

**Supporting Statement  
for  
Barges Carrying Bulk Hazardous Materials**

**A. Justification.**

1) Circumstances that make the collection of information necessary.

The Coast Guard is responsible for ensuring the safe shipment of bulk liquid hazardous cargoes under 46 USC 3703. Tables 1 and 2 list the reporting and recordkeeping and requirements contained in 46 CFR 151. These reporting and recordkeeping requirements are necessary to ensure the safe transport of bulk hazardous materials on tank barges. A total of 461 barges are affected by these reporting requirements.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Marine Safety
- Protection of the 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.

The reporting and recordkeeping requirements in 46 CFR 151 are designed to enable the Coast Guard to determine if a barge meets the safety standards in 46 CFR Part 151 and to ensure the barge's crewmembers have the information necessary to operate the barge safely. Table 1 and the corresponding table explanation detail respondent population and subject description. The information in this collection is used by the Coast Guard to evaluate barge design and conduct inspections for compliance with the regulations.

3) Consideration of the use of improved information technology.

Since the reporting and recordkeeping requirements involve technical details particular to each barge and to the specific cargoes carried, a number of requirements do not lend themselves to computerization or other means of information technology. However, for reporting requirements that involve the

Coast Guard Marine Safety Center (MSC), respondents can use an MSC Web site that details the procedure for submitting plans via electronic formats. Electronic submission is voluntary.

We estimate that 25% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that approximately 5% of the responses are collected electronically.

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

There are no State or local regulations relating to this issue. No similar information collection is conducted by other federal agencies. The Coast Guard does not know of any similar information being collected.

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

Some operating barges would be considered small entities, particularly considering that some large companies set up separate operating companies for each barge to reduce liability. Because each barge must be shown to meet the minimum set of standards required for the cargoes it carries, there is no obvious mechanism by which the impact on small entities may be reduced.

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

The information on each barge is collected on a case-by-case basis as needed. Less frequent collection would make enforcement mechanisms ineffective.

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

These information collection and recordkeeping requirements are consistent with the guidelines.

8) Consultation.

The information necessary to generate this report was obtained from Coast Guard units without the need to consult with members of the tank barge industry.

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

There is no payment or gift to respondents.

10) Describe any assurance of confidentiality provided to respondents.

The information collected is generally not of a type considered confidential by those supplying it. Confidentiality is promised, when requested, for information

exempt from the mandatory public disclosure requirements of the Freedom of Information Act, or when information is proprietary in nature.

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

The information collected is not of a sensitive nature.

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

The annualized hour burden to industry is summarized in Tables 1 and 2. The **annualized total burden hours** to industry is estimated to be **13,255 hours**.

The annualized cost to industry is summarized in Tables 1 and 2. A rate of \$79/hour was used<sup>1</sup> to determine costs. The **annualized cost burden** to industry is estimated to be **\$ 1,047,177**.

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.

The annualized cost to government is summarized in Tables 1 and 2. A rate of \$61/hour<sup>1</sup> was used to determine costs. Due to administration costs, some government burden hours are fixed even if there is minimal industry burden. The annualized cost to the Federal Government for the reporting and recordkeeping in 46 CFR Part 151 is estimated at \$36,317.

15) Explain the reasons for the change in burden.

There is no change in burden.

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

This information is not published for statistical use.

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

There are no forms associated with this collection.

18) Explain each exception to the certification statement.

<sup>1</sup> Equivalent to an O-3 or Lieutenant per Commandant Instruction 73101.11, Hourly Standard Rates for Personnel.

There are no exceptions to the certification statement.

**B. Collection of Information Employing Statistical Methods.**

This information collection does not employ statistical methods.

**Table 1: Reporting Requirements**

46 CFR 151 section affected	# of vessels affected	Frequency/ year	Events/ year	Hours/event	Industry Burden	Government Burden
1. (151.01-10(c))	2,103	0.2	421	0.15	63.2 hours \$4,993	0 hours \$0
2. (151.01-10(c)(1))	1	0.1	0.1	24	2.4 hours \$190	8 hours \$488
3. (151.10-15)	35	1	35	40	2,000 hours \$158,000	560 hours \$34,160
4. (151.15-3(b)(8))	3	0.1	0.3	40	12 hours \$948	4.8 hours \$293
5. (151.15-3(d)(4))	35	--	0.33	16	5.3 hours \$419	8 hours \$488
6. (151.45-4(a)(2))	5	1	5	3	15 hours \$1,185	5 hours \$305
7. (151.50-6(d))	0	0	0	3	0 hours \$0	0 hours \$0
8. (151.50-12(b))	0	0	0	4	0 hours \$0	0 hours \$0
9. (151.50-20(i))	50	--	0.3	3	0.9 hours \$71	0.9 hours \$55
10. (151.50-22 & 23)	10	0.02	0.2	3	0.6 hours \$47	0.6 hours \$37
11. (151.50-30(e))	200	0	0	4	0 hours \$0	0 hours \$0
12. (151.50-31(d))	4	0	0	4	0 hours \$0	0 hours \$0
13. (151.50-50(n))	0	0	0	4	0 hours \$0	0 hours \$0
<b>Total Reporting Requirements</b>			461 Responses		2,099.4 hours \$165,853	587 hours \$35,826

