

**Supporting Statement
for
Vessel and Facility Response Plans (Domestic and Int'l), and
Additional Response Requirements for Prince William Sound, Alaska**

A. Justification

1. Circumstances that make the collection of information necessary.

Facility Response Plan (FRP): Section 4202 (a)(6) of the Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWCPA). It requires the owner or operator of a facility to prepare and submit “a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge of oil or hazardous substances.” This requirement applies to any offshore facility and to an onshore facility that "because of its location, could reasonably be expected to cause substantial harm to the environment by discharging into or on the navigable waters, adjoining shorelines, or the exclusive economic zone." Under Title 33 CFR subpart H, § 154.1220 and § 154.1225 require an owner or operator of a facility that handles animal fats and vegetable oils to modify the facility response plans to incorporate average most probable discharge planning.

Vessel Response Plan (VRP): Section 4202 (a)(6) of the Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWPCA). The plan requires that vessels carrying oil in bulk as cargo and operating in waters subject to U.S. jurisdiction prepare and submit a written response plan for a worst case discharge of oil or hazardous substances.

Non Tank Vessel Response Plan (NTVRP): Section 701 of the Coast Guard and Maritime Transportation Act of 2004 (Public Law 108-293) amended section 311 (a) and (j) of the FWPCA. This plan requires that nontank vessels of 400 ITC gross tons and above which carry oil as fuel for propulsion and operating in waters subject to U.S. jurisdiction prepare and submit a written response plan for a worst case discharge.

Prince William Sound (PWS): Section 5005 of the Oil Pollution Act of 1990 (OPA 90) establishes requirements for a tanker operating in PWS and loading cargo at the Trans Alaska Pipeline System (TAPS), in addition to those required by section 4202(a)(5) of OPA 90. This rule ensures that response plans provide for pre-positioned oil spill containment and removal equipment, an oil spill removal organization, training of local residents in oil spill removal and containment techniques, practice exercises, and periodic testing and certification of equipment.

Shipboard Oil Pollution Emergency Plan (SOPEP): The information collection requirements described below are necessary to comply with the statute (33 USC 1901, et. seq.) This section implements Regulation 26 of Annex I of MARPOL 73/78 for United States flag ships. It requires every oil tanker of 150 gross tons and above and every ship other than an oil tanker of 400 gross tons and above to carry on board an approved SOPEP.

This information collection supports the following strategic goals:

Department of Homeland Security

- Protection
- Recovery

Coast Guard

- Safety
- Protection of the Natural Resources

Prevention Directorate (G-M)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

2. By whom, how, and for what purpose the Information is to be used.

FRP, VRP, and NTVRP: The purpose of OPA 90 is to reduce the number of oil and hazardous substance spills and to minimize the impact of the oil and hazardous substance spills when they do occur in U.S. waters. The requirements for preparation, submission, and approval of Vessel Oil and Hazardous Substance Spill Response Plans (VRPs), Facility Oil and Hazardous Substance Spill Response Plans (FRPs) and Nontank Vessel Response Plans (NTVRPs) are central to the contingency planning elements of the Federal Water Pollution Control Act. The VRP, FRP & NTVRP requirements are necessary to ensure that vessels entering U.S. waters and certain facilities are adequately prepared to respond in the event of an incident involving the spill of oil or a hazardous substance. Without the proposed requirements some operators may not maintain the necessary internal resources (effective planning, training, drilling, etc.) or external resources (adequate response capability) to meet one major intent of FWPCA to reduce the consequences of an oil or hazardous substance spill when it occurs.

Submission of Response Plans to the U.S. Coast Guard for approval is considered to be the most efficient way to ensure compliance and necessary for the Coast Guard to meet its obligations under OPA 90/FWPCA.

PWS: The additional requirements in section 5005 of OPA 90, for trained personnel and pre-positioned response equipment, reflect the particular environmental sensitivity of Prince William Sound (PWS). Without these requirements for tankers operating in Prince William Sound and loading cargo at TAPS, it is believed that sufficient response resources would not be available or be properly maintained to clean up a future oil spill. Certification and testing of response equipment will help ensure the readiness of this equipment for a future response.

