

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
Docket No. PHMSA-2015-0004

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for a revision of an 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 July 31, 2015.

This information collection is being revised to clarify the instructions regarding how to submit information requested on the PHMSA F 7000-1 ACCIDENT REPORT – HAZARDOUS LIQUID PIPELINE SYSTEMS form. Revisions to the form’s instructions pertain to the reporting of information requested under Part A, Questions 9 and 11.

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. This 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 hazardous liquid pipeline infrastructure, understand

emerging safety related trends, and identify opportunities for improving the regulatory system for hazardous liquid pipelines.

3. Extent of automated information collection.

PHMSA Form 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 90 percent of data collection and reporting to be completed electronically.

4. Efforts to identify duplication.

There is no duplication, as the information collected 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 overall 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 circumstances 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.

PHMSA published a notice in the Federal Register on February 4, 2015 [80 FR 617] requesting comments on PHMSA's intent to request a revision of this information collection. The comment period ended on April 6, 2015. PHMSA received no comments on this collection.

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.

PHMSA does not have the authority to guarantee confidentiality.

11. Justification for collection of sensitive information.

The reporting and 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:

52,429 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/4,000 hours

PHMSA estimates that 400 accident reports (responses) are submitted each year. PHMSA estimates that all reports (400) will take approximately 10 hours to file. This results in a burden hour estimate of 4,000 hours (400 responses * (10)

“Incorporation by Reference of Industry Standard on Leak Detection” (50 responses/100 hours)

PHMSA estimates that there are 50 operators in the U.S. using CPM systems. Each of these respondents will make one submission per year for an annual total of 50 responses.

It takes approximately 2 hours of an engineer’s time to record and prepare the test results for an industry total of 100 hours (50 x 2 hours = 100 hours). This requirement accounts for 50 respondents and 100 burden hours of the overall burden to this information collection.

The resulting total is
 [Telephonic plan (2,682 hours) + Accident Reporting (4,000 hours) + Leak Detection (100 hour) +Recordkeeping (48,647)]

The overall average burden hour estimate for HL operators is 156.5 hours (52,429 hours /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 \$64 x 52,429 hours = \$3,355,456.00.

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 is revising this information collection only to clarify the instructions for the form PHMSA F 7000-1 ACCIDENT REPORT – HAZARDOUS LIQUID PIPELINE SYSTEMS (Hazardous Liquid Accident Report. The revisions are meant to clarify two areas addressed under the “Part A General Report Information” area of the instructions. Background for these topics is as follows:

Part A, Question 9 - “volume of commodity released unintentionally” clarification:

The instructions for Part A, Question 9 detail how to report the amount of material unintentionally released from the pipeline as a result of the accident. PHMSA is simplifying the instructions relating to the removal of material from the pipeline and clarifying the instructions pertaining to the reporting of products consumed by fire.

One of the proposed revisions simplifies the instructions by removing discussion of product removed from the pipeline system at locations remote from the failure site. During accident response, pipeline operators often remove product at locations remote from the failure site. These controlled product movements are from within the pipeline system and irrelevant to the category. The “volume of commodity released unintentionally” only applies to the product released from the pipeline system at the failure site.

PHMSA also proposes to revise the instructions for including product consumed by fire in the spill volume. PHMSA proposes to revise this provision to specify that the product consumed by fire inside a tank should not be included in the category of “volume released unintentionally.” If product is consumed under any other circumstances, the volume consumed by fire is included in volume released.

PHMSA is proposing these revisions to ensure that volumes appropriate for analysis of safety performance trends are reported by pipeline operators. These proposed revisions to the instructions will not increase the hourly burden estimate for this information collection.

Part A, Question 11, “volume of commodity recovered” clarification:

The instructions for Part A, Question 11 detail how to report the amount of product recovered after the accident. PHMSA is simplifying the instructions relating to the recovery of product by removing the discussion of product removed from the pipeline system at locations remote from the failure site. These controlled product movements are from within the pipeline system and irrelevant to the “volume of commodity recovered” category for the same reasons given in the above discussion on Question 9. This proposed revision to the instructions will not increase the hourly burden estimate for this information collection.

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.