

**Supporting Statement
for
Declaration of Inspection Before Transfer
of Liquid Cargo in Bulk**

A. Justification

1. Circumstances that make the collection of information necessary.

Title 33 U.S.C. 1221 authorizes the Coast Guard to establish procedures, methods, and equipment requirements to prevent the discharge of oil and hazardous material from vessels and both onshore and offshore facilities. Title 33 U.S.C. 1225 and 46 U.S.C. 3703 authorized the Coast Guard to establish procedures, methods, and equipment requirements to prevent damage to vessels and facilities resulting from an unauthorized discharge of oil or hazardous substances into the environment. The Declaration of Inspection (DOI) is required to ensure safety during transfer of liquid cargo in 33 Code of Federal Regulations (CFR) 156.150 and 46 CFR 35.35-30. A Person-in-Charge (PIC) designated under 33 CFR 154.710 and 155.700 completes the DOI for each bulk transfer conducted. A copy of the DOI must be kept on board the vessel and facility for one month from the date of signature.

Coast Guard personnel, under the direct supervision of the Captain of the Port (COTP), conduct regulatory compliance inspections of vessels and facilities that transfer oil and hazardous materials in bulk. The DOI is checked to ensure compliance and to determine culpability in spill and accident investigations.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of Natural Resources

Prevention Policy & Response Policy Directorates (CG-5P & CG-5R)

- 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.

As part of the Coast Guard's Port Safety and Security Program, this information is used in order to identify potential or actual violations of the regulations. The DOI must be continued for the U.S. to ensure compliance with specific procedures to prevent pollution of U.S. waters or damage to vessels and facilities. If no records were kept, a PIC may not know their responsibilities (in case of foreign nationals working on foreign ships that transfer oil or

hazardous materials in bulk in U.S. ports) or they may not follow all of the proper procedures. The result would be a significant increase in the risk of pollution or damage. Also, it would be more difficult to ascertain culpability for accidents and spills.

3. Consideration of the use of improved information technology.

The DOI may be in written or electronic form.¹ We estimate that 0% of DOI activities are done electronically.

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

The Coast Guard monitors State and local regulatory activity in this field. No State, local, or other Federal agencies have been identified that require equivalent information. No similar information is available.

5. Methods to minimize the burden to small businesses 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 not done or conducted less frequently.

Presently, a DOI is completed each time a bulk transfer is conducted and is kept for one month following each transfer operation. Reducing the use of DOIs could be detrimental in determining the causal factor for accidents and spills. Also, there is the possibility of increased pollution if proper prevention procedures are not followed.

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 a 30-day Notice were published in the *Federal Register* to obtain public comment on this collection (See [USCG-2012-0472], June 1, 2012, 77 FR32657; and September 4, 2012, 77 FR 53898). The Coast Guard has not received any comments on this information collection.

9. Explain any decision to provide 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.

¹ The use of any electronic DOI system is at the discretion of an owner/operator of the waterfront facility or vessel that engages in oil or hazardous materials transfers.

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 annual number of respondents is 10,073.**
- **The annual number of responses is 203,326.**
- **The estimated annual hour burden is 62,514.**
- **The estimated annual cost burden is \$3,473,976.**

Each time a vessel conducts a transfer of oil or other hazardous materials, a DOI must be completed and kept. Completing a DOI constitutes a response. This requirement covers all U.S. vessels and all non-U.S. flagged ships that carry oil and hazardous materials in bulk.

Number of Respondents. The Coast Guard's Marine Information for Safety and Law Enforcement (MISLE) yielded **10,073 vessels** that transport oil and hazardous materials. See Table 1. These vessels would have to comply with the recordkeeping requirement.

Table 1
Estimate of Vessels that Complete the Declaration of Inspection

Tank Ships	88
Tank Barges	3,640
Nontank Vessels	125
Non-U.S. Vessels²	6,220
Grand Total	10,073

Number of Responses: The Coast Guard expects about **203,326 responses** annually (See Table 2).

- The Coast Guard estimates that U.S. tank vessels conduct about 52 transfers annually, and that nontank vessels conduct 26 transfers annually.

Table 2
Total Number of Responses

	Number of Vessels	Entries/Vessel	Total Number of Responses
Tank Ships	88	52	4,576
Tank Barges	3,640	52	189,280
Nontank Vessels	125	26	3,250
Non-U.S. Vessels ³	6,220		6,220
Total	10,073		203,326

² The MISLE database shows approximately 6,220 non-U.S. vessels able to transport cargo that would require a declaration of inspection.

We estimate that it takes 0.3 hours (18 minutes)⁴ to verify that the required procedures have been followed and to sign the DOI. Table 3 shows the burden hours per vessel type.

Table 3
Annual Hour Burden per Vessel Type

	Entries per Vessel	Hours per Entry	Hr. Burden per Vsl
Tank Ships	52	0.3	16
Tank Barges	52	0.3	16
Nontank Vessels	26	0.3	8

Burden Hours: The total annual burden for the affected vessels is expected to be **62,514hours**. (See Table 4).

Table 4
Total Annual Hour Burden to Industry

	Vessels	Hr. Burden per Vsl	Total Hour Burden
Tank Ships	88	16	1,408
Tank Barges	3,640	16	58,240
Nontank Vessels	125	8	1,000
Non-U.S. Vessels ⁵	6,220	0.3	1,866
Total Vessels	10,073		62,514

Costs: The corresponding annual cost to industry is **\$3,473,976** (See Table 5).

- We estimate that for tank ships and non-U.S. ships, the equivalent of a Lieutenant would fill out the declaration. The hourly wage of a Lieutenant is \$84 (O-3 out-of-gov't). For all other vessels, we expect the equivalent of an Ensign to fill out the declaration. The hourly wage of an Ensign is \$54 (O-1 out of gov't). These wages are per COMDTINST 7310.1M.

Table 5
Annual Industry Cost of Completing the Declarations of Inspection

	Total Hour Burden	Cost per Hour	Total Cost
Tank Ships	1,408	84	\$118,272
Tank Barges	58,240	54	3,144,960
Nontank Vessels	1,000	54	54,000
Non-US Vessels	1,866	84	156,744
Total Vessels	62,514		\$3,473,976

13. Estimates of capital and start-up costs.

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

³ The MISLE Database also shows that the 6,220 non-U.S. vessels that are able to carry oil or other hazardous materials. We assume that one transfer took place per visit, and it follows that one DOI would occur per transfer. Therefore, we assume that 6,220 DOIs were completed per year.

⁴ The time estimate (i.e., 18 minutes) to complete a DOI reflects both the vessel and facility time.

⁵ This is the accumulated hour burden to all non-U.S. ships (6,220 declarations x 0.3 hours per declaration).

14. Estimates of annualized Federal Government costs.

Coast Guard personnel review DOIs during cargo transfer monitorings, periodic inspections, random boardings, and post-casualty investigations. The annualized Federal Government cost estimate is \$ 560. This figure is based on the follows—approx. 1,400 DOI reviews per year, conducted by a CG petty officer (E-5)⁶ taking about .5 minutes per review.

15. Explain the reasons for the change in burden.

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

The following items listed below are changes to the collection:

- Decrease in burden (i.e., burden hours) is due to a change in the vessel population.
- Updates are provided for cost burden associated with this collection of information.
- The Coast Guard 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. Approval to not display expiration date.

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.

⁶ Wage rate of \$48/hour per COMDTINST 7310.1M for an E-5 in-gov't rate.