

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

**Supporting Statement**

**Qualification of Pipeline Personnel  
OMB Control No. 2137-0600  
Docket: PHMSA 2018-0021**

**INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) renewed three-year approved clearance for the information collection entitled, "Qualification of Pipeline Personnel" under OMB Control No. 2137-0600, which is currently due to expire on July 31, 2018.

**Part A. Justification.**

1. Circumstances that make collection of information necessary.

As specified in the Accountable Pipeline Safety and Partnership Act of 1996 (Pub. L. No. 104-34), Congress amended its statute of 1992 to require, "All individuals who operate and maintain pipeline facilities shall be qualified to operate and maintain the pipeline facilities." PHMSA's regulations 49 CFR Part 192 Subpart N and 49 CFR Part 195 Subpart G is applicable to natural gas operators and hazardous liquid operators under its jurisdiction respectively.

The recordkeeping requirements in this information collection are as follows:

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

- (1) Identification of qualified individual(s);
- (2) Identification of the covered tasks the individual is qualified to perform;
- (3) Date(s) of current qualification; and
- (4) Qualification method(s).

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

This information collection request supports DOT's safety performance goal of reducing total incidents for gas and hazardous liquid pipelines which directly supports the DOT's safety strategic objective of enhancing public health and safety by working toward the elimination of transportation-related deaths and injuries.

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

This information collection requirement is necessary to ensure pipeline personnel have the necessary qualifications to competently perform operation, and maintenance functions. The intended effect of the information collection requirements is to improve pipeline safety by assuring the competency of pipeline personnel through qualification.

Federal and state pipeline safety inspectors participating in the pipeline safety program may use this information to ascertain compliance with the 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 any additional burden.

4. Efforts to identify duplication.

The recordkeeping requirements will not duplicate any other recordkeeping requirements for pipeline operators.

5. Efforts to minimize the burden on small businesses.

All operators will also be permitted to use individuals who do not meet qualification standards to perform covered functions when accompanied and directed by a qualified persons. For some small gas distribution systems, this allowance may mean only one person is required to be qualified.

6. Impact of less frequent collection of information.

The frequency of the collection of information is one time for the identification of covered functions. This information could not be collected less frequently.

The qualification program needs to be developed only once, however it does require periodic updates to ensure compliance with current company procedures.

Other exceptions include: (1) review of the emergency response training every 15 months, and (2) changes in technology and procedures requiring qualification on an occasional basis. In addition, an incident involving an employee's lack of training may also result in requalification training.

7. Special circumstances.

The collection is consistent with all OMB guidelines, except guideline 5 CFR 1320.6(f) (maximum retention 3 years). Section 192.807 requires operators to maintain records which verify personnel requiring qualification have been qualified. Operators will be required to maintain these records at least five years after the person ceases to be employed by the operator. It is essential these records be maintained for this period of time in order to review records of

personnel involved in an emergency condition, incident or accident, abnormal operating condition, or violation of a pipeline's operating procedures. Maintenance of the records will also allow operators to evaluate the effectiveness of qualification programs.

8. Compliance with 5 CFR 1320.8.

A 60-day Federal Register notice was published on March 26, 2018 [83 FR 13004]. No comments were received regarding this information collection.

9. Payments or gifts to respondents.

There is no remuneration provided.

10. Assurance of confidentiality.

PHMSA does not have the authority to assure confidentiality.

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.

The annual burden hour requested for this information collection is approximately **7,292 hours**.

PHMSA estimates that there are 175,000 covered employees including both contract employees (75,000) and operator personnel (100,000). The burden hour estimate for recordkeeping is approximately 15 minutes per employee. The total industry burden hour estimate for recordkeeping is approximately 43,750 hours (175,000 employees X .25 hours). However, not all covered employees are trained every year. There is an approximate 6-year training cycle for the impacted personnel. PHMSA estimates there to be approximately **29,167 annual respondents**. Therefore, the **annual burden hour** requested for this information collection is approximately **7,292 hours** (29,167 annual respondents X .25 hours)

The estimated annual cost burden of recordkeeping is \$65.07 (per hour) x 7,292 (hours) = **\$474,490.44 per year**.

13. Estimate of total annual costs to respondents.

There are no additional costs beyond the paperwork expenses stated under item 12.

14. Estimate of cost to the Federal government.

Currently, 100 Federal inspectors spend an estimated 10 percent of their time reviewing records retained by gas pipeline operators. The average salary of a Federal transportation inspector is

\$107,630.

This calculates to an estimated annual cost to the Federal Government of:

100 (Federal inspectors) x \$107,630 (mean salary) x 0.10 (time) = \$1,076,300.

15. Explanation of program changes or adjustments.

There is no change in the type of information being collected at this time.

16. Publication of results of data collection.

PHMSA has no plans to publicize this data.

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

OPS is not seeking such approval.

18. Exceptions to certification statement:

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