

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

Supporting Statement

Recordkeeping for Gas Pipelines

Introduction

This is to request the Office of Management and Budget’s (OMB) renewed three-year approved clearance for the information collection entitled, “Recordkeeping Requirements for Gas Pipeline Operators.” This information collection is under OMB Control No. 2137-0049, which is currently due to expire on April 30, 2018.

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 192.14 pertains to the conversion to service of steel pipeline, previously used in service not subject to Part 192, and qualifying for use in gas service under Part 192 without meeting new pipeline requirements. Section 192.14(b) requires these operators to record and maintain a record of the investigations, tests, repairs, replacements, and alterations made under § 192.14(a).

Section 192.179(a) allows operators to petition the Administrator or certain state agencies to approve other than prescribed spacing of sectionalizing block valves in those segments of a transmission line where an operator demonstrates an equivalent level of pipeline safety.

Section 192.225(b) requires the procedures used in welding gas pipelines be recorded and retained.

Section 192.243(f) requires gas pipeline operators to retain records of non-destructive testing if and when required under § 192.241(b).

Section 192.273(b) requires a written procedure proven to produce strong gastight joints when a gas pipeline is to be joined with methods other than welding.

Section 192.283(c) requires a copy of each written procedure being used for joining plastic pipe be made available to the persons making and inspecting joints.

Section 192.303 requires that each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Section 192.491(a) requires gas pipeline operators maintain records or maps of cathodically protected pipe, cathodic protection facilities other than unrecorded galvanic anodes installed before August 1, 1971, and structures bonded to the cathodic protection system.

Section 192.491(b) requires gas pipeline operators maintain for the life of the pipe:

1. The records required in § 192.491(a).
2. Records of each test, survey, or inspection required to determine the adequacy of corrosion control measures and that a corrosive condition does not exist.

Section 192.517 requires gas pipeline operators retain records of all tests required under § 192.505 (Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of specified minimal yield strength) and § 192.507 (Test requirements for steel pipeline to operate at a hoop stress less than 30 percent of specified minimal yield strength and at or above 100 psig.) for the life of the pipeline.

Section 192.553(c) requires a written procedure to ensure all applicable requirements are met when a gas pipeline operator intends to uprate his pipeline. Section 192.553(b) requires all records related to the uprating procedure be retained.

Sections 192.603(b) requires that operators maintain records of a procedural manual for operations, maintenance, and emergencies.

Section 192.614 requires gas pipeline operators establish and maintain a written damage prevention program.

Section 192.615 requires gas pipeline operators establish written emergency procedures.

Section 192.707(d) requires line markers for mains and transmissions lines.

Section 192.709 requires transmission line operators keep records of each leak detected, repair made, transmission line break, leakage survey, line patrol, and inspection for as long as the segment of transmission line involved remains in service.

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. The inspectors will be able to ascertain from these records compliance with regulations.

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.

6. Impact of less frequent collection of information.

The frequency of the collection of information is one time for the written procedures required under §§ 192.225(b), 192.273(c), 192.283(c), 192.303, 192.553(c), 192.603(b), 192.605 and 192.707(d).

Maintenance of records required in §§ 192.491(a) and 192.475 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 § 192.614 is necessary to allow a damage prevention program to remain effective. Pipeline damage due to excavation could result if the collection were conducted less frequently. Maintenance of records required in § 192.615 is necessary to minimize hazards resulting from gas pipeline emergencies. Valuable time could be lost during an emergency if the collection were conducted less frequently, potentially resulting in loss of property and lives. The frequency of recordkeeping is on an even basis for §§ 192.14(b), 192.243(f), 192.491(b), 192.517, 192.553(b), and 192.709. This information could not be collected less frequently.