SOPEP: The purpose of Regulation 26 to Annex I of MARPOL 73/78 is to improve response capabilities and minimize the environmental impact of oil discharges from ships. Without the requirements for "Shipboard Oil Pollution Emergency Plans," there is a greater likelihood of a vessel which is not prepared to handle an unauthorized discharge of oil having a spill and causing a major environmental incident. The submission and approval of these plans ensures that vessels have in place an appropriate plan that deals with such an occurrence.

3. Consideration of the use of improved information technology.

The information required is particular and sole to each vessel and facility. The plans are generally submitted via regular mail. The Coast Guard does not have the capability of receiving them electronically because each plan—due to file size and graphic elements—may require a unique software package to be downloaded before a plan can be reviewed. Brief text-based amendments to plans are accepted electronically. It is estimated that 10% of the correspondence is done in this fashion.

4. Efforts to identify duplication. Why similar information cannot be used.

FRP: The Coast Guard conducted a review of both State and Federal regulations to identify the degree to which facilities affected by the Coast Guard information collection requirements would have already prepared similar information in order to comply with existing regulations. At least 14 states have regulations requiring varying degrees of response planning. The extent of duplication was estimated by evaluating the overlap of response plan requirements and affected facilities between each State regulation and the Coast Guard requirements. For example, the contingency planning requirements of New York State apply only to facilities with an oil storage capacity of 400,000 gallons, which excludes a substantial portion of the Coast Guard regulated facilities in the state.

In addition, State requirements do not generally cover all sections of the facility response plan requirements stated by the Coast Guard, including certain statutorily mandated requirements. Based on a review of the overlap in response plan requirements and facility coverage between current state response planning requirements and the Coast Guard requirements, the extent of overlap is not significant.

In addition to State facility response planning requirements, Environmental Protection Agency (EPA) has facility response plan regulations. These response plan requirements affect certain non-transportation-related facilities that have the potential to discharge oil into the navigable waters or adjoining shorelines of the U.S. and meet certain storage capacity thresholds.

EPA's regulations do not apply to equipment or operations of onshore marine transportation-related facilities that are subject to the authority and control of the Department of Transportation (by delegation to the Coast Guard). However, certain businesses have both transportation-related and non-transportation-related components, such as petroleum bulk terminals that have storage tanks and transfer petroleum to and from vessels. These businesses may be subject to both the Coast Guard's proposed regulation and EPA's proposed regulation. This analysis designates these facilities as complexes.

To avoid duplicative paperwork burdens on complexes, the Coast Guard and EPA have been working together very closely to ensure that their response plan requirements and response plan formats are consistent. As a result of this effort, complexes will be able to comply with both response plan requirements with a single response plan, thereby mitigating duplication of paperwork related burdens. Where available, similar information from EPA will be used.

PWS: The information being required is unique. There is no known duplication of filing

requirements with other Federal information collections.

NTVRP: The information required is unique. Section 701 of the Coast Guard and Maritime Transportation Act of 2004 amended 33 U.S.C. 1321(j)(5)(a) and (j) requiring that nontank vessel response plans be submitted consistent with other plans required by the Federal Water Pollution Control Act.

SOPEP and VRP: The information required is unique. Regulation 26 of Annex I of MARPOL 73/78 requires specific response planning. These requirements work in conjunction with, and not in duplication of, the Vessel Response Plan requirements discussed elsewhere in this supporting statement.

5. Methods to minimize the burden to small businesses if involved.

FRP: Although the Coast Guard regulation has certain reduced requirements for smaller facilities, these are primarily not paperwork related. However, because of the nature of the information collection requirements, the level of effort to prepare the facility response plan is estimated to vary directly with the size and complexity of the facility. As a result, smaller facilities are estimated to incur a lesser burden than larger facilities (i.e., the paperwork burden is not constant across sizes and types of affected facilities).

Furthermore, in drafting OPA 90, it was clearly Congress' intent that certain small facilities be subject to the same response planning requirements as large facilities. Specifically, in discussing the selection of facilities that could cause "substantial harm" to the environment (i.e., those subject to the information collection activities), the OPA Conference report states:

The criteria should not result in the selection of facilities based solely on the size or age of storage tanks. Specifically, the selection criteria should not necessarily omit those smaller facilities that are near major drinking water supplies or that are near environmentally sensitive areas. H. Rep. No. 101-653, 101st Cong. 2nd Sess. 1990, p. 150.

