

## **Supporting Statement for Oil Record Book for Ships**

### **A. Justification**

#### **1) Circumstances which make the collection of information necessary.**

The Act to Prevent Pollution from Ships (APPS) and the International Convention for Prevention of Pollution from Ships, 1973, as modified by the 1978 Protocol relating thereto (MARPOL 73/78), requires that information about oil cargo or fuel operations be entered into an Oil Record Book. The requirement is contained in 33 CFR 151.25. Entries must be made in the Oil Record Book (CG-4602A) for a number of operations, such as:

- Ballasting or cleaning of fuel tanks during the voyage.
- Disposal of oily residues from fuel tanks, or other sources.
- The discharge of oil or oily mixtures for the purpose of securing the safety of the ship, preventing damage to the ship or cargo, or saving of live at sea.
- The escape of oil or oily mixtures resulting from damage to the ship, unavoidable leakage, any accident or exceptional circumstance.
- The discharges of residue arising from the purification or clarification of fuel or lubricating oil.
- The discharge of oil or oily mixtures from tank vessels of 150 gross tons on non-tank vessels of 400 gross tons.
- The internal transfer of oil between tanks during the voyage.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention

Coast Guard

- Protection of the Natural Resources.

Marine Safety, Security and Environmental Protection Directorate (CG-5)

- Reduce the amount of oil and chemicals discharged into the marine environment.
- Reduce the consequences of pollution incidents.

#### **2) Purpose of the information collection.**

The Coast Guard uses the information recorded in the record book to verify sightings of actual violations of the APPS, to determine the level of compliance with MARPOL 73/78, and as a means of reinforcing the discharge provisions. The actual recording of discharge information reinforces the intent of the regulations. Unless this information is recorded, the Coast Guard would have to rely solely on actual sightings of oil discharges for enforcement. Violation of the law may go undetected resulting in continued pollution of the sea by oil. The Coast Guard would have no method of determining the level of compliance with regulations.

3) Considerations of the use of improved information technology to reduce the burden.

This information is not amenable to the use of improved information technology. The information required is particular to each vessel's oil cargo, fuel operation, and configuration. To meet international treaty obligations and national compliance and enforcement requirements, the Oil Record Book must be maintained and available in written (i.e., non-electronic) format. The Oil Record Book content has been standardized. The U.S. Government prints the Oil Record Book and makes it available, from the Coast Guard, to masters and operators of all U.S. vessels. The ownership of the Oil Record Book for all U.S. ships remains with the U.S. Government.

We estimate that 0% of the recordkeeping requirements can be accomplished electronically.

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

The Coast Guard monitors State and local regulatory activity in this field. To date, no equivalent state or local programs have been identified that require similar information, and no other Federal agencies have similar or equivalent regulatory requirements.

5) Methods used to minimize the burdens to small business if involved.

This information collection does not have an impact on small businesses or other small entities.

6) Consequences to the Federal program or policy if collection were conducted less frequently or not collected.

Entries are recorded in the appropriate record books as soon as is practical after the completion of each oil transfer operation in order to ensure the accuracy of the entry. If this information was recorded less frequently, it is possible that the person making the entry may enter incorrect information. Since the Coast Guard uses the information in the record books to enforce the APPS, it is imperative that the information be recorded accurately and in a timely manner. There is no requirement to submit the Oil Record Book to the Coast Guard. The Oil Record Book must be maintained aboard the vessel for three years.

7) Special circumstances for information collection.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8) Consultation.

A 60-day Notice will be published in the *Federal Register* to obtain public comment on this collection. (See [USCG-2009-0115], March 12, 2009, 74 FR 10752). The USCG has not received any comments for this collection.

9) Decision to provide any payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

10) Assurances of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection.

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

There are no questions of sensitive language.

12) Burden hour and annualized cost estimates.

- **The total annual respondents [and responses] is 1,546.**
- **The total annual burden hours requested is 19,425.**
- **The total annual cost is \$1,435,658.**

Hour Burden: The regulation requires “each oil tanker 150 gross tons or above, ship of 400 gross tons and above other than an oil tanker, and manned fixed or floating drilling rig or other platform shall maintain an Oil Record Book Part I (Machinery Space Operations). An oil tanker of 150 gross tons and above or a non oil tanker that carries 200 cubic meters or more of oil in bulk, shall also maintain an Oil Record Book Part II (Cargo/Ballast Operations),” (33 CFR 151.25(a)).

