

**US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Hazardous Materials Enforcement**



**National Business Strategy
February 2008**

Utilizing a risk based approach the Office of Hazardous Materials Enforcement (OHME) will identify, evaluate and prioritize its functional enforcement and compliance activities in accordance with this strategy and plan. Using risk-based data-driven approaches, OHME maximizes the value and impact of the program by driving its resources toward the activities posing the highest risk.

OHME will determine and implement a prioritization list of work for all activity produced by the office. Specifically, OHME will develop, update and maintain region and program specific lists of prioritized activities. The activities are ranked in priority based on the risk of endangerment posed to the public, property and the environment. The ranking factors of the order also include risks that are in high consequence areas.

Using data sources available to OHME, activity prioritization and identification will utilize the risk assessment model in this strategy (Addendum 1). The risk assessment model defines five main color coded priority categories. Each category of activities is ranked by precedence of risk and hazard posed.

Activity Areas (not in rank order)

- * Failure Analysis and Investigation
- * Accident Investigations
- * Serious Incidents
- * National Agency Response
- * Complaints (Internal and External)
- * Undeclared Hazardous Materials
- * Fitness Review Inspections
- * High Risk-High Consequence Inspections
- * Abatements
- * Re-inspections
- * High Aggregate Incidents
- * Routine Inspections
- * Leveraging Training
- * Outreach and Education
- * Systems Integrity Safety Program Inspections

Each region and program area will identify, develop, coordinate, and implement performance tools and procedures to evaluate and measure the effectiveness and efficiency of their work activity priority list. Ensuring continuous improvement and utilizing lessons learned as guiding principles, each region and program area will reprioritize or adjust their work activity lists quarterly or more frequently as warranted by their performance measurement outcomes.

OHME will identify, develop and execute initiatives to leverage its resources and expertise with its modal partners to improve safety through shared responsibility.

OHME will engage in the development and execution of comprehensive integrity reviews incorporating system-based approaches to ensure safety and compliance. The program will develop and standardize criteria for participation eligibility in the systems integrity safety program.

OHME will develop procedures and protocols for identifying, implementing, coordinating, and measuring the leveraging and partnership activities described in this strategy.

OHME will be a risk-based, data-driven, learning operation.

OHME will work towards transparency in decision making that promotes accountability, dialog with, and responsiveness to its stakeholders and partners.

OHME will identify, develop, and execute inter-regional and inter-office synergies with PHH that are complimentary and maximize the business value and efficiencies of the organization in meeting its goals and objectives.

OHME will provide timely and comprehensive inspections in response to requests from PHH for compliance fitness reviews. The program will also provide a timely written recommendation and report to the PHH program initiating the request.

OHME will promote and foster the development and establishment of the training and certification standard for the PHMSA HM Investigative professional.

OHME will, as part of its inspection responsibilities, produce complete and comprehensive inspection/investigation reports, in a timely manner, to accompany all activity products and services. The inspection reports will supplement PHH-40 program recommendations to other PHH and external programs.

OHME will produce and deliver Enforcement Recommendations to relevant PHMSA and modal program offices as a formal and official method of communicating regulatory and safety related discrepancies from field observations and inspections and providing the solutions and recommendations for remedy and or risk mitigation.

OHME will identify, develop, implement and foster national and regional investigative and compliance teams, units, divisions and programs that build capabilities, increase responsiveness and strengthen uniform application.

National Business Strategy
Addendum 1
November 17, 2008

Priority Assessment Categories

All PHH-40 activities are prioritized using this assessment model (in the descending rank order below). PHH-40 utilizes and assigns its resources based on the assessed rank order of the activity. Region and program priority lists will be updated at least every quarter and for changing events, new data, direction, and intelligence. The highest priority drives the program's resources.

DARK RED – Maximum Priority

Accident and Incident Investigations; Failure analysis/investigations; Complaints, *

RED – High Priority

Serious incidents (non-bulk and intermediate bulk); Incidents involving TIH, Class 1, Class 7, PG I and Aircraft; Large package quantity (not cargo tank or tank cars) Chlorine and other Div 2.3 and 6.1 PG I shippers; Fitness reviews; PHMSA verified undeclared shipments, *

ORANGE – Medium Priority

Abatements; High Incident Frequency (> 10 in 3 years); High certification markings reported by the third party laboratories; UN Non-bulk, Intermediate Bulk Package, Inter-modal tank, and Cylinder Manufacturers, Package Self-certifiers and re-manufacturers; Third Party Certification Agencies; Package Rebuilders and Reconditioners; Re-inspections (of completed SISP, Cases, Tickets). *

YELLOW – Priority

FAA repair stations and secondary shippers (O2 generators); Nurse tank and Propane Special Permit Holders (13554 and 13341); Entities and previous registrants prior notified of registration requirements w/o response; Never Inspected High Pressure and Acetylene Cylinder Requalifiers; High Hazard Registered Entities or Shippers (TIH, Class 1 or Class 7); Flagged Registration Entities, Select Agent Shippers; Joint Agency Enforcement Activity in PHH jurisdictional area, *

WHITE – Undetermined Activities

All other data and activities that have not yet been assessed a priority category.

* Other activities identified by OHME Management

BLUE Highlighted priority list entries represent SISP activities. These are strictly reserved for SISP program activities. Listed SISP entities are excluded from regular inspection unless approved by the supervisor in writing.

GRAY Highlighted priority list entries represent completion or action on the activity. Gray highlights will be used to designate completion or action of the activity until the Priority List is updated quarterly. The revised list will not include the previous quarter's gray entries.

It is the responsibility of the supervisor to ensure the business activities are prioritized, ranked, displayed and updated in accordance with this policy.

An Example of a Region Priority List below:

Company	Data Type	Activity	City	State
AE Chemical	Accident	Shipper	Salt Lake	UT
Jims Transport	Complaint	Retester	Billings	MT
Quick Express	Air Incident	Shipper	Portland	OR
Esso	Incident	Shipper	Phoenix	AZ
Capco Inc	Undeclared	Shipper	Richmond	CA
Rouche	Serious In	Shppr/Carr	Salt Lake	UT
Containers Inc	High Mark	Pkg Manuf	Salem	OR
Billy-Bob Inc	Reinspect	FreightFwd	Los Angeles	CA
Stoney's Air	NvrInspected	Retester	San Fran	CA
Zip-Line Ex	SP Holder	Propane	Seattle	WA
Cleaner Chem	Registered	TIH Shipper	Tacoma	WA
ABC Inc	Undetermined	Shipper	Tacoma	WA
ACME	Undetermined	Recondition	Olympia	WA
ACELTER	Undetermined	Chem shipper	Longview	WA