VRP: Due to the nature of the industry, smaller entities tend to own smaller vessels, e.g., barges rather than large tankers. The reporting requirements are less than those for larger vessels; vessels have fewer personnel, carry less cargo, and require less response capability. Vessels that carry oil as secondary cargo, i.e., fishing vessels, offshore supply vessels and towing vessels, require a less comprehensive VRP and have reduced resubmission requirements. In addition, there is a very small number of these vessels applicable to these requirements. Unmanned barge owners or operators are required to maintain a corporate plan with a notification and emergency procedures list on each barge.

NTVRP: The Federal Water Pollution Control Act (33 U.S.C. 1321(j)(5)) as amended by Section 701 of the Coast Guard and Maritime Transportation Act of 2004 requires the same level of information from vessels in order to receive interim operating approval.

PWS: The paperwork requirements for smaller vessels are less because they have fewer personnel on board, carry less oil, and will require less response equipment than larger vessels.

In addition, non-TAPS vessels (most of which are smaller) were eliminated from the requirements.

SOPEP: The small business burden should be minimized as few small entities own ships of the gross tonnage to which this regulation applies.

6. Consequences to the Federal program if collection were done less frequently.

FRP, VRP, and NTVRP: The Coast Guard recognizes the need to minimize the burden of any information collection to the extent permitted under the requirements of the Federal Water Pollution Control Act as amended by OPA 90 and the Coast Guard and Maritime Transportation Act of 2004. Section 4202(a)(6) of OPA 90 requires facilities and vessels to update the response plan periodically, and resubmit for approval of each significant change. Under the regulation, facilities and vessels would be required to: conduct an annual review of the response plan and submit changes to the Coast Guard; or, if no changes are necessary, submit a letter stating that the review has taken place.

The Coast Guard has determined that requiring facilities and vessels to review and update their response plans less frequently than once a year would undermine the intent of the Federal Water Pollution Control Act, which is to ensure that all facilities and vessels have an up-to-date plan at all times. For example, contact lists of spill response personnel may require revision every year, and possibly more frequently. Because the majority of information collection activities (in terms of both hours and cost) would involve initial preparation of the response plan, reducing the frequency of the annual information collection activities would not significantly reduce the overall burden of the information collection activities required under these regulations.

PWS: Less frequent oversight and review of plans and equipment may result in inadequate equipment and poorly trained personnel.

SOPEP: Because the plan must be used in an emergency, less frequent review and submission could result in outdated information impeding a response.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.

The information collection activities discussed in this ICR comply with all Paperwork Reduction Act regulatory guidelines except that facilities and vessels would be required to retain the response plan beyond the three year period. The Coast Guard believes that the incremental burden on facilities and vessels for maintaining the response plan beyond the three year period is justified by the benefits of retaining an adequate and timely oil spill response capability. In addition, it reduces the burden on industry.

8. Consultation.

The regulations for this collection were developed using public notice and comments, and followed the rules of the Administrative Procedure Act.

9. Explain any decision to provide any payment or gift to respondents.

There are no payments or gifts made to respondents.

10. Describe any assurance of confidentiality provided to respondents.

All information collected complies with the Freedom of Information Act, the Privacy Act and OMB Circular A-108. Confidentiality is promised, when requested, for information exempt from the mandatory public disclosure requirements of Freedom of Information Act, or when the information is a trade secret.

11. Additional justification for any questions of a sensitive nature.

The information collection activities discussed in this document do not involve any sensitive questions.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

12-1. **FRP:** This section presents the number of respondents and presents the burden and cost estimates.

(a) Number of Respondents

Based on information from the U.S. Coast Guard Office of Vessel Activities (G-PCV), 3,881 facilities are subject to the Coast Guard facility response plan requirements. It has been assumed for the purposes of document that the number of facilities remains constant due to the mature nature of the industry. However, facilities are sold and new ones are built as older ones are taken out of service, there it has been assumed that 360 new facility response plans will be submitted per year. This figure represents 10% of the affected population.

