

Department of Transportation
Office of the Chief Information Officer

Supporting Statement

Pipeline Safety: Transportation of Hazardous Liquids by Pipeline: Recordkeeping and
Accident Reporting
OMB Control No. 2137-0047

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for an extension and amendment of a currently approved collection entitled “Pipeline Safety: Transportation of Hazardous Liquids by Pipeline: Recordkeeping and Accident Reporting” (OMB Control No. 2137-0047). The current expiration date for this information collection is January 1, 2013. The amendment of this information collection is necessary due to PHMSA actions that affect this information collection. The specific action is as follows:

- Docket No.: PHMSA-2008-0291 Updates to Pipeline and Liquefied Natural Gas Reporting Requirements (One Rule)
 - Adds 447 responses and 2,682 for Telephonic Notification Plans

Part A. Justification

1. Circumstances that make collection of information necessary.

Hazardous liquid pipeline operators must keep records to ensure that their pipelines are operated safely. Operators must also report accidents. The information collection promotes the U.S. DOT’s Safety and Environmental Strategic Goals by identifying areas which would benefit from targeted regulatory actions to decrease incidents involving hazardous liquid low-stress lines.

2. How, by whom, and for what purpose the information is to be used.

The information collection provides PHMSA with the information necessary to evaluate the risk posed by these lines. PHMSA will use the information provided in the reports to more accurately assess the risks to pipeline infrastructure, understand emerging safety related trends, and identify opportunities for improving the regulatory system for rural low-stress pipeline.

3. Extent of automated information collection.

PHMSA Forms 7000.1 Hazardous Liquid Accident Report may be submitted electronically on-line on the PHMSA website. PHMSA encourages the use of electronic

technology. PHMSA expects at least 95 percent of data collection and reporting to be completed electronically.

4. Efforts to identify duplication.

There is no duplication, as the information is unique to specific situations.

5. Efforts to minimize the burden on small businesses.

The burden has been made as simple as possible. PHMSA expects impacted operators to be large and small businesses. For PHMSA to be able to effectively carry out its legislative mandate and monitor natural gas pipeline safety, it is essential that both large and small operators of pipelines provide incident reports.

6. Impact of less frequent collection of information.

It is not possible to conduct the collection less frequently and still ensure the necessary level of safety to life and property inherent in transporting hazardous materials. PHMSA would not be able to adequately assess potential risks associated with these pipelines, which could potentially be detrimental to the pipeline safety and the protection of the environment. Therefore, less frequent information collection could compromise the safety of the U.S. pipeline system and the environment.

7. Special circumstances.

This collection of information is generally conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2). There are three anticipated potential special circumstance regarding information collection: (1) A special circumstance could occur if an operator has more than one low-stress pipeline incident or accident within an officially recognized business quarter; (2) An operator may have an accident or incident in the same quarter as their annual report is submitted; and (3) More than a single safety-related condition within a single business quarter is also possible. Operators' safety measures and vigilance can avoid such circumstances. As such, PHMSA does not mandate information collection occur twice within a single quarter.

8. Compliance with 5 CFR 1320.8.

We have issued several notices and rulemaking which affect this information collection. The Federal Register publication dates and citations for these notices/rulemakings are as follows:

Docket #	Official Title	FR CITE	FR DATE
PHMSA-2008-0291 (One Rule)	Pipeline Safety: Updates to Pipeline and Liquefied Natural Gas Reporting Requirements	74 FR 31675 (NPRM)	July 2, 2009
Comments: The comment period ended August 31, 2009. In general, the comments were supportive of the provision to require a HL pipeline operator to have a written procedure on how to calculate and provide an initial estimate of the amount of product released. The detailed comments and response are specified in the attached draft of the final rule.			

9. Payments or gifts to respondents.

There is no payment or gift provided to respondents associated with this collection of information.

10. Assurance of confidentiality.

The recordkeeping requirements of this information collection do not include anything of a sensitive nature or of any matters considered private. Therefore, we do not foresee any need to assure confidentiality of the information to be collected.

