

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

**INFORMATION COLLECTION
SUPPORTING STATEMENT**

Pipeline Safety: Incident Reporting for Gas and LNG
Requesting New OMB Control No.
Docket No. PHMSA-2015-0205

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) of an information collection entitled “Pipeline Safety: Incident Reporting for Gas and LNG” PHMSA requests a new OMB Control No. for this collection. The forms contained within this new collection [Gas Distribution Incident Report (PHMSA F. 7100.1), Incident Report—Natural and Other Gas Transmission and Gathering Pipeline System (PHMSA F 7100.2), and Incident Report—Liquefied Natural Gas Facilities (PHMSA F 7100.3)] are currently approved under OMB Control No. 2137-0522 which expires on October 31, 2017. PHMSA is making this request in an effort to streamline our data collections.

Part A. Justification

1. Circumstances that make the collection of information necessary. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.

The reports contained within this information collection support the Department of Transportation’s strategic goal of safety. Gas pipeline releases can cause human injuries, fatalities, economic losses, and environmental damage. Rapid reporting, detailed incident reports, and annual summary reports all help to inform PHMSA and the public of release incident risks and trends. The National Transportation Safety Board (NTSB), the U.S. Department of Transportation’s Office of the Inspector General, and the General Accounting Office all urged PHMSA to collect this information. The information is an essential part of PHMSA’s overall effort to minimize natural gas transmission, gathering, and distribution pipeline failures.

The requirements for reporting incidents are in 49 CFR Part 191. 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. The specific legislative authority cites for

the requirements in 49 CFR Part 191 include 49 U.S.C. 60102, 60103, 60104, 60108, 60117, 60118, 60124 and the recently revised 60139.

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

PHMSA uses this information to gather incident and failure information from gas pipeline operators, which includes operators of both gas distribution and gas transmission pipelines, and operators of liquefied natural gas facilities. These operators are required to provide immediate notification, in accordance with § 191.5, following pipeline incidents as defined in § 191.3. PHMSA uses these immediate notifications to address ongoing safety issues related to an incident.

In addition, PHMSA requires gas pipeline operators to submit incident reports. These incident reports enable PHMSA to identify and evaluate existing and potential pipeline safety problems and perform safety trend analyses. The information is also essential for FERC reporting compliance.

The incident reports are identified as follows:

- Gas Distribution Incident Report
- Gas Transmission Incident Report
- LNG Incident Report

The information from incident reports are used for identifying existing or potential pipeline safety problems, to develop statistical and data/safety reports, and to develop benefit-cost analyses pertaining to pipeline safety.

3. Extent of automated information collection.

PHMSA requires operators to submit all required reports electronically with an exception for those operators to whom electronic submissions would pose an undue burden and hardship. PHMSA estimates that approximately 95% of submissions are completed electronically. Pipeline operators are encouraged to file the incident and annual reports on-line at www.opsweb.phmsa.dot.gov.

4. Describe efforts to identify duplication.

PHMSA is the only federal agency that collects information related to distribution pipeline failures. No similar information is requested by the government or industry on distribution pipeline failures that occur between the point-of-sale to a distribution company and a customer's meter.

The information collection on gas transmission and gathering pipelines is extremely limited in terms of scope and population of gas pipeline operators covered. The Department of Interior (DOI) collects information that is in some ways similar to that collected by PHMSA, but the information DOI collects does not cover all gas transmission or gathering pipelines.

5. Efforts to minimize the burden on small businesses

For PHMSA to be able to effectively carry out its legislative mandate and monitor natural gas pipeline safety, it is essential that both large and small operators of pipelines provide incident and annual reports. For those operators to whom electronic submissions would pose an undue burden and hardship, PHMSA allows alternative options for submission.

6. Impact of less frequent collection of information.

Incident Reporting: PHMSA would not be able to assess the rate and locations of incidents to the gas distribution/transmission and gathering pipelines without this information collection. Lack of immediate notification to the National Response Center via phone or e-mail as specified in § 191.5 may increase the risks to people and property if the release is ongoing.

7. Special Circumstances.

There are no special circumstances within this request.

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)). Comments proposed a number of suggestions to PHMSA on ways to make this data collections less burdensome. PHMSA adopted many of the suggestions including allowing estimations, "zero" and "unknown" as options where precised data may not be available. 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.

Proposed Number of Responses: 301
Proposed Burden Estimate: 3,612 hours

Currently PHMSA estimates to receive 301 (300 gas distribution and gas transmission and 1 LNG) incident report submissions annually. PHMSA expects each operator to spend 12 hours preparing and submitting each incident report. This includes the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. PHMSA estimates an **overall annual burden of 3,612 hours (301 reports *12 hours per report)** for this information collection.

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 3,612 hours = \$231,168.

14. Estimates of costs to the Federal Government.

PHMSA spends an estimated cost of \$184,445 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*	7	\$38.82/hr	84	\$3,260
Contracting Costs** - Gas Incident Forms (GT, GD, LNG)	117.5	\$128.50/hr	1410	\$181,185

15. Explanation of the program change or adjustments.

To simplify the renewal process of its data collections in the future, PHMSA proposed collecting incident and annual reports under separate OMB control numbers. To achieve this, PHMSA requested a new OMB control number for the three gas incident forms currently under OMB Control No. 2137– 0522. In addition to this change, PHMSA made several adjustments to the Gas Distribution Incident Report (PHMSA F. 7100.1), the Incident Report—Natural and Other Gas Transmission and Gathering Pipeline System (PHMSA F 7100.2), and Incident Report—Liquefied Natural Gas Facilities (PHMSA F 7100.3) 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 Hazardous Liquid Accident report form.

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.