

**Supporting Statement  
for  
Declaration of Inspection Before Transfer  
of Liquid Cargo in Bulk**

**A. Justification**

1. Circumstances that make the collection of information necessary.

Title 33 U.S.C. 1221 authorizes the Coast Guard to establish procedures, methods, and equipment requirements to prevent the discharge of oil and hazardous material from vessels and both onshore and offshore facilities. Title 33 U.S.C. 1225 and 46 U.S.C. 3703 authorized the Coast Guard to establish procedures, methods, and equipment requirements to prevent damage to vessels and facilities resulting from an unauthorized discharge of oil or hazardous substances into the environment. The Declaration of Inspection (DOI) is required to ensure safety during transfer of liquid cargo in 33 Code of Federal Regulations (CFR) 156.150 and 46 CFR 35.35-30. A Person-in-Charge (PIC) designated under 33 CFR 154.710 and 155.700 completes the DOI for each bulk transfer conducted. A copy of the DOI must be kept on board the vessel and facility for one month from the date of signature.

Coast Guard personnel, under the direct supervision of the Captain of the Port (COTP), conduct regulatory compliance inspections of vessels and facilities that transfer oil and hazardous materials in bulk. The DOI is checked to ensure compliance and to determine culpability in spill and accident investigations.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of Natural Resources

Prevention Directorate (G-P)

- 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.

As part of the Coast Guard's Port Safety and Security Program, this information is used in order to identify potential or actual violations of the regulations. The DOI must be continued for the U.S. to ensure compliance with specific procedures to prevent pollution of U.S. waters or damage to vessels and facilities. If no records were kept, a PIC may not know their

responsibilities (in case of foreign nationals working on foreign ships that transfer oil or hazardous materials in bulk in U.S. ports) or they may not follow all of the proper procedures. The result would be a significant increase in the risk of pollution or damage. Also, it would be more difficult to ascertain culpability for accidents and spills.

3. Consideration of the use of improved information technology.

Improved information technology is not applicable here, because a signed copy of the DOI must be kept at the facility and on board the vessel.

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

The Coast Guard monitors State and local regulatory activity in this field. No state, local, or other Federal agencies have been identified that require equivalent information. No similar information is available.

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

Due to the nature of the industry, recordkeeping requirements for small entities are generally proportionately less due to the smaller number of transfer operations performed.

6. Consequences to the Federal program if collection were not done or conducted less frequently.

Presently, a DOI is completed each time a bulk transfer is conducted and is kept for one month following each transfer operation. Reducing the use of DOIs could be detrimental in determining the causal factor for accidents and spills. Also, there is the possibility of increased pollution if proper prevention procedures are not followed.

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

Information is collected in a manner that is consistent with the guidelines.

8. Consultation.

A request for comment was published in the Federal Register on January 27, 2006, Volume 71, Number 18, page 4604, no comments were received.

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

No payments or gifts of any kind are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents.

No assurance of confidentiality is provided to respondents.

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

There are no issues of a sensitive nature involved in this information collection.

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

Each time a vessel conducts a transfer of oil or other hazardous materials, a DOI must be written and kept. Writing the DOI constitutes a response. This requirement covers all U.S. vessels and all non-U.S. flagged ships that carry oil and hazardous materials in bulk.

**Number of Respondents.** The Coast Guard's Marine Information for Safety and Law Enforcement (MISLE) yielded **6,338 vessels** that transport oil and hazardous materials. See Table 1. These vessels would have to comply with the recordkeeping requirement.

**Table 1**  
**Estimate of Vessels that Complete the Declaration of Inspection**

<b>Non-Tank Vessels</b>		
Freight Barge	215	
Freight Ship	329	
MODU	90	
Oil Recovery	79	
Pub. Tank Ship/Barge	17	
<b>Total Non-Tank Vessels</b>		<b>730</b>
<b>Tank Barges</b>		
Tank Barge	1,575	
Tank Barge: Subchpt. "OD"	1,940	
Tank Barge: Subchpt. "OI"	135	
<b>Total Tank Barges</b>		<b>3,650</b>
<b>Tank Ships</b>		<b>113</b>
<b>Non-U.S. Ships<sup>1</sup></b>		<b>1,845</b>
<b>Grand Total</b>		<b>6,338</b>

**Number of Responses:** The Coast Guard expects about **222,943 responses** annually.

- The Coast Guard estimates that U.S. tank vessels conduct about 52 transfers annually, and that non-tank vessels conduct 26 transfers annually. See Table 2.

