

DEPARTMENT OF TRANSPORTATION  
1INFORMATION COLLECTION

SUPPORTING STATEMENT

“Class Location Change Notification Requirements”

OMB Control No. 2137-0639  
Docket No. PHMSA-2017-0151  
RIN 2137-AF29

**INTRODUCTION**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) of a new information collection entitled, “Class Location Change Notification Requirements”. The development of this information collection is necessary due to the following PHMSA action that will trigger components of the Paperwork Reduction Act:

**Docket No. PHMSA-2017-0151 - Pipeline Safety: Class Location Change Requirements**

- o This collection will add 364 responses and 719 hours to the annual burden for operator notifications to PHMSA.**

**Part A. Justification**

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

Provisions of the Pipeline Safety: Class Location Change Requirements final rule, require natural gas transmission pipeline operators to notify PHMSA if they choose to use an alternative to either an inline-inspection device or when conducting pressure tests on their pipelines. This information collection will allow operators who choose to use a different method of pressure testing to demonstrate that the alternative method is sufficient and for the Office of Pipeline Safety to ensure that the technology is suitable for use.

Operators are also required to notify PHMSA if they use the new Integrity Management (IM) alternative to manage pipeline segments that have changed to a Class 3 location. This prompt notification would provide PHMSA an opportunity to oversee the operator’s implementation of the IM alternative segment regulations.

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 methods used by natural gas transmission pipeline operators when conducting pressure tests.

PHMSA will use the information provided in the notifications to ensure that alternative methods used provide an equivalent level of safety and effectiveness.

**3. Extent of automated information collection**

PHMSA allows operators to send notifications via electronic mail.

**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. Without this information, PHMSA would not be able to adequately assess potential risks associated with the use of alternative technology when dealing with pressure tests or be aware of compliance with the new IM alternative protocols. 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 October 14, 2020 (85 FR 65142). The comment period ended on December 14, 2020. PHMSA received no comments pertaining to 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.**

***364 Annual Responses and 719 Annual Burden Hours***

PHMSA proposes this new information collection to help operators comply with amendments to the Federal Pipeline Safety Regulations. In the Pipeline Safety: Class Location Change Requirements final rule, PHMSA requires natural gas transmission pipeline operators notify PHMSA if they choose to use an alternative to either an inline-inspection device or when conducting pressure tests on their pipelines. This information collection will allow operators who choose to use a different method of pressure testing to demonstrate that the alternative method is sufficient and for the Office of Pipeline Safety to ensure that the technology is suitable for use.

PHMSA also requires operators notify PHMSA if they use Integrity Management protocols to manage pipeline segments that have changed from a Class 1 to a Class 3 location. This prompt notification would provide PHMSA an opportunity to oversee the operator's implementation of the proposed Class 1 to Class 3 location segment regulations.

PHMSA expects to receive 364 of these notifications annually. An estimate of the time burden to comply with each new requirement is below:

IC	Responses	Burden Per Response	Total Burden
Alternate Pressure Testing Methods	5	0.25 hours	1 hour
Use of IM Method 4 Protocols	359	2 hours	718 hours
<b>Total</b>	<b>364 annual responses</b>		<b>719 annual burden hours</b>

**13. Estimate of the total annual costs burden.**

Based on the industry-specific occupational and wage estimates provided by the U.S. Department of Labor's Bureau of Labor Statistics, the median hourly wage of an engineering manager (for NAICS 486000 – pipeline transportation) is estimated as \$58.97 Using an

estimated fringe benefit of approximately 35 percent. The affected notifications for gas transmission operators are prepared at the average rate of \$79.61 per hour for an overall cost of \$57,240 (719 hours x \$79.61).

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

There are no additional costs to the Federal Government.

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

The Pipeline Safety: Class Location Change Requirements final rule requires natural gas transmission pipeline operators to notify PHMSA if they choose to use an alternative to either an inline-inspection device or when conducting pressure tests on their pipelines. This information collection allows operators who choose to use a different method of pressure testing to demonstrate that the alternative method is sufficient and for the Office of Pipeline Safety to ensure that the technology is suitable for use.

Operators are also required to notify PHMSA if they use Integrity Management protocols to manage pipeline segments that have changed from a Class 1 to a Class 3 location. This prompt notification provides PHMSA an opportunity to oversee the operator's implementation of the proposed Class 1 to Class 3 location segment regulations.

**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.