

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 change to this information collection is necessary to incorporate amendments to the Hazardous Liquid Accident Report (PHMSA F 7000-1).

This information collection is being revised in conjunction with the Gas Transmission Annual Report (PHMSA F 7100.2-1) and Gas Transmission Incident Report Incident Report (PHMSA F 7100.2) that are maintained under OMB Control # 2137-0522. The 60-day and 30-day FR notices address all the revisions to all three of the forms associated with the two information collections (2137-0522 and 2137-0047).

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.

The requirements for incident reporting and recordkeeping are found in 49 CFR Part 191 and 192. The PHMSA delegation of authority is found in 49 CFR 1.97 which allows for PHMSA to exercise the authority vested in the Secretary in under Chapter 601 of title 49, U.S.C.

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.

The 60-day Federal Register notice was published on April 13, 2012 (77 FR 22387). PHMSA received 12 comments. Comments were submitted on a variety of topics regarding the proposed changes to the forms and instructions. The comments were summarized and addressed in the 30-day Federal Register notice (attached) that was published on September 21, 2012 (77 FR 58616). PHMSA received one comment to the 30-day FR notice from API/AOPL. PHMSA will address these issues during next year's review of the information collection in connection with the renewal for 2137-0047 which is due to expire on December 31, 2013. PHMSA is currently preparing to address revisions to the Hazardous Liquid Accident form that will include API/AOPL's concerns along with other potential revisions. PHMSA is planning on issuing a 60-day Federal register notice in the Spring/Summer of 2013 to propose revisions to the form in conjunction with the renewal of Information collection 2137-0047

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.

Estimated Annual Burden Hours:

51,329 hours

Written plans for HL operator telephonic notification of accident (447 responses/ 2,682 hours).

PHMSA assumes that approximately 335 HL pipeline operators will be impacted by the 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 responses * (10)) + (200* 5)).

Total Burden Hours

The burden hour estimate specified in this information collection is 51,329 hours as detailed above.

The overall average burden hour estimate for HL operators is 152 hours (51,329 hrs /335 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 x 51,329 hours = \$3,233,727.00.

14. Estimate of cost to the Federal government.

PHMSA spends an estimated cost of \$61,325 to operate and maintain this information collection. Operations and maintenance includes PRA compliance, interface improvements, database management, planning, revisions, and customer service.

	Monthly Average (Hrs)	Hourly Rate	Annual Hours	Total Costs
Salary Costs	2	\$38.82/hr	24	\$930
Contracting Costs Haz. Liquid Accident Forms	39	\$128.50/hr	470	\$60,395
TOTAL				\$61,325

15. Explanation of program changes or adjustments.

PHMSA has made some changes to the Hazardous Liquid Accident Report (PHMSA F 7000-1). PHMSA is revising the form and instructions in regard to the reporting of accidents involving girth welds to allow for the reporting of the characteristics of the pipeline involved in the accident. This information includes basic information such as pipe size, diameter, and thickness. These revisions to the Hazardous Liquid Accident Report will not result in any burden hour increases.

16. Publication of results of data collection.

The results of the accident 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
30 Day FR notice	Responds to Comments and discusses edits to form
Red-lined (tracked changes) Forms/Instructions for Hazardous Liquid Accident Report incl. instructions	This shows the edited forms with tracked changes.