

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

**Supporting Statement**

**Record keeping Requirements for Gas Pipeline Operators  
OMB Control No. 2137-0049  
Docket No. PHMSA-2021-0039  
RIN 2137-AF51**

**Introduction**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for revision of a currently approved collection entitled “Record keeping Requirements for Gas Pipeline Operators,” currently approved under OMB Control No. 2137-0049. The current expiration date for this information collection is April 30, 2026.

The revision of this information collection is necessary due to the following PHMSA action that will trigger components of the Paperwork Reduction Act of 1995:

**Pipeline Safety: Gas Leak Detection and Repair Proposed Rule:** Requires gas pipeline operators to develop emergency plans and maintain records for grading and repairing leaks, leak detection choice analysis, written procedures.

Adds 5,259 responses and 228,023 burden hours to this information collection for recordkeeping.

**Part A. Justification.**

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

Part 192 recordkeeping requirements currently apply to operators transporting natural and other gas by pipeline. There is a continuing need for gas pipeline operators subject to 49 CFR Part 192 to comply with the requirements for recordkeeping as presented below.

49 USC 60117 requires that:

“To enable the Secretary to decide whether a person transporting gas or hazardous liquid or operating a pipeline facility is complying with this chapter and standards prescribed or orders issued under this chapter, the person shall –

(1) maintain records, make reports, and provide information the Secretary requires; and

(2) make the records, reports and information available when the Secretary requests.”

The regulations set forth in 49 CFR 192 require operators to maintain a series of test, inspection, and maintenance records. These recordkeeping requirements are necessary to prevent a gas pipeline incident from occurring to the extent possible, to ascertain compliance with gas pipeline safety regulations, and to provide a background for incident investigations.

**Section 192.13(d)** requires each operator of an onshore gas transmission pipeline must develop and follow a management of change process

**Section 192.319(e)** requires operators to Notify PHMSA at least 90 days in advance of using other technology for installation of a pipe in a ditch

**Section 192.319 (g)** requires an operator of onshore steel transmission pipelines must make and retain for the life of the pipeline records documenting the indirect assessment findings and remedial actions

**Section 192.461(h)** an operator must develop a remedial action plan and apply for any necessary permits within six months of completion of the inspection or testing that identified the deficiency.

**Section 192.461(i)** requires an operator of onshore steel transmission pipelines must make and retain for the life of the pipeline records documenting the indirect assessment findings and remedial actions

**Section 192.465(d)(2)** requires each operator of an onshore gas transmission pipelines to develop a remedial action plan within six months of completion of the inspection or testing that identified the deficiency.

**Section 192.478** each operator must develop and implement a monitoring and mitigation program to identify potentially corrosive constituents in the gas being transported and mitigate the corrosive effects, as necessary.

**Section 192.613** requires operators an operator must inspect all potentially affected onshore transmission pipeline facilities following an extreme weather event to detect conditions that could adversely affect the safe operation of that pipeline and notifying affected communities of the steps that can be taken to ensure public safety following an extreme weather event.

**Section 192.712(c)** requires an operator using other technologies or techniques to comply with paragraph (c) of this section must submit advance notification to PHMSA in accordance with § 192.18.

**Section 192.714(c)** requires an operator to complete remediation of a condition according to a schedule prioritizing the conditions for evaluation and remediation. If an operator cannot meet the schedule for any condition, the operator must document the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety.

**Section 192.714(d)(3)** requires an operator does not have to schedule certain conditions for remediation but must record and monitor the conditions during subsequent risk assessments and integrity assessments for any change that may require remediation.

**Section 192.714(e)(4)** requires an operator must document and keep records of the calculations and decisions used to determine the reduced operating pressure, and the implementation of the actual reduced operating pressure, for a period of five years after the pipeline has been repaired.

**Section 192.714(g)** requires operators during the In Situ Crack Defect Records to maintain records of tools and how you perform examination confirmed by qualified SME.

**Section 192.917(b)** requires an operator must document the names and qualifications of the individuals who approve SME inputs used in the current risk assessment.

