

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

Testing, Inspection and Marking Requirements for Cylinders
OMB Control No. 2137-0022

(Expiration Date: April 30, 2015)

Introduction:

This is to request the Office of Management and Budget's (OMB) renewed three-year approved clearance for the information collection entitled, "Testing, Inspection and Marking Requirements for Cylinders," under OMB Control No. 2137-0022, which is currently due to expire on April 30, 2015. These specific information collection and recordkeeping requirements pertain to manufacturers, re-qualifiers and repairers, and for the marking of cylinders by re-qualifiers and re-certifiers. This OMB control number was initiated on July 29, 1981 and was preceded by a cylinder rulemaking on January 29, 1981 [46 FR 9880], entitled "Intermodal Portable Tanks" under Docket Number HM-167. That rulemaking required an owner or manufacturer of an Intermodal (IM) portable tank to apply to the Department for an approval.

Part A. Justification.

1. Circumstances that make collection of information necessary.

This is a request for an extension without change of an existing information collection under OMB Control No. 2137-0022 for information collection and recordkeeping requirements pertaining to manufacturers, re-qualifiers and repairers, and for the marking of cylinders by re-qualifiers and re-certifiers. This information is used to verify that cylinders meet required manufacturing standards prior to being authorized for initial use, and once manufactured, that the cylinders are maintained and used in compliance with applicable requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as safe packagings for hazardous materials. The HMR are promulgated in accordance with U.S.C. 5110, the Federal hazardous materials transportation law. This information collection supports the Departmental Strategic Goal for Safety.

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

Requirements in § 180.201 of the HMR for qualification, maintenance and use of cylinders specify that cylinders be periodically inspected and retested to ensure continuing compliance with packaging standards. Information collection requirements address registration of retesters and marking of cylinders by retesters with their identification number and retest date following the completion of tests. Records showing the results of inspections and retests must be retained by the cylinder owner or designated agent until the expiration of the retest period or until the cylinder is reinspected or retested, whichever occurs first. These requirements are intended to

ensure that retesters possess the qualifications necessary to perform tests and to identify to cylinder fillers and users that cylinders are qualified for continued use.

The various information collection and recordkeeping requirements, purpose and use include, but are not limited to the following:

Legibility of Cylinder Markings: Each required marking on a cylinder must be maintained so that it is legible. Retest markings and original markings which are becoming illegible may be reproduced by stamping on a metal plate which must be permanently secured to the cylinder.

MANUFACTURE OF CYLINDERS - PART 178

Specification Marking: The packaging identification markings required by Part 178 of the HMR include, where applicable, the name and address or symbol of the packaging manufacturer or approval agency.

Except for marked service pressure, markings required on cylinders may not be altered or removed. The marked service pressure may be changed through application to the Pipeline and Hazardous Materials Safety Administration (PHMSA) and receipt of written instructions applicable to the procedure to be followed, §§ 178.2 and 178.3. Each packaging represented as manufactured to a Department of Transportation (DOT) specification or a United Nations (UN) standard must be marked with specification markings conforming to the applicable specifications. The marking certifies that all requirements of the DOT specification or UN standard, including performance tests, have been met and that all functions performed by, or on behalf of, the person whose name or symbol appears as part of the marking conform to the specified requirements. A packaging not conforming to the applicable specifications or standards may not be marked.

Notification: Except as specifically provided in §§ 178.337-18 and 178.345-10 of Part 178, the manufacturer or other person certifying compliance with the requirements of Part 178, and each subsequent distributor of that packaging shall:

Notify in writing each person to whom that packaging is transferred;

- (a) All requirements not met at the time of transfer;
- (b) Type and dimensions of any closures, including gaskets, needed to satisfy performance test requirements; and
- (c) Retain copies of each written notification for at least one year from date of issuance, and make copies of all written notifications available for inspection.

The following section in Part 178 requires that cylinders be marked:

§ 178.35(f).

Inspectors' Report Retention: An inspector determines that all materials are in compliance with the specification requirements in Part 178 for that specific cylinder. After completion of the

inspection, an inspector must determine that each cylinder is marked in compliance with the specification and furnish complete test reports to the maker of the cylinder, and upon request, to the purchaser. The inspector's report must be retained by the inspector and the manufacturer for 15 years from the original test date or the authorized service life of the cylinder.

