

**Supporting Statement  
for  
Waste Management Plans, Refuse Discharge Logs,  
and Letters of Instruction for Certain Persons-in-Charge (PIC)**

**A. Justification.**

1) Circumstances that make the collection of information necessary.

This collection is a combination of the following three approved information requests.

- **(a)** Waste Management Plans.
- **(b)** Refuse Discharge Logs.
- **(c)** Letter of Instruction for Persons-in-Charge (PIC) on Uninspected Vessels.

**(a) and (b)** The International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 (MARPOL 73/78) and codified in 33 USC §§ 1901-1909 requires that the Secretary of the Department in which the Coast Guard is operating to prescribe regulations for refuse record books and waste management plans. These statutory provisions are addressed in 33 CFR Part 151.55 and 151.57 respectively.

**(c)** The letter of instruction's contents should verify the PIC's credentials, stating that the holder has received sufficient formal instruction from the owner, operator, or agent of the vessel, as required by 33 CFR 155.710(e)(2) and 155.715.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

U.S. Coast Guard

- Safety
- Protection of the Natural Resources

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.

**(a)** Vessel operators of U.S. oceangoing ships, 40 feet or more in length, engaged in commerce or equipped with galleys and berths are required to develop waste management plans. The purpose of a waste management plan is to prevent the discharge of waste, including plastics, into water. These plans are used to determine whether a ship is in compliance with MARPOL 73/78 Annex V.

**(b)** Vessel operators of U.S. oceangoing ships of 400 gross tons or more, and U.S. ships involved on international voyages carrying 15 passengers or more, are required to maintain refuse record books. Refuse record books (discharge logs) are used to document waste discharges from the ships. These are also used to determine whether a ship is in compliance with MARPOL 73/78 Annex V. If noncompliance is indicated, these records may serve as evidence that a ship has violated discharge restrictions.

**(c)** To ensure that fuel transfer competency standards are met, all persons in charge (PICs) on uninspected vessels must carry a Letter of Instruction if they do not hold a Coast Guard issued license or properly endorsed Merchant Mariner's Document.

3) Consideration of the use of improved information technology.

**(a)** We believe that most waste management plans and related materials can be recorded electronically, but at this time few are maintained in this fashion. This is because the information required is particular to each vessel's operation and configuration.

**(b) and (c)** Not applicable. To meet international treaty obligations and national compliance and enforcement requirements, the logs and Letter of Instruction must be maintain and available in written (i.e., non-electronic) format.

We estimate that 60% of all of this collections recordkeeping requirements can be done electronically. At this time, we estimate that 15% are done electronically.

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

**(a), (b), and (c)** 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.

**(a)** 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 waste handling methods, and smaller

numbers of people involved. The procedures are in a narrative form and no particular format is specified.

**(b)** The Coast Guard believes that these recordkeeping requirements will not adversely affect on a substantial number of small entities because recordkeeping is expected to require six minutes per day for smaller vessels and no particular record book or format is prescribed.

**(c)** To ensure safety on uninspected vessels, all PICs must comply with the letter carriage requirement. The small burden imposed on small businesses cannot be lessened relative to the burden on larger entities.

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

**(a)** Written waste management plans ensure personnel responsible for the handling of ship generated refuse are aware of the garbage pollution regulations and that waste is handled aboard the ship in a consistent manner. If this information were not recorded, vessel personnel would be unfamiliar with waste handling procedures, which might result in the unintentional disposal of garbage in violation of the regulations. This information is a one-time requirement and revised whenever waste handling procedures are modified.

**(b)** This information is collected whenever applicable ships discharge garbage. If recordkeeping were required less frequently, the Coast Guard would not be able to use these records as an enforcement tool. Less frequent recordings of disposal/discharge operations would also hinder the Coast Guard's ability to accurately evaluate the level of compliance among ships with MARPOL 73/78 Annex V discharge restrictions. Lastly, if the crew is not held accountable for documenting every disposal/discharge operation, the recordkeeping process will no longer be an effective tool to promote knowledge of discharge regulations and awareness of waste handling practices on the ship.