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 192.14(b) requires gas pipeline operators retain for the life of the pipeline a record of the investigations, tests, repairs, replacements, and alterations made in converting the steel pipeline to service.

b. Section 192.243(f) requires gas pipeline operators retain records of all nondestructive testing required under § 192.241(b) for as long as the pipeline concerned is in use.

c. Section 192.491(b) requires gas pipeline operators retain maps and records required for corrosion control for as long as the pipeline remains in service.

d. Section 192.517 requires gas pipeline operators retain for the life of the pipeline a record of each test performed und §§ 192.505 and 192.507.

e. Section 192.553(b) requires gas pipeline operators retain records of all work, pressure tests, and investigations required to uprate a segment of pipe for as long as the segment of pipe is in service.

f. Section 192.709 requires transmission operators retain a record of all leaks, repairs, transmission line breaks, leakage surveys, line patrols, and inspections for as long as that segment of transmission pipeline remains in service. PHMSA recognized the burden of its record retention requirement under §§ 192.491(b) and 192.709(f) and modified it from the life of the pipeline system to no more than five years.

8. Compliance with 5 CFR 1320.8.

A 60-Day Notice requesting comments was published in the Federal Register on February 12, 2018 [83 FR 6088]. During the 60-day comment period, PHMSA received 6 comments from anonymous sources that were not relevant to the information collection.

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.

Based on annual reports submitted by operators, PHMSA estimates the total number of gas pipeline operators to be 7,721 operators consisting of 1,128 gas distribution operators, 1,002 gas transmission/gathering operators, 221 operators with both distribution and transmission/gathering pipelines, and 5,370 master meter system operators. As detailed further in the subsections below, the total annual burden to gas pipeline industry due to the above recordkeeping requirements of Part 192 is 1,638,490 hours annually across all operators.

Table 1 shows the annual burden hours described in detail. The following subsections describe the estimates in more detail. For transmission, gathering, and distribution mileage and number of operators used in the burden estimates, PHMSA relied on data provided by operators in 2016 annual reports.¹ PHMSA estimated the number of master meter systems based on FEDSTAR data.

To update the burden estimates of the requirements, PHMSA solicited feedback from fewer than 10 transmission and distribution pipeline operators, and revised burden estimates pursuant to the feedback, as described in the subsections.²

Regulation Section	Annual Burden Hour to the Industry
192.14(b)	40
192.225(b)	643
192.243(f)	60,111
192.273(b)	112
192.283(c)	112
192.303	165
192.491(a)	31,780
192.491(b)	583,027
192.517	9107
192.553(b&c)	150
192.603(b)	414,710
192.614	234,620
192.615	293,450
192.707(d)	640
192.709	18,020
Total	1,638,480

¹ Form PHMSA F 7100.2-1 for transmission and gathering line operators, and Form PHMSA F 7100.1-1 for distribution line operators.

² In cases where no operator feedback is discussed, PHMSA either received estimate support from all commenting operators, or did not receive feedback on the requirement.

Section 192.14(b)

Section 192.14(b) requires gas pipeline operators to maintain all conversion to service records for the life of the pipeline. Annually, less than one percent of gas pipeline operators are subject to § 192.14(b). For the purpose of this burden estimate, PHMSA assumes that this requirement takes 80 operators (total number of operators times one percent) approximately 30 minutes each year to maintain this records requirement. Therefore, the annual cost to industry due to this recordkeeping requirement is approximately (40 hours).

Section 192.225(b)

Section 192.225(b) requires procedures used for the welding of gas pipelines be recorded in detail, including the results of the qualifying tests. These procedures are recorded one time and are only updated if a change in a welding procedure occurs. Consequently, the annual cost to industry due to this recordkeeping requirement is minimal. For the purpose of this burden estimate, PHMSA assumes that the average operator spends five minutes meeting this requirement per year, for a total of 643 hours.