The following sections in Part 178 require inspectors and manufacturers to comply with the statement above:

§§ 178.35(g) and (h), 178.44(s), 178.45(n), 178.46(m), 178.47(p), 178.57(q), 178.59(n), 178.60(r), 178.61(p), and 178.68(n).

REQUALIFICATION OF CYLINDERS (§ 180.205)

No person may represent that a DOT specification cylinder has been retested under this section, by marking the cylinder with a test date or by any other means unless that person holds a current retester's identification number issued by PHMSA. Each required marking on a cylinder must be maintained so that it is legible. Original and retest markings which are becoming illegible may be reproduced by stamping on a metal plate which must be permanently secured to the cylinder.

No cylinder required to be retested may be used for the transportation of a hazardous material unless it has been retested successfully and the retester has marked the cylinder by stamping the cylinder retester identification number and date of retest plainly and permanently into the metal of the cylinder or on a metal plate which must be permanently secured to the cylinder.

Retester Application: Any person seeking approval as a cylinder retester shall apply to an independent inspection agency, approved by PHMSA pursuant to § 107.803, for inspection of its retest facility. The applicant shall bear the cost of the inspection. A list of approved independent inspection agencies is available from the Associate Administrator for Hazardous Materials Safety, Approvals and Permits (PHH-32), Pipeline and Hazardous Materials Administration, U.S. Department of Transportation, Washington, DC 20590-0001.

- (a) After the inspection, the person seeking approval must submit a letter of recommendation and inspection report from the independent inspection agency and a completed approval application to the Associate Administrator.
- (b) The Association Administrator reviews the application, the inspection report and recommendation submitted by the independent inspection agency, and other available information. The Associate Administrator issues a Retester Identification Number (RIN) if it finds that the applicant's facility and qualifications are adequate to properly inspect, test, and mark cylinders under this section. Unless otherwise provided in the RIN issuance letter, a RIN expires five years from the date of issuance.

The retester shall apply for RIN renewal in a timely manner. An inspection report and a recommendation of an independent inspection agency are required for renewal. Under 107.705(c), if the Associate Administrator receives a renewal application at least 60 days before expiration of the RIN, the RIN will remain in effect until the Associate Administrator issues the renewal or notifies the retester that the RIN will not be reissued.

A current RIN remains valid provided the retester's facility and qualifications are maintained at or above the level observed at the time of inspection by the independent inspection agency. The RIN holder shall report in writing any change in name, address, ownership or management of the holder; personnel performing any function under this section; or testing equipment to the Associate Administrator for Hazardous Materials Safety, Approvals and Permits Division (PHH-32), Pipeline and Hazardous Materials Administration, U.S. Department of Transportation, Washington, DC 20590-0001 within 20 days of the change.

Recordkeeping: A retester shall maintain at each location at which it inspects, retests, or marks cylinders under this section, current copies of:

- (a) Those portions of the HMR that apply to its cylinder inspection, retesting and marking activities at that location.
- (b) All exemptions governing exemption cylinders inspected, retested, or marked by the retester at that location.
- (c) Each Compressed Gas Association (CGA) publication incorporated by reference in § 171.7 of the HMR that applies to the retester's cylinder inspection, retesting and marking activities that location.

The following records must be maintained on paper or in a form from which a paper copy can be produced upon request.

- (a) Records of authority to inspect, retest, and mark must be maintained, as follows:
 - (1) Current RIN issuance letter;
 - (2) If the RIN has expired and renewal is pending, a copy of the renewal application;
 - (3) Copies of notifications to PHMSA of retest personnel and equipment changes; and
 - (4) Daily records of visual inspection and hydrostatic retest must be maintained in chronological order for five years. These records must include:

For each test to demonstrate calibration, the date; serial number of the calibrated cylinder; calibration test pressure; total, elastic and permanent expansions; and legible identification of retest operator must be indicated. Calibrations must be recorded on the same sheets as, and in chronological order with, retest records for that date.

