

**Supporting Statement  
for  
Certificates of Compliance, Boiler/Pressure Vessel Repairs,  
Cargo Gear Records, and Shipping Papers**

**A. Justification**

1. Circumstances that make the collection necessary.

The requirement for reporting Boiler and Pressure Vessel Repairs, and the requirements for maintaining Cargo Gear Records, Shipping Papers, and the Certificate of Compliance (CG-3585), are a part of the Coast Guard's Marine Safety Program of Title 46, Code of Federal Regulations. They are prescribed or authorized by one or all of the following laws: 46 USC 3301, 3305, 3306, 3702, 3703, 3711 and 3714.

These requirements provide the marine inspector with information regarding the condition of a vessel and its equipment, a list of the type and amount of cargo that has been or is being carried on a vessel, plus information about the owner of the vessel. Each of these requirements relate to the promotion of safety of life at sea and protection of the marine environment.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime 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.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

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

Cargo Gear Records (46 CFR 31.10-16, 71.25-25, & 91.25-25). Cargo gear records are a recordkeeping requirement and are maintained to ensure the availability of unique vessel information that is needed by Coast Guard boarding personnel. Cargo gear records must be maintained by tank vessels carrying combustible or liquid cargo in bulk (Subchapter D), passenger vessels greater than 100 gross tons (Subchapter H), and cargo and miscellaneous vessels (Subchapter I). The owners of these vessels must provide all registers of cargo gear upon request to the Officer in Charge, Marine Inspection.

Shipping Papers (46 CFR 35.01-10). Shipping Papers are a recordkeeping requirement and are maintained by tank vessels to ensure the availability of unique vessel information

that is needed by Coast Guard boarding personnel. Each loaded tank vessel shall have on board a bill of lading, manifest, or shipping document giving the name of the consignee and the location of the delivery point, the kind, grades, and approximate quantity of each kind and grade of cargo, and for whose account the cargo is being handled. In the case of unmanned barges where shipping papers are not available, an entry in the logbook of the towing vessel is sufficient.

*Certificate of Compliance (46 CFR 30-40, 153 & 154).* Certificates of Compliance (CG-3585) are a recordkeeping requirement, as the certificates are issued by the Coast Guard and maintained by foreign vessel owners to ensure the availability of unique vessel information that is needed by Coast Guard boarding personnel. A foreign vessel owner may apply for a Certificate by submitting information to the Commanding Officer at the Marine Safety Center (§154.22(a)). A Certificate of Compliance is issued by the Coast Guard to document a foreign flag vessel has been examined and found to comply with the regulations. Certificates of Compliance must be renewed every 2 years.

*Boiler/Pressure Vessel Repairs (46 CFR 35.25-5, 78.33-1, & 97.30-1).* The purpose of the reporting requirement regarding boiler and pressure vessel repairs is to ensure that work completed on these Coast Guard certified devices has been properly accomplished without compromising safety. Before making any repairs to boilers or unfired pressure vessels, the chief engineer shall notify the Officer in Charge, Marine Inspection, at the nearest port where the repairs are to be made. Repair records must be maintained by tank vessels carrying combustible or liquid cargo in bulk (subchapter D), passenger vessels greater than 100 gross tons (subchapter H), and cargo and miscellaneous vessels (subchapter I).

If these above requirements were no longer permitted, many items critical to the safety of personnel, their vessels, our ports, and the marine environment would be jeopardized.

### 3. Consideration of the use of improved information technology.

Information is submitted in writing or electronically via e-mail or phone. Information may be submitted to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office, or the CG 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.

Cargo Gear Records and Shipping Papers are recordkeeping requirements, and are not restricted to written form. Electronic files are allowed and would reduce the physical volume of records on the vessel. We estimate that many vessels employ an electronic database for their records.

Certificates of Compliance (COC) are maintained on board the vessel for use by the vessel operators and enforcement personnel. A COC is issued by the CG to document a foreign flag vessel has been examined and found to comply with the regulations. The COC—in hard copy format—must be available for CG boarding personnel to annotate—using pen and ink—following completion of subsequent examinations. The form provides instructions to CG Port

State Control Officers on how/when the COC should be annotated. The issuance of a COC to a foreign tank vessel is required by 46 U.S.C. 3711.

Before making any repairs to boilers or unfired pressure vessels, the vessel must notify the local OCMI at the nearest port. A phone call will suffice for notification. The repair records are not restricted to written form. Electronic files are allowed and would reduce the physical volume of records on the vessel.

