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March 2, 2010

The Honorable Joseph I. Lieberman
Chairman
Committee on Homeland Security
and Government Affairs
340 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Susan Collins
Ranking Member
Committee on Homeland Security
and Government Affairs
350 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Chairman Lieberman and Ranking Member Collins:

I write you today on behalf of the Association of Oil Pipe Lines (AOPL) in strong support of the Continuing Chemical Facilities Antiterrorism Security Act of 2010 (S.2996), recently introduced by Senators Susan Collins, Mark Pryor, George Voinovich, and Mary Landrieu.

AOPL is a nonprofit organization whose membership is comprised of owners and operators of liquid pipelines. Our members carry nearly 85 percent of the crude oil and refined petroleum products moved by pipelines in the United States. AOPL supports S.2996 because this bipartisan, common-sense legislation will continue the important implementation of the Chemical Facilities Anti-Terrorism Standards (CFATS) program at the Department of Homeland Security (DHS) without crippling and burdensome new regulations.

Our membership has long been concerned with the imposition of Inherently Safer Technology (IST) on crude oil and refined petroleum product pipeline and storage facilities in other legislative attempts before Congress. This misguided policy would direct limited DHS resources away from its key mission of protecting our nation from terrorism threats, and instead into operational and engineering decisions of specific companies. AOPL's member companies and operators comply faithfully and professionally with a host of safety regulations currently in place within the CFATS program. IST mandates would remove operational decisions away from those most qualified to make them – the trained employees of crude oil and refined petroleum product pipeline and storage facilities. AOPL commends S.2996 because it rightfully excludes unnecessary IST provisions and allows DHS to continue implementation of its safety standards.

As the Committee on Homeland Security and Government Affairs moves forward on its oversight of chemical facilities security, it is my hope that you will swiftly take action on this important legislation. We applaud the bipartisan and thoughtful work of Senators Collins, Pryor, Voinovich, and Landrieu. AOPL stands ready to work with you and the committee on this critical matter.

Sincerely,

A handwritten signature in black ink that reads "Andrew J. Black". The signature is written in a cursive, flowing style.

Andrew J. Black
President and CEO