

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

**Supporting Statement
Reporting of Safety-Related Conditions on Gas, Hazardous Liquid and Carbon
Dioxide Pipelines and Liquefied Natural Gas Facilities**

OMB Control No. 2137-0578

Docket PHMSA-2010-0229

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests Office of Management and Budget (OMB) approval for the renewal of an existing information collection entitled “Reporting of Safety-Related Conditions on Gas, Hazardous Liquid and Carbon Dioxide Pipelines and Liquefied Natural Gas Facilities” (OMB Control No. 2137-0578), which expires on August 31, 2022. The amendment of this information collection is necessary due to the following PHMSA action that will affect the burden of this collection of information:

- **Docket No. PHMSA-2010-0229 - Pipeline Safety: Safety of On-Shore Hazardous Liquid Pipelines**
 - Adds 28 responses and 168 burden hours for the reporting of safety-related conditions.

Part A. Justification

1. Circumstances that make collection of information necessary.

Under 49 U.S.C. 60102, an operator of a pipeline facility (except master meter) must submit a written report to the Department of Transportation on any safety-related condition that causes or has caused a significant change or restriction in the operation of their pipeline or liquefied natural gas (LNG) facility or a condition that is a hazard to life, property, or the environment. PHMSA implemented this requirement under 49 CFR 191.23 and 195.56.

The information collection promotes the US DOT’s and PHMSA’s Safety and Environmental Strategic Goals. PHMSA uses the information collected to identify safety related trends and to take action to reduce pipeline accidents and incidents. Decreased incidents and accidents will better protect both human and environmental resources.

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

PHMSA requires each operator to provide detailed information documenting a safety related condition. A pipeline or LNG facility operator submits the safety related

condition reports every time there is a possible risk to the pipeline integrity. The operator must provide information on the operator, pipeline or LNG facility location, and the date of the safety related condition. In addition, the operator details the event characteristics and operator response to the safety related condition.

The information collection is needed to enhance PHMSA's ability to measure and assess the performance of pipeline and LNG facility operators; to integrate pipeline safety data and to conduct risk analysis.

3. Extent of automated information collection.

PHMSA does not specify the format of this information collection. PHMSA accepts electronic mailings of safety related condition reports. In the past, the majority of operators have faxed the reports.

4. Efforts to identify duplication.

The information collection reduces duplication by exempting incidents that result in an accident before the safety-related condition report filing deadline. No other information collection exists to gather data on these pipeline safety-related conditions.

5. Efforts to minimize the effects on small business.

PHMSA expects impacted operators to be large and small businesses and therefore the requirement may impact small businesses.¹ In an effort to minimize the burden on small businesses, PHMSA allows for the submission of data in a variety of methods. In addition, the smallest operators – master meter operators – are exempt from the reporting requirements.

6. Impact of less frequent collection of information.

The information collection is event driven and therefore cannot be conducted less frequently. PHMSA would be unable to appropriately and properly assess the safety of the impacted pipelines and LNG facilities in a timely fashion without the information collection. Less frequent information collection could compromise the safety and economic viability of the U.S. pipeline system.

7. Special circumstances.

No special circumstances apply with this regulation.

¹ Small businesses as defined by the Regulatory Flexibility Act (P.L. 96-354)

8. Compliance with 5 CFR 1320.8.

PHMSA issued a Notice of Proposed Rulemaking (NPRM) on October 13, 2015 (80 FR 61610). The comment period ended on January 8, 2016. PHMSA did not receive any comments pertaining to this information collection.

9. Payments or gifts to respondents.

The disbursement of payment and gifts is not applicable to this information collection.

10. Assurance of confidentiality.

PHMSA does not have the authority to guarantee confidentiality.

11. Justification for collection of sensitive information.

No sensitive information will be collected.

12. Estimate of burden hours for information requested.

Current Number of Responses: 146	Proposed Number of Responses: 174
Current Burden Estimate: 876	Proposed Burden Estimate: 1,044

IC	Responses	Burden Per Response	Total Burden
Safety-Related Condition Reports	174	6 hours	1,044 hours
Total	174 annual responses		1,044 annual burden hours

Currently, PHMSA estimates that 146 reports are submitted on annual basis. The **Pipeline Safety: Safety of On-Shore Hazardous Liquid Pipelines** final rule will require operators of both gravity lines and gathering lines to be subject to safety-related condition reporting. While there is no guarantee that each of the newly covered operators will incur a safety-related condition, it is a possibility. As a result, PHMSA plans to include an additional 28 HL pipeline operators (**23 gathering line operators** and approximately **5 gravity line operators**) to this reporting community.

PHMSA estimates that it takes each operator 6 hours to complete a safety-related condition report as detailed below:

- Response Time – Operators will require 4 hours to complete each report
- Recordkeeping -- Operators will require 2 hours to collect and maintain record for each report.

- Operator Completing Report – An engineering manager will perform all of the reporting related duties associated with the rule. Engineering managers have a fully loaded cost of \$64.75 per hour.

The addition of the 28 newly covered operators will result in **28 additional responses** and an added burden of **168 hours** (28 operators * 6 hours).

Therefore, PHMSA estimates the **total annual burden hours at 1,044 hours** (174 reports [146 current responses + 28 additional responses] * 6 hours per response).

13. Estimate of total annual costs to respondents.

Safety-Related Condition reports are assumed to be filled out by a senior engineer. Based on the industry-specific occupational and wage estimates provided by the U.S. Department of Labor’s Bureau of Labor Statistics, median hourly wage of an engineering manager (for NAICS 486000 – pipeline transportation²) is estimated as \$77.50. Using an estimated fringe benefit of approximately 35 percent, the reporting requirements for pipeline operators are prepared at the average rate of \$104.63 per hour.

The cost burden associated with this information collection is estimated to \$104.63 x 1,044 hours = \$109,233.72.

14. Estimate of cost to the Federal Government.

Safety-Related Condition reports are reviewed by a Data Analyst at the GS-13 level and then routed to the appropriate regional offices for follow-up. Because SRCRs come in on occasion, only a portion of time is spent addressing these issues. PHMSA estimates the cost of maintaining this information collection to be around \$95,000 annually across all functions. PHMSA does not anticipate additional costs.

15. Explanation of program changes or adjustments.

Added burden will be incurred by the newly covered operators.

16. Publication of results of data collection.

PHMSA will summarize the results of the safety-related condition reports and post the summary on the Data and Statistic portion of PHMSA’s website (<http://www.phmsa.dot.gov/pipeline/library/data-stats>).

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

PHMSA is not requesting approval to not display the OMB approval expiration date.

² https://www.bls.gov/oes/current/naics3_486000.htm

18. Exceptions to certification statement.

There are no exceptions to the certification statement.