Perspective of Pipeline Safety Trust on NPMS Information Collection

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PHMSA NPMS PUBLIC MEETING SEPTEMBER 10, 2015

Stated Goals of Information Collection

- Support PHMSA in its regulatory responsibilities, research, and development
- Assist emergency responders
- Aid industry and all levels of government in promoting public awareness
- But what about directly promoting public education and awareness?

Knowledge will forever govern ignorance. And a people who mean to be their own governors, must arm themselves with the power knowledge gives. A popular government without popular information or the means of acquiring it, is but a prologue to a farce or a tragedy, or perhaps both.

-James Madison, 1822 (quoted by Representative Rumsfeld in 1966 during floor debate on passage of the Freedom of Information Act)

Goals of Information Collection for the Public

Inform residents near pipelines about risk

Create a single, comprehensive source of information about the operator, including enforcement and inspections

Provide members of public with contact and response information in the event of an emergency

Apple Pie Express

Category	Basic Info	For More Info
Pipeline name	Apple Pie Express	Operator Website
Current Pipeline Operator	Good Guys LLC	Operator Website
Contact for more info	John Brown, 360-111-1212, jbrown@ggpipes.com	
Contact in an emergency	Get to a safe location, Call 911, then call 360-111-9000	What to do in an emergency
Contents	Crude Oil	Info on what pipelines carry
Diameter of Pipeline	16 inches	
Maximum Operating Pressure	1200 psi	
Normal Operating Pressure	800-1000 psi	
Year Installed	1953	Info on How Much Age Matters
Type of Pipe	1/4 inch thick LF ERW manufactured by Pittsburgh Steel	More about Types of Pipe
Within HCA	Yes	What's an HCA?
Local USAs	Ten Mile Creek drainage and associated wetlands	What's a USA?
Depth of Cover info	Installed at 40 inches	More on Depth of Cover
Stream Crossings Info	Ten Mile Creek - open cut 8 feet deep	Types of Stream Crossings
Local Emergency Training Info	Click Here for Info Specific to this pipeline	Click Here for General Info on this Subject
Inspection Info	Click Here for Info Specific to this pipeline	Click Here for General Info on this Subject
Ownership Info	Click Here for Info Specific to this pipeline	Click Here for General Info on this Subject
Operator Info	Click Here for Info Specific to this pipeline	Click Here for General Info on this Subject
Operator Incident History	Click Here for Info Specific to this pipeline	Click Here for General Info on this Subject
Enforcement History	Click Here for Info Specific to this pipeline	Click Here for General Info on this Subject

MyEnvironment

Geospatial

Download

EnviroMapper

Availability of Information

Presumption should be that the public has the right to access information about pipeline safety

Security sensitive information (SSI) is limited to information that would:

- Constitute an unwarranted invasion of privacy (including, but not limited to, information contained in any personnel, medical, or similar file);
- Reveal trade secrets or privileged or confidential information obtained from any person; or
- Be detrimental to transportation safety.

Listed examples in the SSI rule involve specific information related to security

• i.e., "threat information against transportation or transportation systems and sources and methods used to gather or develop threat information"

Proposed SSI Attributes

- The existence (location) of these attributes is not specific security information
- Some of the attributes are already disclosed by BSEE (MAOP, valves)
- These attributes are important to public understanding of risk and the regulatory process
- NTSB has recommended that information on HCAs be available through NPMS

Proposed PIMMA Attributes

Unclear what legal basis there is for restricting public access to this information if it is not SSI

Some of the attributes are already disclosed by BSEE (diameter, decade of installation, product)

If it is possible to FOIA the information, it should be part of the public map viewer

Other Concerns

Dropping attributes for installation method in water crossing and type of leak detection

Positional accuracy

Limiting seam type

Lack of clarity regarding decade of installation, pressure test, abandoned pipelines