**Table 1**  
**Estimate of Vessels that Keep Oil Record Books**

| <b>Non-Oil Vessels</b>       |              |
|------------------------------|--------------|
| Freight Barges               | 168          |
| Freight Ships                | 238          |
| Industrial Vessels           | 87           |
| MODUs                        | 55           |
| Offshore Supply Vessels      | 222          |
| Oil Recovery Vessels         | 40           |
| Passenger Vessels            | 65           |
| Research Vessels             | 14           |
| School Ships                 | 6            |
| Towing Vessels               | 13           |
| Other Platforms              | 116          |
| <b>Total Non-Oil Vessels</b> | <b>1,024</b> |

**Table 1 (cont'd)**

**Oil Vessels**

|                          |              |
|--------------------------|--------------|
| Tank Barges              | 461          |
| Tank Ships               | 61           |
| <b>Total Oil Vessels</b> | <b>522</b>   |
| <b>GRAND TOTAL</b>       | <b>1,546</b> |

The total affected population is 1,546 vessels, as depicted in Table 1. It is estimated that each tank vessel makes 540 entries per year (all tank barges and tank ships). Entries in the Oil Record Book take less than 2.5 minutes (.04167 hours, this includes entries in Books I and II) per entry. 540 entries per year times .04167 hours per entry equal 22.5 hours per year per vessel. Non-tank vessels make 1/3 as many Oil Record Book entries annually as tank vessels (all other vessels). Non-tank vessels perform 180 entries per year, and have 7.5 burden hours per year per vessel.

**Table 2**  
Hour Burden per Vessel Type

|                 | Entries per Vessel | Hours per Entry | Burden per Vessel |
|-----------------|--------------------|-----------------|-------------------|
| Tank Ships      | 540                | 0.04167         | 22.50             |
| Tank Barges     | 540                | 0.04167         | 22.50             |
| Non-Oil Vessels | 180                | 0.04167         | 7.50              |

**Table 3**  
Total Hour Burden to Industry

|                      | Vessels      | Burden per Vessel | Total Hour Burden* |
|----------------------|--------------|-------------------|--------------------|
| Tank Ships           | 61           | 22.50             | 1,372              |
| Tank Barges          | 461          | 22.50             | 10,372             |
| Non-Oil Vessels      | 1,024        | 7.50              | 7,680              |
| <b>Total Vessels</b> | <b>1,546</b> |                   | <b>19,425</b>      |

\*Figures may be rounded.

Cost: The United States Coast Guard will supply the operator of a vessel with an Oil Record Book at no cost, however if the vessel operator chooses to he or she can purchase an Oil Record Book from an outside source. // For tank ships, it is expected that the Chief Engineer is responsible for making the proper entries in the Oil Record Book. The responsibilities of a Chief Engineer are deemed commensurate to that of a Chief Engineer on a High Endurance Cutter, a position filled by an O-4. For tank barges and non-tank vessels, it is expected that a Tankerman or Second Engineer/Mate is responsible for making the proper entries in the Oil Record Book. These positions are analogous to a Chief Petty Officer (E-7) in the engineering department on a Coast Guard Cutter. Therefore, using Commandant Instruction 7310.1L the wage rates for a Chief Engineer on a Tank Vessel is \$99 per hour and for a Tankerman or Second Engineer/Mate the wage rate is \$72 per hour.

**Table 4**  
Annual Industry Cost of Data Entry\*

|            | Total Hour Burden | Cost per Hour (\$) | Total Cost (\$) |
|------------|-------------------|--------------------|-----------------|
| Tank Ships | 1,372             | 99.00              | 135,877.50      |

|                      |               |       |                     |
|----------------------|---------------|-------|---------------------|
| Tank Barges          | 10,372        | 72.00 | 746,820.00          |
| Non-Tank Vessels     | 7,680         | 72.00 | 552,960.00          |
| <b>Total Vessels</b> | <b>19,425</b> |       | <b>1,435,658.00</b> |

\*Figures may be rounded.

Table 4 shows that the total Cost of the collection is \$1,435,658.

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

There are no capital, start-up or maintenance costs associated with this information collection.

14) Estimates of annualized cost to the Federal Government.

The estimated cost to the Federal Government is approximately \$7,000. This is based on printing cost of \$3,000, distribution costs of \$2,000 and general overhead cost of \$2,000 which includes warehouse storage, shipping, and handling costs ( $3,000 + 2,000 + 2,000 = 7,000$ ).

15) Reasons for change in the burden.

The change in burden is an ADJUSTMENT due to a change in vessel population. The burden has decreased due to a decrease in the vessel population. The methodology for determining hour and cost burden remain the same.

16) Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17) Approval for not explaining the expiration date for OMB approval.

The Coast Guard would like to request to not display the expiration date. This instrument is in **book form** only. To display the expiration date would be extremely cost prohibitive for the USCG. Additionally, it will cause confusion on the users of this form. Because the collection is renewed every three years, if the form is not completely filled during those three years, we do not want the users to think the form will become an invalid document.

18) Exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.