**Section 192.927** requires gas pipeline operators to explicitly document the results of its feasibility assessment as required by NACE SP0206, Section 3.3. **Section 192.927(b)** specifically requires operators to Notify OPS and State authorities 90 days prior to ICDA assessment (must develop plan and notify OPS) and Must Notify State

**Section 192.929(b)** requires an operator using direct assessment as an integrity assessment method to address stress corrosion cracking in a covered pipeline segment must develop and follow an SCCDA plan that meets NACE SP0204 and that implements all four steps of the SCCDA process including pre-assessment, indirect inspection, detailed examination and post-assessment.

**Section 192.933(b)** requires operators to Notify PHMSA no later than 180 days after conducting an integrity assessment when operator can't make a determination about a condition and notify PHMSA of the date adequate information will be available.

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

The information is used to assist Federal pipeline safety inspectors and State pipeline safety inspectors participating in the gas pipeline safety program. From these records, inspectors will be able to ascertain compliance with regulations. The information will also help to ensure safe pipeline construction, operation, and maintenance, and it will provide important information needed in incident investigations. Further, the information retained will form a record of pipe materials and characteristics that will assist in pipe maintenance and repair efforts by operators.

3. Extent of automated information collection.

Operators are permitted to keep records in any retrievable form. They may use the latest information technology to reduce the additional information collection burden.

4. Efforts to identify duplication.

No similar information is known to exist. Every gas pipeline system is particularly unique in its location, its type of design, and its operation. Therefore, the regulations set forth certain requirements so that each operator produces a record for their unique system.

5. Efforts to minimize the burden on small businesses.

There are no efforts to minimize the burden for small businesses. Records are a necessary to ascertain compliance with the regulations, and to ensure safe construction, operation, and maintenance of pipelines.

6. Impact of less frequent collection of information.

The frequency of the collection of information is one time for the written procedures required under §§ 192.13(d), 192.319(e), 192.461(g), 192.461(h), 192.65(d)(2), 192.478(a), 192.485(c), 192.714(d)(3), 192.714 (g), 192.917(b)(2), 192.927(c)(2), 192.929(b), 192.929 (b)(4)(i), 192.929 (b)(5), 192.613, 192.712(c), 192.927(b), and 192.933(b).

The frequency of recordkeeping is on an annual basis for §§ 192.319 (g), 192.461 (i), 192.478 (c), 192.714(c). This information could not be collected less frequently.

Retaining records under § 192.13(d) is necessary to ensure the safe operation of pipelines throughout their lifetime and operators maintain an organized management of change program.

Maintenance records required in §§ 192.319, 192.461, 192.465, 192.478, 192.485, 192.929 is necessary to properly monitor corrosion in pipelines. Leaks, safety-related conditions, and incidents could result if the collection were conducted less frequently.

Maintenance of records required in §§ 192.917, 192.927, and 192.929 is necessary to clarify, update, and strengthen a range of IM program processes to close regulatory gaps where appropriate and adopt additional measures to increase the level of public safety for pipelines both inside and outside of HCAs

Maintenance of records required under § 192.714 is necessary to minimize hazards associated with anomalies and defects in pipelines.

#### 7. Special circumstances.

It is essential the above records be kept for the life of the gas pipeline in order to establish a history for accident investigation purposes or to trace the origin of a safety-related problem.

a. Section 192.13(d) requires gas pipeline operators retain for the life of the pipeline a management of change process, as outlined in ASME/ANSI B31.8S, section 11, that addresses technical, design, physical, environmental, procedural, operational, maintenance, and organizational changes to the pipeline or processes, whether permanent or temporary

b. Section 192.319(g) requires gas pipeline operators retain records documenting the indirect assessment findings and remedial actions after the installation of pipe in a ditch

c. Section 192.461 requires gas pipeline operators retain records documenting the protective coating indirect assessment findings and remedial actions.

d. Section 192.933(b) requires in cases where a determination cannot be made on the condition of a pipeline the operator must notify PHMSA, and provide an expected date when adequate information will become available

#### 8. Compliance with 5 CFR 1320.8(d).

On May 18, 2023, PHMSA published a Noticed of Proposed Rulemaking (88 FR 31890) to seek public comments on the proposed data collection.

