### Supporting Statement for Display of Fire Control Plans for Vessels

# A. Justification

## 1) <u>Circumstances which make the collection of information necessary</u>.

The requirement for the display of certain vessel plans is part of the Coast Guard's Marine Safety Program in Title 46, Code of Federal Regulations (CFR). The Coast Guard requires the posting of general arrangement plans of the vessel noting the fire detection systems, manual alarms, fire-fighting equipment, fire doors, entries into different compartments, and ventilation systems. The need for ready availability of this information is particularly critical in the event of shipboard fire or flooding, to control damage. In the event an emergency occurs in which assistance is rendered from other vessels, the Coast Guard, or local shore side fire department, the information and its availability is crucial in minimizing danger to those on board, damage to the vessel, and the safety of the port and the environment. The Coast Guard authority to mandate such posting requirement is derived from 46 United States Code 3305 and 3306.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

<u>Coast Guard</u>

- Maritime Safety
- Protection of the Natural Resources

Marine Safety, Security and Stewardship Directorate (CG-5)

- Reduce crewmember deaths and injuries on U.S. commercial vessels
- Reduce the risk of major loss of life on passenger vessels
- Reduce the amount of oil discharged into the marine environment
- Reduce the amount of chemicals entering the environment
- Reduce the consequences of pollution incidents

# 2) <u>Purpose of the information collection</u>.

The information contained on these plans will be used by shipboard personnel during routine duties, such as equipment and system maintenance or servicing, as well as under emergency conditions such as fire or flooding. In the event assistance is rendered from external sources, the plans allow rapid familiarization with the vessel and its systems. This material is also checked periodically by Coast Guard marine inspectors to help insure all information is correct and up-to-date. Without this requirement, vital safety-related information may not be available during emergency situations.

3) <u>Considerations of the use of improved information technology to reduce the burden</u>.

E-format is not recommended for this collection. The need for ready availability of this information—in all possible vessel conditions including loss of power—is particularly critical in the event of shipboard fire or flooding to control damage. In the event an emergency occurs in which assistance is rendered from other vessels, the Coast Guard, or local shore side fire department, hard copy display of this information is crucial in minimizing danger to those on board, damage to the vessel, and the safety of the port and the environment. Alternative procedures for providing this information are available as described in the regulations.

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

The display of plans is also required for compliance with SOLAS chapter II-2, Regulation 20 for vessels engaged in international voyages.

#### 5) <u>Methods used to minimize the burdens to small business if involved</u>.

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

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

The failure to have the vessel plans available could be a major safety problem in the event of an emergency situation. This would be a glaring deficiency in the Coast Guard's efforts to maintain and promote maritime safety.

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) <u>Consultation</u>.

A 60-day Notice was published in the *Federal Register* to obtain public comment on this collection (see [USCG-2009-0116]; March 12, 2009; 74 FR 10750). Additionally, a 30-day Notice was published in the *Federal Register* to obtain public comment on this collection (July 20, 2009; 74 FR 35202). The USCG has not received any comments on this information collection.

9) <u>Decision to provide any payment or gift to respondents</u>.

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 are 1,027. ٠
- The estimated total annual hour burden is 514.
- The estimated total annual cost burden is \$43,176.

The following table specifies the affected population by this requirement.

Vessels Required to Display Fire Control Plans			
46 CFR	Population Description	•	Population
35.10-3	Subchapter D Tank Vessels		•
	Tank Barge—(All with more than six persons aboard)	19	
	Tank Ships	83	
			102
78.45-1	Subchapter H: Passenger Vessels—		
	1,000 gt +	94	
	Others on international voyages (SOLAS)	13	107
97.36-1	Subchapter I: Cargo and Miscellaneous Vessels—(Barges	and	
	self propelled vessels)		
	Freight Barges	3	
	Freight Ships	274	
	Industrial Vessels	110	
	Towboat/Tugboat	13	400
109.563	Subchapter I-A: MODUs—(All)		21
131.945	Subchapter L: Offshore Supply Vessels OSVs— (All)		353
169.853	Subchapter R: Nautical Schools—(Sailing School Vessels	5	
	100+ gt)		23
196.36	Subchapter U: Oceanographic Research Vessels— (All)		21
Total Vessels			1,027

Table 1

It is estimated that each respondent will check the plans at intervals corresponding to the Coast Guard inspections of the vessels. In addition, there may be instances during the periods between inspections when material changes to the vessel must be posted on the display plans. For small changes, minor alterations to the plans will be necessary. These are typically pen and ink corrections. Large or substantial alterations to the vessels are reflected in new plans or drawings completed by naval architects. Changes of this magnitude require the posting of new plans. It is assumed that this posting requirement involving the checks and minor corrections of posted plans each take approximately 30 minutes annually (1,027 vessels X 0.5 = 514<sup>1</sup> recordkeeping hours per year).

<sup>&</sup>lt;sup>1</sup> All figures may be rounded.

It is assumed that an employee equivalent to a LT would conduct the work and would earn approximately \$84 per hour<sup>2</sup>, thus the annual cost burden is **514 hours X \$84/hour = \$43,176.** 

## 13) <u>Total capital and start-up cost burden</u>.

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

#### 14) Estimates of annualized cost to the Federal Government.

Estimated cost to the Federal Government is **\$16,191**. This figure is based on Coast Guard Marine Inspectors (LTs/LTJGs/CWOs) spending .25 hours/vessel/year with an average hourly cost of \$63/hour,<sup>3</sup> for a total of 257 hours checking the display plans for the **1,027** respondent vessels. **(1,027 vessels X .25 hours/vessel = 257 hours; 257 hours X \$63/hour = \$16,191)** 

15) <u>Reasons for change in the burden</u>.

The change in burden is an ADJUSTMENT due to a decrease in the vessel population.

16) <u>Plans for tabulation, statistical analysis and publication</u>.

This information collection will not be published for statistical purposes.

#### 17) <u>Approval for not explaining the expiration date for OMB approval</u>.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18) Exception to the certification statement.

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

#### B. <u>Collection of Information Employing Statistical Methods</u>

This information collection does not employ statistical methods.

<sup>&</sup>lt;sup>2</sup> A LT (O-3) "out-of-government" wage rate, per enclosure (2) to COMDTINST 7310.1L.

<sup>&</sup>lt;sup>3</sup> Developed from the averaging the "in-government" wage rates for LTs/LTJGs/CWOs [i.e., O-3, O-2, W-4, W-3 & W-2], per enclosure (2) to COMDTINST 7310.1L.