<sup>1</sup> The MISLE database shows an average of 1,845 ships that came into the U.S. over a period of three years, transporting cargo that would require a declaration of inspection. Each year and for the three year period in this submission, we assume that the same average number of foreign ships would enter the United States with cargoes required to have a declaration of inspection while unloading or loading.

**Table 2**  
**Total Number of Responses**

	Number of Vessels	Entries/Vessel	Total Number of Responses
Tank Ships	113	52	5,876
Tank Barges	3,650	52	189,800
Non-Tank Vessels	730	26	18,980
Non-U.S. Ships <sup>2</sup>	1,845		8,287
<b>Total</b>	<b>6,338</b>		<b>222,943</b>

We estimate that it takes 0.3 hours (18 minutes) to verify that the required procedures have been followed and to sign the DOI. Table 3 shows the burden hours per vessel type.

**Table 3**  
**Annual Hour Burden per Vessel Type**

	Entries per Vessel	Hours per Entry	Hr. Burden per Vsl
Tank Ships	52	0.3	16
Tank Barges	52	0.3	16
Non-Tank Vessels	26	0.3	8

**Burden Hours:** The total annual burden for the affected vessels is expected to be **68,534 hours**. See Table 4.

**Table 4**  
**Total Annual Hour Burden to Industry**

	Vessels	Burden per Vessel	Total Hour Burden
Tank Ships	113	16	1,808
Tank Barges	3,650	16	58,400
Non-Tank Vessels	730	8	5,840
Non-U.S. Ships <sup>3</sup>	1,845		2,486
<b>Total Vessels</b>	<b>6,338</b>		<b>68,534</b>

**Costs:** The corresponding annual cost to industry is **\$3,615,466**. See Table 5.

- We estimate that for tank ships and non-U.S. ships, the equivalent of a Lieutenant would fill out the declaration. The hourly wage of a Lieutenant is \$79. For all other vessels, we expect the equivalent of an Ensign to fill out the declaration. The hourly wage of an Ensign is \$51. These wages are per COMDTINST 73101.1I.

<sup>2</sup> The MISLE Database also shows that the 1,845 non-U.S. ships that entered the U.S. to load or unload oil or other hazardous materials made an average total of 8,287 combined visits. We assume that one transfer took place per visit, and it follows that one declaration of inspection would occur per transfer. Therefore, we assume that 8,287 declarations of inspections were filed in 2004, and that same number of declarations would continue to be filled out during the three years covered in this submission.

<sup>3</sup> This is the accumulated hour burden to all non-U.S. ships (8,287 declarations x 0.3 hours per declaration).

**Table 5**  
**Annual Industry Cost of Completing the Declarations of Inspection**

	Total Hour Burden	Cost per Hour	Total Cost
Tank Ships	1,808	79	\$142,832
Tank Barges	58,400	51	2,978,400
Non-Tank Vessels	5,840	51	297,840
Non-US Ships	2,486	79	196,394
<b>Total Vessels</b>	<b>68,534</b>		<b>\$3,615,466</b>

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.

We assume that Coast Guard personnel monitor 5 percent of the **222,943** transfers conducted annually in the U.S. It takes approximately 0.1 hours (6 minutes) to review a DOI for completeness. A Petty Officer will typically perform this duty. The average hourly wage of a Petty Officer is \$38.<sup>4</sup> Therefore, the cost to the Coast Guard is about \$42,359 (222,943 transfers x 5% x 0.1 hours x \$38).

15. Explain the reasons for the change in burden.

The change in the burden is an ADJUSTMENT due to a change in vessel population.

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

There is no plan to use statistical analysis or to publish this information.

17. Approval to not display expiration date.

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.

<sup>4</sup> The average hourly wage of a Petty Officer (E-4, E-5 and E-6) is \$38 [(\$32+\$39+\$44)/3 = \$38]. This information is listed in COMDTINST 7310.11