(b) Summary of Paperwork Burdens and Cost

The paperwork requirements consist of the initial preparation and submission of the response plan, annual submission of revisions to the Coast Guard as changes occur, and annual recordkeeping activities. The burden and cost were estimated over a 5 year period. These are described in more detail below.

Response Burden. The primary response burden in the first year is for facilities to prepare and submit to the Coast Guard the facility response plan. In subsequent years, facilities would be required to perform an annual review of their response plan and submit to the Coast Guard either (1) any revisions made to the response plan, or (2) a letter indicating that the annual review was conducted. In addition, facilities would be required to resubmit their response plans to the Coast Guard every five years.

Recordkeeping Burden. Recordkeeping activities include revising and maintaining an updated response plan based on information collected primarily during the annual review. In addition, facilities are required to maintain records of drills and training. Copies of the updated plan must be maintained by the facility owner or operator and by the qualified individual.

Total Burden and Cost. The estimated annual burden and cost for FRPs is **93,720 hours** at a cost of **\$3,280,193**. See FRP Table for details.

12-2. **VRP:** This section presents the number of respondents and presents the burden and cost estimates.

(a) Number of Respondents

Based on information from the U.S. Coast Guard Office of Vessel Activities (G-PCV), the office responsible for reviewing and approving VRPs, there are approximately 798 VRPs covered by this collection of information. There are 6,840 correspondence letters annually for plan revisions. Companies will approach the plan development requirement in different ways. Some companies will develop the VRPs entirely in-house; some will contract out to consultants or use a combination of consultant and in-house resources for plan development; while others may rely on industry associations for core "generic" VRPs that are then modified to suit the particulars of a vessel or company.

(b) Summary of Paperwork Burdens and Cost

The paperwork requirements consist of the initial preparation and submission of the response plan, annual review and submission of revisions to the Coast Guard as changes occur, annual recordkeeping activities, and resubmit of the plan every 5 years. The burden and cost were estimated over a 5-year period. These are described in more detail below.

Response Burden. The primary response burden, consists of the 1) initial preparation of the vessel response plan; 2) submission of the plan to the U.S. Coast Guard for approval; 3) submission of revisions or modifications to a response plan, as material changes occur for the vessel to prepare, and 4) submit to the Coast Guard the vessel response plan. In addition, the plans are to be resubmitted every five years and the paperwork burden for the resubmission is expected to be the same as for the annual review plus additional time for copying/mailing.

Recordkeeping Burden. Recordkeeping activities include revising and maintaining an updated response plan based on information collected primarily during the annual review. In addition, vessels are required to maintain records of drills and training. Copies of the updated plan must be maintained by the vessels response planholder and by the qualified individual.

Total Burden and Cost. The estimated annual burden and cost for VRPs is **29,588 hours** at a cost of **\$2,719,440**. See VRP Table for details.

12-3. **NTVRP:** This section presents the number of respondents and presents the burden and cost estimates.

(a) Number of Respondents

Based on information from the U.S. Coast Guard Office of Vessel Activities (G-PCV), the office responsible for reviewing and approving NTVRPs, there are approximately 2,000 NTVRPs covered by this collection of information. There are 4,156 correspondence letters annually for plan revisions. Companies will approach the plan development requirement in different ways. Some companies will develop the NTVRPs entirely in-house; some will contract out to consultants or use a combination of consultant and in-house resources for plan development; while others may rely on industry associations for core "generic" NTVRPs that are then modified to suit the particulars of a vessel or company.

(b) Summary of Paperwork Burdens and Cost

The paperwork requirements consist of the initial preparation and submission of the response plan, annual review and submission of revisions to the Coast Guard as changes occur, annual recordkeeping activities, and resubmit of the plan every 5 years. The burden and cost were estimated over a 5-year period. These are described in more detail below.

Response Burden. The primary response burden, consists of the 1) initial preparation of the vessel response plan; 2) submission of the plan to the U.S. Coast Guard for approval; 3) submission of revisions or modifications to a response plan, as material changes occurs for the vessel to prepare, and 4) submit to the Coast Guard the vessel response plan. In addition, the plans are to be resubmitted every five years and the paperwork burden for the resubmission is expected to be the same as for the annual review plus additional time for copying/mailing.

