

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

**Supporting Statement
Hazardous Liquid Pipeline Assessment Requirements
OMB Control No. 2137-0605
Docket No. PHMSA-2025-0019
RIN 2137-AF44**

INTRODUCTION

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for proposed revisions to an information collection under OMB Control No. 2137-0605 entitled, “Integrity Management in High Consequence Areas for Operators of Hazardous Liquid Pipelines.”

This request is made in conjunction with the Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines (NPRM), which includes expanded notification and recordkeeping requirements for liquid integrity management assessments.

PHMSA expects this action to add 854 responses and 284,290 hours to the estimated burden of this information collection for plan development, notification and recordkeeping activities.

The existing authorization to collect information under this OMB Control No. expires on June 30, 2028.

Part A. Justification.

1. Circumstances that make collection of information necessary.

Certain areas are particularly environmentally sensitive to hazardous liquid pipeline failures. These areas are called “high consequence areas” (HCAs). Operators are required by 49 CFR §195.452 to develop and implement a program to provide direct integrity testing and evaluation of hazardous liquid pipelines in HCAs. The purpose of the program is to require HL operators to continually reassess their system to mitigate potential safety risk in High Consequence Areas.

Owners and operators of hazardous liquid pipelines must continually assess the integrity of their pipelines. Operators that are not subject to the integrity management requirements in 49 CFR §195.452 must provide PHMSA with notifications under certain circumstances. Operators in this category must notify PHMSA when they are unable to assess their pipeline via an in-line inspection. In-line inspections have been proven across industry standards to be one of the most effective ways to assess the integrity of a pipeline.

Operators who choose to use a different method of pressure-testing must demonstrate that their pipeline is not capable of accommodating an in-line inspection tool and that the use of an alternative assessment method will provide a substantially equivalent understanding of the condition of the pipeline.

Owners and operators of hazardous liquid pipelines that are not subject to the integrity management requirements in 49 CFR §195.452 are also required to notify PHMSA, in writing, in cases where a determination about pipeline threats has not been obtained within 180 days following the date of an inspection. Operators are required to provide an expected date when adequate information will become available.

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 used.

The information collection provides PHMSA's Office of Pipeline Safety (OPS), and state inspectors with the data necessary to evaluate operator compliance with Pipeline Safety Regulations. Specifically, these notifications allow regulators to review deviations from the HL IM Program and ensure that any alternative methods implemented by operators maintain an equivalent level of safety and effectiveness.

3. Extent of automated information collection.

PHMSA allows operators to send notifications via email and, in some instances, operators may make notification by phone. PHMSA encourages the use of electronic technology where applicable.

4. 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.

Small businesses may get assistance from pipeline trade associations in helping them develop the necessary documentation in addition to the information provided by PHMSA.

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 hazardous materials. Without this information, PHMSA would not be able to adequately assess potential risks associated with hazardous liquid pipelines. These pipelines could potentially be detrimental to pipeline safety and the protection of the environment. 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.

PHMSA maintains an “open-door” policy with its stakeholders where continual engagement on ways to improve pipeline safety are routine. PHMSA published a Notice of Proposed Rulemaking in the Federal Register [91 FR 42272] on July 8, 2026. The comment period closes on September 8, 2026.

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 guarantee confidentiality, moreover, the requirements of this information collection do not include anything of a sensitive nature or of any matters considered private.

