

Department of Transportation  
Office of the Chief Information Officer

Supporting Statement

Qualification of Pipeline Safety Training Reporting  
OMB Control No. 2137-0600  
Docket No. PHMSA-2013-0163

**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 “Qualification of Pipeline Safety Training Reporting” (OMB Control No. 2137-0600). The current expiration date for this information collection is July 31, 2018. The amendment of this information collection is necessary due to the following PHMSA action that will affect the current collection of information:

- Docket No. PHMSA-2013-0163 - Pipeline Safety: Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Proposed Changes
  - Adds 16,008 responses and 42,668 annual burden hours for recordkeeping.

**Part A. Justification.**

1. Circumstances that make collection of information necessary.

As specified in the Accountable Pipeline Safety and Partnership Act of 1996 (Pub. L. No. 104-34), Congress amended its statute of 1992 to require, “All individuals who operate and maintain pipeline facilities shall be qualified to operate and maintain the pipeline facilities.” PHMSA’s regulations 49 CFR Part 192 Subpart N and 49 CFR Part 195 Subpart G are applicable to natural gas operators and hazardous liquid operators under its jurisdiction respectively.

This information collection request supports DOT’s safety performance goal of reducing total incidents for gas and hazardous liquid pipelines which directly supports the DOT’s safety strategic objective of enhancing public health and safety by working toward the elimination of transportation-related deaths and injuries.

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

This information collection requirement is necessary to ensure pipeline personnel have the necessary qualifications to competently perform operation, and maintenance functions. The intended effect of the information collection requirements is to improve pipeline safety by assuring the competency of pipeline personnel through qualification.

Federal and state pipeline safety inspectors participating in the pipeline safety program may use this information to ascertain compliance with the regulations.

3. Extent of automated information collection.

Operators are permitted to keep records in any retrievable form. They may use the latest information technology to reduce any additional burden.

4. Efforts to identify duplication.

The recordkeeping requirements will not duplicate any other recordkeeping requirements for pipeline operators.

5. Efforts to minimize the burden on small businesses.

All operators will also be permitted to use individuals who do not meet qualification standards to perform covered functions when accompanied and directed by a qualified persons. For some small gas distribution systems, this allowance may mean only one person is required to be qualified.

6. Impact of less frequent collection of information.

The frequency of the collection of information is one time for the identification of covered functions. This information could not be collected less frequently.

The qualification program needs to be developed only once, however it does require periodic updates to ensure compliance with current company procedures.

Other exceptions include: (1) review of the emergency response training every 15 months, and (2) changes in technology and procedures requiring qualification on an occasional basis. In addition, an incident involving an employee's lack of training may also result in requalification training.

7. Special circumstances.

The collection is consistent with all OMB guidelines, except guideline 5 CFR 1320.6(f) (maximum retention 3 years). Section 192.807 requires operators to maintain records which verify personnel requiring qualification have been qualified. Operators will be required to maintain these records at least five years after the person ceases to be employed by the operator. It is essential these records be maintained for this period of time in order to review records of personnel involved in an emergency condition, incident or accident, abnormal operating condition, or violation of a pipeline's operating procedures. Maintenance of the records will also allow operators to evaluate the effectiveness of qualification programs.

8. Compliance with 5 CFR 1320.8.

PHMSA issued a Notice of Proposed Rulemaking (NPRM) on July 10, 2015 (80 FR 39916). The comment period ends on September 8, 2015.

9. Payments or gifts to respondents.

There is no remuneration provided.

10. Assurance of confidentiality.

The information collection requirements do not include any matters considered private or sensitive.

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.

Currently there are 175,000 covered employees including both contract employees (75,000) and operator personnel (100,000). The burden hour for training (including transitional evaluation and recordkeeping) is estimated at approximately .25 hours per employee. The total industry burden hour estimate for subsequent evaluation is approximately 43,750 hours (175,000 X .25 hours). However, not all covered employees are trained every year. There is an approximate 6-year training cycle for the impacted personnel. Therefore, the currently approved annual burden for this information collection is approximately 7,292 hours (43,750 hours divided by 6 years).

As a result of the changes proposed in this NPRM, PHMSA estimates a total of 16,008 new employees will be subject to participate in an OQ plan either as a result of new gathering line requirements or because of newly covered tasks. Participation in an OQ plan necessitates the retention of records associated with those plans. This proposal will require those newly covered employees to keep records according those required for Operator Qualifications. Each of these 16,008 newly covered employees will be allotted .25 hours recordkeeping purposes according to the existing information collection. : **As a result of the proposed changes this NPRM adds 16,008 responses and 667 annual burden hours** (16,008 responses x .25 hours = 4,002/6 years) to the existing information collection burden.

Given the recordkeeping requirements in this information collection:

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

- (1) Identification of qualified individual(s);
- (2) Identification of the covered tasks the individual is qualified to perform;
- (3) Date(s) of current qualification; and
- (4) Qualification method(s).

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

**The new annual burden hour requested for this information collection is approximately 31,835 responses and 7,959 annual burden hours.**

13. Estimate of total annual costs to respondents.

The incremental cost of establishing an operator qualification program is estimated to be \$1,200 per employee for 191,008 employees (175,000 previously covered employees + the 16,008 newly covered employees affected by the proposals in the NPRM). This results in a total industry cost estimated at \$229.3 million (191,008 employees \* \$1,200 = \$229.3 million). There are no additional costs beyond the paperwork expenses stated under item 12.

14. Estimate of cost to the Federal government.

There is no cost to the Federal Government associated with this information collection.

15. Explanation of program changes or adjustments.

All individuals responsible for the operation and maintenance of pipeline facilities are required to be properly qualified to safely perform their tasks and keep proper documentation as required by PHMSA regulations. As a result of the changes proposed in this NPRM, PHMSA estimates a total of 16,008 new employees will be subject to participate in an OQ plan either as a result of new gathering line requirements or because of newly covered tasks. Participation in an OQ plan necessitates the retention of records associated with those plans. This proposal will impose a recordkeeping requirement for Operator Qualifications on the estimated 16,008 newly covered employees that will be affected by this rule.

16. Publication of results of data collection.

This information will not be published for statistical purposes.

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

PHMSA is not seeking such approval.

18. Exceptions to certification statement:

There is no exception.