We estimate that over 90% of the reporting and recordkeeping requirements can be done electronically.

4. Efforts to identify duplication.

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

5. Methods to minimize the burden 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 if collection were conducted less frequently.

The availability of the information required for cargo gear testing, shipping papers, and Certificates of Compliance, along with reporting requirements for boiler and pressure and vessel repairs are all elements of the Coast Guard's marine safety program. The protection of life and property, our ports and the marine environment would be seriously hindered by the loss of these requirements.

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 was published in the *Federal Register* to obtain public comment on this collection (see [USCG-2011-0843]; September 12, 2011; 76 FR 56208). Additionally, a 30-day Notice was published in the *Federal Register* to obtain public comment on this collection (November 18, 2011; 76 FR 71581). The Coast Guard 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 any questions of a sensitive nature.

There are no questions of sensitive language.

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

- The estimated annual number of respondents is 14,224
- The estimated annual number of responses is 37,805
- The estimated annual hour burden is 14,725
- The estimated annual cost burden is \$736,250

The estimated burden varies with the reporting or recordkeeping requirement. The total respondents, responses, and burden hours are detailed in the attached tables:

A. *Boiler and Pressure Vessel Repairs (see Appendix, Table 1).* This requirement dictates that the vessel owners report and record any repairs. The numbers represent the number of boiler and pressure vessel repair deficiencies resolved during the corresponding year by ship type. The average time spent per response was assumed to not have changed from the previous analysis, and therefore was used in this updated analysis. The data was available for years 2009 and 2010 in SANS.<sup>1</sup> The number of respondents and the number of responses are the same in the “Average Number of Respondents per Year Column” and “Average Number of Responses per Year Column.” This is due to the query being done on an annual basis, which is more accurate than having an aggregate estimate over a given number of years then estimating a yearly rate. Actual annual data is available and was used in this analysis.

B. *Cargo Gear Records (see Appendix, Table 2).* Cargo gear records are a recordkeeping requirement and are maintained to ensure the availability of unique vessel information that is needed by Coast Guard boarding personnel. The number of cargo gear records for this analysis was estimated using SANS and the corresponding query for this estimate used distinct vessel arrivals into the United States. We assume that all these distinct arrivals keep the required records. The average time spent per response was assumed to be the same as the last COI analysis. The analysis was estimated using years 2008-2010 in MISLE.<sup>2</sup> The number of respondents and the number of responses are the same in the “Average Number of Respondents per Year Column” and “Average Number of Responses per Year Column.” This is due to the query being done on an annual basis, which is more accurate than having an aggregate estimate over a given number of years then estimating a yearly rate. Actual annual data is available and was used in this analysis.

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<sup>1</sup> SANS – Ship Arrival Notification System.

<sup>2</sup> MISLE – Marine Information for Safety and Law Enforcement.

C. Shipping Papers (see Appendix, Table 3). Shipping papers represent a recordkeeping requirement and the below figures were calculated based on distinct arrivals and bounces. Distinct arrivals were used to determine the number of respondents and bounces to determine the number of responses. Distinct US arrivals, both foreign and United States ships, and bounces for U.S and Foreign were used for these calculations. We assume that all arrivals processed the appropriate shipping paper recordkeeping requirement.

D. Certificates of Compliance (see Appendix, Table 4). Certificates of Compliance are issued once every two years. The number of foreign vessels issued Certificates of Compliance was estimated using SANS and the corresponding query for this estimate used “Compliance” as the search word for the query. The average time spent per response was assumed to be the same as the last COI analysis. The analysis was estimated using years 2008-2010 in SANS. The number of respondents and the number of responses are the same in the “Average Number of Respondents per Year Column” and “Average Number of Responses per Year Column.” This is due to the query being done on an annual basis, which is more accurate than having an aggregate estimate over a given number of years then estimating a yearly rate. Actual annual data is available and was used in this analysis.

The total burden to the public is depicted in Appendix, Table 5. Assuming an average salary of \$50/hour<sup>3</sup>, the annual cost of the reporting and recordkeeping requirements would be **\$736,250**.

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

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

14. Estimates of annualized Federal Government costs (see Appendix, Table 6).

Cargo Gear Records and Shipping Papers are vessel recordkeeping requirements. Therefore, there is no review or collection required of the Coast Guard unless it is necessary to board the vessel. Certificates of Compliance are the forms that require Coast Guard review. Using a salary estimate of \$72/hour<sup>4</sup>, the annualized cost to the Federal Government would be **\$31,120**.

