

**REVISION TO THE
SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS OF THE
STANDARD ON MECHANICAL POWER PRESSES
(29 CFR 1910.217(e)(1))¹
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NO. 1218-0229 (November 2013)**

This ICR seeks OMB pre-approval of information collection requirements contained in OSHA's direct final rule, *Revising Record Requirements in the Mechanical Power Presses Standard*. Pre-approval will allow the information collections to become effective at the same time as the remaining provisions of the rule. The Department of Labor will notify OMB if the agency receives any significant adverse comments affecting the information collection provisions of the rule in order to allow OMB to conclude its review of this ICR by filing comment.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The main objective of the Occupational Safety and Health Act of 1970 (i.e., the "Act") is to "assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources" (29 U.S.C. 651). To achieve this objective, the Act authorizes "the development and promulgation of occupational safety and health standards" (29 U.S.C. 651).

With regard to recordkeeping, the Act specifies that "[e]ach employer shall make, keep and preserve, and make available to the Secretary . . . such records . . . as the Secretary . . . may prescribe by regulation as necessary or appropriate for the enforcement of this Act . . ." (29 U.S.C. 657). The Act states further that "[t]he Secretary . . . shall prescribe such rules and regulations as [he/she] may deem necessary to carry out [his/her] responsibilities under this Act, including rules and regulations dealing with the inspection of an employer's establishment" (29 U.S.C. 657).

Under the authority granted by the Act, the Occupational Safety and Health Administration (i.e., "OSHA" or "the Agency") published at 29 CFR 1910.217 a safety standard for general industry regulating the use of mechanical power presses (i.e., "the Standard"). The paperwork provisions of the Standard specify requirements for developing and maintaining inspection, maintenance, and repair records.

In response to the Office of Management and Budget's June 22, 2012, memorandum requesting agencies to take steps to streamline, improve or eliminate paperwork burdens, OSHA developed a direct final rule (DFR) and companion notice of proposed rulemaking (NPRM) to revise its

¹The purpose of this Supporting Statement is to analyze and describe the burden hours and costs associated with a provision of this standard that contains a paperwork requirement; this Supporting Statement does not provide information or guidance on how to comply with, or how to enforce, the Standard.

existing Mechanical Power Presses Standard. OSHA is proposing to make two main revisions to its Mechanical Power Presses Standard. First, OSHA is proposing to revise a provision that requires employers to develop and maintain certification records of periodic inspections performed on the presses by adding a requirement that they develop and maintain certification records of any maintenance and repairs they perform on the presses during the periodic inspections. Second, OSHA is proposing to remove the requirement from another provision that employers develop and maintain certification records of weekly inspections and tests performed on the presses. This rulemaking is part of the Department of Labor's initiative to reduce paperwork burden, and will remove 613,600 hours of unnecessary paperwork burden for employers, while maintaining employee protection.

This rulemaking would result in information collection requirements for a covered employer to develop and maintain a certification record of any maintenance and repair work performed when the employer performs such work on a press before operating it. The certification record requirement is an information collection subject to OMB approval under the Paperwork Reduction Act. Records would be retained until replaced by updated record.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

This rule revises paragraphs (e)(1)(i) and (e)(1)(ii) of OSHA's Mechanical Power Presses Standard at 29 CFR 1910.217. This rulemaking also reorganizes these paragraphs by dividing the requirements into discrete provisions, and redrafts the provisions in plain language to make them easier to understand than the existing provisions. The first two provisions, paragraphs (e)(1)(i) and (e)(1)(ii), cover periodic and weekly tasks associated with the mechanical power-press inspection program. To further delineate the tasks covered by these two provisions, OSHA refers to the requirements of paragraph (e)(1)(i) as the "general component of the inspection program," and to the requirements of paragraph (e)(1)(ii) as the "directed component of the inspection program." In this regard, the requirements of paragraph (e)(1)(i), the general component of the inspection program, cover all parts of the equipment and stipulate a nonspecific interval ("periodic") for meeting these requirements. However, the requirements of paragraph (e)(1)(ii), the directed component of the inspection program, address specific parts of the equipment and define the frequency schedule employers would have to follow when inspecting and testing these parts ("at least once a week"). OSHA believes these revisions would assist the regulated community in differentiating the requirements of these provisions.