Section 192.243(f)

Current practice is for operators to test 100% of newly constructed pipeline with welds. Based on 2016 annual report data, 13,658 miles of transmission pipelines and 2,281 miles of gathering pipelines were constructed since 2010, for an annual average of 2,277 miles. PHMSA assumes that newly constructed distribution lines are primarily constructed of plastic with no welds. As such, PHMSA estimates that approximately 2,277 miles of gas pipelines are nondestructively tested per year. PHMSA estimates that, for new construction, welds are located at 60 to 80 foot intervals. One operator who provided feedback on this requirement reported that 1 weld for every 20 feet is a better assumption to account for more frequent welds associated with compressor stations, meter stations, and fabrications. Two other operators supported an assumption of one weld every 40 feet.

For the purpose of this burden estimate, PHMSA assumes that there is one weld every 40 feet, resulting in approximately 132 welds per mile of pipeline. Therefore, approximately 300,556 welds are nondestructively tested per year. An estimated 0.2 hours per weld is spent by operators meeting the paperwork requirements for an annual paperwork burden of 60,111 hours.

Section 192.273(b)

Section 192.273(b) requires each joint be made in accordance with written procedures proven to produce gastight joints. These written procedures are normally provided by the pipeline manufacturer. Consequently, there is minimal incremental recordkeeping cost to the gas pipeline operators to acquire and retain these written procedures. For the purpose of this burden estimate, PHMSA assumes that 1,349 distribution pipeline operators

(including those with both distribution and transmission pipelines) spend an incremental 5 minutes per year meeting the requirements, for a total burden of 112 hours.

Section 192.283(c)

Section 192.283(c) requires gas pipeline operators to make a copy of each written procedure used for joining plastic pipe to be made available to the persons making and inspecting joints. The recordkeeping costs to provide these plans to inspectors are minimal. For the purpose of this burden estimate, PHMSA assumes that 1,349 distribution pipeline operators (including those with both distribution and transmission pipelines) spend 5 minutes per year meeting the requirements, for a total burden of 112 hours.

Section 192.303

Section 192.303 requires that operators must construct transmission lines and mains in accordance with written procedures. Because this is industry practice, the incremental recordkeeping cost is minimal. For the purpose of this burden estimate, PHMSA assumes that 1,980 operators that have transmission and/or distribution lines spend an incremental 5 minutes per year meeting the requirements, for a total burden of 165 hours.

Section 192.491(a)

Section 192.491(a) requires gas pipeline operators maintain records or maps to show the location of their cathodic protection system. These maps and records are created one time and are updated as changes to the cathodic protection system occur. Based on 2016 annual reports submitted by transmission and distribution pipeline operators, 297,965 miles of transmission lines, 16,517 miles of gathering lines, and 479,883 miles of distribution main miles are cathodically protected steel pipelines subject to the recordkeeping requirements.

Operators spend an estimated one hour per 25 miles of gas pipeline updating corrosion control records.³ This results in an annual burden of 12,580 hours for transmission and gathering pipelines and 19,200 hours for distribution pipelines.

Due to the small size of the systems, master meter operators spend limited time updating corrosion control records. Consequently, the annual cost to master meter systems due to this recordkeeping requirement is minimal.

³ Four operators provided feedback on this estimate. Two of them agreed that one hour per 25 miles of pipeline is reasonable, and two stated that this estimate is likely an underestimate; one of these operators suggested 4 hours per 25 miles and another suggested 62.5 hours per 25 miles.

Section 192.491(c)

Section 192.491(c) requires a gas pipeline operator to maintain certain corrosion control records for five years. These records are required to determine the adequacy of corrosion control measures or that a corrosive condition does not exist.

Section 192.491(c) requires records of tests, surveys, and inspections to be kept for the following:

Section 192.455: External corrosion control – Buried or submerged pipelines installed after July 31, 1971.

Section 192.457: External corrosion control – Buried or submerged pipelines installed before August 1, 1971.

Gas pipeline operators spend a minimal amount of time annually performing the recordkeeping requirements which result from this regulation. For the purpose of this burden estimate, PHMSA assumes that 7,721 operators spend 5 minutes per year meeting the requirements, for a total burden of 643 hours.

Section 192.459: External corrosion control – Examination of buried pipeline when exposed.