15. Explain the reasons for the change in burden.

The change in hour burden is an ADJUSTMENT due to a change in vessel population/activity levels. 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.

- In this ICR, we estimate an annual increase in respondents is due to an increase in the number of vessels that carry out Cargo Gear recordkeeping. This change may be due to the use of a different data base to collect the vessel population (i.e., a shift from MISLE to SANS).

<sup>3</sup> Equivalent to a GS-09 “out-of-gov’t” rate, per COMDTINST 7310.1M.

<sup>4</sup> Equivalent to an O-3 “in-gov’t” rate, per COMDTINST 7310.1M.

- In this ICR, we estimate an annual decrease in responses and burden due to a decrease in the number of vessels that carry out Shipping Papers recordkeeping. This change may be due to the use of a different data base to collect the vessel population (i.e., a shift from MISLE to SANS).
- Updates are provided for cost burden associated with this collection of information.
- Form CG-3585 was revised to better distinguish between tank vessels and FPSOs and FPSs. The change to the form is burden neutral as this is a CG-issued form that is maintained by the vessel operator.
- The CG has created printable instructions for this collection of information.

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 display the expiration date for OMB approval of the information of collection.

The certificate associated with this collection is prescribed by U.S. Code. This certificate has a specific two year expiration date. The addition of a second expiration date to this certificate—that for OMB approval—may cause problems. It may cause foreign-flag vessel owner/operators to interact with the Coast Guard more frequently than required to reconcile the existence of 2 expirations dates on their ships' certificate. It is for this reason that expiration date for OMB approval is not displayed on the certificate. However, the OMB expiration date will be displayed on the Instruction sheet related to the information collection request.

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.

Tbl 1 Boiler &amp; Pressure Vessel

Respondents	2009 Number Responses	2010 Number Responses	Average Number of Respondents Per Year	Avg. Time Spent per Response (Hrs.)	2009 Total Annual Time (Hrs.)	2010 Total Annual Time (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year (Hrs.)
Tank Ships	0	0	0	0.16	0	0	0	0
Passenger Ships	0	0	0	0.16	0	0	0	-
Cargo Ships	0	1	1	0.16	0	1	1	1
Research Ships	0	0	0	0.16	0	0	0	0
School Ships	0	0	0	0.16	0	0	0	0
<b>Total</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0.16</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>

Tbl 2 Cargo Gear Records

Respondents	2008 Number Responses	2009 Number Responses	2010 Number Responses	Average Number of Respondents Per Year	Avg. Time Spent per Response (Hrs.)	2008 Total Annual Time (Hrs.)	2009 Total Annual Time (Hrs.)	2010 Total Annual Time (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year
Tank Ships (United States)	86	80	69	78	0.16	14	13	11	78	12
Tank Ships (Foreign)	2,483	2,477	2,655	2538	0.16	397	396	425	2,538	406
Passenger Ships (United States)	437	422	447	435	0.16	70	68	72	435	70
Passenger Ships (Foreign)	294	278	284	285	0.16	47	44	45	285	46
Cargo Ships (United States)	256	229	207	231	0.16	41	37	33	231	37
Cargo Ships (Foreign)	5,802	5,604	5,838	5748	0.16	928	897	934	5,748	920
Research Ships (United States)	35	27	25	29	0.16	6	4	4	29	5
Research Ships (Foreign)	54	58	65	59	0.16	9	9	10	59	9
School Ships (United States)	10	12	9	10	0.16	1	2	1	10	2
School Ships (Foreign)	11	9	10	10	0.16	2	1	2	10	2
<b>Total United States</b>	<b>824</b>	<b>770</b>	<b>757</b>	<b>783</b>	<b>0.16</b>	<b>132</b>	<b>124</b>	<b>121</b>	<b>783</b>	<b>125</b>
<b>Total Foreign</b>	<b>8,644</b>	<b>8,426</b>	<b>8,852</b>	<b>8,640</b>	<b>0.16</b>	<b>1,383</b>	<b>1,347</b>	<b>1,416</b>	<b>8,640</b>	<b>1382</b>
<b>Grand Total</b>	<b>9,468</b>	<b>9,196</b>	<b>9,609</b>	<b>9,423</b>	<b>0.16</b>	<b>1,515</b>	<b>1,471</b>	<b>1,537</b>	<b>9,423</b>	<b>1,509</b>