§§1910.217(e)(1) – Inspection, maintenance, and modification of presses -- Inspection and maintenance records.

Revisions to paragraph (e)(1)(i)

Paragraph (e)(1)(i) currently requires employers to inspect all parts, auxiliary equipment, and safeguards of mechanical power presses on a periodic and regular basis and to maintain certification records of these inspections. The main revision OSHA is proposing to make to this paragraph is to require that employers perform necessary maintenance or repair, or both, on presses before operating them, and to maintain certification records of any maintenance and

repairs performed.² Therefore, employers would have to perform, following the periodic and regular inspections, but before operating the equipment, any necessary maintenance and repair found during the inspections, and maintain certification records of the maintenance and repairs performed (in addition to the inspection certification records already required).

A national consensus standard, American National Standards Institute (ANSI) B11.1–2009 (“American National Standard for Safety Requirements for Mechanical Power Presses”), has requirements that are similar to paragraph (e)(1)(i). In this regard, paragraph 9.4.1 (“Program”) of this ANSI standard requires employers to “establish a systematic program of periodic and regular inspection of press production systems to ensure that all their parts, auxiliary equipment, and safeguarding are in safe operating condition and adjustment.” In addition, paragraph 9.4.2 (“Documentation”) of ANSI B11.1–2009 states that the “user shall document the press inspections are made as scheduled and that any necessary follow-up repair work has been performed.” A nonmandatory appendix to the ANSI standard, Annex K (“Press Inspection Report, Checklist, & Maintenance Record (Informative)),” supplements these requirements by providing a checklist detailing the parts, components, and equipment subject to inspection and maintenance.

The revisions and reorganization of proposed paragraph (e)(1)(i), therefore, are consistent with the requirements of ANSI’s B11.1 “Safety Requirements for Mechanical Power Presses.” Specifically, the proposed revision to paragraph (e)(1)(i) to certify maintenance and repairs performed on mechanical power presses are similar to the requirement in the ANSI standard to “document that press inspections are made as scheduled, and that any necessary follow-up repair work has been performed.” Not only does this revision represent the usual and customary practice of general industry, but OSHA believes that adding an explicit requirement to perform necessary maintenance and repair will ensure that employers perform such maintenance and repair on all of the parts, auxiliary equipment, and safeguards of each press, and not just the clutch/brake mechanism, antirepeat feature, and single-stroke mechanism delineated in existing paragraph (e)(1)(ii). In addition, the revision will provide OSHA with information that replaces information removed from revised paragraph (e)(1)(ii) (see the following discussion of that paragraph), notably the name of the individuals who perform maintenance and repair work on the presses. This information will not only verify that the employer performed the requisite maintenance and repair on presses, but will enable the Agency, during compliance inspections, to identify and interview the individuals responsible for maintaining and repairing the presses so that it can determine whether employees are operating safe equipment.

Paragraph (e)(1)(ii) requires employers to conduct weekly inspections and tests on the clutch/brake mechanism, antirepeat feature, and single-stroke mechanism of each mechanical power press, and to perform any necessary maintenance and repair on the equipment before operating it. Employers also must maintain a certification record of the inspection, testing, and maintenance tasks.

²The requirement for employers to perform maintenance and repair necessary for the safe operation of the entire press is implicit in the requirement in existing paragraph (e)(1)(i), which specifies that the employer’s inspection program ensure that presses “are in a safe operating condition and adjustment.” An inspection program that found, but did not correct, unsafe conditions would not meet this existing requirement.