11. Justification for collection of sensitive information.

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

12. Estimate of burden hours for information requested.

IC	Responses	Burden Per Response	Total Burden
New Integrity Management Plans	72	2,440 hours	175,680 hours
Integrity Management Plan Updates	209	760 hours	158,840 hours
HI Assessment Notifications	10,150	1 hours	10,150 hours
180 Day Repair	74	0.5 hours	37 hours

Notifications			
Non-ILI Notifications	10	10 hours	100 hours
Alternate Sampling Notifications	2	3 hours	6 hours
Dent ECA Procedures Notification	710	400 hours	284,000 hours
Anomaly Evaluation Records	71	2 hours	142 hours
Material Property Records	71	2 hours	142 hours
Total	11,369 annual responses		629,097 annual burden hours

Initial Integrity Management Plans

PHMSA estimates that approximately 209 hazardous liquid operators are subject to integrity management requirements. Among those requirements are the need to have a detailed integrity management plan. Based on PHMSA audits, it is assumed that approximately 72 new integrity management plans will be developed each year. PHMSA expects each operator to spend an average of 1,400 hours developing the initial plan.

The labor breakdown is as follows:

Administrative: 400 hours
 Technical: 800 hours
 Senior Engineering: 200 hours

1,400 hours per plan x 72 plans = 100,800 hours to develop the initial plan.

Additionally, it is estimated that each company will be required to commit additional resources to ensure that the data collected is properly integrated and analyzed to ensure safety. It is estimated that this will require a total of 1,040 hours of administrative (400 hours) and supervisory time (640 hours).

The labor breakdown is as follows:

Administrative: 400 hours
 Supervisory Time: 640 hours

1,040 hours x 72 operators = 74,880 hours for data integration.

Therefore, it is estimated that the burden to complete the initial plan is (100,800 hours to develop + 74,880 hours for data integration) **175,680 hours for 72 respondents – approximately 2,440 burden hours per respondent.**

Integrity Management Plan Updates

All 209 operators that have existing plans are required to update their plans annually. It is assumed that each operator will take 260 hours each year to update their plan.

The labor breakdown is as follows:

Administrative:	70 hours
Engineering:	150 hours
Senior Engineering:	<u>40 hours</u>

260 hours per plan x 209 plans = 54,340 for plan updates

Additionally, the 209 operators will also need 500 hours of supervisory time to ensure that the data collected annually is appropriately integrated, for an industry total of (209 x 500) 104,500

Therefore, each subsequent year will require:

Updates:	54,340 hours
Data Integration:	<u>104,500 hours</u>

158,840 for plan updates and data integration each year

Hazardous Liquid Assessment Notifications

Additionally, operators subject to integrity management must submit notifications to PHMSA in various situations. Notifications include Repair, Use of Alternate Technology, Interval Changes, and Long-term Pressure Reductions. These notifications may be submitted in any format.

PHMSA estimates that each operator will submit 50 of these ad hoc notifications each year.

PHMSA estimates that each notification takes approximately 1 hour to submit. **This results in a total annual burden of 10,150 responses and 10,150 hours.**

180 Day Repair Notifications

Owners and operators of hazardous liquid pipelines are required to have continual assessment and evaluation of pipeline integrity through inspection or testing, as well as remedial preventive and mitigative actions. Operators must notify PHMSA if they incur an anomalous condition in which the cause cannot be identified within 180 days. In cases where a determination about pipeline threats has not been obtained within 180 days following the date of inspection, pipeline

operators are required to notify PHMSA in writing and provide an expected date when adequate information will become available. PHMSA expects approximately 74 operators to submit these notifications each year. PHMSA estimates that it will take each operator 30 minutes to complete the notification. **This results in a burden of 74 responses and 37 hours.**

Non-ILI/ Alternate Assessment Method Notifications

Hazardous Liquid pipeline operators are also required to notify PHMSA when they are unable to assess their pipeline via an in-line inspection. Operators who choose to use an alternate assessment method must demonstrate that their pipeline is not capable of accommodating an in-line inspection tool and that the use of an alternative assessment method will provide a substantially equivalent understanding of the condition of the pipeline. PHMSA estimates that operators will submit approximately 10 notifications each year regarding these conditions. Further, PHMSA estimates that each notification will take 10 hours, which includes the time to assemble the necessary information to demonstrate that the pipeline is not capable of accommodating an ILI tool and specify that the alternative assessment method will provide a substantially equivalent understanding of the pipeline. **This requirement results in a burden of 10 responses and 100 hours.**

