

**Supporting Statement  
for  
Periodic Gauging and Engineering Analyses for  
Certain Tank Vessels Over 30 Years Old**

**A. Justification**

1. Circumstances which make the collection of information necessary.

Section 4109 of the Oil Pollution Act (Pub. L. 101-380; OPA 90) required the issuance of regulations related to the structural integrity of all tank vessels “constructed or adapted to carry, or that carry, oil in bulk as cargo or cargo residue.” The current regulations – found in 46 CFR 31.10-21a and 32.59-1 – establish minimum standards for plating thickness and require periodic gauging of the plating thickness of tank vessels over 30 years old. Gauging reports (survey data and associated engineering analysis) are submitted to comply. The Coast Guard needs these reports as part of the recertification inspection for the affected tank vessels.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention

Coast Guard

- Protection of the Natural Resources

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

- Reduce the amount of oil discharged into the marine environment

2. Purpose of the information collection.

The gauging report is utilized by the Coast Guard to verify the structural integrity of an older tank vessel before reissuing its Certificate of Inspection.

3. Considerations of the information technology to reduce burden.

Information—gauging surveys/engineering analysis—may be submitted in writing or electronically via e-mail. Information is submitted to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office, or the CG Marine Safety Center (MSC). Contact info for CG OCMI's can be found at— <http://www.uscg.mil/top/units/>. 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 reporting requirements can be done electronically. At this time, we estimate that approximately 33% of the responses are collected electronically.

4. Efforts to identify duplication.

The collected information is expected mainly from owners/operators of domestic-service tank barges on inland waterways. There are no other agencies (Federal, state or private) that collect this information on these vessels. The collected information is vessel-specific. The Coast Guard accepts American Bureau of Shipping (ABS)

classification or an international load line certificate as satisfactory evidence of structural integrity and regulatory compliance.

5. Methods used to minimize the burdens to small business.

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

6. Consequences to the Federal program if collection were not done or conducted less frequently.

The collected information is not required until a tank vessel is 30 years old and then only once every five years thereafter. This is considered the longest allowable interval in order to detect corrosion-induced weakening of the vessel before its structural integrity is compromised.

7. Special circumstances that require collection to be conducted in an inconsistent manner.

The collected information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d) (2).

8. Consultation.

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (see [USCG-2011-0710]; August 3, 2011; 76 FR 46824). Additionally, a 30-day Notice was published in the Federal Register to obtain public comment on this collection (October 7, 2011; 76 FR 62424). The Coast Guard has not received any comments on this information collection.

9. Decision to provide payment or gift to respondents.

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

10. Assurance of confidentiality provided.

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. Estimates of information collection burden.

The U.S. domestic population of tank vessels (barges and ships) older than 30 years is approximately 685<sup>1</sup>. Tankships will probably have either ABS certification or load line certification that also requires gauging reports and engineering analyses. The Coast

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<sup>1</sup> The average number of vessels that have attained or will attain an age of 30 years during the three year period of this extension.

Guard accepts ABS certification and load line certification as evidence of compliance with the requirement here. However, we consider the entire population as eligible for this collection of information as the number of tankships is small. Thus, the number of gauging surveys and analyses conducted **annually (respondents/responses) is 137** (or 685/5), as they are required once every 5 years.

Each gauging survey will require the following:

- The survey itself will require approximately 16 hours, by a subcontractor technician;
- Reverse-engineering of midship section drawing, analysis of the gauging data, and report write-up will require approximately 40 hours by a licensed Professional Engineer;
- Review and submittal of the report by the owner/operator will require 1 hour by a manager and 1 hour by a secretary; and
- Non-labor costs to industry (equipment charges, travel, etc.) are estimated to be an additional 36% per survey.

Summary of annual burden hours and costs to industry, based on the average of 137 surveys per year in the period of the extended authorization to collect information are:

CATEGORY	-- PER SURVEY --			TOTAL (PER YEAR)	
	Rate	Hours	Total	Hours	Cost
Industry/Technician	\$50	16	\$800	2,192	\$109,600
Industry/Prof. Engineer	\$96	40	\$3,840	5,480	\$526,080
Industry/Manager	\$125	1	\$125	137	\$17,125
Industry/Secretary	\$32	1	\$32	137	\$4,384
Industry/Non-Labor costs		--	\$1,727	--	\$236,599
Industry/TOTALS:		58	\$6,524	<b>7,946</b>	<b>\$893,788</b>

Estimated burdens were based upon USCG staff knowledge of the efforts required to perform gauging surveys and analyses, and the age profile of the existing tank barge fleet.

The estimated industry costs of labor per hour are derived from Commandant Instruction 7310.1M. Industry Technicians are assumed to have a rank equivalent to GS-9 with a labor cost of \$50 per hour. Industry Professional Engineers are assumed to equate to GS-14 with a labor cost of \$96 per hour. Industry Managers are assumed to be costly, and do not equate with any of the categories available. Therefore, they are assumed to have a cost that is 30% higher than a GS-14 hourly rate. Industry Secretaries are assumed to equate to GS-4 with a labor cost of \$32 per hour.

**AVERAGE ANNUAL BURDEN HOURS TO INDUSTRY = 7,946.**

**AVERAGE ANNUAL COST TO INDUSTRY = \$ 893,788.**

13. Estimate of annual cost to the respondent (capital and start-up).

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

14. Estimates of annual cost to the Federal Government.

It is estimated that the review and processing of the report by the Coast Guard will require 1 hour by a commander/supervisor, 4 hours by a lieutenant/engineer, and 1 hour by a secretary (GS-04).

Annual costs to the Coast Guard for the 137 surveys are \$56,581 as described below:

CATEGORY	-- PER SURVEY --			TOTAL (PER YEAR)	
	Rate	Hours	Total	Hours	Cost
Government/USCG CDR	\$95	1	\$95	137	\$13,015
Government/USCG LT	\$72	4	\$288	548	\$39,456
Government/USCG Sec.	\$30	1	\$30	137	\$4,110
Government/TOTALS:		6	\$413	<b>822</b>	<b>\$56,581</b>

15. Reasons for change in the burden.

The change in burden is an ADJUSTMENT due to a decrease in the estimated vessel population. The principal reason for the decrease is a decline in the number of vessels in operation that are at or above 30 years of age due to the OPA 1990 phase-out schedule of single hull tank vessels.

There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and the methodology for calculating burden, remain unchanged.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval to not display expiration date.

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 statement of this information collection.

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

This information collection does not employ statistical methods.