

**Supporting Statement
for
Approval of Alterations to Marine Portable Tanks;
Approval of Non-Specification Portable Tanks**

A. Justification

1. Circumstances that make the collection of information necessary.

The U.S. Coast Guard administers and enforces the laws and regulations promoting the safety of life and property in marine transportation. The offshore oil industry uses marine portable tanks (MPTs) and other types of portable tanks to carry hazardous materials such as combustible liquids to and from offshore drill rigs. These tanks must be capable of being filled and discharged safely aboard vessels.

Title 46 CFR 64.9 specifies that each owner or manufacturer who wants to alter an existing MPT must request a written approval from the Commanding Officer, U.S. Coast Guard Marine Safety Center. New MPTs may no longer be built under this part. Title 46 CFR 98.33-1 specifies that the Commandant of the Coast Guard may approve the design of portable tanks for the transport of certain Grade E combustible liquids and other low hazard materials when the tank does not meet a DOT design specification.

The legal requirements that necessitate this collection are 46 U.S.C. 3306, 3703 and 49 U.S.C. 5103, 5106 and 5121.

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

U.S. Coast Guard

- Marine Safety
- Protection of the Natural Resources

Prevention Directorate (CG-3P)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Economic Growth and Trade/Mobility: Reduce interruptions and impediments that restrict the economical flow of goods and people, while maximizing safe, effective, and efficient waterways for all users.

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

Approval by the Coast Guard for alterations to MPTs ensures that the altered tank retains the level of safety to which it was originally designed. Approval by the Coast Guard of portable tanks that do not meet DOT specification ensures that the non-specification tank will provide a level of safety equivalent to a specification tank. If the Coast Guard did not approve MPT

alterations, use of unsafe tanks could result in fires, chemical spills or similar marine casualties. In addition, rules that allow for the approval of non-specification portable tanks assure that innovation and new designs are not frustrated by the regulations.

3. Consideration of the use of improved information technology.

The information specified above is MPT specific. The Coast Guard Marine Safety Center (MSC) has a Web site that details how a respondent may submit plans electronically for review. We estimate that 100% of the responses may be done electronically. At this time, we estimate that 0% are received in electronic format.

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

The information of each submission is specific to that operation. There are no other similar Federal requirements known to exist.

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

For safety reasons all portable tanks must be built to the same recognized standards. The burden imposed on small businesses cannot, therefore, be lessened relative to the burden on larger entities.

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

Information will not be collected at any set frequency or schedule. Information is submitted only when a manufacturer or owner seeks approval of an MPT alteration or new tank design.

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-2007-27923]; May 3, 2007; 72 FR 24594). 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 of 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 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 burden of the collection of information.

- The estimated annual number of respondents is-- 1 (.33 rounded)
- The estimated annual number of responses is-- 1 (.33 rounded)
- The estimated total annual burden is-- 18 hours.

The Coast Guard has received no submissions during the three years, but to account for the possibility, we estimate that one submission of average complexity for MPT modifications is received every three years (0.33 submissions are received annually.)

We assume that the plans would be prepared by a Technical Expert, and the duplication work would be done by an Administrative Assistant. These positions are analogous to a GS-13 and a GS-7, respectively. The wage rates shown are in accordance with the current edition of COMDTINST 7310.1 (series) for "Out-Government."

Minimum cost (submit existing plans without revision; plans approved without correction):

Engineering, 1/2 hour @ \$71.00/hr	\$ 35.50
Administrative, 1.5 hours	57.00
3 copies at \$10 each	30.00
Visit to Coast Guard Office, 1 hour	<u>71.00</u>
Total Minimum Cost	<u>\$ 193.50</u>

Maximum cost (plans prepared specifically for Coast Guard approval, or existing plans returned for correction, visit to Coast Guard Office.)

Engineering, 100 hrs @ \$71.00	\$ 7,100.00
Administrative, 1.5 hours	57.00
3 copies at \$10 each	30.00
Visit to Coast Guard Office, 1 hour	<u>71.00</u>
Total Maximum Cost	<u>\$ 7,258.00</u>

Total annual reporting hour burden and cost burden to respondents is:

18 hours [Average of Minimum and Maximum burden (3hrs. + 102.5hrs.)/2, annualized by multiplying by 0.33], and

\$1,242 [Average of Minimum and Maximum cost (\$193.5 + 7,258)/2, annualized by multiplying by 0.33].

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

There are no annualized capital or start-up costs.

14. Estimate of annualized Federal Government costs.

Given the frequency of plan submission described in Block 12, we estimate that 0.33 plans per year will be received by the Coast Guard. The following calculations use the current “In-Government” wage rates contained in COMDTINST 7310.1 (series) for an O-3/O-4 to review the plans and for an O-5 to approve them:

<u>Federal Government:</u>	
Number of Submissions	0.33 per year (1 every 3 years)
Hours (typical):	
-to review	6hrs @ \$67.5/hr. = \$405/plan
-to approve	2hrs @ \$81/hr. = \$162/plan.
Total Labor Cost:	\$567/plan
Administrative Cost and Overhead (1/3 of labor cost):	\$189/plan
Total Cost per Plan:	\$756/plan
Annualized Total Federal Government Cost -----	\$252 (=\$756 x 0.33)

The total annual burden to the government is 2.67 hours (0.33 submission per year x 8 hours review time).

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.

There are no plans to use statistical analysis or publish this information.

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

We are not seeking such approval. The PRA number will appear on appropriate 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.