

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

**Supporting Statement
“National Pipeline Mapping Program,”
Docket No. PHMSA-2013-0137**

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests Office of Management and Budget (OMB) approval for the renewal of current information collection 2137-0596 entitled “National Pipeline Mapping Program.” The existing authorization to collect mapping information under this OMB Control No. is expiring on February 28, 2014. This is a request for renewal with no change.

Part A. Justification

1. Circumstances that make collection of information necessary.

The Pipeline Safety Improvement Act of 2002 (Pub. L. 107–355), 49 U.S.C. 60132, “National Pipeline Mapping System,” enacted on December 17, 2002, requires, the operator of a pipeline facility (except distribution lines and gathering lines) to provide information to the Pipeline and Hazardous Safety Administration (PHMSA). Each operator is required to submit geospatial data appropriate for use in the National Pipeline Mapping System or data in a format that can be readily converted to geospatial data; the name and address of the person with primary operational control (to be known as its operator), and a means for a member of the public to contact the operator for additional information about the pipeline facilities it operates.

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

The information will be used by State agencies and the Federal government to locate gas and hazardous liquid pipelines in the United States. Accurate knowledge on pipeline location improves the Federal government and States’ ability to enforce pipeline safety regulations and respond to pipeline incidents.

3. Extent of automated information collection.

As of September 30, 2007 pipeline operators may no longer submit paper maps. The data must be submitted electronically to PHMSA via the National Pipeline Mapping System National Repository. PHMSA accepts submissions via several formats that include: ArcInfo, ArcGIS, AutoCAD, Smallworld, or Generic (ASCII). Submissions can be made via the NPMS website, ESRI shapefile, or Microsoft Excel files.

4. Efforts to identify duplication.

There is no duplication, as the information requested is not required by any other source. Each response is unique and information derived from one may not be inferred to another.

5. Efforts to minimize the effects on small business.

PHMSA expects impacted operators to be large and small businesses and therefore the requirement may impact small businesses.¹ In an effort to minimize the burden on small businesses, PHMSA allows for the submission of data in a variety of methods. PHMSA works with any entity, including small businesses, that may have a problem submitting data to help them find the best way to submit the requested information in an acceptable format.

6. Impact of less frequent collection of information.

PHMSA would not be able to appropriately and properly assess the status and related location considerations without the proposed information collection. Less frequent information collection could compromise the safety and economic viability of the U.S. pipeline system.

7. Special circumstances.

No special circumstances apply with this regulation.

8. Compliance with 5 CFR 1320.8.

A notice and request for comments was published in the Federal Register on June 14, 2013 under Docket No. PHMSA-2013-0137 (78 FR 36016) inviting public comment on the renewal of this information collection. PHMSA received one comment on this collection from the Pipeline Safety Trust.

The Pipeline Safety Trust (PST) believes that improvements are needed to the data collected by the NPMS. They point out, "The accuracy of the data is not high enough to adequately assist local communities who are planning or preparing for potential emergencies;" and suggest that PHMSA require, rather than suggest, NPMS data submissions be made annually. The PST also requests that PHMSA require data on pipelines that are in High Consequence Areas (HCAs) to be submitted at a greater degree of accuracy and recommends that PHMSA heed NTSB's (P-11-1) recommendation that pipeline operators share "...system-specific information, including pipe diameter, operating pressure, product transported, and potential impact radius, about their pipeline systems..." through the NPMS system. PST believes that sharing this information would be a good way to make this important data accessible to emergency management and planning professionals in local communities.

¹ Small businesses as defined by the Regulatory Flexibility Act (P.L. 96-354)

A separate notice requesting comments was published in the Federal Register on September 18, 2013 (78 FR 57455). In response to this notice, PHMSA received two comments by way of docket submission. The Pipeline Safety Trust (PST) reiterated their request for PHMSA to strengthen the requirements for data submission to the NPMS. Amongst other things, the PST asked that PHMSA “require rather than suggest the NPMS information collection be updated annually by pipeline companies, as clearly authorized in 49 USC 60132(b).” The PST also, in accordance with the 2011 Pipeline Safety and Job Creation Act, to “issue guidance to owners and operators of pipeline facilities on the importance of providing system-specific information about their pipeline facilities to emergency response agencies of the communities and jurisdictions in which these facilities are located.”

PHMSA also received a joint comment from the American Petroleum Institute (API) and the Association of Oil Pipelines (AOPL) which states: “.API and AOPL do not oppose PHMSA’s renewal of its information collection, which states that operators of pipeline facilities (except distribution lines and gathering lines) must provide PHMSA contact information and geospatial data on their pipeline system and provide updates on an annual basis. However, certain suggestions by the Pipeline Safety Trust (“PST”) in response to this request for renewal raise concerns.” API/AOPL further expressed concerns about security-sensitive information being released to the public and the belief that the information requested by the PST exceeds the scope of the NPMS data collection

In the interest of public safety, PHMSA has strongly considered the comments made by the PST during the 60 day comment period. In response, PHMSA plans to address those concerns in an upcoming revision to the National Pipeline Mapping System (NPMS) information collection. A notice announcing and requesting comments on the proposed revision is scheduled to be published in the Federal Register during the winter of 2013-2014. PHMSA acknowledges the additional comments received during the 30 day comment period and thereby encourages members of the public and industry groups to voice their concerns regarding the upcoming NPMS revision during the planned notice and comment period.

9. Payments or gifts to respondents.

The disbursement of payment and gifts is not applicable to this information collection.

10. Assurance of confidentiality.

PHMSA has an internal security policy to protect information deemed sensitive. The detailed information collected is only shared within state, local, and federal government and not with the public.

11. Justification for collection of sensitive information.

It is essential for PHMSA to know where pipelines are located in order to accurately respond to emergencies and safety issues concerning pipelines. This information is shared only within specified government entities and is not made available to the public.

12. Estimate of burden hours for information requested.

PHMSA estimates that this information collection affects a community of 894 operators who are currently submitting mapping information. Each operator submits one update annually.

Number of Annual Burden Hours: 16,312.

The number of annual burden hours was calculated as follows:

The national Pipeline mapping system indicates that there are 420,117 pipeline miles in the US.

We estimate that operators take approximately 2 minutes to update PHMSA regarding each mile of pipeline.

The total hours for all updates would be $420,117 \text{ miles} \times \text{approximately } 2 \text{ minutes} = 840,234 \text{ minutes} / 60 \text{ minutes per hour} = 16,312 \text{ hours}$.

An engineering manager is estimated to perform the update at an average pay rate of \$64.75 per hour. The total cost for the information collection is estimated to be \$1,056,202 ($= 16,312 \text{ hours} \times \64.75).

13. Estimate of total annual costs to respondents.

PHMSA does not anticipate any costs other than those detailed in question number 12.

14. Estimate of cost to the Federal Government.

PHMSA does not anticipate additional costs in regard to its review of the map updates submitted as a result of this information collection.

15. Explanation of program changes or adjustments.

PHMSA is not making any changes or adjustments to this information collection.

16. Publication of results of data collection.

While there is no publication of the detailed information collected, PHMSA aims to make the public aware of existing pipelines within their communities. In an effort to meet the public's "right to know" PHMSA opened the online pipeline map data to the public in October, 2007. This information may be viewed by the public at

<https://www.npms.phmsa.dot.gov/PublicViewer/>. As a security precaution there are access restrictions to the website including limiting user ability to “zoom-in” and restricting viewers to a single county per log-in session.

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

PHMSA is not requesting approval to not display the OMB approval expiration date.

18. Exceptions to certification statement.

There are no exceptions to the certification statement.