

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

**Supporting Statement  
“Pipeline Safety: Integrity Management Program for Gas Distribution Pipelines”  
OMB Control No. 2137-0625  
Docket No. PHMSA-2021-0046  
RIN 2137-AF53**

**INTRODUCTION**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for a revision of a currently approved collection entitled “Integrity Management Program for Gas Distribution Pipelines” (OMB Control No. 2137-0625). The current expiration date for this information collection is May 31, 2024

The revision of this information collection is necessary due to the following PHMSA action that will affect the current collection of information:

**Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives**

- Reduces annual burden by 2,539 responses and 66,014 hours for recordkeeping activities.

**Part A. Justification**

1. Circumstances that make collection of information necessary.

49 CFR Part 192, Section 1005, in Subpart P requires operators of gas distribution pipelines to develop and implement integrity management (IM) programs. The purpose of these programs is to enhance safety by identifying and reducing pipeline integrity risks.

This regulation addresses recommendations from the Department of Transportation’s (DOT) Office of the Inspector General (OIG) and the National Transportation Safety Board. It also implements a requirement in the Pipeline Inspection, Protection, Enforcement and Safety Act (PIPES Act) of 2006 that integrity management requirements be established for distribution pipelines.

The Pipeline Safety: Gas Pipeline Regulatory Reform Final Rule eliminates the requirement for master meter operators to develop and maintain integrity management plans under § 192.1015. This deregulatory action will significantly reduce the burden on these small operators.

This information collection supports the U.S. Department of Transportation's SAFETY GOAL, which targets three main strategic initiatives: managing risk and integrity, sharing responsibility, and providing effective stewardship. This goal enhances public health and safety by working toward the elimination of transportation-related deaths and injuries.

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

The integrity management (IM) approach was designed to promote continuous improvement in pipeline safety by requiring operators to identify and invest in risk control measures beyond core regulatory requirements. Based on the required risk assessments and enhanced controls, this requirement also establishes procedures permitting risk-based adjustment of prescribed intervals for leak detection surveys and other fixed-interval requirements in the agency's existing regulations for gas distribution pipelines. PHMSA requires operators to maintain records demonstrating compliance with its requirements for 10 years and these records must include superseded IM plans. The recordkeeping requirements are consistent with good business practices and are designed to enhance risk management practices. PHMSA will use the information to evaluate the overall effectiveness of distribution IM requirements.

3. Extent of automated information collection.

Operators may keep the records in any retrievable form and operators may use the technology that is most cost effective to reduce the burden.

4. Efforts to identify duplication.

Each gas distribution pipeline system is particularly unique in its location, its type of design, and its operation. Therefore, the regulations set forth certain requirements so that an operator will produce for PHMSA a record for his unique system. At this time, no other alternate source is available.

5. Efforts to minimize the burden on small businesses.

The Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives NPRM eliminates the requirement for LPG operators of a gas distribution pipeline with fewer than 100 customers to develop and maintain integrity management plans. This significantly reduces the burden on these small operators. PHMSA estimates that 2,539 small LPG operators spend 66,014 hours annually developing and updating integrity management plans.

6. Impact of less frequent collection of information.

49 CFR Part 192.1011 requires operators to maintain records demonstrating compliance with its requirements for 10 years, and that these records must include superseded IM plans.

7. Special circumstances.

None of the conditions apply.

8. Compliance with 5 CFR 1320.8.

On September 7, 2023 PHMSA published a Noticed of Proposed Rulemaking (88 FR 61746) to seek public comments on the proposed data collection. The comment period closes on November 6, 2023.

9. Payments or gifts to respondents.

No payment is provided.

10. Assurance of confidentiality.

PHMSA does not have the authority to guarantee confidentiality.

11. Justification for collection of sensitive information.

There is no sensitive information collected.

12. Estimate of burden hours for information requested.

Current Number of Responses: 3,882	Proposed Number of Responses: 1,343
Current Burden Estimate: 723,192 hours	Proposed Burden Estimate: 657,178 hours

The burden estimate for this information collection has been revised to include a decrease in burden resulting from provisions of the Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives NPRM. With this deregulatory action, PHMSA proposes to eliminate the requirement for LPG operators of a gas distribution pipeline with fewer than 100 customers to develop and maintain integrity management plans. PHMSA expects that by eliminating this recordkeeping requirement for these operators, the **currently approved burden for this information collection will decrease by 2,539 responses and 66,014 hours.**

Each affected operator must develop and maintain a written integrity management plan, which includes initial plan development, recordkeeping and updates. Burden for complying with this requirement is heavily based on the size of the operator.

The table below has the breakdown by system.

Type of Operator	Prepare an IM Plan (hours per operator)	Threat Identification (hours per operator)	Update Plan (hours per operator)	Total Hours Per Operator Type
Large Operators (201)	960	800	288	411,648
Small Operators and LPG Operators with 100 or more Customers (1,142)	71	120	24	245,530
<b>Total for 1,343 operators</b>				<b>657,178</b>

In sum, PHMSA estimates the overall burden for developing and periodically revising IM plans is approximately 657,178 hours annually.

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>1</sup> is estimated as \$77.50. Using an estimated fringe benefit of approximately 35 percent, the recordkeeping requirements for the gas operators are prepared at the average rate of \$104.63 per hour.

The total cost to the industry is 657,178 hours x \$104.63/hour = \$68,760,534.14.

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 \$107,630. This calculates to an estimated annual cost to the Federal Government of:

$$100 \text{ (Federal inspectors)} \times \$107,630 \text{ (mean salary)} \times 0.10 \text{ (time)} = \$1,076,300.$$

15. Explanation of program changes or adjustments.

This ICR is revised to include reflect changes proposed in the Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives NPRM. With this deregulatory action, PHMSA eliminates the requirement for LPG operators of a gas distribution pipeline with fewer than 100 customers to develop and maintain integrity

<sup>1</sup> [https://www.bls.gov/oes/current/naics3\\_486000.htm](https://www.bls.gov/oes/current/naics3_486000.htm)

management plans. Eliminating this requirement for master meter operators will result in reduction of 2,539 responses and 66, 014 burden hours for this information collection.

16. Publication of results of data collection.

PHMSA summarizes the information. PHMSA makes information available on its website.

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

PHMSA does not seek approval to not display expiration date.

18. Exceptions to certification statement.

There are no exceptions to the certification statement.