On May 5, 2021, PHMSA held a two-day virtual Pipeline Leak Detection, Leak Repair and Methane Emission Reductions public meeting to engage stakeholders on gas pipeline leak detection and repair issues as an important step in fulfilling the requirements of Sections 113 and 114 of the PIPES Act of 2020 ("Act"). During the meeting, stakeholders—including environmental and public

safety groups, Federal and state governments, and the pipeline industry shared perspectives on improving gas pipeline leak detection and repair. Topics discussed included the scope of the current problem, as well as advanced technologies and practices to address methane emissions from natural gas pipeline systems.

Additionally, PHMSA maintains an “open-door” policy with its stakeholders where continual engagement on ways to improve pipeline safety are routine. In this vein, PHMSA participates in various discussions where updates on this information collection are provided. PHMSA includes updates on this information collection in its regulatory updates presentation that is used to update stakeholders on the status of pending actions. PHMSA takes all feedback received into consideration in the proposed adjustments.

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 grant confidentiality.

11. Justification for collection of sensitive information.

The recordkeeping requirements of Part 192 do not involve questions of a sensitive nature.

12. Estimate of burden hours for information requested.

Current Number of Responses: 3,861,842	Proposed Number of Responses: <b>3,867,101</b>
Current Burden Estimate: 1,677,030 hours	Proposed Burden Estimate: <b>1,905,053 hours</b>

Based on annual reports submitted by operators, PHMSA estimates the total number of gas pipeline operators to be 7,695 operators consisting of 1,092 gas distribution operators, 1,015 gas transmission/gathering operators, 218 operators with both distribution and transmission/ gathering pipelines, and 5,370 master meter system operators. PHMSA currently estimates gas pipeline operators spend approximately 1,677,030 hours, annually, complying with the existing recordkeeping requirements in 49 CFR Part 192.

Table 1 shows the burden breakdown for the existing recordkeeping requirements in Part 192. For transmission, gathering, and distribution mileage and number of operators used in the burden estimates, PHMSA relied on data provided by operators in 2018

annual reports.<sup>1</sup> For all annual industry burden estimates, PHMSA rounded up to the nearest 10 hours. The appendix provides a detailed breakout of the costs for each provision.

Table 1: Summary of Annual Burden Hours to Industry	
Regulation Section	Annual Burden Hour to the Industry
192.5(d)	70
192.9	2,220
192.14(b)	40
192.67	90
192.127	90
192.205	90
192.225(b)	650
192.227	10
192.243(f)	63,520
192.273(b)	110
192.283(c)	110
192.285	10
192.303	10
192.491(a)	31,640
192.491(c)1	576,970
192.5172	1,800
192.553(b)&(c)	160
192.603(b)3	414,090
192.607(b)	40
192.614	272,480
192.615(4)	291,630
192.619(a)(4)(f)	230
192.624(d)	450
192.707(d)	650
192.709	18,040
192.712(g)	1,830

Table 1: Summary of Annual Burden Hours to Industry	
Regulation Section	Annual Burden Hour to the Industry
Total	1,677,030

In the Pipeline Safety: Gas Leak Detection and Repair Proposed Rule, PHMSA proposes adding 4 new mandatory recordkeeping requirements for operators of natural gas pipelines. New requirements include:

- §192.605 requires operators to develop or revise procedural manuals for operations, maintenance, and emergencies.
- §192.615 requires Type B gas gathering operators to maintain records regarding their emergency planning.
- §192.760(a)(1) requires operators to develop written procedures for grading and repairing leaks.
- §192.763(f) requires operators to document their leak detection equipment choice analysis.

As detailed in Table 2 below, the total added burden to this information collection due to these new recordkeeping requirements is 228,023 hours annually for gas pipeline operators. Consequently, **the new total annual burden to gas pipeline industry due to the recordkeeping requirements of Part 192 is 1,905,053** (1,677,030 + 228,023) hours annually.

