

DEPARTMENT OF TRANSPORTATION  
INFORMATION COLLECTION

SUPPORTING STATEMENT

“Rupture Mitigation Valve Recordkeeping Requirements”

OMB Control No. 2137-0637

RIN No.: 2137-AF06

Docket No. PHMSA-2013-0255

**INTRODUCTION**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) of a new information collection titled, “Rupture Mitigation Valve Recordkeeping Requirements”. The development of this information collection is necessary due to the following PHMSA action that triggers components of the Paperwork Reduction Act:

**Docket No. PHMSA-2013-0255 - Pipeline Safety: Amendments to Parts 192 and 195 to Require Valve Installation and Minimum Rupture Detection Standards**

- o **This collection will add 4,213 Annual Responses and 85,724 Annual Burden Hours for recordkeeping requirements**

**Part A. Justification**

**1. Circumstances that make the collection of information necessary.**

On April 22, 2022, PHMSA issued a final rule titled “Pipeline Safety: Amendments to Parts 192 and 195 to Require Valve Installation and Minimum Rupture Detection Standards” which made revisions to 49 CFR parts 192 and 195. Based on the provisions contained within the final rule, operators are required to document certain procedures and to maintain records pertaining to various aspects of their rupture-mitigation valve operations. These provisions are detailed below.

Operators are required to develop written rupture identification procedures to evaluate and identify whether a notification of potential rupture is an actual rupture event or non-rupture event as soon as practicable. These procedures must, at a minimum, specify the sources of information, operational factors, and other criteria that operator personnel will use to evaluate a notification of potential rupture.

Operators who have experienced a rupture or rupture-mitigation valve shut-off are required to complete a post-incident review. The post-incident summary, all investigation and analysis documents used to prepare it, and records of lessons learned must be kept for the life of the pipeline.

Operators are required to maintain records if they take any of the following actions:

- establish an unanticipated or unplanned pressure loss threshold that is greater than a 10 percent pressure loss within a time interval of 15 minutes or less.
- use a manual valve in lieu of a rupture-mitigation valve for a crossover connection.
- increase the valve spacing intervals by 1.25 times the allotted distance.

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 to be used.**

The information collection provides PHMSA with the information necessary to evaluate the incidents in which pipelines rupture or in which the rupture-mitigation valves were closed. methods used by hazardous liquid operators when mitigating pipeline ruptures. PHMSA will use the information provided in the records to identify potential preventive and mitigative measures that could be taken to reduce or limit the release volume and damage from similar events in the future.

**3. Extent of automated information collection**

PHMSA allows operators to keep the records by whatever means is easiest for them.

**4. Describe 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.

**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 natural gas and hazardous materials. 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(d).**

PHMSA issued a Notice of Proposed Rulemaking (NPRM) on February 6, 2020 (85 FR 7162). The comment period ended on April 6, 2020. PHMSA did not receive any comments on this information collection request.

**9. Payment 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.

**11. Justification for collection of sensitive information.**

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

**12. Estimate of burden hours for information requested.**

<b>Proposed number of responses: 4,213 responses</b>
<b>Proposed annual burden: 85,724 hours</b>

PHMSA requires operators to make and keep certain records pertaining to rupture valve mitigation. PHMSA estimates 1,812 operators (1,304 gas and 508 hazardous liquid) will be subject to the following recordkeeping requirements. The following information details the various records operators are required to keep:

- § 192.615(a)(6) - *Rupture Identification Procedures for Natural Gas Operators* - An operator must develop written rupture identification procedures to evaluate and identify whether a Notification of Potential Rupture, as defined in § 192.3, is an actual rupture event or a non-rupture event as soon as practicable. These procedures must, at a minimum, specify the sources of information, operational factors, and other criteria that operator personnel use to evaluate a Notification of Potential Rupture. PHMSA expects that 1,304 natural gas operators will take 40 hours each to comply with this requirement.
- § 192.617 - *Post-Incident Lessons Learned Records for Natural Gas Operators* - Each operator must develop, implement, and incorporate lessons learned from a post-incident review into its written procedures, including in pertinent operator personnel training and qualification programs, and in design, construction, testing, maintenance, operations, and emergency procedure manuals and specifications. PHMSA expects that 24 operators will take 40 hours each to comply with this requirement.

- § 192.634(b)(4) – *Lockout/Tagout Records for Natural Gas Operators* - An operator may use a manual valve in lieu of a rupture-mitigation valve for a crossover connection if during normal operations the valve is closed to prevent the flow of gas with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator. The operator must document that the valve has been locked in accordance with the operator’s lock-out and tag-out procedures. PHMSA expects that 130 operators will take 4 hours each to comply with this requirement.
- § 192.634(c) – *Procedures for Manual Valves as Alternative Equivalent Technology* - Operators using a manual valve as an alternative equivalent technology must develop and implement operating procedures that appropriately designate and locate nearby personnel to ensure valve shut-off. PHMSA expects that 130 operators will take approximately 40 hours each to comply with this requirement.
- § 192.745(d)(4) – *Response-Time Drills Lessons Learned* - Based on the results of response-time drills, an operator must include lessons learned in training and qualifications programs, design, construction, testing, maintenance, operating, and emergency procedures manuals. PHMSA expects that 130 operators will take 8 hours each to comply with this requirement.
- § 192.745(e) – *Remedial Measures for Valves* - Each operator must develop and implement remedial measures to correct any valve installed on an onshore pipeline that is indicated to be inoperable or unable to maintain an effective shut-off. PHMSA expects that it will take 1,304 operators 2 hours each to comply with this requirement.
- § 195.260(g)(2) – *Valve Spacing Interval Records for Liquid Operators* - If the operator increases the valve spacing intervals by 1.25 times the allotted distance they must keep the records necessary to support that determination for the useful life of the pipeline. PHMSA expects that 51 operators will take 8 hours each to comply with this requirement.
- § 195.402(c)(5)(i) – *Post-Incident Lessons Learned Records for Hazardous Liquid Operators* - Each operator must develop, implement, and incorporate lessons learned from a post-incident review into its written procedures, including in pertinent operator personnel training and qualifications programs, and in design, construction, testing, maintenance, operations, and emergency procedure manuals and specifications. PHMSA expects that 22 operators will take 40 hours each to comply with this requirement.