Recordkeeping Burden. Recordkeeping activities include revising and maintaining an updated response plan based on information collected primarily during the annual review. In addition, vessels are required to maintain records of drills and training. Copies of the updated plan must be maintained by the vessels response planholder and by the qualified individual.

Total Burden and Cost. The estimated annual burden and cost for NTVRPs is **35,268 hours** at a cost of **\$2,926,800**. See NTVRP Table for details.

12-4. **PWS:** There will be one spill response organization working in Prince William Sound. It will serve the Trans Alaska Pipeline System (TAPS) traffic and includes large tankers receiving oil at the Valdez terminal.

Burden to Industry

There are 600 total clerical hours (80 hrs for operational readiness + 120 hrs for drills + 400 hrs for training) required for reporting and recordkeeping. Total clerical cost is \$12,000 for information collection for section 5005 of OPA 90 (600 hours x \$20 clerical cost/hour).

There are 680 total technical hours (200 hrs for operational readiness + 480 hrs for drills)

required for information collection. The total technical cost is \$34,000 for information collection for section 5005 of OPA 90 (680 hours x \$50 technical cost/hour)

Total Burden and Cost. The estimated annual burden and cost for PWS requirements is **1,280 hours** at a cost of **\$46,000**. See PWS Table for details.

12-5. **SOPEP:** This section presents the number of respondents and presents the burden and cost estimates.

(a) Number of Respondents

Based on information from the U.S. Coast Guard Office of Vessel Activities (G-PCV), the office responsible for reviewing and approving SOPEPs, there are approximately 2,794 SOPEPs annually covered by this collection of information. The Coast Guard estimates 921 new SOPEP get approved annually. There are 2,820 correspondence letters annually for plan revisions. It is assumed that 2 new US flagged tank vessels will be built each year. Companies will approach the plan development requirement in different ways. Some companies will develop the SOPEPs entirely in-house; some will contract out to consultants or use a combination of consultant and in-house resources for plan development; while others may rely on industry associations for core "generic" SOPEPs that are then modified to suit the particulars of a vessel or company.

(b) Summary of Paperwork Burdens and Cost

The paperwork requirements consist of initial preparation of the Shipboard Oil Pollution Emergency Plan (SOPEP), submission of the plan to the U.S. Coast Guard for approval, and submission of revisions or modifications to a plan as material changes occur. All vessels require certification every year. US flagged tank vessels are assumed to be in compliance with the MARPOL 73/78 by submitting their plans in conjunction with their VRPs, with a small additional time increased. The Coast Guard estimates the cost of adding the MARPOL requirements into the VRP to be 18 hours per plan. The burden and cost were estimated over a 5 year period.

Total Burden and Cost. The estimated annual burden and cost for SOPEP requirements is **60,703 hours** at a cost of **\$2,731,635**. See SOPEP Table for details.

12-6. **Total Burden and Cost of submitting form CG-6083.** The Coast Guard has created the form "Application for Approval/Revision of Vessel Response Plans." The purpose of the form is to provide for an easier and clearer method to request a specific USCG review a submitted vessel response plan or revision to a response plan. The Coast Guard estimates that approximately 50% of submissions will voluntarily use this form. It will take approximately .16 hours to complete form, therefore the total hours of burden will be about 16,400 ($32,675 * .5$) at a cost of \$118,080 ($16,400 * (\$45/hr * .16)$). However, this burden is not added to the total, as use of the form replaces the need to draft a letter explaining what action is requested.

12-7. **Summary**

Total Number of Respondents. The number of respondents subject to the information collection requirements is estimated to be a total of **9,834** in terms of response burden [(FRP: 3,881 +360) + (VRP: 798) + (NTVRP: 2,000) + (PWS: 1) + (SOPEP: 2,794)]

Total Number of Responses. The number of responses subject to the information collection requirements is estimated to be a total of **32,675** [(FRP: 8,838 = 360 + 3,881 + 3,881 + 716) + (VRP: 7,909 = 111 + 6,840 + 798 +160) + (NTVRP: 6,596 = 280 + 4,156 + 2,000 + 160)+ (PWS: 1) + (SOPEP: 9,331 = 921 + 2 + 2,820 +2,794 + 2,794)].