**(c)** If information was submitted or recorded less frequently, no assurance could be given that vessels are operating within the applicable requirements that ensure marine safety.

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 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 payments or gifts of any kind are provided to respondents.

10) Describe any assurance of confidentiality provided to respondents.

No assurances 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 for each of the three aspects of this collection is contained in the following paragraphs and in Tables 12.1, 12.2, and 12.3. Table 12.4 provides a summation of the burden for all aspects of this collection. It should be noted that the applicability of each regulation is different, as described in paragraph 2. All hour burdens are for recordkeeping.

The burden associated with the Waste Management Plan portion of this collection is reported in 12.1.

Table 12.1 - Waste Management Plans

Universe of Potential Respondents	18,497
# New Plans Developed Annually	217
# Plans Modified Periodically	3,656
Annual # of Respondents	3,873
Annual # of Responses	3,873
Clerical Effort/Response, New Plans (hrs)	1.25
Clerical Hourly Rate	\$31
Management Effort/Response, New Plans (hrs)	1.25
Management Hourly Rate	\$75
<b>New Plan Hour Burden/Plan</b>	2.5
<b>New Plan Cost Burden/Plan</b>	\$133
<b>Total New Plan Hour Burden</b>	543
<b>Total New Plan Cost Burden</b>	\$28,753
Clerical Effort/Response, Plan Modification (hrs)	0.5
Clerical Hourly Rate	\$31
Management Effort/Response, Plan Modification (hrs)	0.5
Management Hourly Rate	\$75
<b>Plan Modification Hour Burden/Plan</b>	1
<b>Plan Modification Cost Burden/Plan</b>	\$53
<b>Total Plan Modification Hour Burden</b>	3,656
<b>Total Plan Modification Cost Burden</b>	\$193,768
<b>TOTAL BURDEN HOURS</b>	<b>4,199</b>
<b>TOTAL BURDEN COST</b>	<b>\$222,521</b>

Notes on Table 12.1:

- The Coast Guard estimates that these plans will be modified, on average, once every five years. The estimated number of responses is therefore 20 percent of the universe of potential respondents (number of vessels required to maintain a waste management plan.)
- We estimate that, on average, five percent of the population consists of new vessels, requiring the creation of a new waste management plan.
- The positions of management and clerical staff are analogous to a Lieutenant (O-3) and a GS-5, respectively. The rates shown are in accordance with the current edition of COMDTINST 7310.1 (series).

The burden associated with the Refuse Discharge Log portion of this collection is collection is reported in 12.2.

Table 12.2 - Refuse Discharge Logs

<i>Vessel Type</i>	<i># Vessels</i>	<i>Avg Annual # of Days in Operation</i>	<i>Avg Daily Entries</i>	<i>Total # Entries</i>	<i>Annual Hour Burden Per Vessel Type</i>
Commerical fishing vsls	192	330	1	63,360	5,280
Freight Ship	158	330	2	104,280	8,690
Industrial vsls	94	330	1	31,020	2,585
MODUs	67	365	1	24,455	2,038
OSVs	209	365	1	76,285	6,357
Oil recovery vsls	44	330	1	14,520	1,210
Passenger vsls	144	330	2	95,040	7,920
Research vsls	0	200	1	0	0
School Ship	10	200	1	2,000	167
Tank Ship	73	330	2	48,180	4,015
Towing Vessel	19	262	1	4,978	415
Unclassified	10	200	1	2,000	167
Manned Platforms	788	365	1	287,620	23,968
<b>TOTAL</b>	<b>1,808</b>			<b>753,738</b>	<b>62,812</b>

**Cost/Hour \$75**

<b>TOTAL NUMBER OF RESPONDENTS</b>	<b>1,808</b>
<b>TOTAL NUMBER OF RESPONSES</b>	<b>753,738</b>
<b>TOTAL ANNUAL HOUR BURDEN</b>	<b>62,812</b>
<b>TOTAL ANNUAL COST BURDEN</b>	<b>\$4,710,900</b>

Notes on Table 12.2:

a. The Coast Guard estimates that each log entry will take no more than five minutes to complete.

b. The responsibilities of the individual making the log entry is commensurate with that of a Lieutenant (O-3). The wage rate shown is in accordance with the current edition of COMDTINST 7310.1 (series).

