



July 12, 2016

Via www.regulations.gov and email

Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE., PHP-30
Washington, DC 20590-0001.

Re: Pipeline Safety: Information Collection Activities: Agency Information Collection Activities; Proposals, Submissions, and Approvals; Docket ID: PHMSA-2015-0205

To whom it may be concerned:

The Interstate Natural Gas Association of America (INGAA), a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in North America, respectfully submits these comments in response to the Pipeline and Hazardous Materials Safety Administration (PHMSA)'s Information Request regarding Docket ID: PHMSA-2015-0205.

INGAA appreciates your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Terry Boss". The signature is written in a cursive, flowing style.

Terry Boss
Senior Vice President of OS & E
Interstate Natural Gas Association of America
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INGAA appreciates the opportunity to provide comments on proposed revisions to the incident and accident report forms and associated instructions included in this Docket. INGAA collaborated with PHMSA on early versions of these revisions. INGAA agrees with PHMSA's goal to streamline and improve the incident data collection processes, and greatly appreciated the opportunity to contribute to the development of these form revisions. In response to the current Notice, INGAA offers the following additional comments and clarifications:

I. Form PHMSA F 7100.2 (GT GG Incident Report) Comments

Add Time Input Logic to Online Form

INGAA recommends that PHMSA incorporate logic in the online form to not accept recorded times that are earlier than the time indicated in A4. *Local time (24-hr clock) and date of incident* for the multitude of subsequent response fields (A4 shown below for reference). This will assist in preventing errors in entering data.

A4. Local time (24-hr clock) and date of the Incident:

Hour: / / Month: / / Day: / / Year: / /

A4.a Time Zone for local time (select only one) ☐ Alaska ☐ Eastern ☐ Central ☐ Hawaii-Aleutian ☐ Mountain ☐ Pacific.

A4.b Daylight Savings in effect? ☐ Yes ☐ No

Add Additional Selections for Reason for Incident

INGAA recommends that the 8. *Incident resulted from* proposed to be removed fields be retained in the proposed form (8 shown below for reference).

8. Incident resulted from:

☐ Unintentional release of gas

☐ Intentional release of gas

☐ Reasons other than release of gas

Additionally, there are some incidents that pipeline operators report which do not involve a release of gas. This should be selectable within *Incident resulted from* so those incidents can be analyzed separately from the incidents that involve the releases of gas. The reporting criteria and reasons for reporting are listed below.¹

¹ 49 C.F.R. § 191.3

Incident means any of the following events:

(1) An event that involves a release of gas from a pipeline, or of liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences:

(i) A death, or personal injury necessitating in-patient hospitalization;

(ii) Estimated property damage of \$50,000 or more, including loss to the operator and others, or both, but excluding cost of gas lost;

(iii) Unintentional estimated gas loss of three million cubic feet or more;

(2) An event that results in an emergency shutdown of an LNG facility. Activation of an emergency shutdown system for reasons other than an actual emergency does not constitute an incident.

(3) An event that is significant in the judgment of the operator, even though it did not meet the criteria of paragraphs (1) or (2) of this definition.

Clarify Area of Incident

INGAA recommends that in *B10. Area of Incident (as found): (select only one)*, the description should be changed to *Area of Incident (at time of incident): (select only one)*

B104. Area of Incident (as found): *(select only one)*

- ☐ Belowground storage or aboveground storage vessel, including attached appurtenances
☐ Underground ➞ Specify: ☐ Under soil ☐ Under a building ☐ Under pavement ☐ Exposed due to excavation
☒ Exposed due to loss of cover ☐ In underground enclosed space (e.g., vault) ☐ Other _____

B10.a Depth-of-Cover (in):

This will help in preventing reporting confusion about the status of the incident site at the exact time of the event or after the event has occurred and the pipeline was uncovered as a result of the incident.