OSHA is proposing two revisions to paragraph (e)(1)(ii). First, OSHA is proposing to revise the requirement that “[e]ach press shall be inspected and tested no less than weekly” to require explicitly that employees conduct these inspections and tests on a “regular basis at least once a week.” Second, OSHA is proposing to remove the requirement that employers prepare certification records for the weekly inspections and tests.³

The certification records for the weekly inspections and tests required by paragraph (e)(1)(ii) serve the following functions: (i) Remind employers to inspect and test mechanical power presses; (ii) inform employees that the employer performed these tasks and that the equipment is safe to operate; and (iii) provide a record of compliance, which OSHA representatives can use to verify that the employer meets the inspection and test requirements set forth in the standard. However, OSHA determined that certification records for weekly inspections and tests of mechanical power presses are not necessary to achieve these functions. In making this determination, the Agency noted that the revisions to §1910.217(e)(1)(ii) do not remove or lessen the requirement to inspect, test, maintain, and repair presses—tasks that are essential to ensuring that the equipment is functioning properly and that working conditions are safe for employees. In addition, OSHA believes that employers do not need certification records to remind them to perform weekly inspections, tests, maintenance, and repair. The Agency believes that employers generally perform these tasks on a regular basis, for example, at the start of the first shift each Monday, and, therefore, do not need certification records to remind them to complete these tasks. In this regard, under the existing standard, employers may refer to the required records directly, use computer-generated prompts, or simply perform the tasks the same time every week.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Employers may use automated, electronic, mechanical, or other technological information collection techniques, or other forms of information technology (e.g., electronic submission of responses) when establishing and maintaining the required records. The Agency wrote the paperwork requirements of the Standard in performance-oriented language (i.e., in terms of what data to collect, not how to record the data).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The requirements to collect and maintain information are specific to each employer and worker involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA (i.e., the required information is available only from employers).

5. If the collection of information impacts small businesses or other small entities, describe any methods used to reduce the burden.

³By requiring certification records of all necessary maintenance and repairs, paragraph (e)(1)(i) in the proposed rule includes the existing requirement to maintain certification records of maintenance and repair performed as a result of the weekly inspections, thereby preserving the safety benefits to employees.

The information collection requirements specified by the Standard do not have a significant impact on a substantial number of small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

OSHA believes that removing the weekly inspection certifications from the Mechanical Power Presses Standard will not jeopardize its mandate “to assure so far as possible every working man and woman in the nation safe and healthful working conditions and to preserve our human resources” as specified in the Act at 29 U.S.C. 651. The Agency believes that employers generally perform these tasks on a regular basis, for example, at the start of the first shift each Monday, and, therefore, do not need certification records to remind them to complete these tasks. In this regard, under the existing standard, employers may refer to the required records directly, use computer-generated prompts, or simply perform the tasks the same time every week.

Further, OSHA believes that adding an explicit requirement to perform necessary maintenance and repair will ensure that employers perform such maintenance and repair on all of the parts, auxiliary equipment, and safeguards of each press, and not just the clutch/brake mechanism, antirepeat feature, and single-stroke mechanism delineated in existing paragraph (e)(1)(ii). In addition, the proposed revision will provide OSHA with information that replaces information removed from proposed paragraph (e)(1)(ii), notably the name of the individuals who perform maintenance and repair work on the presses. This information will not only verify that the employer performed the requisite maintenance and repair on presses, but will enable the Agency, during compliance inspections, to identify and interview the individuals responsible for maintaining and repairing the presses so that it can determine whether employees are operating safe equipment.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can prove that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The information collection would not implicate any of these special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This rulemaking is proposing to remove a weekly inspection certification requirement that is subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (PRA-95), 44 U.S.C. 3501 *et seq.*, and OMB's regulations at 5 CFR part 1320. OMB approved the information-collection (paperwork) requirements currently contained in OSHA's Mechanical Power Presses Standard (29 CFR 1910.217(e)(1)) under OMB Control Number 1218-0229. Pursuant to 5 CFR 1320.5(a)(1)(iv), OSHA is submitting to OMB the revised information-collection request (ICR) for OSHA's Mechanical Power Presses Standard.