**Table 2: Recordkeeping Requirements**

14. (151.45-2)	40	1	40	16	640 hours \$50,560	0 hours \$0
15. (151.45-3)	2,103	--	.5	2	1 hour \$79	8 hours \$488
16. (151.45-7)	2,103	20	42,060	0.25	10,515 hours \$830,685	0 \$0
<b>Total Recordkeeping Requirements</b>					11,156 hours \$881,324	8 hours \$488

## TABLE EXPLANATION

1. (151.01-10(c)) - All tank barges must submit an application for inspection once every five years. It is estimated that 2,103 tank barges are certificated under 46 CFR 151.
2. (151.01-10(c)(1)) - New tank vessels over 300 feet in length must have loading information approved by the Commandant. The Marine Safety Center records indicate one new barge per year has to comply with this regulation.
3. (151.10-15) - Only new or modified barges need to comply with this requirement for Coast Guard approval of stability calculations. The Marine Safety Center records indicate 50 such barges each year.
4. (151.15-3(b)(8)) - Calculation showing the stress level in the tanks under dynamic loading or grounding conditions are required for new pressure vessels tank barges. The Marine Safety Center records indicate 3 such barges each year.
5. (151.15-3(d)(4)) - Heat transmission tests and studies may be required to demonstrate that the structural material temperatures in the hull are acceptable when low temperature protection is needed. Marine Safety Center records indicate that one barge every three years has to submit this information.
6. (151.45-4(a)(2)) - When the cargo is not flammable, the Coast Guard must be shown documentation that the person on duty to perform transfer operations must be qualified to handle the cargo. Five people each year are assumed to furnish this documentation.
7. (151.50-6(d)) - Before internally inspecting tanks used for motor fuel antiknock compounds (MFAKC), the Commandant must be notified. Ten barges are estimated to carry MFAKC and, according to Commandant (G-PSO) records, over a period of five years, there will be 3 such notifications.
8. (151.50-12(b)) - The chemical composition of all steel used in the construction of tanks that will carry ethylene oxide must be submitted to the Commandant for approval. Commandant (G-PSO) records indicate that ethylene oxide is not presently shipped in tank barges.
9. (151.50-20(i)) - Tanks approved for acid cargoes cannot be used for any other cargo without Commandant authorization. Fifty acid barges are assumed. Commandant (G-PSO) records indicate 3 barges in a period of ten years will need Commandant approval to switch in and out of acid service.
10. (151.50-22 & 23) - Spent hydrochloric acid and phosphoric acid adulterates by other chemicals, inhibitors, water, solvents, etc., shall not be transported without

Commandant authorization. Ten new acid barges per year assumed. Commandant (G-PSO) records indicate there will be one request in a five-year period.

- 11.** (151.50-30(e)) - Deviations from the filling density limits given in the requirements for compressed gases transported at ambient temperature needs Commandant approval. Two hundred gas barges are assumed. Commandant (G-PSO) has no recent record of requests for deviation from the compressed gas filling density limits.
- 12.** (151.50-31(d)) - Welded unions or other unions approved by the Commandant may be used at terminal points for chlorine transfer cargo lines. Thirty chlorine hose manufacturers assumed. Commandant (G-PSO) has no recent request for union approval.
- 13.** (151.50-50(n)) - Commandant authorization is needed to transport anything other than phosphorous in phosphorous cart tanks or to transport a cargo other than phosphorous when phosphorous is being carried in another tank. Commandant (G-PSO) has no record of receiving requests under this requirement in the recent past.
- 14.** (151.45-2(e)) - Dangerous Cargo, No Smoking, No Visitors, and No Open Lights warning signs are required at all times unless the vessel is gas free. Cargo information cards are also required. It is assumed that 35 barges are brought into service each year and have to install the warning signs and provide the cargo information cards required by this regulation and that each year 5 barges need to replace and update these signs and cards.
- 15.** (151.45-3) - Tank barges requiring manning for safe operation can be subject to additional requirements prescribed by the Commandant. Commandant (G-PSO) receives approximately one request every two years for additional requirement for manned barges.
- 16.** (151.45-7) - Shipping papers are required for all cargoes. Twenty yearly trips are assumed for each vessel.