

**DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE CHIEF INFORMATION OFFICER**

**INFORMATION COLLECTION  
SUPPORTING STATEMENT**

Pipeline Safety: Transportation of Hazardous Liquids by Pipeline: Recordkeeping and  
Accident Reporting  
OMB Control No. 2137-0047  
Docket No. PHMSA-2015-0205

**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 information 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 December 31, 2016.

This information collection is being revised to capture changes made to the PHMSA F 7000-1 ACCIDENT REPORT – HAZARDOUS LIQUID PIPELINE SYSTEMS form. Revisions were made to reorganize existing questions and to add more detailed questions about incident response, incident consequences, operating conditions, cause, and contributing factors. As a result of the proposed revisions to PHMSA F 7000-1, **800 additional burden hours** are being added to this information collection.

**Part A. Justification**

**1. Circumstances that make the 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.**

This 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. Describe efforts to identify duplication.**

There is no duplication of this data collection as the information collected is unique to specific situations.

**5. Efforts to minimize the burden on small businesses.**

PHMSA expects impacted operators to include both 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 of information 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 this 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(d).**

PHMSA published a notice in the Federal Register on May 13, 2016 [81 FR 29943] requesting comments on PHMSA's intent to request a revision of this information collection. The comment period ended on July 12, 2016. PHMSA received 10 comments on the proposed revisions to this collection from the following entities: one public interest group (Pipeline Safety Trust (PST)); five industry organizations (American Petroleum Institute (API)-Association of Oil Pipelines (AOPL) joint submission, API, American Gas Association (AGA), Interstate Natural Gas Association of America (INGAA), and Common Ground Alliance (CGA)); three natural gas operators (DTE Gas Company (DTE), Southwest Gas Corporation (SW), Paiute Pipeline Company (PPC)); and one manufacturer of compression fitting (Norton McMurray Manufacturing Company (NORMAC)). PHMSA summarized and responded to each of these comments in a Federal Register notice published on December 27, 2016 [81 FR 95294]. A copy of both the 60-Day and the 30 Day notices are included in the Supplementary Documents section.

**9. Payment 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.**

Current Number of Responses: 847	Proposed Number of Reponses: 847
Current Burden Estimate: 52,429 hours	Proposed Burden Estimate: 56,229 hours

**Note:** PHMSA found an error in the currently-approved burden estimate. The burden was recorded at 52,429 when, in fact, it should have been 55,429. PHMSA believes this to have been completely accidental and, in no way, reflects a change in scope of the currently-approved collection as the previous Supporting Statements will support.

Currently PHMSA estimates that there are 335 operators of hazardous liquid pipelines that will make approximately 847 responses each year according to the varying reporting and recordkeeping requirements covered under this information collection.

As a result of the proposed changes to PHMSA F 7000-1, the burden associated with this information collection is being revised to add 800 burden hours for the reporting of hazardous liquid accidents. This change results in an **overall annual burden of 56,229 hours** for this information collection. A breakdown of the burden estimate is listed below:

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/4,800 hours)

Currently, PHMSA estimates that 400 accident reports (responses) are submitted each year with operators spending 10 hours to complete each report. As a result of the proposed changes to PHMSA Form F7000-1 PHMSA is adding 2 additional hours for the reporting of hazardous liquid accidents. This brings the total time for each report to 12 hours for an estimated burden of 4,800 hours ( $400 \text{ reports} * 12 \text{ hours per report}$ ).

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

In an effort to consolidate similar information collections, PHMSA merged the information collection relative to leak detection formally under OMB Control 2137-0598 with this information collection (2137-0047). 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 ( $50 * 2 \text{ hours} = 100 \text{ hours}$ ).

The resulting total is

[Telephonic plan (2,682 hours) + Accident Reporting (4,800 hours) + Leak Detection (100 hour)  
+ Recordkeeping (48,647)]

### **13. Estimate of the total annual costs burden.**

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 56,229 hours = \$3,598,656.00.

**14. Estimates of costs 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 the program change or adjustments.**

In an effort to improve the efficiency of this data collection, PHMSA made several adjustments to the Hazardous Liquid Accident report to reorganize existing questions and add more detailed questions about incident response, incident consequences, operating conditions, cause, and contributing factors. These changes were made in an effort to streamline the data collection across PHMSA and correlate with similar changes proposed to the Incident Report forms for Natural Gas pipelines and Liquefied Natural Gas facilities.

**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 of OMB approval.**

PHMSA is not seeking approval to not display the expiration date.

**18. Exceptions to the certification statement.**

There is no exception to PHMSA's certification of this request for information collection approval.