- (b) For each cylinder retested or visually inspected, records containing the date; serial number; DOT specification or exemption number; service pressure; dimensions; manufacturer (name or symbol); owner; result of visual inspection; test pressure; total, elastic and permanent expansions; percent permanent expansion; disposition, with reason for retest, rejection or condemnation; and legible identification of test operator are required. For each cylinder marked pursuant to § 173.302a(b)(5), the retest sheet must indicate the method by which average and maximum wall stresses were computed. Records must be kept for all completed retests, as well as unsuccessful retests. The entry for a later retest when performed after a cylinder fails to hold test pressure, or retest of a

cylinder re-qualified after rejection, must indicate the date of the earlier inspection or retest; and

- (c) Calculations of average and maximum wall stress pursuant to § 173.302a(b)(3), if performed.
- (d) The most recent certificate of calibration must be maintained for each calibrated cylinder used by the retester.

Cylinders made in compliance with certain specifications in the table in § 180.209(g) and used exclusively in the service indicated may, in lieu of the periodic hydrostatic retest, be given a complete external visual inspection at the time such periodic retest becomes due. External visual inspection as described in the applicable CGA Pamphlet will, in addition to the following requirements, meet the requirements for visual inspection.

When this inspection is used in lieu of hydrostatic retesting, subsequent inspections are required. Inspections will be made only by competent persons and results will be recorded on a suitable data sheet, the completed copies to be kept by the owner or his authorized agent until either expiration of the retest period or until the cylinder is again re-inspected or retested, whichever occurs first.

The points to be recorded and checked on these data sheets are: date of inspection (month and year; DOT specification number; cylinders identification (registered symbol and serial number; cylinders identification (registered symbol and serial number, date of manufacture, and ownership symbol (if needed for adequate identification); type cylinder protective coating (painted, etc., and statement as to need of refinishing or recoating); conditions checked (leakage, corrosion, gouges, dents or digs in shell or heads, broken or damaged footing or protective ring or fire damage); disposition of cylinders (returned to service, to cylinder manufacturer for repairs or scrapped); a cylinder which passes the inspection prescribed shall have the date recorded in the manner presently prescribed for the recording of the retest date, except that an "E" is to follow the date (month and year) indicating re-qualification by the external inspection method.

Cylinder markings: Each cylinder passing retest must be marked with the cylinder retester's identification number set in a square pattern, between the month and year of the retest date in characters not less than 1/8" high with the first character occupying the upper left corner of the square pattern. The second character must in the upper right, the third in the lower right and the fourth in the lower left. For example, a cylinder retested May 1984 and approved by a retester who has been issued identification number A123 would be stamped:

	A	1	
5			84
	3	2	

Variations from the marking requirements may be permitted upon written request to, and approval from, PHMSA. Stamping must be in accordance with the location requirements of the cylinder specification. Date of previous tests must not be obliterated. Cylinders which are

subject to the modified hydrostatic test only are not required to be marked with a retester's identification number.

Most cylinders must be subjected, at least once in five years, to a test by hydrostatic pressure in a water jacket for the determination of the expansion of the cylinder. A cylinder must be condemned if the elastic expansion exceeds the marked rejection elastic expansion.

A particular cylinder (DOT-3HT) must be condemned if there is any evidence of any denting or bulging. A cylinder must be condemned at the termination of a 24-year period following the date of the original test or after 4,380 pressurizations, whichever occurs first. If a cylinder is recharged more than an average of once every other day, an accurate record of the number of rechargings must be maintained by its owner, or his agent. Retest dates shall be applied by low stress type steel stamping to a depth no greater than that of the original marking at the time of manufacture.

Condemned markings: A cylinder that is condemned may not be filled with hazardous material for transportation in commerce where use of a specification packaging is required and may not be marked as meeting the requirements of the HMR or any DOT exemption. When a cylinder is required to be condemned, the retester must stamp a series of X's over the DOT specification number and marked service pressure, must stamp "**CONDEMNED**" on the shoulder, top head, or neck using a steel stamp and must notify the cylinder owner, in writing, that the cylinder is condemned and may not be filled with hazardous material for transportation in commerce where use of a specification packaging is required. Alternatively, at the direction of the owner, the retester may render the cylinder incapable of holding pressure. No person may remove or obliterate the "**CONDEMNED**" marking.

A cylinder made in compliance with DOT-3A specification or 3AA, not exceeding 125 pounds water capacity, currently in compliance with listed requirements and stamped with a five pointed star at least one-fourth of an inch high following the test date. If at any time a cylinder marked with the star is used other than as specified, the star following the most recent test date is obliterated and subsequent tests are made every 5 years.

