

C Samya Lutz - Comments

This is a Comment on the **Pipeline and Hazardous Materials Safety Administration (PHMSA) Notice: [Agency Information Collection Activities; Proposals, Submissions, and Approvals](#)**

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Comment Period Closed
Oct 18 2013, at 11:59 PM ET

Comment

Thank you for once again inviting comments on, among other things, ways to enhance the quality, utility and clarity of the information to be collected through the National Pipeline Mapping Program/System (NPMS).

On August 13, the Pipeline Safety Trust (PST) submitted comments on Docket No. PHMSA-2013-0137. We again comment here, and encourage PHMSA to take these and our previous comments into consideration.

PST asks that PHMSA require rather than suggest the NPMS information to be updated annually by pipeline companies, as clearly authorized in 49 USC 60132 (b). Also, §6b of the 2011 Pipeline Safety and Job Creation Act asks the Secretary to "issue guidance to owners and operators of pipeline facilities on the importance of providing system-specific information about their pipeline facilities to emergency response agencies of the communities and jurisdictions in which those facilities are located." This is separate from providing information during incidents or probable incidents, as addressed in a number of PHMSA advisory bulletins; this direction has to do with local planners and emergency responders having access to system-specific data in order to plan and prepare for emergencies well ahead of time. The accuracy and detail of the NPMS data is not high enough to adequately assist local communities who are planning or preparing for potential emergencies; it is not unusual for PST staff to find more detailed and accurate information on operators' own websites than on the NPMS, though not in a way that is searchable by location, indicating to us that many operators have this information readily available in a geospatial format. NTSB addresses this issue as well (P-11-1), recommending to PHMSA that pipeline operators share "...system-specific information, including pipe diameter, operating pressure, product transported, and potential impact radius, about their pipeline systems..."; PST believes that doing so through data requested for the National Pipeline Mapping System - and subsequently including the information on that system - would be a very good way to make this important data accessible to those who need it most - the emergency management and planning professionals in the local communities through which pipelines run.

Lastly, not all High Consequence Areas are viewable on the maps at this time (e.g. those designated near hazardous liquid pipelines due to environmental considerations); this is also problematic and needs to be changed, with information and data gathered from pipeline companies that allows the public to view pipelines including their location within any HCA with a much higher level of accuracy.

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