

**Department of Transportation
Office of the Chief Information Officer**

Supporting Statement

Pipeline Integrity Management in High Consequence Areas Gas Transmission Pipeline Operators

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) approval for the renewal of the information collection entitled, ""Pipeline Integrity Management in High Consequence Areas Gas Transmission Pipeline Operators"" OMB Control No. 2137-0610, which is currently due to expire on September 30, 2012.

Part A. Justification.

1. Circumstances that make collection of information necessary.

This information collection request pertains to gas transmission operators that are subject to the Gas Transmission Pipeline Integrity Management requirements detailed in 49 CFR Part 192 Subpart O. The gas transmission integrity management requirements became effective February 14, 2004. The regulation improves pipeline safety through (1) accelerating the integrity assessment of pipelines in high consequence areas, (2) improving integrity management systems within companies, (3) improving the government's role in reviewing the adequacy of integrity programs and plans, and (4) providing increased public assurance in pipeline safety.

The information collection required by gas transmission integrity management requirements is the maintenance of a written integrity management program and records that demonstrate compliance with Subpart O to PHMSA by operators of gas transmission pipelines in high consequence areas. Operators must maintain their integrity management records for the life of the pipeline, and PHMSA or State regulators may review it as a part of inspections. Gas transmission operators are also required to report to PHMSA certain actions related to their integrity management program. This information collection supports the DOT strategic goal of safety by reducing the number of incidents in natural gas transmission pipelines.

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

Federal pipeline safety inspectors and state pipeline safety inspectors participating in the pipeline safety program will use the maintained records to determine compliance with 49 CFR Part 192 Subpart O operators of gas transmission pipelines in high consequence areas

3. Extent of automated information collection.

Operators are permitted to keep integrity management plan records in any retrievable format, including the use of the latest information technology. PHMSA actively encourages the use of electronic technology wherever possible.

4. Efforts to identify duplication.

There is no other similar information available.

5. Efforts to minimize the burden on small businesses.

Smaller operators will have lower costs than the larger operators, as they will likely have fewer pipelines that are located in HCAs.

6. Impact of less frequent collection of information.

If the activities were conducted less frequently, then PHMSA's ability to gather pertinent information on the status of pipelines in HCAs would be reduced, as would PHMSA's ability to properly monitor and ensure safety as directed by Congress in Pipeline Safety Improvement Act of 2002.

7. Special circumstances.

The collection is consistent with all OMB guidelines, except guideline 5 CFR 1320.5(d)(2) (maximum retention 3 years). In the case of integrity testing, testing may take place as infrequently as once every ten years. Since some actions build on previous work, to maintain a complete picture of the integrity management associated with a pipeline, the collected information will need to be retained for the life of that pipeline. Some information may be of confidential in nature, and PHMSA will consider requests for confidentiality from operators on a case-by-case basis.

8. Compliance with 5 CFR 1320.8.

A 60-day Federal Register notice was published on May 9, 2012 (77 FR 27279). PHMSA received no comments on this information collection. A 30-day Federal Register notice for public comment was published on August 2, 2012 (77 FR 46115).

9. Payments or gifts to respondents.

Not applicable.

10. Assurance of confidentiality.

Confidentiality will be considered on a case-by-case basis using the Freedom of Information Act (FOIA) as guidance.

11. Justification for collection of sensitive information.

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

12. Estimate of burden hours for information requested.

PHMSA estimates that 721 gas transmission operators are expected by to submit on-going yearly updates for the plans and comply with associated recordkeeping and notification requirements. Based on its experience monitoring the plans in past years, PHMSA estimates the following hour requirements for the four components of this information collection request:

Plan modification - 233 hours of engineering time and 80 hours for clerical time or 313 hours per operator

Record keeping - 80 hours of clerical time for each operator

Data integration - 1,020 hours (700 hours of engineering time and 320 hours of clerical time)

Semi-annual reporting of performance measures – 8 hours of clerical time each time (the time associated with collecting and maintaining the data is included in the record keeping estimate) or 16 hours per year. **(This reporting is now done on the Gas Transmission Annual Report that is addressed under OMB Control Number 2137-0522 resulting in 721 less responses and 11,536 less hours for this information collection)**

Therefore, a total of $(313+80+1,020+0.42+16) = 1,413$ hours per operator per year.

The total information collection burden on the affected industry is thus $721 \times 1,413 = 1,018,773$ hours.

In addition to the responses specified above, PHMSA estimates approximately 12 additional responses per year. These responses are for reports that at an operator may need to submit when dealing with a special situation relative to their plan. PHMSA estimates an additional 2.8 hours per response which yields an approximate 34 additional hours to the information collection.

Therefore this information collection has estimated total of 733 responses $(721+12)$ with an estimated total 1,018,807 burden hours $(1,018,773+34)$.

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 $\$64.75 \times 1,018,807$ hours = $\$65,967,753.25$.

13. Estimate of total annual costs to respondents.

There is no cost beyond the labor cost cited above.

14. Estimate of cost to the Federal Government.

The costs to the Federal Government associated with this rulemaking is expected to be minimal as the regulations will necessitate little additional enforcement work because PHMSA will redirect some of the focus of its compliance activities rather than add additional inspection time.

15. Explanation of program changes or adjustments.

| | Responses | Estimated Burden Hours |
|--|-----------------------|-------------------------------|
| Currently Approved | 1454 responses | 1,030,343 hours |
| Removal of Bi-annual Reporting (now covered under 2137-0522) | -721 responses | -11,536 hours |
| New Total | 733 responses | 1,018,807 hours |

16. Publication of results of data collection.

This information will not be published for statistical purposes.

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

Not applicable.

18. Exceptions to certification statement.

Not applicable.