

**SUPPORTING STATEMENT FOR
THE INFORMATION COLLECTION REQUIREMENTS OF
THE STANDARD ON EXCAVATIONS
(DESIGN OF CAVE-IN PROTECTION SYSTEMS)
(29 CFR PART 1926, SUBPART P)¹
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NUMBER 1218-0137 (October 2014)**

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.

Congress declared the purpose of the Occupational Safety and Health Act (OSH Act) was 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). The OSH Act listed numerous ways of attaining its goals. One was “[to authorize] the Secretary of Labor [“Secretary”] to set mandatory occupational safety and health standards ...” and another was “[to provide] for the development and promulgation of [the] standards” (29 U.S.C. 651). In addition, the OSH Act specifies that “The Secretary may by rule promulgate, modify, or revoke any occupational safety or health standard...” (29 U.S.C. 655) and 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).

Under the authority granted by the OSH Act, the Department of Labor’s Occupational Safety and Health Administration (“OSHA” or “the Agency”) published 29 CFR part 1926, subpart P (Excavations). Among its many sections, subpart P at §1926.651(b)(2) requires that, before digging, contractors request utility companies or owners to establish the location of underground utilities on the contractors’ jobsites. Additionally, the standard requires that “[each] employee in an excavation [must] be protected from cave-ins by an adequate protective system [...]” (§1926.652(a)). Section 1926.652 contains several additional sections that describe protective systems. Sections 1926.652(b), (c), and (d), *Design of sloping and benching systems, Design of supports systems, shield systems, and other protective systems*, and *Materials and equipment*, respectively, provide methods for protecting employees as required in §1926.652(a). Some of the methods contain paperwork requirements that impose burden hour costs on employers as specified by the Paperwork Reduction Act of 1995 (PRA-95). Items 2 and 12 below list and describe the specific information collection requirements of the Standard.

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

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.

Subpart P of 29 CFR part 1926 is comprised of §1926.650-.652 and appendices A-F. Section 1926.650 provides the scope, application and definitions applicable to the subpart. Section 1926.651 sets specific excavation requirements and §1926.652 provides requirements and options for using various protective systems. The appendices include: Soil Classification-(A); Sloping and Benching-(B); Timber Shoring for Trenches-(C); Aluminum Hydraulic Shoring for Trenches-(D); Alternatives to Timber Shoring-(E); and Selection of Protective Systems [a decision tree]-(F). Depending on the protective system option chosen by a contractor, some appended language becomes mandatory. Nevertheless, the temporarily mandatory language does not increase paperwork burden hours or costs because the standard language and appendices provides specifications needed to comply with the chosen option.

Section 1926.651(b)(2)² requires what is and has been a usual and customary practice or required by local codes for decades. For many decades, before any excavation begins, contractors have contacted local “One-Call Centers,” utilities, or owners to request that underground utility installation locations be marked on the surface of their worksite(s).

Section 1926.652(a)(1) generates no paperwork burden but requires that “[e]ach employee in an excavation shall be protected from cave-ins ... in accordance with paragraph (b) or (c) of this section...” Sections 1926.652 (b) and (c) of the Standard provide options for employers which assists them to choose amongst required protective systems. Depending on jobsite conditions, employers must choose how to and must protect their workers from cave-ins during the excavation work. Protective systems include sloping the sides of an excavation, benching the soil away from the bottom of an excavation, or using a support system (like shoring), a shield system (like a trench box), or other protective systems. Section 1926.652(d) requires that a registered professional engineer, under certain circumstances, must approve damaged and repaired protective system components for return to service.

More specifically, §1926.652(b) specifies allowable criteria for sloping and benching protective systems in excavations. The section provides contractors with four sloping or benching options for protecting workers. Sections 1926.652(b)(1) and (2), Options 1 and 2, rely on soil classification in Appendix A and sloping/benching in Appendix B to protect workers in excavations that are 20 feet or less deep. Options 1 and 2 generate no burden hours and cost since the necessary compliance information is included in the Standard and appendices. Also it is worth noting that there is no express requirement that options 1 and 2 be written, be maintained or be made available to the Secretary. Section 1926.652 (b) (3), Option 3, allows benching/sloping systems “...using other tabulated data....” and §1926.652(b)(4), Option 4, allows systems based on written designs with registered professional engineer approval. These

²Paragraph (b)(2) of §1926.651 (“Specific Excavation Requirements”) requires that “[u]tility companies or owners shall be contacted within established or customary local response times, advised of the proposed work, and asked to establish the location of the utility underground installations prior to the start of actual excavation...” Across the country excavation contractors are required to follow these steps by local custom or One-Call System call before you dig programs. The Agency considers this a long standing usual and customary business practice and, therefore, does not take burden for this provision under PRA-95 (see 5 CFR 1320.3(b)(2)).

last two options require a written form, document maintenance, and document retrieval for the Secretary. (§§1926.652(b)(3)(ii) and (iii) as well as (b)(4)(ii) and (iii)).