The frequency of examinations conducted under § 192.459 depends on the operator and the status of the pipeline. One operator reported that excavations are done only as needed, with a frequency of approximately 2 times a year, and another reported that the frequency is approximately once a year for every 15 miles of pipeline. For the purpose of this burden estimate, PHMSA assumes that each transmission and gathering pipeline operator examines exposed gas pipeline approximately once every two weeks or 26 surveys annually per operator. This carries forward the frequency assumption from the previous burden estimate, which one operator supported. An estimated 0.2 hours per survey is spent meeting the paperwork requirements.⁴ 1,002 gas transmission and/or gathering line operators submitted annual reports in 2016, and all are subject to this requirement. As such, the annual burden to transmission/gathering operators is approximately 5,210 hours.

As with transmission and gathering operators, the frequency of excavations of distribution lines is variable. One operator reported that they expose sections only a couple of times a year when taps are made, and another reported that it is done only as needed. For the purpose of this burden estimate, PHMSA assumes that each operator that has distribution mileage (1,349 operators, including 221 operators that also have transmission and/or gathering lines) examines exposed

⁴ Two operators supported the estimate of 0.2 burden hours per test, whereas another stated that the estimate should be 2 hours to account for review and approval processes, particularly in cases where substantial amounts of data are collected and photos are incorporated, such as investigations of anomalies.

gas pipeline approximately once every week or 52 surveys annually. An estimated 0.2 hours per survey is spent meeting the paperwork requirements, resulting in an annual burden of 14,030 hours.

Section 192.461: External corrosion control – Protective coating.

Gas pipeline operators spend a minimal amount of time annually performing the recordkeeping requirements which result from this regulation. For the purpose of this burden estimate, PHMSA assumes that 7,721 operators spend 5 minutes per year meeting the requirements, for a total burden of 643 hours.

Section 192.465: External corrosion control – Monitoring;

Section 192.481: Atmospheric corrosion control – Monitoring.

a. Section 192.465(a) regulates gas pipeline operators test cathodically protected pipeline each calendar year, but with intervals not exceeding 15 months. According to 2016 annual report data, 297,965 miles of transmission lines, 16,517 miles of gathering lines, and 479,883 miles of distribution mains are cathodically protected.

Transmission and gathering pipelines are tested for corrosion control at roughly one mile intervals resulting in 314,482 tests per year. These operators spend an estimated 0.1 hours per test meeting the recordkeeping requirements⁵ for an annual burden of 31,450 hours.

Distribution pipeline is tested roughly five times per mile for 2.4 million tests per year. Based on feedback from an operator, PHMSA estimates that distribution operators spend an estimated 0.17 hours (ten minutes) per test meeting the recordkeeping requirements for an annual burden of 399,900 hours.

Master meter systems average two corrosion control tests per system for 10,740 tests per year. These operators spend an estimated 0.17 hours (ten minutes) per test meeting the recordkeeping requirements for an annual burden of 1,790 hours.

b. Section 192.465(b) requires each cathodic protection rectifier or other impressed current power source be inspected six times per calendar year, but with intervals not exceeding two and one-half months. An estimated 29,540 rectifiers and impressed current power sources are subject to § 192.465(b), resulting in 177,240 inspections annually. Operators spend approximately 0.2 hours per inspection meeting the recordkeeping requirements⁶ for an annual burden to industry of 35,448 hours.

c. Section 192.465(c) requires each reverse current switch, diode, and interference

⁵ One operator suggested ten minutes per test, and two supported the estimate of 0.1 hours (6 minutes) per test.