Total Respondent Hour Burden. The hour burden is estimated to total **220,559** hours [(FRP: 93,720) + (VRP: 29,588) + (NTVRP: 35,268) + (PWS: 1,280) + (SOPEP: 60,703)].

Total Respondent Cost Burden. The cost burden of collection on the respondents is expected to total **\$11,704,068** [(FRP: \$3,280,193) + (VRP: \$2,719,440) + (NTVRP: \$2,926,800)+ (PWS: \$46,000) + (SOPEP: \$2,731,635)].

13. Estimates of annualized capital and start-up costs.

There are no annualized capital and start-up costs.

14. Estimates of annualized Federal government costs.

14-1 **FRP**

Based on Coast Guard estimates, about 18 full time equivalents are utilized annually for this program to process, review, and approve facility response plans. Additional information-related collection burdens also may be incurred to conduct inspections, oversee drills, and perform other tasks to implement the program. The Coast Guard is expected to spend approximately 36,000 hours (18 billets x 250 work days x 8 hour work days) or \$1,075,320, based on full-year salaries of \$59,740.

14-2 **VRP, NTVRP, and SOPEP**

Based on information from the Coast Guard's Office of Vessel Activities (G-PCV) the cost to the Federal government to administer the NTVRP, VRP and SOPEP program is approximately \$3,318,675 annually. To accomplish this, the Coast Guard utilizes a private support contract to accomplish administrative and technical requirements.

14-3 **PWS**

It is estimated that this requirement would require 20% of the time of a lieutenant assigned to the USCG Marine Safety Office in Valdez. Estimated at 400 hours annually.

Four hundred hours for a lieutenant at \$51/hour will cost the Coast Guard \$20,400 annually (\$51 x 400 = \$20,400).

Total Government Cost Burden. Therefore, annual costs to the Coast Guard are expected to total \$4,406,395 [(FRP: \$1,075,320) + (VRP/NTVRP/SOPEP: \$3,318,675) + (PWS: \$12,400)].

15. Explain the reasons for the change in burden.

The change in burden is both a PROGRAM CHANGE and an ADJUSTMENT. The program change is due to the addition of the new NTVRP collection. The adjustment is due to a change in the vessel and facility populations and frequency of document submission.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

There are no plans to publish information for statistical use.

17. Explain the reasons for seeking not to display the expiration date for OMB approval of the information collection.

We are not seeking such approval. The OMB Number will appear on appropriate PRA disclosure information.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.

Table FRP

INDUSTRY REPORTING BURDEN/COSTS

INITIAL PLAN DEVELOPMENT

<u>Number of Facilities</u>	<u>Burden Hours Per Facility</u>	<u>Total Burden Hours</u>	<u>Cost</u>
360	90 ¹	32,400	x\$35/hr = \$ 1,134,000

Subsequent Year Response Burden Estimates
Annual review

<u>Number of Facilities</u>	<u>Burden Hours Per Facility</u>	<u>Total Burden Hours</u>	<u>Cost</u>
3,881	10 ¹	38,810	x \$35/hr = \$ 1,358,350

ANNUAL RECORDKEEPING BURDEN

<u>Number of Facilities</u>	<u>Burden Hours Per Facility</u>	<u>Total Burden Hours</u>	<u>Cost</u>
3,881	5 ¹	19,405	x \$35/hr = \$ 679,175

FIFTH YEAR SUBMITTAL BURDEN

<u>Number of Facilities</u>	<u>Burden Hours Per Facility</u>	<u>Total Burden Hours</u>	<u>Cost</u>
3,881	4 ¹	15,524	x 0.2
		3,105	x \$35/hr = \$ 108,668
		Total Annual Cost	\$ 3,280,193

INDUSTRY BURDEN HOURS

<u>DEVELOPMENT</u>	<u>YEAR</u>	<u>FREQUENCY</u>	<u>HOURS REQUIRED</u>
Facility Plans	1	(x 1)	32,400
Annual Review	2 thru 5	(x 1)	38,810
Annual Recordkeeping	1 thru 5	(x 1)	19,405
Submittals	5	(x 1/5)	3,105
	Total Annual Burden Hours on Industry (1-5)		93,720

Note:

\$35 represents the average hourly wage of facility personnel

¹Total reflects the weighted average burden for all model facilities, rounded to two significant digits after the decimal point.

