

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

**Supporting Statement
Hazardous Liquid Pipeline Assessment Requirements
OMB Control No. 2137-0605
Docket PHMSA-2010-0229**

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) renewed three-year approved clearance for the information collection entitled, "Integrity Management in High Consequence Areas for Operators of Hazardous Liquid Pipelines," under OMB Control No. 2137-0605, which expires on September 30, 2022. The amendment of this information collection is necessary due to the following PHMSA action that will affect the current collection of information:

- **Docket No. PHMSA-2010-0229 - Pipeline Safety: Safety of On-Shore Hazardous Liquid Pipelines**
 - **Adds 74 responses and 37 burden hours for 180 Day Repair Notifications.**
 - **Adds 10 responses and 100 burden hours for Non-ILI Notifications**
 - **Requests title change of this ICR from "Integrity Management in High Consequence Areas for Operators of Hazardous Liquid Pipelines," to "Hazardous Liquid Pipeline Assessment Requirements"**

Part A. Justification.

1. Circumstances that make collection of information necessary.

Certain areas are particularly environmentally sensitive to hazardous liquid pipeline failures. These areas are called "high consequence areas" (HCAs). Operators are required by 49 CFR §195.452 to develop and implement a program to provide direct integrity testing and evaluation of hazardous liquid pipelines in HCAs. The purpose of the program is to require HL operators to continually reassess their system to mitigate potential safety risk in High Consequence Areas.

The Pipeline Safety: Safety of Hazardous Liquid Pipelines Final Rule requires owners and operators of hazardous liquid pipelines to continually assess the integrity of their pipelines. Operators that are not subject to the integrity management requirements in 49 CFR §195.452 to provide PHMSA with notifications under certain circumstances. Operators in this category must notify PHMSA when they are unable to assess their pipeline via an in-line inspection. In-line inspections have been proven across industry standards to be one of the most effective ways to assess the integrity of a pipeline.

Operators who choose to use a different method of pressure-testing must demonstrate that their pipeline is not capable of accommodating an in-line inspection tool and that the use of an

alternative assessment method will provide a substantially equivalent understanding of the condition of the pipeline.

Owners and operators of hazardous liquid pipelines that are not subject to the integrity management requirements in 49 CFR §195.452 will be also be required to notify PHMSA, in writing, in cases where a determination about pipeline threats has not been obtained within 180 days following the date of an inspection. Operators are required to provide an expected date when adequate information will become available.

This information collection promotes the US DOT's Safety Strategic Goals. 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 is the information used.

The information collection provides PHMSA with the information necessary to evaluate an operator's compliance with the Pipeline Safety Regulations (PSR) and to make determinations in cases where deviations from the PSR are necessary. PHMSA will use the information provided in these notifications to ensure that alternative methods used provide an equivalent level of safety and effectiveness.

This information will be used by the Office of Pipeline Safety (OPS) and state pipeline inspectors to determine compliance with OPS regulations. The data collected as a result of this IC allows for both PHMSA and the state pipeline inspectors to ensure that operators are taking the necessary measures to review their system and implement their HL IM Program. The notifications allow PHMSA, and state pipeline inspectors, to be made aware of certain deviations from the HL IM Program.

3. Extent of automated information collection.

PHMSA allows operators to send notifications via facsimile, email and, in some instances, operators may make notification by phone. PHMSA encourages the use of electronic technology where applicable.

4. Efforts to identify duplication.

There is no duplication, as the information collected is unique to specific situations.

5. Efforts to minimize the burden on small businesses.

The burden has been made as simple as possible. PHMSA expects impacted operators to be large and small businesses. For PHMSA to be able to effectively carry out its mission and monitor overall pipeline safety, it is essential that both large and small operators of pipelines

comply with the associated directives.

Small businesses may get assistance from pipeline trade associations in helping them develop the necessary documentation in addition to the information provided by PHMSA.

6. Impact of less frequent collection of information.

It is not possible to conduct the collection less frequently and still ensure the necessary level of safety to life and property inherent in transporting hazardous materials. Without this information, PHMSA would not be able to adequately assess potential risks associated with hazardous liquid pipelines. These pipelines could potentially be detrimental to 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.

The information collection contains no special circumstances.

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 received no comments pertaining to this information collection.

9. Payments 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, moreover, the requirements of this information collection do not include anything of a sensitive nature or of any matters considered private.

11. Justification for collection of sensitive information.

This information collection does not contain questions of a sensitive nature.

12. Estimate of burden hours for information requested.

- Currently Approved Responses: 203 Currently Approved Hours: 325,470 hours
- Estimated Annual Responses: 10,503 Estimated Burden Hours: 325,607 hours

IC	Responses	Burden Per Response	Total Burden
New Integrity Management Plans	66	2,440 hours	161,040 hours
Integrity Management Plan Updates	203	760 hours	154,280 hours
HI Assessment Notifications	10,150	1 hours	10,150 hours
180 Day Repair Notifications	74	0.5 hours	37 hours
Non-ILI Notifications	10	10 hours	100 hours
Total	10,503 annual responses		325,607 annual burden hours

PHMSA has recalculated the previously-approved number of responses for this information collection to count each individual action as a separate response. Previously, PHMSA estimated the number of responses based on the number of responding operators. PHMSA estimated 1 response per respondent. While updating this IC, PHMSA recalculated the number of responses to account for each separate action an operator must take to comply with this information collection request. This recalculation led to a significant increase in the number of responses although the previously-approved burden estimate remains the same. PHMSA estimates that the rule-related revisions to this information collection will add 84 new responses and 137 burden hours for new notification requirements as detailed below.