⁶ One operator supported the estimate of 0.2 hours (or 12 minutes), while another suggested 10 minutes and another suggested 20 minutes.

bond, whose failure would jeopardize structure protection, be inspected six times per calendar year, but with intervals not exceeding two and one-half months. A reverse current switch, diode, or interference bond may be found approximately once every 50 miles of cathodically protected pipeline, for a total of 15,887 (314,482 cathodically protected transmission and gathering lines, plus 479,883 cathodically protected distribution lines, divided by 50). This results in 95,324 inspections annually. Operators spend an estimated 0.2 hours per inspection meeting the recordkeeping requirements⁵ for an annual burden of 19,060 hours.

d. Section 192.465(e) requires operators inspect all unprotected pipeline at intervals not exceeding three years. Section 192.481 requires operators inspect all onshore pipeline exposed to the atmosphere at intervals not exceeding three years. According to 2016 annual report data, 57,219 miles of distribution main miles are unprotected steel miles subject to §§ 192.465 (e) and 192.481. Less than 1,000 miles of transmission and 300 miles of gathering pipelines are unprotected steel.

Distribution pipeline is tested for corrosion roughly five times per mile, resulting in 286,094 tests per year. Based on feedback from an operator, PHMSA estimated that operators spend an estimated 0.25 hours per test meeting the recordkeeping requirements for an annual burden of 71,520 hours.

Master meter systems average two corrosion tests per system for 10,740 tests per year. Based on feedback from an operator, PHMSA assumes that master meter operators spend an estimated 0.25 hours per test meeting the recordkeeping requirements for an annual burden of 2,690 hours.

Section 192.475: Internal Corrosion Control – General

Gas pipeline operators spend a minimal amount of time annually performing the recordkeeping requirements which result from this regulation. For the purpose of this burden estimate, PHMSA assumes that 7,721 operators spend 5 minutes per year meeting the requirements, for a total burden of 640 hours.

Table 2 breaks out the annual industry burden hours pursuant to the recordkeeping requirements of § 192.491(c).

Table 2: Annual Industry Burden Hours for Recordkeeping under § 192.491(b)	
Regulation Section Requiring Corrosion Control Action	Annual Industry Burden Hours for Recordkeeping
192.455&457	643
192.459	19,240
192.461	643
192.465(a)	433,140
192.465(b)	35,448

Regulation Section Requiring Corrosion Control Action	Annual Industry Burden Hours for Recordkeeping
192.465(c)	19,060
192.465(e)	74,210
192.475	643
Total	583,027

Section 192.517

Section 192.517 requires gas pipeline operators maintain all records required under §§ 192.505 and 192.507 for the life of the pipeline. Based on 2016 annual report data, 13,658 miles of transmission pipelines and 2,281 miles of gathering pipelines were constructed since 2010, for an annual average of 2,277 miles.⁷ Testing, on an average, is performed at five mile intervals, resulting in 445 tests performed annually. An estimated two hours per test is spent by operators meeting the paperwork requirements⁸ for an annual burden of 910 hours.

Section 192.553(b and c)

Section 192.553(b) requires gas pipeline operators maintain all records associated with uprating of a section of pipe for the life of that segment. Section 192.553(c) requires operators establish a written procedure to insure all uprating requirements are met. Fewer than one percent of all operators are subject to § 192.553 (b and c). Thus, the annual cost to industry due to this recordkeeping requirement is minimal. For the purpose of this burden estimate, PHMSA assumes that this requirement takes 77 operators (total number of operators times one percent) 2 hours each year to maintain records requirement. Therefore, the annual cost to industry due to this recordkeeping requirement is 150 hours.

Sections 192.603(b)

Section 192.605 requires gas pipeline operators establish and administer a written operation and maintenance program, and § 192.603(b) requires that they maintain all records necessary to demonstrate compliance with the requirements. This written program is created one time and is updated as changes occur. Three transmission operators reported spending 100 hours, 120 hours, and 442 hours maintaining records pursuant to § 192.603(b). One distribution operator reported that they typically spend approximately 45 hours annually maintaining these records.

⁷ PHMSA assumes that newly constructed distribution lines are primarily plastic, not subject to this requirement.

⁸ Previous supporting statements estimated one hour per report; however 3 operators provided feedback to PHMSA that this was an underestimate. Two operators recommended 2 hours per test, while a third recommended 3 hours per test.