<b>Regulation Section</b>	<b>Estimated Responses</b>	<b>Estimated Burden Per Response</b>	<b>Total Estimated Burden</b>
192.605	63	100 hours	6,300 hours
192.615	64	38 hours	2,432 hours
192.760(a)(1)	2,630	61.5 hours	161,745 hours
192.763(f)	2,502	23 hours	57,546 hours
<b>Total</b>	<b>5,259 responses</b>		<b>228,023 hours</b>

### **Section 192.605**

PHMSA proposes to extend the requirement under §192.605 to prepare and follow a written procedure manual for operations, maintenance, and emergency response activities to Type B and Type C gathering lines. The requirements currently apply to onshore or offshore gas transmission pipelines, gas distribution pipelines, offshore gas gathering pipelines, and Type A gas gathering pipelines. PHMSA expects **63** impacted Type B and Type C operators to spend 100 hours, annually, completing this task. This results in an overall annual burden of 63 responses and **6,300** hours for this recordkeeping requirement.

### **Section 192.615**

PHMSA proposes to extend the emergency planning requirements at §192.615 to Type B gas gathering pipelines. For this analysis, PHMSA expects that operators with pipelines already covered by an existing procedure manual already implement applicable procedures across their pipeline network. The number of operators incurring the burden associated with this change include the **64** operators that reported Type B gathering lines only in 2020 (*i.e.*, did not also operate gas transmission, Type A gas gathering, or offshore gas gathering pipelines), as well as operators estimated to operate Type C gathering lines only. PHMSA estimates that these operators will spend approximately 38 hours, annually, creating and maintaining these records. Therefore, the annual cost to industry due to this recordkeeping requirement is approximately **2,432** hours.

### **Section 192.760(a)(1)**

This section requires that operators of gas pipelines to develop written procedures for grading and repairing leaks. PHMSA estimates that it takes **2, 630** operators (**209** Part 192-regulated gas gathering operators, **1,322** gas distribution pipeline operators, and **1,099** gas transmission operators) each approximately 61.5 hours, annually, to make and retain these procedures. Therefore, the annual cost to industry due to this recordkeeping requirement is approximately **161,745** hours.

### **Section 192.763(f)**

This section requires that requires operators to document their leak detection equipment choice analysis. PHMSA estimates **2,502** operators (**84** Part 192-regulated gas gathering operators, **1,322** gas distribution pipeline operators, and **1,096** gas transmission pipeline operators) will spend approximately 23 hours, annually, to make and retain these records. Therefore, the annual cost to industry due to this recordkeeping requirement is approximately **57,546** hours.

### 13. Estimate of total annual costs to respondents.

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)<sup>2</sup> is estimated as \$78.31. Using an estimated fringe benefit of approximately 35 percent, the recordkeeping requirements for the gas operators are prepared at the average rate of \$105.72 per hour.

The total cost to the industry is 1,905,053 hours x \$105.72/hour = \$201,402,203.00

### 14. Estimate of cost to the Federal Government.

PHMSA estimates that 100 Federal inspectors spend an estimated 10 percent of their time reviewing records retained by gas pipeline operators. The average salary of a federal transportation inspector is \$110,370. This calculates to an estimated annual cost to the Federal Government of:

100 (Federal inspectors) x \$110,370 (mean salary) x 0.10 (time) = \$1,103,700.

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<sup>2</sup> [https://www.bls.gov/oes/current/naics3\\_486000.htm](https://www.bls.gov/oes/current/naics3_486000.htm)

15. Explanation of program changes or adjustments.

This ICR is revised to include new recordkeeping requirements contained in the Pipeline Safety: Gas Leak Detection and Repair Proposed Rule which requires gas pipeline operators to develop emergency plans and maintain records for grading and repairing leaks, leak detection choice analysis, written procedures.

16. Publication of results of data collection.

The information will not be published.

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

OPS is not seeking approval to not display the expiration date.

18. Exceptions to certification statement.

There is no exception to PHMSA's certification of this request for information collection approval.