

MARINE TERMINAL OPERATIONS (29 CFR PART 1917) AND LONGSHORING (29 CFR

PART 1918)

1218-0196

July 2015

**SUPPORTING STATEMENT FOR
THE INFORMATION COLLECTION REQUIREMENTS OF
THE STANDARDS ON MARINE TERMINALS (29 CFR PART 1917)¹
AND LONGSHORING (29 CFR PART 1918)
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NO. 1218-0196 (July 2015)**

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 purpose of the Occupational Safety and Health Act (“OSH 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 OSH Act specifically authorizes “the development and promulgation of occupational safety and health standards” (29 U.S.C 651).

Section 6(b)(7) of the OSH Act states that “[a]ny standard promulgated under this subsection shall prescribe the use of labels or other appropriate forms of warning as are necessary to insure that employees are apprised of all hazards to which they are exposed, relevant symptoms and appropriate emergency treatment, and proper conditions and precautions of safe use or exposure” (29 U.S.C. 655). The OSH Act also 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).

Under the authority granted by the OSH Act, the Occupational Safety and Health Administration (“OSHA” or “the Agency”) published standards on Marine Terminal Operations (29 CFR part 1917) and Longshoring (29 CFR part 1918). The standards contain requirements related to the testing, certification and marking of specific types of cargo lifting appliances and associated cargo handling gear and other cargo handling equipment such as conveyors and industrial trucks. The collections of information required from employers by OSHA are necessary to reduce employee injuries and fatalities associated with cargo lifting gear, transfer of vehicular cargo, manual cargo

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

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handling, and exposure to hazardous atmospheres. Item 12 below describes the specific information collection requirements of the Standards.

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.

The collections of information required by the standards are used by employers to ensure that employees are informed properly about the safety and health hazards associated with marine terminal operations and longshoring. OSHA uses the records developed in response to the collection of information requirements to find out if the employer is complying adequately with the provisions of the standards.

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 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 standards 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 A.2 above.

OSHA coordinated the preparation of its standards, including the information collection requirements, with appropriate individuals from other Federal OSHA programs, state OSHA programs, and the U.S. Coast Guard (USCG) to avoid duplication of effort. OSHA reviewed standards addressing similar operations in industries regulated by other parts of title 29 (i.e., part 1910 for general industry and part 1926 for the construction industry) to ensure that there was no duplication of effort.

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

The information collection requirements of the standards on Marine Terminals and Longshoring 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.

The frequencies for collecting information under these requirements are the necessary minimums. The Agency believes that failure of the employer to collect and distribute the information required

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by the information collection requirements in the regulations will affect significantly the cooperative effort between OSHA and the employer to ensure employee safety through controlling or reducing injuries and fatalities in marine terminal operations and longshoring. Likewise, any Federal program or policy activities or decisions that would reduce or eliminate the collections of information required in these standards would also affect OSHA's efforts to ensure employee safety and health in the workplace.

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 which require employers to collect information in the manner or using the procedures specified by this item. The information collection requirements are consistent with the guidelines provided in 5 CFR 1320.5.

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 before submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments specifically address comments received on cost and hour burdens.

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, revealed, or reported.

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

As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the Federal Register on May 21, 2015 (80 FR 29341) under docket number OSHA-2012-0016, requesting public comment on its proposed extension of the information collection requirements specified by the Standards on Marine Terminal Operations (29 CFR part 1917) and Longshoring (29 CFR part 1918). This notice was part of a preclearance consultation program that provided those interested parties the opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the information collection requirements found in the Standards. The Agency did not receive any comments in response to this request.

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

The Agency does 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.

No elements of confidentiality are involved.

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 regulations require 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 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 burden.

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- **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.**

Burden Hour and Cost Determinations

OSHA's estimates of the burden hours for each information collection requirement are shown below. The estimates are based on data from the United States Census Bureau-- County Business Patterns (CBP) from 2012, the Bureau of Labor Statistics (BLS), and other Department of Labor staff expertise.

Marine terminal means wharves, bulkheads, quays, piers, docks, and other berthing locations and adjacent storage or adjacent areas and structures associated with the primary movement of cargo or materials from vessel to shore to vessel including structures which are devoted to receiving, handling, holding, consolidating and loading or delivery of waterborne shipments or passengers, including areas devoted to the maintenance of the terminal or equipment. The term does not include production or manufacturing areas nor does the term include storage facilities directly associated with production or manufacturing areas.

Longshoring operations means the loading, unloading, moving or handling of cargo, ship's stores, gear, or any other materials, into, in, on, or out of any vessel.

OSHA identifies all the affected establishments in the industry profile (see Tables 1 and 2); the port and harbor operations (NAICS 488310) has 525 establishments affected², the deep sea freight transportation (NAICS 483111) has 375 establishments affected, and coastal and great lakes freight transportation (NAICS 483113) has 496 establishments affected. Overall, OSHA estimated that there are 525 marine cargo handling facilities in Marine Terminals, and 871 in Longshoring. Many of the requirements in 29 CFR part 1918 have been in existence as Federal requirements for 30 years or more, and are the result of international agreements required under the Longshore and Harbor Workers' Compensation Act (33 U.S.C. 901 et seq.). These requirements have become usual and customary practices, especially where labor-management contracts exist.

OSHA has identified a number of requirements in the 1917 and 1918 standards that are subject to approval by OMB under the Paperwork Reduction Act of 1995. Tables 1 and 2 provide a listing of each information collection requirement and the estimated burden hours associated with the requirement.