The burden associated with the PIC Letter of Designation portion of this collection is reported in 12.3.

Table 12.3 - PIC Letter of Designation

# Vessels Requiring PIC Designation	192
# PICs On Board Each Vessel	2
Total # PICs Holding Designation	384
Estimated Annual Attrition Rate	30%
Estimated # Replacement Letters Created	115
Hour Burden per Designation Letter	0.167
Total Hour Burden	19
Wage Rate of Individual Creating Letter	\$59
Total Cost Burden	\$1,133

<b>TOTAL NUMBER OF RESPONDENTS</b>	<b>115</b>
<b>TOTAL NUMBER OF RESPONSES</b>	<b>115</b>
<b>TOTAL ANNUAL HOUR BURDEN</b>	<b>19</b>
<b>TOTAL ANNUAL COST BURDEN</b>	<b>\$1,133</b>

Notes on Table 12.3:

a. The Coast Guard estimates that each vessel will be required to maintain two designated PICs.

b. Because this collection is performed only once during an individual's period of employment, the number of responses is assumed to match the rate of attrition (turnover), conservatively estimated at 30 percent.

b. The responsibilities of the individual creating the Letter of Designation is commensurate with that of a Lieutenant, Junior Grade (O-2). The wage rate shown is in accordance with the current edition of COMDTINST 7310.1 (series).

c. We estimate that each letter will take no more than 10 minutes to create.

The summation of the three aspects of this collection is provided in the following table:

Table 12.4 - Summation of Collection Burden

	Waste Management Plans	Refuse Discharge Logs	PIC Designation Letters	<b>GRAND TOTALS</b>
Total # Respondents	3,873	1,808	115	<b>5,796</b>
Total # Responses	3,873	753,738	115	<b>757,726</b>
Total Burden Hours	4,199	62,812	19	<b>67,030</b>
Total Burden Cost	\$222,521	\$4,710,900	\$1,133	<b>\$4,934,553</b>

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

There are no annualized annual or start-up costs.

14) Estimates of annualized Federal Government costs.

This collection is for recordkeeping purposes only, and the public need not submit the information for review to the Coast Guard. Instead, Coast Guard personnel review these documents during periodic inspections, random boardings, and post-casualty, in conjunction with other vessel documentation and equipment. The incremental burden to the Government is negligible, and therefore not herein calculated.

15) Explain the reasons for the change in burden.

The change (i.e., increase) in hour burden is strictly due to an increase in the vessel population. The Coast Guard now uses a relatively new data base--MISLE--for estimating vessel populations and this allows us to more accurately estimate the vessels impacted by this COI. The methodology for estimating hour burden per respondent per year remains unchanged.

The change in the number of responses is due to a change in the methodology used to determine number of Refuse Discharge Log (RDL) responses. Previously, the Coast Guard estimated the number of annual RDL responses as equal to the number of respondents. In this periodic renewal, we have changed the methodology to account for the estimated number of recordkeeping actions taken by each respondent for a year. Thus, instead of 1 response per respondent per year, we are estimating about 417 responses per respondent per year. We believe this more accurately reflects the amount of activity needed to comply with the RDL recordkeeping requirement. As stated above, the methodology for estimating hour burden per respondent per year remains unchanged. We have before, and continue, to estimate RDL hour burden per action (now equal to a response).

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 of 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.