INGAA recommends that the original test pressure at the time of construction be entered in Part C3 if **Pipe** or **Weld/Fusion, including heat-affected zone** is selected. If this information is not available, the preparer can enter *Unknown*. This information will be useful in determining the effectiveness of pressure testing in preventing operational incidents (C2 shown below for reference).

INGAA recommends to remove the present option in *D3* to identify that the PIR is not applicable because the gas is *Not Flammable*. Since almost all incidents that are reported in this form involve a flammable gas (e.g. natural gas) being released, this is confusing and should not be an option (*D3* is shown below for reference).

INGAA recommends that the word *affected* in *D10* and *D11* be changed to *damaged* (*D10* and *D11* are shown below for reference). The terminology *affected* is unclear and subjective. For example, *affected* could mean damage to the building, or it could mean that building access is limited during the incident. INGAA believes that the intent of *D10/D11* is to quantify the number of buildings damaged.

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Clarify Benchmark for Wildlife Impacts

The present proposed description in *D12* for Wildlife Impact is very unclear about the intended benchmark that the preparer is trying to describe (*D12* shown below for reference). If any ignition occurs, then there could be some terrestrial impact. There could be a single bird involved in the fire. The instructions are terse for this set of fields, so it is unclear what the intent of this information is for analysis.

D12. Wildlife impact: ☐ Yes ☐ No
D12.a If Yes, specify all that apply:
☐ Fish/aquatic
☐ Birds
☐ Terrestrial

Clarify Pressure Test in J2

INGAA recommends changing *J2* to read: *Other than an initial pressure test recorded in G5, has one or more additional hydrotest or other pressure test been conducted since original construction at the point of the Incident?* The proposed instructions for *J2* clarify that *Information from the initial post-construction hydrostatic test is not to be reported*, but the Form may still cause confusion (*G5* question 5 and *J2* shown below for reference).

5. Post-construction pressure test value (psig)— / / / / / OR ☐ Unknown

J2. Has one or more hydrotest or other pressure test been conducted since original construction at the point of the Incident?
☐ Yes ⇨ Most recent year tested: / / / / / Test pressure (psig): / / / / /
☐ No

Remove Questions Related to Legal Violations by Outside Motor Vehicles

INGAA recommends removing questions 5 and 6 from the bottom of section *G4* (questions 5 and 6 shown below for reference). INGAA believes that it would be inappropriate for an operator to comment/speculate as to potential violations. This should be left to the appropriate law enforcement and court structures.

<p>Complete the following if Damage by Car, Truck, or Other Motorized Vehicle/Equipment NOT Engaged in Excavation sub-cause is selected.</p> <p>5. Was the vehicle or equipment being operated in accordance with state or local laws? <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unknown</p> <p>If 5 is No, what laws were violated (select all that apply)</p> <p>5a. Excessive Speed</p> <p>5b. Reckless Driving</p> <p>5c. Driving Under the Influence</p> <p>5e. Other, describe: _____</p> <p>6. Was the driver under control of the vehicle at the time of the collision? <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Unknown</p>
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Clarify Definition of Contributing Factors

INGAA recommends revising the introduction to *PART K – CONTRIBUTING FACTORS* to read: *If Contributing Factors were identified in addition to the Apparent Cause, select all that apply below and explain each in the Narrative* (introduction to *PART K* shown below for reference). This will help clarify that the Preparer should not select the Apparent Cause again in *PART K*.

PART K – CONTRIBUTING FACTORS	
<p>The Apparent Cause of the accident is contained in Part G. If Contributing Factors were identified, select all that apply below and explain each in the Narrative:</p>	

II. Instructions for Form PHMSA F 7100.2 (GT GG Incident Instructions) Comments

Clarify Use of Correct Form Revision

INGAA recommends General Instructions clarify that all Incident Reports be submitted using the Form revision which is active at the date of incident, including any Supplemental/Final Reports. INGAA is concerned about potential for redundant paperwork and information-collection efforts as PHMSA transitions to the revised Forms proposed in this Docket.

