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Pipeline and Hazardous Materials Safety Administration (PHMSA)  
U.S. Department of Transportation  
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Washington, DC 20590-0001

**Pipeline Safety: Information Collection Activities- [Docket No. PHMSA–2021–0054]**

The American Petroleum Institute (API) and The Association of Oil Pipe Lines (AOPL) are pleased to jointly respond to the request by PHMSA for comments on the proposed revision to the Form PHMSA F7000-1, “Accident Report – Hazardous Liquid and Carbon Dioxide Pipeline Systems”, which is currently collected under OMB Control number 2137–0047. API represents all segments of America’s oil and natural gas industry. Its nearly 620 members produce, process, and distribute most of the nation’s energy. The industry supports 10.3 million U.S. jobs and is backed by a growing grassroots movement of more than 40 million Americans.

While it is important for PHMSA to continually take steps to improve its data collection efforts, it is also imperative for both PHMSA and the industry to work together to ensure that the final F7000-1 reporting form promotes principles of data quality, certainty and data accuracy for midstream pipeline operators, while minimizing potential added costs and burden.

With PHMSA’s request for comments on the proposed accident form, API and AOPL submit a list of suggestions, listed below to facilitate the information gathering requirements for their members.

**API and AOPL’s comments to the revision of the F7000-1 accident form:**

- Proposal to modify Part C3 to require additional details for breakout tank –

**Section 1A. Background** notes that in Part C3 of the accident form, operators report the type of item that failed. When a breakout tank weld fails, operators select “onshore breakout tank or storage vessel” in Part A14 and “weld” in Part C3, but are currently unable to enter additional data about the breakout tank in Part C3, sections u and v. PHMSA proposes to require the collection of breakout tank data in Part C3, sections u and v, for reports where A14, describing the part of the system involved in the accident, is “Onshore Breakout Tank or Storage Vessel.” This change would provide stakeholders with data about the breakout tank regardless of the item that failed on the breakout tank.

Based on the analysis of the PHMSA Flagged Files hl2010toPresent dated 3/31/2022, API and AOPL agree that the proposed requirement will not allow for better data analysis. Rather, it would require that the analyst filter multiple fields in order to analyze data on tank failures. Please see the analysis below.

**Database used:** PHMSA Flagged Files hl2010toPresent dated 3/31/2022.

**Data Breakdown**

Pivot Table generated with SYSTEM\_PART\_INVOLVED followed by ITEM\_INVOLVED to match A14 and C3 respectively. Used DATAFILE\_AS\_OF to get Count of reports in each category. There have been 495 releases involving Onshore Breakout Tank or Storage Vessel, Including Attached Appurtenances since 2010:

Row Labels	Count of DATAFILE_AS_OF
OFFSHORE PIPELINE, INCLUDING RISER AND RISER BEND	26
OFFSHORE PLATFORM/DEEPWATER PORT, INCLUDING PLATFORM-MOUNTED EQUIPMENT AND PIPING	11
ONSHORE BREAKOUT TANK OR STORAGE VESSEL, INCLUDING ATTACHED APPURTENANCES	495
ONSHORE EQUIPMENT AND PIPING ASSOCIATED WITH BELOWGROUND STORAGE	25
ONSHORE PIPELINE, INCLUDING VALVE SITES	1446
ONSHORE PUMP/METER STATION EQUIPMENT AND PIPING	1571
ONSHORE TERMINAL/TANK FARM EQUIPMENT AND PIPING	1153
(blank)	1
Grand Total	4728

Filter to just Onshore Breakout Tank or Storage Vessel, Including Attached Appurtenances releases and expand to include Item Involved results in:

Row Labels	Count of DATAFILE_AS_OF	Percentage
AUXILIARY PIPING (E.G. DRAIN LINES)	13	3%
DRAIN LINES	1	0%
FLANGE ASSEMBLY	21	4%
INSTRUMENTATION	2	0%
OTHER	53	11%
PIPE	7	1%
PUMP	9	2%
RELIEF LINE AND RELIEF EQUIPMENT	5	1%
SCRAPER/PIG TRAP	1	0%
SUMP	7	1%
TANK/VESSEL	308	62%
TUBING	1	0%
VALVE	44	9%
WELD, INCLUDING HEAT-AFFECTED ZONE	23	5%
<b>Grand Total</b>	<b>495</b>	

The scenario PHMSA is concerned about has only occurred 23 times since 2010 or approximately 5% of releases where the System Part involved is an Onshore Breakout Tank or Storage Vessel, Including Attached Appurtenances. Most operators are selecting Onshore Breakout Tank or Storage Vessel, Including Attached Appurtenances and then Tank/Vessel (62%) and describing the actual part that failed in the narrative.

Adding Narrative to the above Pivot Table then filtering narrative by the word “weld” results in the following:

Row Labels	Count of DATAFILE_AS_OF	Percentage
FLANGE ASSEMBLY	2	3%
PIPE	2	3%
SUMP	3	4%
TANK/VESSEL	45	60%
VALVE	1	1%
WELD, INCLUDING HEAT-AFFECTED ZONE	22	29%
<b>Grand Total</b>	<b>75</b>	

More operators are selecting Onshore Breakout Tank or Storage Vessel, Including Attached Appurtenances and then Tank/Vessel (60%) and describing weld failure in the narrative.

The current instructions for the 7000-1 do not provide any direction on how to enter information if a weld fails on a tank. Operators appear to be completing reports for weld failures on a tank in a variety of ways which is not ideal for data analysis. If PHMSA is going to change the Annual Report for weld failures on tanks, API and AOPL recommend that PHMSA also change that option for Flange Assembly, Pipe, Sump, and Valve since those options under Item Involved have also had weld failures described in the narrative.

API and AOPL do not believe revising Part C for just this one scenario will improve data quality. PHMSA should clarify specifically how tank releases should be reported as Operators have multiple options at this time.

On behalf of the industry, we respectfully submit the comments we have gathered from API and AOPL who worked diligently in reviewing the proposed revisions to the F7000-1 form. Thank you for the opportunity. We look forward to working with PHMSA in its efforts to consider improving its data gathering processes.

Respectfully submitted,



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