

Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
Office of Pipeline Safety

SUPPORTING STATEMENT

Integrity Management Program for Gas Distribution Pipelines

**INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) approval for the renewal of the information collection entitled "Integrity Management Program for Gas Distribution Pipelines" (OMB Control No. 2137-0625) which is currently due to expire on April 30, 2019.

**Part A. Justification**

1. Circumstances that make collection of information necessary.

49 CFR Part 192, Section 1005, in Subpart P requires operators of gas distribution pipelines to develop and implement integrity management (IM) programs. The purpose of these programs is to enhance safety by identifying and reducing pipeline integrity risks.

This regulation addresses recommendations from the Department of Transportation's (DOT) Office of the Inspector General (OIG) and the National Transportation Safety Board. It also implements a requirement in the Pipeline Inspection, Protection, Enforcement and Safety Act (PIPES Act) of 2006 that integrity management requirements be established for distribution pipelines.

This information collection supports the U.S. Department of Transportation's SAFETY GOAL, which targets three main strategic initiatives: managing risk and integrity, sharing responsibility, and providing effective stewardship. This goal enhances 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.

The integrity management (IM) approach was designed to promote continuous improvement in pipeline safety by requiring operators to identify and invest in risk control measures beyond core regulatory requirements. Based on the required risk assessments and enhanced controls, this requirement also establishes procedures permitting risk-based adjustment of prescribed intervals for leak detection surveys and other fixed-interval requirements in the agency's existing regulations for gas distribution

pipelines. PHMSA requires operators to maintain records demonstrating compliance with its requirements for 10 years and these records must include superseded IM plans. The recordkeeping requirements are consistent with good business practices and are designed to enhance risk management practices. PHMSA will use the information to evaluate the overall effectiveness of distribution IM requirements.

3. Extent of automated information collection.

Operators may keep the records in any retrievable form. The information may be reported electronically and they may use the technology that is most cost effective to reduce the burden. PHMSA revised the annual report format to accommodate the IMP information.

4. Efforts to identify duplication.

Every gas distribution pipeline system is particularly unique in its location, its type of design, and its operation. Therefore, the regulations set forth certain requirements so that an operator will produce for PHMSA a record for his unique system. At this time, no other alternate source is available.

5. Efforts to minimize the burden on small businesses.

A master meter operator or small LPG operator (with fewer than 100 customers) of a gas distribution pipeline must follow the requirements in § 192.1015. The IM requirements applicable to smaller operators are simplified somewhat, to reflect both the relative simplicity of these pipelines and the limited capability of the operators. These operators are not required to submit performance measures, which is consistent with their prior treatment with respect to annual reports. PHMSA developed guidance suitable for use by master meter and small LPG operators to develop simple IM plans for their simple pipelines, and this guidance is available via PHMSA's web site. In addition, APGA SIF developed and implemented a computer program "Simple, Handy, Risk-based, Integrity Management Program" (SHRIMP) to support these operators in developing and implementing their IM plans. Operators are permitted to keep records in any retrievable form. They may use the latest information technology to reduce the additional information-collection burden.

6. Impact of less frequent collection of information.

49 CFR Part 192.1011 requires operators to maintain records demonstrating compliance with its requirements for 10 years, and that these records must include superseded IM plans.

7. Special circumstances.

None of the conditions apply.

8. Compliance with 5 CFR 1320.8.

A 60-day Federal Register notice was published on February 11, 2019 (84 FR 3278). PHMSA received no comments on this information collection.

9. Payments or gifts to respondents.

No payment is provided.

10. Assurance of confidentiality.

Not applicable.

11. Justification for collection of sensitive information.

There is no sensitive information collected.

12. Estimate of burden hours for information requested.

IM Plans: each affected operator to develop and maintain a written integrity management plan, which includes initial plan development, recordkeeping and updates.

Although small LPG operators, those with LPG distributions systems serving less than 100 customers from a single source must comply with the same requirements as master meter operators. Documentation requirements for these operators are different - consistent with their treatment in the rest of Part 192. Master meter operators and operators of LPG distribution pipeline operators that serve fewer than 100 customers from a single source are not required to submit annual reports.

All gas distribution operators will need to prepare and maintain a written integrity management plan. The table below has the breakdown by system.

Type of Operator	Prepare an IM Plan (hours per operator)	Threat Identification (hours per operator)	Update Plan (hours per operator)	Total Hours Per Operator Type
Large Operators (201)	960	800	288	411,648
Small Operators and LPG Operators with 100 or more Customers (1,142)	71	120	24	245,530
Master Meter and Small LPG Operators with fewer than 100 Customers	14	8	4	208,000

(8,000)				
Total for 9,343 operators				<b>865,178</b>

In sum, PHMSA estimates burden hours for developing an IM plan and revising it periodically is approximately 865,178 hours.

13. Estimate of total annual costs to respondents.

IM Plans: PHMSA estimates that the cost of developing and updating the IM plans is approximately \$51 million the first-year and \$8 million annually in subsequent years. The following table has the breakdown by system.

Operator Type	First-Year Cost (\$ million)	Total Annual Cost after the first-year (\$ million)
Large Operators (201)	25	4
Small Operators and LPG Operators with 100 or More Customers (1,142)	15	2
Master Meter and Small LPG Operators with Fewer than 100 Customers (8,000)	11	2
Total for 9,343 operators	51	8

Recordkeeping: Some of the required records will be kept electronically, while some may be kept on paper. The required recordkeeping and record-storing requirements of the rule may consist of a clerk entering data, scanning materials, placing materials in file folders, placing the file folders in file cabinets, and retrieving files, when needed. It may also call for a system for signing materials in and out. Finally, in some cases, physical recordkeeping may require the acquisition of file cabinets and file folders by some operators. (The average hourly salary, including benefits, for a clerk is estimated at \$20). There is no expectation that the recordkeeping would require operators to hire additional personnel. Neither is there an expectation that the recordkeeping would require operators to acquire new computers or peripherals.

PHMSA estimates that the total cost to 9,343 operators to comply with these paperwork requirements is approximately \$9 million every year after the first-year.

14. Estimate of cost to the Federal government.

The recordkeeping component of this information collection requires that records are inspected once every 5-10 years. Over the course of this renewal period, PHMSA estimates the annual cost to the Federal government to be \$3,148 where a federal inspector at the GS-13 grade level with a base salary of \$34.34 per hour will spend an estimated 91.7 hours annually reviewing the required records.

15. Explanation of program changes or adjustments.

There are no program changes.

16. Publication of results of data collection.

PHMSA summarizes the information. PHMSA makes information available on its website.

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

PHMSA does not seek approval to not display expiration date.

18. Exceptions to certification statement.

There are no exceptions to the certification statement.