Because initial Incident Report may be submitted as long as 30 days after detection of an incident, INGAA suggests that PHMSA will need to retain Portal link for current form revision for a period of time after the proposed form revision is active.² During this time, the Form Preparer would click the appropriate Portal link based on date of the Incident and be directed to the Form that was active on that date.

² 49 C.F.R. § 191.15

Expand Instructions for Time Inputs

INGAA recommends that the instructions on the incident form clearly highlight that all recorded times on the form should be in local time and should occur after the *A4. Local time (24-hr clock) and date of incident* (A4 shown below for reference).

A4. Local time (24-hr clock) and date of the Incident:

____/____/____
Hour Month Day Year

A4.a Time Zone for local time (select only one) ☐ Alaska ☐ Eastern ☐ Central ☐ Hawaii-Aleutian ☐ Mountain ☐ Pacific.

A4.b Daylight Savings in effect? ☐ Yes ☐ No

Add Additional Selections for Reason for Incident

INGAA recommends that the 8. *Incident resulted from* proposed to be removed fields be retained in the proposed form (8 instructions shown below for reference).

~~8. Incident resulted from~~

~~Indicate whether the incident resulted from the intentional or unintentional release of gas or for reasons other than a release of gas.~~

Additionally, there are some incidents that pipeline operators report which do not involve in a release of gas. This should be selectable within *Incident resulted from*, and explained accordingly within instructions for this section.

Clarify C4/C5 Instructions

INGAA recommends that C4 instructions should be changed from *Enter the year the item that failed was installed* to *Enter the year that the item described in C3 was installed*. This clarifies which “item” is being referenced. INGAA recommends a similar wording change for C5 instructions (C4/C5 instructions shown below for reference).

C4. Year Installed

Enter the year the item that failed was installed.

C5. Year Manufactured

If you know the year the item that failed was manufactured, enter it. Otherwise, select Unknown.

Remove Option to Select *Not Flammable* for PIR

INGAA recommends to remove the present option in *D3* to identify that the PIR is not applicable because the gas is *Not Flammable*. Since almost all incidents that are reported in this form involve a flammable gas (e.g. natural gas) being released, this is confusing and should not be an option (*D3* instructions are shown below for reference).

An operator is to answer this question for all incidents, regardless of whether or not the incident occurred in a high consequence area (HCA) or of the method used to identify an HCA. A PIR is one of the two methods for identifying an HCA, and this question and those immediately following are intended to collect data from actual incidents as part of a continuing effort to assure that the definition of a PIR is appropriate for that purpose. If the Incident involved the release of a non-flammable gas, select "Not Flammable."

Change "Affected" Buildings to "Damaged" Buildings

INGAA recommends that the word *affected* in instructions for *D10* and *D11* be changed to *damaged* (*D10* and *D11* instructions are shown below for reference). The terminology *affected* is unclear and subjective. For example, *affected* could mean damage to the building, or it could mean that building access is limited during the incident. INGAA believes that the intent of *D10/D11* is to quantify the number of buildings damaged.

D10. Enter the number of residential buildings affected.

D11. Enter the number of commercial and industrial buildings affected.

Clarify Benchmark for Wildlife Impacts

The present proposed description in *D12* for Wildlife Impact is very unclear about the intended benchmark that the preparer is trying to describe. If any ignition occurs, then there could be a terrestrial impact. There may be a single bird involved in the fire. The instructions are terse for this set of fields, so it is unclear what the intent of this information is for analysis (*D12* instructions shown below for reference).

D12. If wildlife was impacted, select Yes and indicate the type in D12a. Otherwise, select No.

Clarify Definition of Contributing Factors

INGAA recommends adding clarification in the Instructions to note that Contributing Factors are *in addition* to the Apparent Cause selected in *PART G*. Therefore, the Contributing Factors selections should not include the Apparent Cause again in *PART K*.