

Department of Transportation
Office of the Chief Information Officer

Supporting Statement

“National Registry of Pipeline and LNG Operators”
OMB Control No. 2137-0627
Docket PHMSA-2010-0229

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for an amendment of a currently approved collection entitled “National Registry of Pipeline and LNG Operators” currently under OMB Control No. 2137-0627. The current expiration date for this information collection is April 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 29 responses and 29 burden hours for reporting activities.

Part A. Justification

1. Circumstances that make the collection of information necessary.

PHMSA’s statutory authority to collect pipeline facility information from operators is found in 49 U.S.C. 60102. This authority allows for the collection of information such as pipeline location, description, transported products, and any other information pertaining to the safe operation of a pipeline facility under PHMSA jurisdiction.

Moreover, 49 CFR 191.22 and 195.64, require operators to notify PHMSA when they experience significant asset changes, including new construction, that affect PHMSA’s ability to accurately monitor and assess pipeline safety performance. Certain types of changes to, or within, an operator’s facilities or pipeline network represent potential safety-altering activities for which PHMSA may need to inspect, investigate, or otherwise oversee to ensure that any public safety concerns are adequately and proactively addressed. In these cases, timely notification will allow PHMSA to efficiently manage its inspection resources or notify one of its partner state pipeline safety agencies if needed.

The accurate and timely representation of the scope and make-up of the nation's pipeline and LNG facility infrastructure is not only critical to PHMSA, but it is also critical to the various oversight bodies, Congress, the GAO, the DOT Inspector General, and the NTSB.

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

PHMSA will use two forms to collect the applicable registration and notification information from operators for the Registry. The forms and the purpose of the resulting information are identified below:

Operator Assignment Request Form (PHMSA F 1000.1)

The information provided in this form is broken into four different steps as detailed below:

Step 1 “..Basic Report Information”

This step allows for the operator to provide basic information that PHMSA will use to determine whether the requesting operator has regulated assets and currently exists in the registry. PHMSA will also use this information to distinguish relationships between companies and reduce the potential for assigning unnecessary OPIDs to companies.

Step 2 “...Description of Pipelines and/or Facilities”

PHMSA will use this information to collect asset type and location to determine oversight authority (PHMSA region staff or State partners). Once the oversight authority is determined, PHMSA will contact the appropriate entity to assist in the approval process for issuing OPIDs.

Step 3 “...PHMSA-Required Pipeline Safety Program Information”

PHMSA will use this information to quickly identify whether the requesting operator's program is part of any programs for existing operators (i.e., whether the requesting operator is operationally related to other operators under PHMSA jurisdiction). PHMSA will use this information to efficiently coordinate future inspections.

Step 4 “Provide Contact Information”

PHMSA will use this information to maintain direct lines of communication with key Operator personnel. Contact information is invaluable and vital to the efficient handling of pipeline emergencies and regulatory compliance.

Operator Registry Notification Form (PHMSA F 1000.2)

The purpose of this form is to provide PHMSA with notifications as required under §§ 191.22(c) and 195.64(c). PHMSA will use the information from this form to update the Registry and equip PHMSA and state regulatory staff with relevant and up-to-date information on the operators subject to applicable jurisdictions.

Summary

This Registry is necessary to compile an integrated national pipeline inventory of operator contact and facility information that is current. The Registry will also enable PHMSA to distribute up-to-date pipeline safety information for various technology applications used in the performance of inspections, regulatory oversight, reporting, and other safety-based needs, and will provide the accurate and up-to-date compilation of operating entities and facilities that is a critical element of PHMSA's pipeline safety mission.

3. Extent of automated information collection.

Operators will be required submit the required forms (OPID Assignment Request and Operator Registry Notification) electronically. Operators unable to submit electronically can contact PHMSA for an alternate means of submission.

4. Describe efforts to identify duplication.

To date, PHMSA is the only entity that compiles a national database of regulated pipeline operators

5. Efforts to minimize the burden on small businesses.

PHMSA expects affected operators to be both large and small businesses. However, this information is necessary for safety and tracking purposes regardless of business size. There are currently no exceptions for small businesses.

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 its regulated community. 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.

8. Compliance with 5 CFR 1320.8(d).

PHMSA issued a Notice of Proposed Rulemaking (NPRM) on October 13, 2015 (80 FR 61610). The comment period ended on January 8, 2016.

9. Payments or gifts to respondents.

PHMSA will not provide payments or gifts to respondents.

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 confidential.

11. Justification for collection of sensitive information.

The requirements of this information collection do not involve questions of a sensitive nature.