- § 195.402(e)(4) – *Rupture Identification Procedures for Hazardous Liquid Operators* – Each hazardous liquid operator installing valves in accordance with § 195.258(c), § 195.258(d), or that are subject to the requirements in § 195.418 must develop written rupture identification procedures to evaluate and identify whether a notification of potential rupture, as defined in § 195.2, is an actual rupture event or non-rupture event as soon as practicable of the notification of potential rupture. These procedures must, at a minimum, specify the sources of information, operational factors, and other criteria that operator personnel use to evaluate a notification of potential rupture. PHMSA expects that 508 operators will take 40 hours each to comply with this requirement.
- § 195.418(b)(4) – *Lockout/Tagout Records for Hazardous Liquid Operators* - An operator may use a manual valve as a rupture-mitigation valve for a crossover connection if, during normal operations, the valve is closed to prevent the flow of hazardous liquid with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator. The operator must document that the valve has been locked in accordance with the operator’s lock-out and tag-out procedures. PHMSA expects that 51 operators will take 4 hours each to comply with this requirement.
- § 195.420(e)(4) – *Response-Time Drills Lessons Learned* - Based on the results of response-time drills, an operator must include lessons learned in training and qualifications programs, design, construction, testing, maintenance, operating, and emergency procedures manuals. PHMSA expects that 51 operators will take 8 hours each to comply with this requirement.
- § 195.420(f) - *Remedial Measures for Valves* - Each operator must develop and implement remedial measures to correct any valve installed on an onshore pipeline that is indicated to be inoperable or unable to maintain an effective shut-off. PHMSA expects that it will take 508 operators 2 hours each to comply with this requirement.

The following table details the estimated burden in keeping these records:

IC	Responses	Burden Per Response	Total Burden
§ 192.615(a)(6) Rupture Identification Procedures for Natural Gas Operators	1, 304 responses	40 hours	52,160 hours

§ 192.617 Post-Incident Lessons Learned Records for Natural Gas Operators	24 responses	40 hours	960 hours
§ 192.634(b)(4) Lockout/Tagout Records for Natural Gas Operators	130 responses	4 hours	520 hours
§ 192.634(c) procedures for manual valves as alternative equivalent technology	130	40	5,200
§ 192.745(d)(4) Response-Time Drills Lessons Learned	130 responses	8 hours	1,040 hours
§ 192.745(e) Remedial Measures for Valves	1,304 responses	2 hours	2,608 hours
§ 195.260(g)(2) Valve Spacing Interval Records for Liquid Operators	51 responses	8 hours	408 hours
§ 195.402(c)(5)(i) Post-Incident Lessons Learned Records for Hazardous Liquid Operators	22 responses	40 hours	880 hours
§ 195.402(e)(4) Rupture Identification Procedures for Hazardous Liquid Operators	508 responses	40 hours	20, 320 hours
§ 195.418(b)(4) Lockout/Tagout Records for Hazardous Liquid Operators	51 responses	4 hours	204 hours
§ 195.420(e)(4) Response-Time Drills Lessons Learned	51 responses	8 hours	408
§ 195.420(f) Remedial measures for valves	508 responses	2 hours	1,016

<b>Total</b>	<b>4,213 annual responses</b>		<b>85,724 annual burden hours</b>
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**13. Estimate of the total annual costs burden.**

PHMSA expects the records in this information collection to be kept 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) is estimated at \$77.50 per hour. Using an estimated fringe benefit of approximately 35 percent, the notification requirements for gas pipeline operators are prepared at the average rate of \$104.63 per hour.

The total cost to the industry is 85,724 hours x \$104.63/hour = \$8,969,302.12.

**14. Estimates of costs to the Federal Government**

PHMSA expects the review of these records to fall under the basic responsibilities of an inspector conducting a routine site visit. Therefore, PHMSA expects there to be no additional cost to the Federal Government associated with this information collection.

**15. Explanation of the program change or adjustments.**

Based on the amendments to 49 CFR parts 192 and 195 by the Pipeline Safety: Amendments to Parts 192 and 195 to Require Valve Installation and Minimum Rupture Detection Standards final rule, operators are now required to document certain procedures and to maintain records pertaining to various aspects of their rupture-mitigation valve operations. First, operators must develop written rupture identification procedures to evaluate and identify whether a notification of potential rupture is an actual rupture event or non-rupture event as soon as practicable. These procedures must, at a minimum, specify the sources of information, operational factors, and other criteria that operator personnel use to evaluate a notification of potential rupture. Operators who have experienced a rupture or rupture-mitigation valve shut-off are required to complete a post-incident review. The post-incident summary, all investigation and analysis documents used to prepare it, and records of lessons learned must be kept for the life of the pipeline. Operators are required to maintain records if they establish an unanticipated or unplanned pressure loss threshold that is greater than a 10 percent pressure loss within a time interval of 15 minutes or less; use a manual valve in lieu of a rupture-mitigation valve for a crossover connection; or increase the valve spacing intervals by 1.25 times the allotted distance.

**16. Publication of results of data collection.**

This information will not be published for statistical purposes.

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

PHMSA is not seeking such approval.

**18. Exceptions to the certification statement.**

There is no exception.