

## **Supporting Statement for Oil and Hazardous Materials Transfer Procedures**

### **A. Justification.**

1) Circumstances that make the collection of information necessary.

The Port and Tanker Safety Act (33 U.S.C. 1221 *et seq.*) authorizes the Coast Guard to develop regulations for equipment, methods, and procedures to prevent discharges of oil and hazardous materials from vessels, onshore facilities, and offshore facilities into the navigable waters of the United States. Consequently, the Coast Guard published oil pollution prevention requirements in 33 CFR Parts 154-156. This collection of information addressed the requirements for vessels in 33 CFR 155.720-820.

Under the Federal Enterprise Architecture Business Reference Module, the Line of Business is **Transportation** and the Subfunction is **Water Transportation**.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Protection of the Natural Resources
- Marine Safety

Prevention Directorate (CG-3P)

- 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.

Vessel personnel are required to follow the vessel's transfer procedures each time an oil or a hazardous material is transferred to or from the vessel or from tank to tank within the vessel. The purpose is to ensure that proper procedures are followed and to prevent the discharge of oil or hazardous material.

3) Consideration of the use of improved information technology.

The information required is particular and unique to each vessel. Due in part to the harsh

and hazardous working environment, the regulations require that the transfer procedures be (1) legibly printed and (2) permanently posted or available at a place where the procedures can be easily seen and used by all members of the crew when engaged in transfer operations. Thus, this collection is not amenable to the use of improved information technology.

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. Similar information does not exist.

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

Owing to the nature of the industry, recordkeeping requirements for small entities are generally proportionately less. This can be attributed to smaller vessels, simpler transfer systems, and smaller numbers of people involved. The procedures are in a narrative form and no particular format is specified.

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

If this information were not recorded, vessel personnel would be unfamiliar with the vessel's transfer systems procedures, which might result in the accidental discharge of oil or hazardous materials, fire, or explosion. This information is a one-time requirement and revised whenever the vessels' transfer system is modified. If the information were recorded less frequently, the procedures would become outdated and a hazard to all concerned parties.

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 60-day Notice was published in the Federal Register to obtain public comment on this collection. (See [USCG-2007-27793]; April 2, 2007; 72 FR 18483). The USCG has not received any comments on this information collection.

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

No payment or gift of any kind is 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.

The burden to respondents is provided in Table 12.1. The positions of Management and Clerical personnel are analogous to an O-4 and E-4, respectively. The rates shown are in accordance with the current edition of COMDTINST 7310.1 (series) for Out-Government.

The frequency of response is not on a set schedule, but happens whenever a revision is made. The Coast Guard estimates that five percent of the population annually revises these plans.

Table 12.1

|   |                |
|---|----------------|
| Number of vessels required to maintain Transfer Procedures: | 5,299          |
| Estimated number of vessels revising Procedures annually:   | 265            |
| <b>Estimated number of respondents</b>                      | <b>265</b>     |
| Management time to revise each Procedure (hrs) :            | 0.25           |
| Management hourly rate                                      | \$89           |
| Management cost burden per procedure                        | \$22           |
| Total Management cost burden                                | \$5,830        |
| Clerical time to revise each Procedure (hrs):               | 0.25           |
| Clerical hourly rate  | \$38           |
| Clerical cost burden per procedure                          | \$9.50         |
| Total clerical cost burden                                  | \$2,518        |
| Total Time required to revise each Procedure (hours)        | 0.5            |
| <b>Total Hour Burden</b>                                    | <b>133</b>     |
| <b>Total Cost Burden</b>                                    | <b>\$8,348</b> |

13) Estimate of annualized capital and start-up costs.

There are no annualized capital or start-up costs.

14) Estimate of annualized Federal Government costs.

Coast Guard enlisted personnel review transfer procedures during transfer monitor boardings, typically conducted by an E-5. The annual cost estimates are contained in Table 14.1. The wage rates shown are in accordance with the current edition of COMDTINST 7310.1 (series) for In-Government.

Table 14.1

|   |                |
|---|----------------|
| Coast Guard time to review each plan (hrs): | 0.15           |
| Reviewer hourly rate:                       | \$40.00        |
| Average annual CG Transfer Monitors         | 1,011          |
| <b>TOTAL COAST GUARD BURDEN HOURS</b>       | <b>152</b>     |
| <b>TOTAL COAST GUARD BURDEN COST</b>        | <b>\$6,066</b> |

15) Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change in vessel population. While the hour burden did not increase significantly, the total number of responses did increase substantially. This is a result of a correction in the Coast Guard's data collection and analysis methodology which enabled us to accurately capture additional subpopulations.

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

There are no forms associated with this collection.

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.