12. Estimate of burden hours for information requested.

- Currently Approved Responses: 689 Currently Approved Hours: 689 hours
- Estimated Annual Responses: 718 Estimated Burden Hours: 718 hours

PHMSA estimates that this revision will add 29 responses and 29 burden hours for new operator registration and notification requirements as detailed below.

The following burden breakdown has been revised to include the burden increase resulting from provisions of the Safety of On-Shore Hazardous Liquid Pipelines Final Rule. This Final Rule will require operators of both gravity lines and gathering lines to be subject to accident, annual, and safety-related condition reporting. As such, these newly regulated operators will need to register with the National Registry of Pipeline Operators to obtain an Operator Identification Number (OPID). As a result of this change, PHMSA expects an additional 28 HL pipeline operators (**23 gathering line operators** and approximately **5 gravity line operators**) to be added to the reporting community. PHMSA expects that the currently-approved **burden for this information collection will increase by 29 responses and 29 burden hours** for notifications and OPID registrations relative to operators of hazardous liquid gravity and gathering lines.

IC	Responses	Burden Per Response	Total Burden
OPID Assignment Registry	262	1 hour	262 hours
Operator Notifications	456	1 hour	456 hours
Total	718 annual responses		718 annual burden hours

Burden for OPID Assignment Registry (Form PHMSA F 1000.1)

Previously Approved burden: 234 responses and 234 burden hours

Added Burden: 28 responses and 28 burden hours (revision)

Estimated total burden: 262 responses and 262 burden hours

The Pipeline Safety: Safety of On-Shore Hazardous Liquid Pipelines final rule makes operators of hazardous liquid gravity lines and hazardous liquid gathering lines subject to both annual, accident, and safety-related condition reporting requirements. Because of this, PHMSA expects an additional 28 HL pipeline operators (23 gathering line operators and approximately 5 gravity line operators) to be added to the reporting community. Consequently, the 28 newly regulated operators will need to apply for an OPID by completing form PHMSA F 1000.1. PHMSA estimates that it takes each operator 1 hour to complete the OPID registry process. The addition of the 28 newly covered operators will result in **28 new responses** and an added burden of **28 hours** (28 operators * 1 hour) to this information collection.

Burden for Operator Notifications(Form PHMSA F 1000.2)

Previously Approved burden: 455 responses and 455 burden hours

Added Burden: 1 response and 1 burden hour (revision)

Estimated total burden: 456 responses and 456 burden hours

PHMSA requires pipeline operators to make notifications by way of form PHMSA F1000.2 when certain events occur. PHMSA estimates that 5 percent of operators make these notifications each year. Likewise, PHMSA expects 5 percent of the newly-regulated hazardous liquid gravity and hazardous liquid reporting-regulated gathering line operators (approximately 1) to make these notifications as well. PHMSA estimates that this activity will take 1 hour per operator. Therefore, PHMSA estimates an increase of **1 hour** (1 notification *1 hour) to the currently-approved burden for Operator Notifications.

Summary

The burden for this information collection is being revised to account for the additional burden (29 responses {28 new OPIDs and 1 new Operator notification responses} x 1 hour = 29 hours) that will be incurred by the newly regulated operators. Therefore, PHMSA estimates the overall combined annual burden for OPID Assignment and Operator Notification at **718 responses** (689 + 29) **and 718 annual burden hours** (689+29) for this information collection.

13. Estimate of the total annual costs burden.

Operator Registry and Notifications 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 transportation)^a is estimated as \$77.50. Using an estimated fringe benefit of

^a https://www.bls.gov/oes/current/naics3_486000.htm

approximately 35 percent, the registry and notification 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 $\$104.63 \times 718 \text{ hours} = \$75,124.34$.

14. Estimates of costs to the Federal Government.

PHMSA expects to incur no additional costs due to the collection of this information.

15. Explanation of the program change or adjustments.

PHMSA is revising the Pipeline Safety Regulations to require operators of gravity and gathering lines to submit annual and accident reports. The Pipeline Safety: Safety of Hazardous Liquid Pipelines final rule requires the newly-regulated operators to obtain an OPID through PHMSA's National Registry of Operators and make notification when applicable.

16. Publication of results of data collection.

PHMSA will publish basic information at www.phmsa.dot.gov. "Basic Information" will be focused on summary data such as:

- # of operators per state/county
- # of operators by transported commodity
- # of operators for all commodities
- # of miles for each commodity
- # of miles for each operator

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

PHMSA is not requesting approval to not displaying the expiration date.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.