OSHA is providing members of the public with an opportunity to submit comments to OMB on the information collections contained in this rulemaking. OSHA also encourages interested parties also to submit a copy of their comments to OSHA.

9. Explain any decision to provide any payments or gift to respondents, other than reenumeration of contractors or grantees.

The Agency will not provide payment or gifts to the respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

OSHA will offer no assurance of confidentiality in connection with this information collection. The requirements specified by the Standard do not involve confidential information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

None of the provisions in the Standard request sensitive information.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-1.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage-rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

Burden-Hours and Cost Determinations

Based on the experience of experts on the B-11 Accredited Standards Committee (Ex. OSHA-2007-0003-0017.1), the use of mechanical power presses is declining due to the closure of many stamping businesses, as well as companies moving their press operations overseas. However, the experts could provide no estimate on the number of mechanical power presses covered by the Standard. Based on a lack of updated information, OSHA will continue to use its previous estimate of 295,000 mechanical power presses covered by the Standard. The Agency estimates that, of these presses, only 65% (191,750) will be operating at any given time and will require inspection; the other 35% are not be in operation and do not require inspection.

The Agency adopted the mean wage rates from the *May 2012 National Occupational Employment and Wages*, Bureau of Labor Statistics, U.S. Department of Labor.⁴ Total compensation for the following occupational categories includes an adjustment of 30.9 percent (*Employer Costs for Employee Compensation, June 2013*) for fringe benefits; this figure represents the average level of fringe benefits in the private sector. The costs of labor used in this analysis are, therefore, estimates of total hourly compensation. These hourly wages are:

Print Press Operator (51-5112)	\$22.71
Supervisory Printing Operator (51-1011)	\$36.14

Certification Records of Inspection (§ 1910.217(e)(1)(i) and (ii))

General component

⁴The website is http://www.bls.gov/oes/current/oes_net.htm.

Proposed paragraph (e)(1)(i) of the standard states the general component requirements for inspection and maintenance. Paragraph (e)(1)(i)(A) would require employers to conduct periodic and regular inspections of all parts of each power press including auxiliary equipment, and safeguards, including the clutch/brake mechanism, antirepeat feature, and single-stroke mechanism. Paragraph (e)(1)(i)(B) would require employers to perform and complete any maintenance and repair, or both, before workers operate the power press. Paragraph (e)(1)(i)(C) would require employers to maintain certification of each inspection and maintenance and repair task performed on the power press.

As discussed under Item 2 of this supporting statement, OSHA believes it is a usual and customary practice for employers to conduct and document the inspection, maintenance, and repair of presses. However, the Agency acknowledges that employers are not inspecting, maintaining, and repairing the mechanical power presses as proposed. Therefore, OSHA assumes that 5% of employers may not be conducting and documenting inspections, maintenance, and repairs.

Based on discussions with OSHA field staff, it is reasonable to assume that employers conduct an inspection of each mechanical power press once a month (i.e., 12 times a year). In addition, the Agency estimates that a press operator takes 20 minutes (.33 hour) to inspect the parts, auxiliary equipment, and safeguards, including the clutch/brake mechanism, antirepeat feature, and single-stroke mechanism of each press. Included in the 20 minutes is the employer time needed to prepare and maintain the inspection certificate and to document maintenance and repair performed on a press.

Burden hours: 191,750 presses x 5% x 12 monthly inspections x .33 hour =
37,967 hours

Cost: 37,967 hours x \$22.71 = \$862,231

Directed Component

Proposed paragraph (e)(1)(ii) of the standard states the directed component requirements for inspection and maintenance. Paragraph (e)(2)(ii)(A) would require that employers inspect and test each press on a regular basis at least once a week to determine the condition of the clutch/brake mechanism, antirepeat feature, and single-stroke mechanism. Paragraph (e)(2)(ii)(B) would require that employers perform and complete necessary maintenance or repair, or both, on the clutch/brake mechanism, antirepeat feature, and single-stroke mechanism before operating the press, while paragraph (e)(2)(ii)(c) proposes that employers maintain a certification record of each maintenance task performed under the directed component of the inspection program.