11. Justification for collection of sensitive information.

The recordkeeping requirements of this information collection do not involve questions of a sensitive nature.

12. Estimate of burden hours for information requested.

PHMSA estimates that the currently approved 300 respondents for this information collection should be revised to 335 respondents based on recent reviews of annual report data.

With the changes detailed in the One Rule, PHMSA has estimated an increase of 2,682 burden hours to this information collection

Estimated Annual Burden Hours:

48,647 hours	(Currently Approved)
+ 2,682 hours	(One rule: <u>Telephonic Notification Plan</u>)
51,329 hours	Subtotal

Modify HL operator telephonic notification of accidents to require written plans (447 responses/ **Additional 2,682 hours**).

PHMSA assumes that approximately 335 HL pipeline operators will be impacted by the new requirement for operators to have and use a procedure to calculate and report a reasonable initial estimate of released product. Since these operators submit 447 annual reports, PHMSA estimates that each report represents a separate facility and therefore, a separate procedure. PHMSA estimates that it will take approximately 6 hours to develop and maintain each procedure on an annual basis. The total burden will be approximately **2,682 hours** ($447 * 6$) each year.

Accident Reporting (PHMSA Form 7000-1) (400 responses)

PHMSA estimates that 400 accident reports (responses) are submitted each year. This estimate is based on accident reporting data that PHMSA has collected over the past seven years (2002 – 2008). PHMSA estimates half of the reports (200) will take approximately 10 hours to file. The remaining 200 responses are estimated to be for small releases which are estimated to take 5 hours to file. For accidents involving a “small release” (release between 5 gallons and 5 barrels), only certain parts of the revised form are required to be filled out. Of the total 400 accident forms submitted 200 are “small release” reports. This results in a burden hour estimate of 3,000 hours ($(200 \text{ responses} * (10)) + (200 * 5)$).

Total Burden Hours

Once this information collection is approved, there will be an increase in the burden hour estimate specified in this information collection to 51,329 hours as detailed above. The primary areas of this information collection are broken down as follows:

The overall average burden hour estimate for HL operators is 152 hours ($51,329 \text{ hrs} / 335 \text{ operators}$).

13. Estimate of total annual costs to respondents.

The expected costs associated with the burden hours are assumed to be filled out by a senior engineer whose fully-loaded hourly cost (i.e., salary plus overhead) is estimated to $\$63 \times 51,329 \text{ hours} = \$3,233,727.00$.

14. Estimate of cost to the Federal government.

No federal costs above and beyond salaries are anticipated.

15. Explanation of program changes or adjustments.

The One Rule will modify HL operator telephonic notification of accidents to require operators to have and use a procedure to calculate and report a reasonable initial estimate of released product. This new provision will result in an additional 447 responses and 2,682 hours to this information collection.

16. Publication of results of data collection.

The results of the accident, incident, and annual reports will be summarized and posted on PHMSA's website.

17. Approval for not displaying the expiration date for OMB approval.

PHMSA is not seeking approval to not display the expiration date.

18. Exceptions to certification statement.

There is no exception to PHMSA's certification of this request for information collection approval.

Attachments:

Attachment	Description
One Rule NPRM	
Draft of One Rule (final)	Includes Summary of comments and PHMSA response

Part B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.

1. Describe potential respondent universe and any sampling selection method to be used.

There is no potential respondent universe or any sampling selection method being used.

2. Describe procedures for collecting information, including statistical methodology for stratification and sample selection, estimation procedures, degree of accuracy needed, and less than annual periodic data cycles.

There are no procedures for collecting information, including statistical methodology for stratification and sample selection, estimation procedures, degree of accuracy needed, and less than annual periodic data cycles.

3. Describe methods to maximize response rate.

There are no methods to maximize the response rate.

4. Describe tests of procedures or methods.

There are no tests of procedures or methods.

5. Provide name and telephone number of individuals who were consulted on statistical aspects of the information collection and who will actually collect and/or analyze the information.

There were no individuals consulted on statistical aspects of this information collection.