Table VRP

INDUSTRY REPORTING BURDEN/COSTS

INITIAL PLAN DEVELOPMENT

<u>Number of Plans</u>	<u>Burden Hours</u>	<u>Per Plan</u>	<u>Total Burden Hours</u>	<u>Cost</u>
111 VR Plans		40	4,440 x \$100/hr=	\$444,000

PLAN MAINTENANCE AND REVISION

<u>Number of Revisions</u>	<u>Hours</u>	<u>Total Burden Hours</u>	<u>Cost</u>
6,840 Revisions (Correspondence)	3	20,520 x \$100/hr=	\$2,052,000

ANNUAL RECORDKEEPING BURDEN

<u>Industry</u>	<u>Hours</u>	<u>Total Burden Hours</u>	<u>Cost</u>
798 VR Plans	5	3,990 x \$40/hr=	\$159,600

FIFTH YEAR SUBMITTAL BURDEN

<u>Number of Plans</u>	<u>Hours</u>	<u>Total Burden Hours</u>	<u>Cost</u>
798 VR Plans	4	3,192 x 0.2	
		638.4 x \$100/hr=	\$63,840
		Total Annual Cost	\$2,719,440

INDUSTRY BURDEN HOURS

<u>DEVELOPMENT</u>	<u>YEAR</u>	<u>FREQUENCY</u>	<u>HOURS REQUIRED</u>
Vessel Plans	1	(x 1)	4,440
Review/Revisions	2 thru 5	(x 1)	20,520
Recordkeeping	1 thru 5	(x 1)	3,990
Submittals	5	(x 1/5)	638
Total Annual Burden Hours on Industry (1-5)			29,588

Table NTVRP

INDUSTRY REPORTING BURDEN/COSTS**INITIAL PLAN DEVELOPMENT**

<u>Number of Plans</u>	<u>Burden Hours</u> <u>Per Plan</u>	<u>Total Burden Hours</u>	<u>Cost</u>
280 NTVR Plans	40	11,200 x \$100/hr=	\$1,120,000

PLAN MAINTENANCE AND REVISION

<u>Number of Revisions</u>	<u>Hours</u>	<u>Total Burden Hours</u>	<u>Cost</u>
4,156 Revisions (Correspondence)	3	12,468 x \$100/hr=	\$1,246,800

ANNUAL RECORDKEEPING BURDEN

<u>Industry</u>	<u>Hours</u>	<u>Total Burden Hours</u>	<u>Cost</u>
2,000 NTVR Plans	5	10,000 x \$40/hr=	\$400,000

FIFTH YEAR SUBMITTAL BURDEN

<u>Number of Plans</u>	<u>Hours</u>	<u>Total Burden Hours</u>	<u>Cost</u>
2,000 NTVR Plans	4	8,000 x 0.2 1600 x \$100/hr=	\$160,000
		Total Annual Cost	\$2,926,800

INDUSTRY BURDEN HOURS

<u>DEVELOPMENT</u>	<u>YEAR</u>	<u>FREQUENCY</u>	<u>HOURS REQUIRED</u>
Vessel Plans	1	(x 1)	11,200
Review/Revisions	2 thru 5	(x 1)	12,468
Recordkeeping	1 thru 5	(x 1)	10,000
Submittals	5	(x 1/5)	1,600
Total Annual Burden Hours on Industry (1-5)			35,268

Table PWS

Industry Reporting Burden

<u>Requirements</u>	<u>Hours</u>	<u>Costs</u>
Operational Readiness:		
Technical (\$50/hour)	200	\$ 10,000
Clerical (\$20/hour)	<u>80</u>	\$ 1,600
Total	280	\$ 11,600

Drills:		
Technical (\$50/hour)	480	\$ 24,000
Clerical (\$20/hour)	<u>120</u>	\$ 2,400
Total	600	\$ 26,400

Industry Recordkeeping Burden

Training:		
Clerical (\$20/hour)	<u>400</u>	\$ 8,000
Total	400	\$ 8,000

Total Hours 1,280

Total Costs \$ 46,000