Proposed paragraph (e)(1)(ii) retains the requirement that employers maintain a certification record of each maintenance and repair task performed. However, this rulemaking would eliminate the existing requirement that employers maintain certifications of weekly inspections records. Again, as discussed in Item 2 of the supporting statement, OSHA believes it is usual and customary for employers to document the maintenance and repair performed on mechanical power presses. Further, OSHA believes that employers will perform maintenance and repair tasks associated with mechanical power presses under proposed paragraph (e)(1)(i), which

requires certification of maintenance and repair task performed; paragraph (e)(1)(i), therefore, includes the burden hours and costs for these tasks.

Disclosure of Certification Records of Inspection

OSHA designed the inspection certification-records requirement to ensure employers and workers that mechanical power presses are in safe operating condition and adjustment. The records covered by this requirement also provide the most efficient means for an OSHA compliance officer to determine that an employer is complying with the Standard, and that the power presses are in safe operating condition.

OSHA believes that, each year, approximately 4,130 mechanical power presses covered by the Standard⁵ will be subject to an OSHA inspection that requires the employer to disclose inspection certification records. OSHA estimates that it will take a supervisory press operator 2 minutes (.03 hour) to disclose the requested information.

Burden hours: 4,130 inspections x .03 hour = 124
Cost: 124 burden hours x \$34.57 = \$4,287

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

⁵OSHA estimated the number of inspections by multiplying OSHA's inspection rate (1.4%) by the number of presses covered by this ICR (i.e., 295,000 presses x 1.4% = 4,130 inspections).

Item 12 above provides the total cost of the information collection requirements specified by the Standard.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

OSHA estimates that a compliance officer (GS-12, step 5), at an hourly wage rate of \$37.37, spends about five minutes (.08 hour) during an inspection reviewing the documents required by the Standard. The Agency determines that its compliance officers will conduct about 4,130 inspections of mechanical power presses during each year covered by this ICR (see footnote 5). OSHA considers other expenses, such as equipment, overhead, and support staff salaries, as normal operating expenses that would occur without the collection of information requirements specified by the Standard. Therefore, the annual total cost of these paperwork requirements to the Federal government is:

$$\text{Costs: } 4,130 \text{ inspections} \times .08 \text{ hour} \times \$37.37 = \$12,347$$

15. Explain the reasons for any program changes or adjustments.

OSHA is proposing to remove the requirement that employers prepare records for weekly inspections and tests. Removing the requirement would result in a program-change reduction of 613,000 hours.

The Agency determined that it is usual and customary for employers to conduct and document periodic inspections of power presses. PRA-95 excludes usual and customary activities from the definition of the term “burden” (5 CFR 1320.3(b)(2)). OSHA based this determination on discussions with its field staff and a thorough review of ANSI’s B11.1, “Safety Requirements for Mechanical Power Presses.” Therefore, OSHA is requesting an adjustment reduction of 721,363 hours. However, OSHA is taking 37,967 burden hours for employers to conduct maintenance and repair to presses and to document these activities.

Summary of Burden hours

Collection of Information Requirement	Currently Approved Burden Hours	Requested Burden Hours	Difference Program Change or Adjustment
Periodic – General Component	759,330	37,967	-721,363 hours—an adjustment decrease based on a determination that it is usual and customary for employers to conduct maintenance and repair activities and to document such activities.
Weekly – Directed Component	613,600	0	-613,600 hours—program change resulting from removing the weekly

			inspection certification.
Disclosure	124	124	0
Totals	1,373,054 hours	38,091 hours	-1,334,963 hours

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

OSHA will not publish the information collected under the Standard.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No forms are available for the Agency to display the expiration date.

18. Explain each exception to the certification statement.

OSHA is not seeking an exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

This supporting statement does not contain any collection of information requirements that employ statistical methods.