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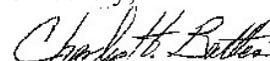
**Reference: Docket:** PHMSA RSPA-15-15852 71FR32631 Comments on Public Awareness Data Collection Final Rule titled "Pipeline Safety: Public Awareness Programs for Hazardous Liquid and Gas Pipeline Operators."

The pipeline industry apparently did not find the requirements in your final rule on operator public awareness programs overly burdensome since no comments were received. Likely, this was due to the fact that these requirements basically adopted an industry-developed and approved recommended practice. Unfortunately, that practice like your final rule established no criteria against which to measure compliance; thus, compliance evaluations will be subjective and influenced by an evaluator's individual knowledge and prejudices.

PHMSA's requirements on information collection is not specific, detailed, nor standardized, thus, operator's are free to collect minimal information without concern about enforcement action. Non-objective, non-specific, and non-enforceable regulatory action by PHMSA certainly does not comport with public safety needs; but the present rule could serve as a basis for assisting PHMSA in developing data collection criteria for these programs that could be uniformly applied and be expected to produce information of the types and quality necessary for assessing whether the programs are effective. Further, PHMSA should use this initial time to develop specific types of information that should be conveyed to the public and local officials, including who to first call when product or gas odors are first detected, and the availability safety enhancement devices such as home gas detectors and excess flow valves.

PHMSA's present public awareness requirements certainly require greater specificity if ever these programs are to be adequate for public safety education and if ever the States or PHMSA expects to perform effective enforcement. PHMSA should expeditiously complete an initial evaluation on the adequacy of industry-selected data collection methods and details, and use the results of these evaluations to develop explicit criteria for these programs and future evaluations for compliance. It seems only reasonable that the PHMSA should want the regulated industry provide necessary information to the public and for it to inform the industry precisely how compliance will be evaluated.

Sincerely,



Charles H. Batten, President