A cylinder that previously contained a commodity classified as a "Class 8" must not be used for the transportation of any compressed gas unless the listed requirements are complied with. In addition to records showing the result of re-inspection and retest being kept by the owner or his authorized agent until either expiration of the retest period or until the cylinder is again re-inspected or retested, whichever occurs first, the record of the inspection and test shall include the date (month and year) of the inspection and test; the cylinder identification (including ICC or DOT specification number, registered symbol, serial number, date of manufacture, and ownership symbol); the conditions checked (leakage, corrosion, gouges, dents, or digs in shell heads, broken or damaged footings, or fire damage) and the disposition on the cylinder (returned to service, returned to the manufacturer for repairs, or scrapped).

An acetylene cylinder must be re-qualified by a person who holds a valid retester's identification number. Each cylinder successfully passing a shell or filler re-qualification must be marked with the retester's identification number. In addition, the cylinder must be appropriately marked to

identify the type of re-qualification performed in accordance with paragraph 4.8 of CGA Pamphlet C-13. For example, the letter "S" shall be used for a shell re-qualification and the letter "F" for a porous filler re-qualification.

Fire extinguishers in compliance with § 173.309 are authorized to be retested in accordance with § 180.209(g) if using the modified hydrostatic test method. The cylinder must be marked with the date of the rests (month and year) followed by the letter "S."

Reheat treatment: Previous to the reheat treatment procedure, each cylinder must be subjected to a careful internal and external inspection. The cylinders must be segregated for reheat treatment in lots of 100 or less cylinders of the same general size having practically the same chemical composition. The reheat treatment must be carried out, supervised, and reported as prescribed for the heat treatment in the specification in Part 178 covering the manufacture of the cylinder in question. Data from the original reports of manufacture of the cylinders must be available.

The reheat treatment must be followed by hydrostatic retest, such retest to be carried out, supervised, and reported and prescribed for the hydrostatic test (as discussed above) in the specification covering the manufacture of the cylinder in question. Repair by welding or brazing of specification DOT 3A, 3AA, 3B, 3C cylinders, but only for the removal and replacement of neckrings and footrings attached to cylinders originally manufactured to conform to §§ 178.36(e), 178.37(e), 178.38(e). Replacement must be followed by reheat treating, testing, inspection, and supervised and reported as prescribed by the specification covering their original manufacture.

Repaired and rebuilt cylinders: Inspectors' reports must conform to that required by the specification covering original manufacture with the word "repaired" substituted for "manufactured." Original markings must be shown and new additional markings and the statement added: "Cylinders were carefully inspected for defects after removal of neckrings and after replacement when replacement was made by process of welding-brazing)" are required.

Rebuilt DOT 4 and DOT 8 welded or brazed cylinders - Such rebuilding must be done by a manufacturer of these types of cylinders or a repair facility approved by PHMSA, and by a process similar to that used in its original manufacture and under the following specific requirements:

- (1) The replacement of a pressure part such as wall, heads, or bottoms of cylinders or the replacement of the porous filling material shall be considered rebuilding;
- (2) Rebuilt cylinders shall be considered as new cylinders and conform to all requirements of the specifications applying, including verification of material, examination, inspection, etc., and the rendering of the proper reports to the purchaser, cylinder rebuilder, and PHMSA. The report must show that cylinders were rebuilt; and
- (3) Information in sufficient detail regarding previous serial numbers and identification symbols must be filed with PHMSA.

The current requalification functions include a visual inspection and a volumetric expansion test. Pressure tests, repairs, and rebuilding approval are existing requirements.

3. Extent of automated information collection.

The information required is particular and unique. Industry may use any type of technology to meet information collection and recordkeeping requirements as long as it is retrievable when requested. PHMSA encourages the use of automated technology to reduce burden.

The Government Paperwork Elimination Act directs agencies to allow the option of electronic filing and recordkeeping by October 2003, when practicable. Electronic filing and recordkeeping for tests for manufacture and inspection of cylinders is authorized; however, we do not require these records to be submitted to us, so this is not applicable.

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 source may not be obtained from another.

5. Efforts to minimize the burden on small businesses.

Because this information is unique, similar information is unavailable. However, the collection of this information is reviewed periodically to ensure that the requirements involving safety in the transportation of hazardous materials are kept to the necessary standards to protect all involved.