Section 1926.652(c) specifies allowable criteria for excavation “support systems, shield systems and other protective systems”. This section also provides four options and references the appendices for information that assists excavation contractors to select suitable systems for their projects. Option 1, §1926.652(c)(1), requires “[d]esign for timber shoring in trenches [to] be determined [according to appendices A, C, and D]. Option 2 in §1926.652(c)(2)(iii) requires that “[m]anufacturer’s specifications, recommendations, and limitations, and manufacturer’s approval to deviate from [them] shall be in written form.” Option 3, §1926.652(c)(3), allows the use of support, shield, or other protective systems based on “[...] other tabulated data.” Option 4, §1926.652(c)(4), Option 4, allows the use of such systems based on written designs with registered professional engineer approval. These three options create burden hours and costs for being written, maintained, and retrieved. “At least one copy of each is to be stored on site during excavation and off site after for retrieval pursuant to the Secretary’s request” (§§1926.652(c)(2)(iii), (c)(3)(iii), and (c)(4)(iii)).

Section 1926.652(d)(3) requires that in certain circumstances damaged material or equipment used for protective systems must be “...removed from service, and [must] be evaluated and approved by a registered professional engineer before being returned to service.” There is no express requirement that the approval be written, maintained, or retrieved for the Secretary, but usually and customarily, the engineer will certify approval in writing. To be conservative, the Agency will take a small burden hour charge for requiring the approval.

While each excavation project is unique, most employers/contractors can use either Option 1 or 2 from §§1926.652(b) or (c) to design and use protective systems without deviating from manufacturers’ specifications, recommendations, and limitations. Option 2, paragraph (iii) of §1926.652(c)(2), as well as Options 3 and 4 of both, sections 1926.652(b) and (c), affect the small percentage of construction sites that may have unique situations requiring protective system use that generates paperwork burdens. The circumstances include the project size, its configuration, its location and its environment (weather, vibration, water, previous use, etc., for example).

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 burdens.

Employers may use improved information technology to establish and maintain 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 of the purpose described in item A.2. above.

The information collection requirements in the Standard are specific to each employer 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.

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.

Employers need to comply with each paperwork requirement specified by the Standard only once for each protective system constructed at a jobsite. Any reduction in frequency would eliminate the requirements entirely; thereby, jeopardizing the safety of workers who rely on properly constructed protective systems to prevent cave-ins during excavation work. The requirement also allows employers and OSHA compliance officers to assess if the selection and design of a protection system are appropriate to the excavation work.

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 demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that require employers to collect information in the manner or using the procedures specified by this item.

8. If applicable, provide a copy and identify the data 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 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 specific situation. These circumstances should be explained.

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.

As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 506(c)(2)(A)), OSHA published a notice in the Federal Register on July 30, 2014 (79 FR 44199) soliciting comments on its proposal to extend the Office of Management Budget's (OMB) approval of the information collection requirements specified in the standard on Excavations (Design of Cave-In Protection Systems) (29 CFR part 1926, subpart P). This notice was part of a preclearance consultation program that provided the general public and government agencies with an opportunity to comment. The Agency received three comments in response to its notice. Two comments were received from the North American Excavation Shoring Association (NAXSA) (ID No. OSHA-2011-0057-0006) and a revised version (ID No. OSHA 2011-0057-0007). NAXSA commented in part:

“... After polling our membership, we believe that the paperwork burden on contractors in complying with paragraphs (b) and (c) of Sec. 1926.652 (Requirements for Protective Systems) are not onerous.... “

“We cannot report that these options are proving to require onerous paperwork requirements upon the contractor or that they result in billing costs for engineering services that are beyond reasonable expectation. We certainly are not getting feedback from our customers that these options are problematic in terms of costs associated with securing the tabulated data or the engineering stamp required by the standard....”

“...we believe that the requirements of the standard are reasonable; the data in written form is necessary for the safe implementation of the protective system for worker safety, but also necessary for the Agency to properly fulfil its duty of oversight for worker safety.”

“...Finally, we are unfortunately unable to comment at this time, as to the accuracy of your estimate of the burden (but we feel it is high and overstated).”

“...But we do believe that the quality, utility and clarity of the information collected is suitable to the purposes for which it has been generated and that both manufacturers and relevant engineers are using current technologies that are available to provide timely and definitive data to satisfy the parameters of the data being requested in the standard.”