Tbl 3 Shipping Papers

Respondents	Total Respondents for				Average Annual Respondents Per Year	Avg. Time Spent per Response (Hrs.)	2008 Total Annual Time (Hrs.)	2009 Total Annual Time (Hrs.)	2010 Total Annual Time (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year
	2008, 2009, 2010	2008 Number Responses	2009 Number Responses	2010 Number Responses							
Tank Ships (United States)	225	3,875	3,398	2,960	75	0.5	1,938	1,699	1,480	3,411	1,706
Tank Barges (US)	29	34	26	23	10	0.5	17	13	12	28	14
Tank Ships (Foreign)	5,521	23,391	20,949	21,848	1840	0.5	11,696	10,475	10,924	22,063	11,032
Tank Barges (Foreign)	3	0	8	7	1	0.5	0	4	4	5	3
<b>Total United States</b>	<b>1,135</b>	<b>5,401</b>	<b>5,993</b>	<b>5,669</b>	<b>378</b>	<b>0.5</b>	<b>2,701</b>	<b>2,997</b>	<b>2,835</b>	<b>3,439</b>	<b>1,720</b>
<b>Total Foreign</b>	<b>5,537</b>	<b>23,533</b>	<b>26,331</b>	<b>27,599</b>	<b>1,846</b>	<b>0.5</b>	<b>11,767</b>	<b>13,166</b>	<b>13,800</b>	<b>22,068</b>	<b>11,034</b>
<b>Grand Total</b>	<b>5,778</b>	<b>27,300</b>	<b>24,381</b>	<b>24,838</b>	<b>1,926</b>	<b>0.5</b>	<b>13,651</b>	<b>12,191</b>	<b>12,420</b>	<b>25,507</b>	<b>12,755</b>

Tbl 4 Certificate of Compliance

Respondents	2008 Number of Responses	2009 Number of Responses	2010 Number of Responses	Average Number of Respondents Per Year	Avg Time Spent per response	2008 Time Spent per Response (Hrs.)	2009 Time Spent per Response (Hrs.)	2010 Time Spent per Response (Hrs.)	Average Number of Responses Per Year	Average Annual Time Per Year
Towing Vessel	2	3	1	2	0.16	1	1	1	2	0
Passenger >6	83	84	131	99	0.16	8	13	18	99	16
Unclassified	2	5	14	7	0.16	1	1	1	7	1
Commercial Fishing Vessel	0	0	0	0	0.16	0	0	0	0	0
Industrial Vessel	1	4	1	2	0.16	1	1	1	2	0
Tank Barge	11	13	12	12	0.16	1	1	1	12	2
Research Vessel	5	3	4	4	0.16	1	1	1	4	1
Mobile Offshore Drilling Unit	62	57	59	59	0.16	7	8	9	59	9
Offshore Supply Vessel	7	7	3	6	0.16	1	1	2	6	1
Tank Ship	1966	2,038	2,176	2,060	0.16	135	209	201	2,060	330
Passenger < 6	4	3	5	4	0.16	1	1	1	4	1
Recreational	0	1	3	1	0.16	1	1	1	1	0
Freight Ship	827	594	432	618	0.16	126	121	112	618	99
<b>Total</b>	<b>2,970</b>	<b>2,812</b>	<b>2,841</b>	<b>2,874</b>	<b>0.16</b>	<b>284</b>	<b>359</b>	<b>349</b>	<b>2,874</b>	<b>460</b>

**Tbl 5 Total Burden to Public**

Respondents	Average Number of Respondents Per Year	Average Number of Responses Per Year	Yearly Average Annual Time (Hrs.)
Boiler & Pressure Vessel Repairs	1	1	1
Cargo Gear Records	9,423	9,423	1,509
Shipping Papers	1,926	25,507	12,755
Certificate of Compliance	2,874	2,874	460
<b>Total</b>	<b>14,224</b>	<b>37,805</b>	<b>14,725</b>

**Tbl 6 Total Fed Gov't Burden**

Respondents	Average Number of Responses Per Year	Avg. Time Spent per Response (Hrs.)	Average Annual Time Per Year (Hrs.)
Certificates of Compliance	2,874	0.16	460
<b>Total Annual Burden</b>	<b>2,874</b>	<b>0.16</b>	<b>460</b>