6. Impact of less frequent collection of information.

Due to the hazards involved in transporting cylinders, if collection of information or recordkeeping were required less frequently, the hazards to the public safety would increase due to the probability of incidents occurring during transportation.

7. Special circumstances.

This collection of information is generally conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2) with the following qualifications:

- a. Length of time between tests and inspections and results of prior tests that must be kept until the next re-qualification.
- b. Tests that must be made every time a cylinder is recharged or when there is evidence of damage or corrosion and records maintained of re-qualification results.
- c. Tests that must be made after repairs to verify integrity of repaired cylinders and records maintained to verify repairs.

8. Compliance with 5 CFR 1320.8.

We published a 60-Day Notice and Request for comments under Docket No. PHMSA-2014-0136 (Notice No. 14-13) on November 24, 2014 in the Federal Register [79 FR 69990]. The comment period closed on January 22, 2015. No comments pertaining to this information collection were received.

We published a 30-Day Notice and Request for comments under Docket No. PHMSA-2014-0136 (Notice 15-5) on February 13, 2015 in the Federal Register [80 FR 8133]. The comment period closed on March 13, 2015. No comments pertaining to this information collection were received.

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.

Not applicable. Information is not of a sensitive nature.

12. Estimate of burden hours for information requested.

Estimate of total annual burden: 171,462 (66,667 + 417 + 792 + 180 + 1,666 + 360 + 30 + 100,000 + 100 + 1,250)

1) Cylinder Requalification

- § 180.205(f)(4) Testing required for sustained load cracking
- § 180.209 Requirements for requalification of specification cylinders

Approximately 800 persons and 4,000,000 cylinders will be affected by the requirements pertaining to this information collection each year (once every 5 years) at the time of requalification. It will take approximately 5 minutes to perform an external inspection on aluminum cylinders manufactured of 6351-T6 aluminum alloy.

4,000,000 cylinders x 5 minutes = 20,000,000 minutes, divided by 60/ hour = 333,333 hours, divided by 5 years = 66,667 hours.

The total information collection from this burden is 66,667 hours.

2) Requalification Markings for Cylinders required under § 180.213

- § 180.213 Requalification markings

Cylinder requalification: 2,000,000 cylinders requalified annually by 1,975 respondents with each cylinder taking approximately 0.75 seconds to stamp identification number and requalification date.

2,000,000 cylinders x 0.75 seconds = 1,500,000 seconds, divided by 60 seconds / minute = 25,000 minutes, divided by 60 minutes / hour = 417 hours.

The annual information collection from this burden is 417 hours.

3) Approval of Cylinder Pressure Requalifiers

- § 107.805 Approval of cylinder and pressure receptacle requalifiers:
- § 107.805(c) application for approval

An average of 66 applications for a cylinder identification number are received each month for an annual total of 792 applications. Each application will take approximately one hour.

66 applications / month x 12 months x 1 hour / application = 792.

The annual information collection burden for this activity is 792 hours.

4) Approval of Rebuilding Facilities

- § 107.805 Approval of cylinder and pressure receptacle requalifiers
- § 180.211 Repair, rebuilding, and reheat treatment of DOT-4 series specification cylinders
- § 180.215(c) Repair, rebuilding or reheat treatment records

An average of two requests for approval of rebuilding facilities are received annually. These requests will take an average of 10 hours each to complete. Recordkeeping for each request will take approximately 80 hours for cylinder rebuilding facilities.

(2 requests / year x 10 hours / request) + (2 requests / year x 80 hours / request) =
20 + 160 = 180 hours.

The total information collection burden for this activity is 180 hours.

5) **Requalification for Cylinders containing corrosive liquids**

- § 180.205(e) Cylinders containing class 8 (corrosive) liquids requalification requirements as prescribed;
- § 180.205(f) Visual inspection;
- § 180.205 General requirements for requalification of specification cylinders;
- § 180.213 Requalification marking; Decontaminated to remove all residue of class 8

Approximately 500 cylinder owners will each annually requalify an average of 10 cylinders that contained corrosive liquid. This is an annual total of 5,000 cylinders. Each cylinder will take approximately 20 minutes to requalify, inspect, and record test results.

$500 \text{ owners} \times 10 \text{ cylinders} = 5,000 \text{ cylinders} \times 20 \text{ minutes} / \text{cylinder} = 100,000 \text{ minutes}$, divided by 60 minutes / hour = 1,666 hours.