The third comment was from the National Society of Professional Engineers (NSPE) (ID No. OSHA 2011-0057-0008) which quoted in part: “The National Society of Professional Engineers (NSPE) commends the Department of Labor for its continued effort to improve the information

collection requirements contained in the Standard on Excavations (Design of Cave-In Protection Systems) (29 CFR part 1926, subpart P). NSPE greatly appreciates the Department’s recognition of the important role the Professional Engineer plays in protecting the public health, safety and welfare....”

It appears that, based on the comments that OSHA is urged to continue the information collection requirements but is cautioned to more closely calculate the burden hours in the future as the current assessment seems too high.

The Agency appreciates the comments of both associations; however, neither was able to provide OSHA with any information on revising our estimated burden hours, therefore, the Agency will continue to use them.

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

The Agency will not provide payments 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.

The paperwork 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.

The paperwork requirements specified by the Standard do not involve sensitive information.

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

- **Show 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 burdens, and explain the reasons for the variance. General 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 burdens estimates for each form and aggregate the hour burden.**
- **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 14.**

The following estimates are based on Agency staff experience and its analysis of Agency trench excavation fatality investigation data, as well as data available from McGraw Hill Dodge, and

from the Bureau of Labor Statistics. OSHA's data are most recently from 2003-2006 trench/excavation fatality case analyses. The analyses indicate that of the 171 investigations 108 cases or 63% were the result of soil collapses (108 cases of 171 equals 63.15%-rounded). The data further revealed that, of the 108 involving soil collapse, only 22 or 20% documented use of protective systems ($22 \div 108 = 20.37\%$ -rounded). Eighty-two (82) cases documented no use of protective systems. Of the remainder, some records indicated that protective systems were inapplicable or simply not discussed. Also, OSHA staff found, according to the December 2013 "Dodge Construction Potentials Bulletin" published by McGraw Hill in January 2014, that there were 645,975 residential projects/sites contracted in 2013 ("623,461 One-Family, 9,027 Two-Family, and 13,487 Apartment Buildings" totaling 645,975 sites). Additionally, the Bulletin showed 115,898 non-residential construction projects were contracted in 2013.

The Agency assumes three propositions: First, most residential construction excavations are performed within the criteria set in §1926.652(b)(1) and (2) or in §1926.652(c)(1) and (2) without deviation from manufacturer specifications and; therefore, have no burden hour charge; Second, all the non-residential and apartment building construction captured by the Dodge data do require excavation work covered by 29 CFR part 1926, subpart P; and thirdly, by using the most recent Dodge data and the Agency's excavation fatality case data analysis, OSHA has a more accurate understanding of excavation burden hours than using the relatively crude distinction between "residential" and "commercial" construction as done in the past.

For residential sites on average, the Agency estimates that all one and two family homes or 632,488 projects/sites would not require excavations deeper than 20 feet (623,461 One-Family plus 9,027 Two-Family = 632,488 sites). These sites would be excavated using §1926.652(b) Options 1 and 2 or §1926.652(c) Options 1 and 2 without deviating from manufacturers' specifications, recommendations and limitations. Since these options rely on information available in the Standard and its appendices there is no associated burden. However, in the case of the 13,487 apartment buildings which are more like non-residential construction, the Agency accrues some burden.

Applying Agency percentages to Dodge data of apartment and non-residential construction sites produces an estimated 81,513 soil collapse sites (63% of 13,487 apartment sites plus 115,898 non-residential sites produces 81,512.5-sites, rounded-up to a whole site). Agency staff further estimates that 10% of the 81,513 sites would require use of §1926.652(b) Option 3 or 4 as well as §1926.652(c) Option 2 paragraph (iii), Option 3, or Option 4. Therefore 8,152 sites would require paperwork burden hour calculations (10% of 81,513 produces 8,151.3 sites, rounded-up to a whole site). The Agency further estimates that 25% of these 8,152 sites or 2,038 sites would require outside contracted professional engineering services while the majority 75% or 6,114 sites would be approved in-house.

The data indicates a noticeable increase from the number of construction projects/sites used for OSHA burden hour cost calculations in 2011. The Agency ascribes the increase to better use of McGraw Hill Dodge bulletin data and modest improvement in the construction industry over past years. In 2011, OSHA estimated 706,000 total construction projects, of which 588,000 were residential projects. For 2014, using 2013 data, the latest year available, Dodge calculated 761,873 contracted construction projects. Dodge data indicates that 645,975 were residential.

Total projects increased by 55,873 and residential projects by 57,975 (761,873 – 706,000 = 55,873 sites and 645,975 – 588,000 = 57,975 sites).

Non-Residential Burden and Wage Hour Costs

Based on staff familiarity with construction and conversations with knowledgeable industry representatives, OSHA estimated above that 8,152 sites would be required to create, store and retrieve paperwork under §§1926.652(b)(3) and (b)(4) as well as under §§1926.652(c)(2)(iii), (c)(3), and (c)(4). The Agency estimates that for 6,114 of the 8,152 sites, an in-house registered professional engineer, earning \$53.48³ per hour, on average takes 2 hours to create, modify (deviate from manufacturers' specifications), or to approve the required protective system designs or materials.