Initial Integrity Management Plans

PHMSA estimates that approximately 203 hazardous liquid operators are subject to integrity management requirements. Among those requirements are the need to have a detailed integrity management plan. Based on PHMSA audits, it is assumed that approximately 66 new integrity management plans will be developed each year. PHMSA expects each operator to spend an average of 1,400 hours developing the initial plan.

The labor breakdown is as follows:

Administrative: 400 hours
 Technical: 800 hours
 Senior Engineering: 200 hours

1,400 hours per plan x 66 plans = 92,400 hours to develop the initial plan.

Additionally, it is estimated that each company will be required to commit additional resources to ensure that the data collected is properly integrated and analyzed to ensure safety. It is estimated that this will require a total of 1,040 hours of administrative (400 hours) and supervisory time (640 hours).

The labor breakdown is as follows:

Administrative: 400 hours
Supervisory Time: 640 hours

1,040 hours x 66 operators = 68,640 hours for data integration.

Therefore, it is estimated that the burden to complete the initial plan is (92,400 hours to develop + 68,640 hours for data integration) **161,040 hours for 66 respondents – approximately 2, 440 burden hours per respondent.**

Integrity Management Plan Updates

All 203 operators that have existing plans are required to update their plans annually. It is assumed that each operator will take 260 hours each year to update their plan.

The labor breakdown is as follows:

Administrative: 70 hours
Engineering: 150 hours
Senior Engineering: 40 hours

260 hours per plan x 203 plans = 52,780 for plan updates

Additionally, the 203 operators will also need 500 hours of supervisory time to ensure that the data collected annually is appropriately integrated, for an industry total of (203 x 500) 101,500

Therefore, each subsequent year will require:

Updates: 52,780 hours
Data Integration: 101,500 hours

154,280 for plan updates and data integration each year

Hazardous Liquid Assessment Notifications

Additionally, operators subject to integrity management must submit notifications to PHMSA in various situations. Notifications include: Repair, Use of Alternate Technology, Interval Changes, and Long-term Pressure Reductions. These notifications may be submitted in any format. PHMSA estimates that each operator will submit 50 of these ad hoc notifications each year. PHMSA estimates that each notification takes approximately 1 hour to submit. **This results in a total annual burden of 10,150 responses and 10,150 burden hours.**

180 Day Repair Notifications

Owners and operators of hazardous liquid pipelines are required to have continual assessment and evaluation of pipeline integrity through inspection or testing, as well as remedial preventive and mitigative actions. The Pipeline Safety: Safety of On-Shore Hazardous Liquid Pipelines final rule, requires operators to notify PHMSA if they incur an anomalous condition in which the cause cannot be identified within 180 days. In cases where a determination about pipeline threats has not been obtained within 180 days following the date of inspection, pipeline operators are required to notify PHMSA in writing and provide an expected date when adequate information will become available. PHMSA expects approximately 74 operators to submit these notifications each year. PHMSA estimates that it will take each operator 30 minutes to complete the notification. **This new provision will result in a burden increase of 74 responses and 37 burden hours.**

Non-ILI/ Alternate Assessment Method Notifications

Hazardous Liquid pipeline operators are also required to notify PHMSA when they are unable to assess their pipeline via an in-line inspection. Operators who choose to use an alternate assessment method must demonstrate that their pipeline is not capable of accommodating an in-line inspection tool and that the use of an alternative assessment method will provide a substantially equivalent understanding of the condition of the pipeline. PHMSA estimates that operators will submit approximately 10 notifications each year regarding these conditions. Further, PHMSA estimates that each notification will take 10 hours, which includes the time to assemble the necessary information to demonstrate that the pipeline is not capable of accommodating an ILI tool and specify that the alternative assessment method will provide a substantially equivalent understanding of the pipeline. **This new provision will result in a burden increase of 10 responses and 100 burden hours.**

Therefore, the total annual burden hours are estimated as:

Initial Plans:	161,040 hours
Annual Updates	154,280 hours
Ad Hoc Notifications:	10,150 hours
180 Day Repair Notifications:	37 hours
Non-ILI Notifications:	100 hours

325,607 burden hours for 10, 503 responses

13. Estimate of total annual costs to respondents.

Integrity Assessment Notifications are assumed to be made 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 transportation)¹ is estimated as \$77.50. Using an estimated fringe benefit of approximately 35 percent, the recordkeeping 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 $\$104.63 \times 325,607$ hours = \$34,068,260.41

14. Estimate of cost to the Federal government.

Notifications are reviewed by PHMSA's regional staff and engineers at the GS-13 and GS-14 levels. The average annual salary is estimated to be around \$115,500. Other than salary costs, there are no additional costs to the federal government.

15. Explanation of program changes or adjustments.

The Pipeline Safety: Safety of On-Shore Hazardous Liquid Pipelines final rule requires operators under Integrity Management to notify PHMSA if it cannot obtain sufficient information about the discovery of anomalous conditions within 180 days. If 180-days is impracticable to make a determination about a condition found during an assessment, the pipeline operator must notify PHMSA and provide an expected date when adequate information will become available. This final rule also requires hazardous liquid pipeline operators to notify PHMSA if they are unable to use an in-line inspection tool to assess their pipeline. Lastly, PHMSA requests the title of this information collection, previously "Integrity Management in High Consequence Areas for Operators of Hazardous Liquid Pipelines," be changed to better align with the newly requested data.

16. Publication of results of data collection.

The information will not be published for statistical purposes.

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

OPS is not seeking approval to not display expiration date.

18. Exceptions to certification statement.

There are no exceptions.

¹ https://www.bls.gov/oes/current/naics3_486000.htm