

**Department of Transportation
Office of the Chief Information Officer
Supporting Statement
Pipeline Integrity Management in High Consequence Areas Gas Transmission Pipeline
Operators**

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) approval for the revision of the information collection entitled, "Pipeline Integrity Management in High Consequence Areas Gas Transmission Pipeline Operators" under OMB Control No. 2137-0610 which is currently due to expire on April 30, 2016. 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 144 responses and 72 burden hours for notifications.

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

Part A. Justification.

1. Circumstances that make collection of information necessary.

This information collection request pertains to gas transmission operators that are subject to the Gas Transmission Pipeline Integrity Management requirements detailed in 49 CFR Part 192 Subpart O. The gas transmission integrity management requirements became effective February 14, 2004. The regulation improves pipeline safety through (1) accelerating the integrity assessment of pipelines in high consequence areas, (2) improving integrity management systems within companies, (3) improving the government's role in reviewing the adequacy of integrity programs and plans, and (4) providing increased public assurance in pipeline safety.

The information collection required by gas transmission integrity management requirements is the maintenance of a written integrity management program and records that demonstrate compliance with Subpart O to PHMSA by operators of gas transmission pipelines in high consequence areas. Operators must maintain their integrity management records for the life of the pipeline, and PHMSA or State regulators may review it as a part of inspections. Gas transmission operators are also required to report to PHMSA certain actions related to their integrity management program. This information collection supports the DOT strategic goal of safety by reducing the number of incidents in natural gas transmission pipelines.

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

Federal pipeline safety inspectors and state pipeline safety inspectors participating in the pipeline safety program will use the maintained records to determine compliance with 49 CFR Part 192 Subpart O operators of gas transmission pipelines in high consequence areas

3. Extent of automated information collection.

Operators are permitted to keep integrity management plan records in any retrievable format, including the use of the latest information technology. PHMSA actively encourages the use of electronic technology wherever possible.

4. Efforts to identify duplication.

There is no other similar information available.

5. Efforts to minimize the burden on small businesses.

Smaller operators will have lower costs than the larger operators, as they will likely have fewer pipelines that are located in HCAs.

6. Impact of less frequent collection of information.

If the activities were conducted less frequently, then PHMSA's ability to gather pertinent information on the status of pipelines in HCAs would be reduced, as would PHMSA's ability to properly monitor and ensure safety as directed by Congress in Pipeline Safety Improvement Act of 2002.

7. Special circumstances.

The collection is consistent with all OMB guidelines, except guideline 5 CFR 1320.5(d)(2) (maximum retention 3 years). In the case of integrity testing, testing may take place as infrequently as once every ten years. Since some actions build on previous work, to maintain a complete picture of the integrity management associated with a pipeline, the collected information will need to be retained for the life of that pipeline. Some information may be of confidential in nature, and PHMSA will consider requests for confidentiality from operators on a case-by-case basis.

8. Compliance with 5 CFR 1320.8.

PHMSA issued a Notice of Proposed Rulemaking (NPRM) on April 8, 2016 [81 FR 20722].

9. Payments or gifts to respondents.

Not applicable.

10. Assurance of confidentiality.

Confidentiality will be considered on a case-by-case basis using the Freedom of Information Act (FOIA) as guidance.

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.

PHMSA estimates that 721 gas transmission operators are expected to conduct on-going yearly updates for their integrity management plans and comply with associated recordkeeping and notification requirements. Based on its experience monitoring the plans in past years, PHMSA estimates the following hour requirements for the four components of this information collection request:

Plan modification - 233 hours of engineering time and 80 hours for clerical time or 313 hours per operator

Record keeping - 80 hours of clerical time for each operator

Data integration - 1,020 hours (700 hours of engineering time and 320 hours of clerical time)

This results in a total of $(313+80+1,020) = 1,413$ hours per operator each year.

The total information collection burden on the affected industry is thus $721 \times 1,413 = 1,018,773$ hours.

In addition to the responses specified above, PHMSA estimates approximately 12 additional responses per year. These responses are for reports that an operator may need to submit when dealing with a special situation relative to their plan. PHMSA estimates it will take operators an additional 2.8 hours per response which yields an approximate 34 additional hours to the information collection.

In the proposed rule, PHMSA requires operators who are subject to integrity management requirements to provide PHMSA notice when 180 days is insufficient to conduct an integrity assessment following the discovery of a condition (§ 192.933). PHMSA estimates that 20% of the 721 operators ($721 \times .2 = 144$ operators) will file such notifications. PHMSA estimates that each response will take about 30 minutes. This change will result in **144 responses and 72 burden hours (.5 hours *144 response) being added to the currently approved information collection.**

Therefore this information collection has estimated total of 877 responses ($721+12+144$) with an estimated total 1,018,879 burden hours ($1,018,773+34+72$).

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 \$64.75 x 1,018,879 hours = \$65,972,415.25.

13. Estimate of total annual costs to respondents.

There is no cost beyond the labor cost cited above.

14. Estimate of cost to the Federal Government.

The costs to the Federal Government associated with this rulemaking is expected to be minimal as the regulations will necessitate little additional enforcement work because PHMSA will redirect some of the focus of its compliance activities rather than add additional inspection time.

15. Explanation of program changes or adjustments.

PHMSA is proposing that operators subject to integrity management requirements, provide PHMSA notice when 180 days is insufficient to conduct an integrity assessment following the discovery of a condition (192.933). PHMSA estimates that 20% of the 721 operators (721*.2= 144 operators) will file such a notification. PHMSA estimates that each notification will take about 30 minutes.

	Responses	Estimated Burden Hours
Currently Approved	733 responses	1,018,807hours
Change in Integrity Management condition reporting	144 responses	72
New Total	877 responses	1,018,879 hours

16. Publication of results of data collection.

This information will not be published for statistical purposes.

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

Not applicable.

18. Exceptions to certification statement.

Not applicable.