The annual information collection burden for this activity is 1,666 hours.

6) **Aircraft Cylinder Recharge**

The average burden for maintaining an accurate record of the number of cylinders recharged more than once every other day is 360 hours. This is arrived at as follows: 100 user-owners, airlines and private aircraft operators will recharge these cylinders an average of 108 times per year. It will take approximately two minutes to note this on a log.

$100 \text{ owners} \times 108 \text{ recharges} = 10,800 \times 2 \text{ minutes} = 21,600 \text{ minutes}$, divided by 60 minutes / hour = 360 hours.

The total annual information collection burden and recordkeeping burden of cylinders recharged more than once every other day is 360 hours.

7) **Marked Service Pressure**

- § 180.205(c)(3) Marked service pressure may be changed upon approval of the Associate Administrator
- § 107.705 Registrations, reports, and applications for approval

An average of 10 requests to change marked service pressure is received annually. The request takes approximately three hours to complete.

$10 \text{ requests} \times 3 \text{ hours} / \text{request} = 30 \text{ hours}$.

The annual information collection burden for this activity is 30 hours.

8) **General hydrostatic and visual inspections**

- § 180.205(f) visual inspection
- § 180.205(g) pressure test
- § 180.215 reporting and record retention requirements

The general hydrostatic retest and visual inspection requirements for all cylinders and related recordkeeping requirements will involve retesting or inspecting approximately 2,000,000 cylinders annually with records maintained by approximately 100,000 cylinder owners. These recordkeeping requirements will take approximately 3.0 minutes based on the following:

Internal visual inspection	40 seconds
Pressurization	20 seconds
External visual inspection and holding time	60 seconds
Pressure release	30 seconds
Checking data sheet	<u>30 seconds</u>

180 seconds or 3.0 minutes

2,000,000 cylinders x 3.0 minutes, divided by 60 minutes / hour = 100,000 burden hours.

The total annual information collection and recordkeeping burden for this activity is 100,000 hours.

9) Cylinders being welded or brazed

- § 180.215 Reporting and record retention requirements
- § 180.215(c) Repair, rebuilding, or reheat treatment records

Approximately 300 cylinders will be repaired by welding or brazing annually. Each report, due to welding or brazing time will take approximately 20 minutes to prepare.

300 cylinders x 20 minutes / cylinder = 6,000 minutes, divided by 60 minutes / hour = 100 hours.

The annual recordkeeping burden for this activity is 100 hours.

10) Retesting of acetylene cylinders

- § 178.59 Specification 8 steel cylinders with porous fillings for acetylene
- § 178.59(h) Hydrostatic test
- § 178.59(i) Leakage test
- § 178.59(j) Physical test
- § 178.60 Specification of 8AL steel cylinders
- § 178.60(j) Hydrostatic test
- § 178.60(k) Leakage test
- § 178.60(l) Physical test
- § 178.60(m) Elongation

- § 178.60(n) Weld tests
- § 178.60(l) Tensile test

Approximately 100 processors of acetylene will each test approximately 500 cylinders annually for an annual total of 50,000 cylinders tested. Each test will take approximately 1.5 minutes.

$100 \text{ processors} \times 500 \text{ cylinders} = 50,000 \text{ cylinders} \times 1.5 \text{ minutes} / \text{cylinder} = 75,000 \text{ minutes}$,
divided by 60 / hour = 1,250.

The annual recordkeeping burden for this activity is 1,250 hours.

13. Estimate of total annual costs to respondents.

There is no cost burden to respondents except those identified in item 12 above.

14. Estimate of cost to the Federal government.

One clerical employee spending approximately 500 hours annually on each request (typing, filing, mailing, etc.) at a cost of \$10.23 per hour.

$500 \text{ hours} \times \$10.23 = \text{total clerical cost of } \$5,115.$

Contractor to input data received on volumetric expansion tests, requalification applications, generate letters, forms, etc., are approximately \$35,000 annually.

Total cost to the federal government= $\$5,115 + \$35,000 = \underline{\$40,115}.$

15. Explanation of program changes or adjustments.

There is no change in burden hours.

16. Publication of results of data collection.

There is no publication for statistical use and no statistical techniques are involved.

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

Approved OMB number 2137-0022 is prominently displayed in the text of 49 CFR 171.6 of the HMR.

18. Exceptions to certification statement.

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