

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-2010-0229

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 “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 May 31, 2014. 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-2010-0229 - Pipeline Safety: Safety of On-Shore Hazardous Liquid Pipelines**
 - Adds 34 responses and 4,126 burden hours for accident reporting and recordkeeping.

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 195. 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 pipeline infrastructure, understand emerging safety

related trends, and identify opportunities for improving the regulatory system for rural low-stress pipelines.

3. Extent of automated information collection.

PHMSA Forms 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 95 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 issued a Notice of Proposed Rulemaking (NPRM) on October 13, 2015 (80 FR 61610). The comment period ends on January 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.

The reporting and 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.

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.

PHMSA estimates that this revision will add 34 responses and 4,126 burden hours for accident reporting and recordkeeping.

- Currently Approved Hours: 52,429 hours
- Estimated Annual Burden Hours: 56,555 hours

Burden for Accident Reporting (PHMSA Form 7000-1) Estimated total burden: 406 responses and 4060 burden hours – Previously Approved burden: 400 responses and 4000 burden hours. Added Burden: 6 responses and 60 burden hours)

The proposed rule will require operators of both gravity lines and gathering lines to be subject to accident reporting. As a result of this change, PHMSA expects an additional 28 HL pipeline operators (23 gathering line operators and approximately 5 gravity line operators) to be added to the reporting community.

Accident reporting occurs on occasion. PHMSA estimates that 400 accident reports (responses) are submitted each year. This estimate is based on accident reporting data that PHMSA has collected between 2002 and 2008. While PHMSA recognizes that approximately 363 (a total of the previously approved 335 HL pipeline operators and the newly added 28 HL pipeline operators) HL pipeline operators will be required to submit accident reports, PHMSA does not expect each operator to submit a report each year. PHMSA has previously estimated that 335 HL operators would submit 400 responses. Of the 23 new gathering line operators, PHMSA expects 5 accident reports to be filed per year. Of the 5 new gravity line operators, PHMSA expects 1 accident report to be filed within a year. This results in an added burden of **6 new accident reports per year at 10**

hours per report for a total added burden of 60 hours for accident reporting. The overall total burden estimate for accident reporting is now **406 responses and 4,060 burden hours.**

Burden for Recordkeeping Requirements Estimated total burden: 363 responses and 52,495 burden hours –**Added Burden: 28 responses and 4066 burden hours)**

PHMSA estimates that the currently covered 335 HL operators spend 48,647 hours maintaining records. This equates to approximately 145 hours per operator. The proposed rule requires each of the 28 newly covered operators to maintain associated records. This requirement results in an additional 28 responses and 4,066 burden hours (28 operators {23 gathering line operators+5 gravity line operators} x 145hours) for recordkeeping.

The overall average burden hour estimate for HL operators is 155.8 hours (56,555 hours /363 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 \$63 x 56,555 hours = \$3,562,965.00.

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.

Under the proposed rulemaking, hazardous liquid pipelines operating by gravity only would be changed from unregulated to regulated. Also, accident reports would be required for all liquid gathering lines, but only a subset of these liquid gathering lines are regulated for safety. The inclusion of “gravity line” and “reporting-regulated gathering” as response options under Part E5f is crucial to PHMSA’s understanding of the performance of such pipeline systems.

PHMSA proposes the following changes be made to the Hazardous Liquid Accident Report (PHMSA F 7000-1):

Accident Report – Hazardous Liquid Pipeline System (PHMSA F 7000-1)	Revise Question 5f, “Function of pipeline system,” under Part E of the form by adding “gravity line” and “reporting-regulated gathering” as response options.
--	---

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.