

**Supporting Statement  
for  
Application and Permit to Handle Hazardous Material**

**A. Justification**

1) Circumstances that make the collection of information necessary.

The Coast Guard and the Pipeline and Hazardous Materials Safety Administration (formerly Research and Special Programs Administration) have issued regulations to ensure the safe handling and transportation of explosives and hazardous materials. The Coast Guard's regulations have been issued under the Ports and Waterways Safety Act (33 USC 1225) which authorizes the Secretary of the department in which the Coast Guard is operating to establish procedures and standards for the handling, loading and unloading, storage, and movement of hazardous material on a vessel and/or a waterfront facility. These regulations are covered in 33 CFR 126.17 for facilities, and 49 CFR 176.100 and 49 CFR 176.415 for vessels. Improper stowage and handling of explosives or other hazardous material have led to catastrophic explosions which have caused extensive damage and death.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Maritime Stewardship

Prevention Directorate (CG-3P)

- Maritime Safety
- Human and Natural Environment

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

The Coast Guard Captain of the Port (COTP) uses these permits to determine whether safe practices are being followed in the stowage and handling of explosives and hazardous materials. Permits are issued, at times, for extended periods of time up to one year. COTPs schedule their patrols around permits in force to maximize people and equipment resources.

3) Consideration of the use of improved information technology.

The information required is particular and unique to each request. The "Application and Permit to Handle Hazardous Materials" form (CG-4260) can be downloaded from the Coast Guard's web site: <http://www.uscg.mil/ccs/cit/cim/forms/formmgmt.htm> . A future version of Coast Guard "forms software" will allow electronic transfer of documents/data, but currently very few of these applications are submitted electronically to COTPs.

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

This information is specific to each operation. There are no other similar Federal requirements or duplications known to exist.

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

COTP issues permits for extended periods of time when the same material is routinely handled. In addition, other exceptions are permitted when the handling of explosives or hazardous material is necessary for a special project of lengthy duration to allow for only one permit application.

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

If the information were not collected the COTP would be forced to expend more resources to ensure that the port was safe from potential hazardous conditions due to the possible improper handling of explosives or other hazardous materials. The COTP would no longer be able to target patrols for the most effective use of people and resources. The program is presently at a minimum level with most permits being issued for extended periods of time, up to one year in many cases, with terminals being able to notify via telephone only when they are handling explosive or other hazardous materials required to have a permit.

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

Information is collected in 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-2007-0045], November 15, 2007 72 FR 64233) 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.

There are no personal or organization identifiers involved. Information is kept on file at each COTP office along with other company records in accordance with the Coast Guard Paperwork Management Manual.

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

There are no questions of a sensitive nature in this information collection process.

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

- **The estimated annual number of respondents is 68.**
- **The estimated annual number of responses is 168.**
- **The estimated annual hour burden is 185 hours.**
- **The estimated annual cost burden is \$10,491.**

There are 68 respondents submitting an average of two and a half (2.5) applications per year. This information is based on an analysis of the available data in the MISLE system, for permits to handle explosives awarded from 2004-2006. The average time to complete the application is one hour per application and so this information collection contains 168 reporting burden hours (68 respondents × ~2.5 applications/respondent × 1 hour/application). The recordkeeping requirement is estimated at 0.1

hour per permit. This information collection contains 17 recordkeeping burden hours ( $168 \times 0.1$  hours). Permits must be maintained for one year at the work site as well as at the local COTP. This recordkeeping requirement is necessary because explosive cargoes are often maintained onboard ship for long periods of time. The inherent danger involving an accident makes it imperative that in the event of an incident, specific information on the hazardous material stowed be immediately available to prevent potential catastrophic loss of life and property.

The estimated annual hour burden ( $168 + 17$ ) is 185 hours.

The cost estimate was calculated using the appropriate wage rate categories for management (\$78.00 per hour for an O-3) and clerical (\$39.00 per hour for an E-4) and the hour burden figures.

It will take an average of approximately  $\frac{1}{2}$  an hour of management time to prepare and review the appropriate information required for the permit. It will likewise take approximately a  $\frac{1}{2}$  an hour of clerical time to type this information and  $\frac{1}{10}$  of an hour to file the resulting paperwork. Thus the total annual cost for submitting applications for permits as well as recordkeeping costs to the public is \$10,491. See Table 1 below for details.

**TABLE 1**  
**ANNUAL HOUR AND COST BURDEN**

	<b>Respondents</b>	<b>Responses</b>	<b>Time (hours)</b>	<b>Burden Hours</b>	<b>Applicable wage rate</b>	<b>Cost</b>
<b>Permit applications (management)</b>	68	168	0.5	84	\$78.00	\$6,552
<b>Permit applications (clerical)</b>	68	168	0.5	84	\$39.00	\$3,276
<b>Recordkeeping</b>	68	168	0.1	17	\$39.00	\$663
<b>ANNUAL TOTAL</b>				<b>185</b>		<b>\$10,491</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.

It will take approximately an hour of management time to review the appropriate information required and issue the permit. It will take approximately  $\frac{1}{10}$  an hour of clerical time to file the resulting paperwork. The cost estimate was calculated using the appropriate wage rate categories for management and clerical, and the hour burden figures.

There are approximately 168 applications for permits per year based on information retrieved from MISLE. Table 2 illustrates the cost of \$12,591 that the Coast Guard will incur as a result of this information collection.

**TABLE 2**  
**ANNUAL HOUR AND COST BURDEN TO GOVERNMENT**

	<b>Responses</b>	<b>Time (hours)</b>	<b>Burden Hours</b>	<b>Applicable wage rate</b>	<b>Cost</b>
<b>Permit applications (initial review, O-3)</b>	168	0.5	84	\$62.00	\$5,208
<b>Permit applications (senior review, O-5)</b>	168	0.5	84	\$80.00	\$6,720
<b>Recordkeeping (E-5)</b>	168	0.1	17	\$39.00	\$663
<b>ANNUAL TOTAL</b>			<b>185</b>		<b>\$12,591</b>

15) Explain the reasons for the change in burden.

The change (i.e., increase) in hour burden is an ADJUSTMENT and is strictly due to an increase in the annual number of requests for permits. The Coast Guard now uses a relatively new data base--MISLE-- for estimating permit activity and this allows us to more accurately determine the annual number of permit requests. The methodology for estimating hour burden per response per year remains unchanged.

The change in the number of responses is strictly due to an increase in the annual number of requests for permits. The methodology for estimating responses per year remains unchanged.

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 collection.

We are not seeking such approval. The OMB Number will appear on appropriate PRA disclosure information.

18) Explain each exception to the certification statement.

1625-0005

There are no exceptions.

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

Collection does not employ statistical methods.