Alternate Sampling Notifications

The Pipeline Safety: Repair Criteria NPRM would require hazardous liquid pipeline operators to notify PHMSA in advance of using an alternative sampling approach in accordance with § 195.18(a) and (b). PHMSA expects to receive two (2) notifications, with each notification taking three (3) hours to complete in accordance with this requirement. **This requirement results in an annual burden of 2 responses and 2 hours.**

Dent ECA Procedures Notifications

The Pipeline Safety: Repair Criteria NPRM would also require hazardous liquid pipeline operators who perform an Engineering Critical Assessment (ECA) for dents to submit their ECA procedures to PHMSA. This submission must be made through the notification and no-objection process outlined in § 195.18(c). The submission may also include a request to use alternative technology or methodology for reliably identifying anomalies that would be actionable under the rule's requirements. PHMSA expects 710 operators to spend approximately 400 hours developing and submitting the documents to PHMSA. **This requirement results in a one-time burden of 710 responses and 284,000 hours.**

Anomaly Evaluation Records

The Pipeline Safety: Repair Criteria NPRM would require hazardous liquid pipeline operators to make and maintain records necessary to reproduce any engineering analysis conducted in accordance with the new § 195.415. PHMSA expects ten percent, or approximately 71 operators, to spend 2 hours complying with this recordkeeping requirement. **This results in an annual burden of 71 responses and 142 hours.**

Material Property Records

The Pipeline Safety: Repair Criteria NPRM would require hazardous liquid pipeline operators to make and maintain records of actions taken to gather material property information under the new § 195.407, including results, investigations, and analyses. PHMSA expects ten percent, or approximately 71 operators, to spend 2 hours complying with this recordkeeping requirement. **This results in an annual burden of 71 responses and 142 hours.**

Therefore, the total annual burden hours are estimated as:

Initial Plans:	175,680 hours
Annual Updates	158,840 hours
Ad Hoc Notifications:	10,150 hours
180 Day Repair Notifications:	37 hours
Non-ILI Notifications:	100 hours
Alternate Sampling Notifications:	6 hours
Dent ECA Procedure Notifications:	284,000 hours
Anomaly Evaluation Records:	142 hours
Material Property Records:	142 hours
629,097 burden hours for 11,369 responses	

13. Estimate of total annual costs to respondents.

Integrity Assessment Notifications are assumed to be made 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)¹ is estimated as \$77.50. Using an estimated fringe benefit of approximately 35 percent, the recordkeeping 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 be \$104.63 x 629,097 hours = \$65,822,419.00

14. Estimate of cost to the Federal government.

Notifications are reviewed by PHMSA's regional staff and engineers at the GS-13 and GS-14 levels. The average annual salary is estimated to be around \$115,500. Other than salary costs, there are no additional costs to the federal government.

¹ https://www.bls.gov/oes/current/naics3_486000.htm

15. Explanation of program changes or adjustments.

PHMSA proposes to modify this collection to include new notification and recordkeeping provisions in the Pipeline Safety: Repair Criteria NPRM. Under the proposal, hazardous liquid operators would be required to notify PHMSA in advance of using an alternative sampling approach in accordance with § 195.18(a) and (b) and operators who perform an Engineering Critical Assessment (ECA) for dents would be required to submit their ECA procedures to PHMSA through the notification and no-objection process outlined in § 195.18(c). PHMSA expects 710 operators to spend approximately 400 hours developing and submitting ECA documentation to PHMSA. Likewise, approximately 71 operators will incur an additional time burden complying with new recordkeeping requirements. The burden estimate for this information collection has been adjusted accordingly.

16. Publication of results of data collection.

The information will not be published for statistical purposes.

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

OPS is not seeking approval to not display expiration date.

18. Exceptions to certification statement.

There are no exceptions.