Burden hours: 6,114 projects/sites x 2 hours per design = 12,228 hours
Costs: 12,228 hours x \$53.48 hourly cost = \$653,953

Also the Agency estimates that, on average, it would take a non-supervisory construction worker, earning \$21.84⁴ per hour, 15 minutes (0.25 hour) on average to maintain, retrieve or remotely retrieve the required written designs.

Burden hours: 8,152 projects/sites x .25 hour = 2,038
Costs: 2,038 hours x \$21.84 hourly cost = \$44,510

Therefore, the annual burden hours and cost of this paperwork requirement are:

Total burden hours: 12,228 hours + 2,038 hours = **14,266 hours**
Total burden hour cost: \$653,953 + \$44,510 = **\$698,493**

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 service 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**

³The wage rate of \$53.48 for a civil engineer (SIC Code: Professional Engineer (Civil Engineers) (17-2051) is \$41.17 (source: *Occupational Employment Statistics, Occupational Employment and Wages, May 2013*, Bureau of Labor Statistics, U.S. Department of Labor (DOL) and includes fringe benefits of 29.7 percent (\$12.31) (Source: *Employer Costs for Employee Compensation—June 2013, Employer Costs for Employee Compensation News Releases*, Bureau of Labor Statistics, U.S. Department of Labor (DOL),

⁴The wage rate of \$21.84 for a construction laborer (non-supervisory) (SIC Code 47-2061) is \$16.84 (source: *Occupational Employment Statistics, Occupational Employment and Wages, May 2013*, Bureau of Labor Statistics, U.S. Department of Labor (DOL) and includes fringe benefits of 29.7 percent (\$5.00) (source: *Occupational Employment Statistics December 2013, National Occupational Employment and Wage Estimates*, Bureau of Labor Statistics, Department of Labor (DOL)

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 respondent (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.

OSHA believes that one quarter (i.e., 2,038) of the 8,152 apartment and non-residential construction sites would require the use of outside contracted engineering services for the required protective system design, approval, etc. The hourly wage rate cost to employers for these engineering services is \$53.17.⁵ In addition, the Agency estimates that the engineer will require 2 hours on average for this service. Therefore, the annual cost to employers for these engineering services at is:

Cost: 2,038 construction starts x 2 hours to develop each design x
\$53.17 = \$216,721

14. Provide estimates of 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 Item 12, 13, and 14, in a single table.

The Agency estimates that a compliance officer (GS-12, step 5), at an hourly wage rate of \$37.74⁶ spends 5 minutes (.08 hour) reviewing the documents required by the Standard. OSHA's Integrated Management Information System data indicate that for fiscal year 2013, there were 724 citations of §1926.652 issued pursuant to 665 construction inspections. The Agency estimates that the number of inspections will increase over the next three years and will take a burden based on 750 inspections during each year covered by this ICR. The Agency 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 total cost of these paperwork requirements to the Federal government is:

Costs: 750 inspections x .08 hour each x \$37.74 hourly costs = \$2,264

⁵Based on an hourly wage rate of \$53.17 for a civil engineer (SIC Code: Professional Engineer (Civil Engineers) -17-2051) including benefits (source: U.S. Department of Labor (DOL), Bureau of Labor Statistics, *Occupational Employment Statistics December 2013, National Occupational Employment and Wage Estimates*).

⁶Source: U.S. Office of Personnel Management; *2014 General Schedule (GS) Locality Pay Tables*; Salary Table 2014 -RUS, <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/leohr.pdf>.

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

An increase in the number of construction starts from 706,000 starts to 761,873 contracted for projects/sites has resulted in an adjustment increase in burden hours from 11,813 to 14,266, a total increase of 2,453 burden hours. OSHA reduced the number of apartment and non-residential construction sites that would use outside contractor engineering services for the required protective system design, approval from 5,900 to 2,038. While there was an increase in hourly wage for a civil engineer from \$49.04 to \$53.17, there is an overall cost decrease of \$361,951 from \$578,672 to \$216,721.

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.

The Agency will not publish the information collected under this 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.

OSHA lists current valid control numbers in §§1910.8, 1915.8, 1917.4, 1918.4, and 1926.5 and publishes the expiration date in the Federal Register notice announcing OMB approval of the Information collection requirement (see 5 CFR 1320.3(f)(3)). OSHA believes that this is the most appropriate and accurate mechanism to inform interested parties of these expiration dates.

18. Explain each exception to the certification statement.

The Agency is not seeking an exception to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

There are no collections of information employing statistical methods.