

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

OMB Control No.: 1625-0062

Collection Instrument: None

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

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

- 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. For information on submitting information to the CG MSC, go to—
<https://homeport.uscg.mil/msc> > CONTACT US > MAIL ADDRESS, TELEPHONE CONTACTS, AND E-COMMERCE INFO. 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.

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

8. Consultation.

A 60-day Notice and 30-day Notice were published in the *Federal Register* to obtain public comment on this collection. (See USCG-2010-0853: September 27, 2010; 75 FR 59278; December 22, 2010, 75 FR 80512). The USCG has not received any comments on this information collection.

9. Explain any decision to provide any payment or gift to respondents.

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

10. Describe any assurance of confidentiality provided to respondents.

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

11. Additional justification for questions of a sensitive nature.

There are no questions of sensitive language.

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 last 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 @ \$73.00/hr	\$ 36.50
Administrative, 1.5 hours	57.00
3 copies at \$10 each	30.00
Visit to Coast Guard Office, 1 hour	73.00
Total Minimum Cost	<u>\$ 196.50</u>

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

Engineering, 100 hrs @ \$73.00	\$ 7,300.00
Administrative, 1.5 hours	57.00
3 copies at \$10 each	30.00
Visit to Coast Guard Office, 1 hour	73.00
Total Maximum Cost	<u>\$ 7,460.00</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

\$1,263 [Average of Minimum and Maximum cost (\$196.5 + 7,460)/2, annualized by multiplying by 0.33].

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

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

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 (averaged two salaries) 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 @ \$72/hr. = \$432/plan
-to approve	2hrs @ \$88/hr. = \$176/plan
Total Labor Cost:	
\$608/plan	
Administrative Cost and	
Overhead (1/3 of labor cost):	
\$202.67/plan	
Total Cost per Plan:	
\$810.67/plan	
Annualized Total Federal Government Cost -----\$270.22 (= \$810.67x	
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. There has been no change to the information being collected.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

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

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

18. Explain each 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.