For the purpose of this burden estimate, based on limited data, PHMSA assumes that each operator that has transmission and/or gathering lines spends approximately 100 hours meeting the minimum requirements of § 192.603(b), and that distribution and master meter system operators spend approximately 45 hours. There are 1,223 operators that have transmission and/or gathering pipelines (including 221 that also have distribution lines), 1,129 operators that have only distribution lines, and 5,31170 master meter systems. This results in 122,300 hours for transmission/gathering line operators, 50,760 hours for distribution line operators, and 241,650 hours for master meter system operators.

Section 192.614

Section 192.614 requires gas pipeline operators establish written programs to prevent pipeline damage due to excavation. PHMSA assumes that 1,128 distribution operators are subject to these recordkeeping requirements, with each spending an estimated four hours per week⁹ meeting the paperwork burden. PHMSA assumes the remaining operators participate in a “one-call” system meeting the requirements of this section. As such, the total burden for this requirement is approximately 234,620 hours.

Section 192.615

Section 192.615 requires gas pipeline operators establish written procedures to minimize the hazards resulting from a gas pipeline emergency. This written plan is created one time and is updated as changes occur.

One operator supported PHMSA’s previous burden estimate of 6 hours to meet the recordkeeping requirements; one operator reported that they spent 24 hours to annually review the plans, and another suggested 200 hours per year. A separate operator reported spending 3 hours per 500 miles of pipe. One master meter system operator reported 24 hours. For the purpose of this burden estimate, PHMSA estimates that transmission, distribution, and gathering operators spend 70 hours per year meeting the recordkeeping requirements, and that master meter operators spend 24 hours per year.

There are 2,351 operators with transmission, gathering, and/or distribution pipeline miles, and 5,370 operators with master meter systems. The total burden for this requirement is approximately 164,570 hours for transmission, gathering, and distribution pipeline operators and 128,880 hours for master meter system operators.

Section 192.707(d)

This requirement for warning labels on pipelines is a minimal standard than is common practice in the industry. As such, gas pipeline operators spend a minimal amount of time

⁹ Previous supporting statements estimated 8 hours per week for this requirement for large distribution operators. Two distribution operators provided feedback on this burden estimate, stating that it was likely an overestimate. One operator recommended 4 hours per week.

annually performing the recordkeeping requirements which result from this regulation. For the purpose of this burden estimate, PHMSA assumes that 7,721 operators spend an incremental 5 minutes per year on recordkeeping, for a total burden of 640 hours.

Section 192.709

Approximately 300,374 miles of gas transmission pipeline are subject to the recordkeeping requirements of § 192.709, which requires transmission pipeline operators maintain records of each leak discovered, repair made, transmission line break, leakage survey, line patrol, and inspection for the life of that segment of pipeline. An estimated six hours per 100 miles of pipeline¹⁰ is spent by operators recording leakage surveys, line patrols, and inspections. This results in an annual burden of approximately 18,020 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)¹¹ 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 1,638,350 hours x \$104.63/hour = \$171,424,924.

14. Estimate of cost to the Federal Government.

Currently, 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.

There are no program changes or additional recordkeeping requirements being proposed. However, PHMSA adjusted the burden estimate based on updated information from a sampling of stakeholders. To update the burden estimates of the requirements, PHMSA solicited feedback from fewer than 10 transmission and distribution pipeline operators, and revised burden estimates pursuant to the feedback, as described in Question 12. In cases where no operator feedback is listed, PHMSA either received estimate support from all commenting operators, or did not receive feedback on the requirement.

¹⁰ One operator supported PHMSA's previous estimate of four hours, another suggested 6 hours, and another suggested 8 hours.

¹¹ https://www.bls.gov/oes/current/naics3_486000.htm

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 the expiration date.

18. Exceptions to certification statement.

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

ATTACHMENTS:

There are no attachments.