

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

**Supporting Statement**

**Record keeping Requirements for Gas Pipeline Operators  
OMB Control No. 2137-0049  
Docket No. PHMSA-2011-0023**

**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 “Record keeping Requirements for Gas Pipeline Operators” (OMB Control No. 2137-0049). The current expiration date for this information collection is April 30, 2018. This request is necessary due to the following PHMSA action that will affect the current collection of information:

Docket No. PHMSA-2011-0023:- Safety of Gas Transmission and Gathering Pipelines  
- Adds 100 responses and 600-burden hours for recordkeeping.

The revisions to this information collection are detailed under Part A, 15.

**Part A. Justification.**

1. Circumstances that make collection of information necessary:

Part 192 recordkeeping requirements currently apply to operators transporting natural and other gas by pipeline. There is a continuing need for gas pipeline operators subject to 49 CFR Part 192 to comply with the requirements for recordkeeping as presented below.

49 USC 60117 requires that:

“To enable the Secretary to decide whether a person transporting gas or hazardous liquid or operating a pipeline facility is complying with this chapter and standards prescribed or orders issued under this chapter, the person shall –

- (1) maintain records, make reports, and provide information the Secretary requires; and
- (2) make the records, reports and information available when the Secretary requests.”

The regulations set forth in 49 CFR 192 require operators to maintain a series of test, inspection and maintenance records. These recordkeeping requirements are necessary to inhibit a gas pipeline incident from occurring, to ascertain compliance with gas pipeline safety regulations, and to provide a background for incident investigations.

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

The information is used to assist Federal pipeline safety inspectors and State pipeline safety inspectors participating in the gas pipeline safety program. The inspectors will be able to ascertain from these records compliance with 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 the additional information collection burden.

4. Efforts to identify duplication.

No similar information is known to exist. Every gas pipeline system is particularly unique in its location, its type of design, and its operation. Therefore, the regulations set forth certain requirements so that an operator will produce a record for his unique system.

5. Efforts to minimize the burden on small businesses.

There are no efforts to minimize the burden for small businesses. Records are a necessary to ascertain compliance with the regulations.

6. Impact of less frequent collection of information.

The frequency of the collection of information is one time for the written procedures required §§ 192.225(b), 192.273(c), 192.283(c), 192.303, 192.553(c), 192.603(b), 192.605 and 192.707(d).

Maintenance of records required in §§ 192.491(a) and 192.476 is necessary to properly monitor corrosion in pipelines. Leaks, safety-related conditions, and incidents could result if the collection were conducted less frequently. Maintenance of records required in § 192.614 is necessary to allow a damage prevention program to remain effective. Pipeline damage due to excavation could result if the collection were conducted less frequently. Maintenance of records required in § 192.615 is necessary to minimize hazards resulting from gas pipeline emergencies. Valuable time could be lost during an emergency if the collection were conducted less frequently, potentially resulting in loss of property and lives. The frequency of recordkeeping is on an even basis for §§ 192.14(b), 192.243(f), 192.491(b), 192.517, 192.553(b), and 192.709. This information could not be collected less frequently.

7. Special circumstances.

It is essential the above records be kept for the life of the gas pipeline in order to establish a history for accident investigation purposes or to trace the origin of a safety-related problem.

- a. Section 192.14(b) requires gas pipeline operators retain for the life of the pipeline a record of the investigations, tests, repairs, replacements, and alterations made in converting the steel pipeline to service.
- b. Section 192.243(f) requires gas pipeline operators retain records of all nondestructive testing required under § 192.241(b) for as long as the pipeline concerned is in use.
- c. Section 192.491(b) requires gas pipeline operators retain maps and records required for corrosion control for as long as the pipeline remains in service.
- d. Section 192.517 requires gas pipeline operators retain for the life of the pipeline a record of each test performed und §§ 192.505 and 192.507.
- e. Section 192.553(b) requires gas pipeline operators retain records of all work, pressure tests, and investigations required to uprate a segment of pipe for as long as the segment of pipe is in service.
- f. Section 192.709 requires gas pipeline operators retain a record of all leaks, repairs, transmission line breaks, leakage surveys, line patrols, and inspections for as long as that segment of transmission pipeline remains in service. The Pipeline and Hazardous Safety Materials Administration (PHMSA) recognized the burden of its record retention requirement under §§ 192.491(b) and 192.709(f) and modified it from the life of the pipeline system to no more than five years.

8. Compliance with 5 CFR 1320.8.

PHMSA published a Notice of Proposed Rulemaking [81 FR 20722] on April 8, 2016.

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.

While the recordkeeping requirements of this information collection do not include any matters considered to be private, PHMSA does not have the authority to guarantee confidentiality.

11. Justification for collection of sensitive information.

The recordkeeping requirements of Part 192 do not involve questions of a sensitive nature.

12. Estimate of burden hours for information requested.

- Currently Approved Hours: 940,454 hours

- Estimated Annual Burden Hours: 941,054 hours

PHMSA estimates that this revision will add **100 responses** and **600 burden hours** to the currently approved information collection to account for the recordkeeping components of the proposed rule detailed below:

The proposed rule will add a requirement for newly proposed Type A, Area 2 gas gathering operators to comply with the provisions in § 192.615. PHMSA estimates that this will impact approximately 100 operators that will each require 6 hours per year to update their emergency plans. This will result in a burden of 600 hours (100\*6).

13. Estimate of total annual costs to respondents.

Based on the industry-specific occupational and wage estimates provided by the U.S. Department of Labor's Bureau of Labor Statistics, median hourly wage of an engineering manager (for NAICS 486000 – pipeline transportation) is estimated as \$75.57. Using an estimated fringe benefit of approximately 31 percent, the recordkeeping requirements for the gas operators are prepared at the average rate of \$110.00 per hour.

14. Estimate of cost to the Federal Government.

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

$$100 \text{ (Federal inspectors)} \times \$67,261.5 \text{ (mean salary)} \times 0.10 \text{ (time)} = \$672,615.$$

15. Explanation of program changes or adjustments.

The basis for this revision is due to a notice of proposed rulemaking titled, "Pipeline Safety: Gas Transmission." The proposals in this rulemaking will result in the following revision to this information collection:

**Emergency Planning:**

In the proposed rule, PHMSA proposes to revise § 192.9 to subject certain gathering line operators (newly proposed Type A, Area 2) to the emergency planning requirements detailed in § 192.615. PHMSA estimates that 100 operators will be impacted and that each operator will require approximately 6 hours to comply with the recordkeeping requirements resulting in additional 600 hours ( 100 operators \* 6 hours).

16. Publication of results of data collection.

The information will not be published for statistical purposes.

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

OPS 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.

**ATTACHMENTS:**

There are no attachments.