requested in the Form does not provide much meaningful information.

19. <u>Additional Integrity Inspection Data</u>

PHMSA proposes collecting two sets of in-line inspection (ILI) results. Under PHMSA regulations, operators conduct multiple rounds of integrity inspections. This change would provide a history of ILIs rather than just the most recent. The additional inspection data may provide insights into the effectiveness of the various types of ILIs. Also, in the current form, the same set of integrity inspection questions appear in four different cause sections. Only one cause can be selected so three sets of these questions are redundant. PHMSA proposes having the questions appear once. PHMSA would also adjust existing reports to have the questions appear only once. This change would Start Printed Page 13703 simplify the form by reducing the number of distinct data fields. PHMSA proposes collecting the type of direct assessment when this inspection method has been implemented. The additional inspection data may provide insights about the effectiveness of the various types of direct assessments.[33]

The Associations do not object to PHMSA collecting two sets of in-line inspection results. Further, the Associations do not object to PHMSA's proposed modification to the questionnaire, resulting in only one set of integrity inspection-related questions. The Associations ask, however, that PHMSA rephrase "Integrity Inspection" to "Successful Integrity

[33] *Id.*

Inspection" or "Completed Integrity Inspection". This will ensure that operators only provide data on ILI tool runs that provided a consistent and complete data set.

Finally, the Associations do not object to PHMSA adding direct assessment methods to the Form. The Associations recommend, however, that PHMSA provide a list of the methods available to the operator.

20. Contributing Factors

Pipeline operators currently select only one cause on the Form. Factors contributing to, but not causing, an accident are often relevant to preventing future accidents. PHMSA proposes collecting data about contributing factors.[34] Collection of information on contributing factors in addition to the apparent cause would help stakeholders develop a more thorough understanding of the accident and ways to prevent future accidents.[35]

The Associations agree with this proposal, identifying the factors that contributed to an accident. The Associations recommend that PHMSA provide options, as well as include an option for "No contributing factors."

With a variety of causal analysis techniques across the industry, there may be variations in the wording and selection of contributing factors related to an incident. It would be beneficial for the Associations to review and comment on the proposed list of contributing factors that will be selectable on the revised Form. It is also important to note that contributing factors are often finalized upon the completion of internal company incident analysis (IAs). The complementary

[34] The proposal is similar to a recommendation made by the National Transportation Safety Board (NTSB) in a January 2015 safety study report which can be viewed at *http://www.ntsb.gov/safety/safety-studies/Documents/SS1501.pdf*.
[35] Pipeline Safety: Information Collection Activities, 85 Fed. Reg. 13700, 13702 (proposed Mar. 9, 2020)

instructions for the Form should emphasize this point. Supplemental reports may be submitted at the conclusion of the IA.

IV. CONCLUSION

The Associations appreciate the opportunity to provide comments on "Pipeline Safety: Information Collection Activities" regarding PHMSA's proposed revisions to PHMSA F 7000-1 Accident Report – Hazardous Liquid Pipeline Systems. We applaud PHMSA for their diligent and tireless efforts to revise this Form and look forward to future collaboration as changes are made.

Respectfully submitted,

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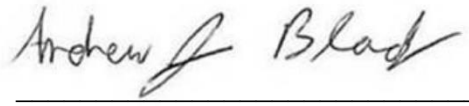

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