²The previous ICR (2012) used establishment estimates from the Final Economic Analysis (FEA) for the Marine Terminals and Longshoring Standards (73 FR 75281), published December 10, 2008. The FEA, in turn, used establishment data from 2002. Therefore, the change in estimated establishments from 212 to 525 for port and harbor operations, and by extension, marine cargo handling, reflects economic developments over a 10 year period.

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OSHA is presenting the burden for 100% compliance even though many of these collections are one-time collections, such as posting signs, charts, etc. In many instances, the burdens were completed many years ago, maybe as many as over 30 years ago. For those collections that OSHA assumes as one-time events, OSHA is reflecting no burden. However, collections that recur on an annual basis will be calculated on that basis. OSHA has also indicated, where appropriate, a burden for information that may become lost, damaged, or otherwise in need of replacement during the period covered by this approval. All estimates are based on staff expertise and experience. In addition, the Agency uses the following wage rates³ in making the cost determinations for this Information Collection Request:

• First-Line Supervisor/Manager	\$49.94
• Transportation Workers	\$31.59
• Office Clerks, General	\$23.17

See Tables 1 and 2 for a list and breakdown of the burden hours and cost taken for the collections of information.

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 determinations made under Item 12 account for the total annual cost burden to respondents or recordkeepers resulting from these collection of information requirements.

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 Items 12, 13, and 14 in a single table.

There are no costs to the Federal Government.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14.

OSHA is requesting an adjustment increase in the number of burden hours from 47,398 hours to 65,694 hours, a difference of 18,296 hours. The increase is due to a growth in the number of longshoring operations from 808 to 871 establishments and the number of port and harbor

³May 2014, *National Industry-Specific Occupational Employment and Wage Estimates* for employees under NAICS 483100 – Deep Sea, Coastal, and Great Lakes Water Transportation, U.S. Department of Labor, BLS, at http://www.bls.gov/oes/current/naics4_483100.htm . OSHA used OES code 55-1031 for the supervisor/manager, \$37.92, OES code 53-5000 for the transportation worker, \$23.99, and OES code 43-9061 for the office clerk, general, \$17.59. Wage rates include fringe benefits of 31.7% from *Employer Costs for Employee Compensation, March 2015*, <http://www.bls.gov/news.release/ecec.nr0.htm>.

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operations from 212 to 525 establishments. Tables 1 and 2 below provide the burden hours and cost for each collection of information.

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 information, completion of report, publication dates, and other actions.

OSHA will not publish the information collected under the Standards.

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

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 identified.

OSHA is not seeking an exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

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

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TABLE 1 – Affected Marine Terminal Establishments

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Paragraph Number and Collection of Information	No. of Projects Annually		No. of Facilities Affected ⁴	Total Responses	Time Per Activity	Burden Hours Requested	Existing Burden Hours	Hourly Wage Rate	Cost Under #12	Burden Hour Change	Explanation of Adjustment
.17(n) -- posting warning signs where doorways open onto tracks/where vision is restricted	3	signs replaced (employer already has these signs available)	26	78	2 mins. (.03 hr.)	2	1	\$31.59	\$63	1	The change is due to the increase in the number of marine terminals.
.17(o) -- posting warning signs if insufficient clearance for personnel between railcars and structure	1	sign replaced (employer already has these signs available)	26	26	2 mins. (.03 hr.)	1	1	\$31.59	\$32	0	No change.
.23(b)(1) -- testing of hazardous atmosphere	10	tests conducted	525 existing + 1 new	5,260	30 mins. (.50 hr.)	2,630	1,065	\$31.59	\$83,082	1,565	The change is due to the increase in the number of marine terminals..

⁴This number accounts for 525 existing establishments and one (1) new establishment, or 5 percent of the existing 525 establishments plus 1 new establishment (26) which may be required to replace warning signs, tags, labels, etc., annually.

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.23(b)(2) -- maintaining record of test	10	records (generate and maintain)	525 existing + 1 new	5,260 3 mins. (.05 hr.)	263	107	\$23.17	\$6,094	156	The change is due to the increase in the number of marine terminals.
.23(d)(4) -- warning signs to prevent employee entry into spaces identified as having hazardous atmospheres	3	signs (employer already has these signs available)	26	78 2 mins. (.03 hr.)	2	1	\$31.59	\$63	1	The change is due to the increase in the number of marine terminals.
.24(b) -- tests to determine carbon monoxide concentrations	10	tests conducted	525 existing + 1 new	5,260 30 mins. (.50 hr.)	2,630	1065	\$31.59	\$83,082	1,565	The change is due to the increase in the number of marine terminals.
.24(d) -- maintain record of test	10	generate and maintain records	525 existing + 1 new	5,260 3 mins. (.05 hr.)	263	107	\$23.17	\$6,094	156	
.25(a) -- test of atmosphere when concentration reaches hazardous	2	tests conducted	525 existing + 1 new	1,052 30 mins. (.50 hr.)	526	213	\$31.59	\$16,616	313	The change is due to the increase in the number of marine terminals.

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.25(b) -- tests to determine atmospheric concentration of chemicals used to treat cargo	20	tests conducted	525 existing + 1 new	10,520	30 mins. (.50 hr.)	5,260	2,130	\$31.59	\$166,163	3,130	The change is due to the increase in the number of marine terminals.
.25(c) -- maintain record of tests	20	records (generate and maintain)	525 existing + 1 new	10,520	3 mins. (.05 hr.)	526	213	\$23.17	\$12,187	313	The change is due to the increase in the number of marine terminals.
.25(f) -- posting of signs where fumigants, pesticides or hazardous preservatives have created a hazardous atmosphere	2	signs (employer already has signs available for use)	525 existing + 1 new	1,052	2 mins. (.03 hr.)	32	13	\$31.59	\$1,011	19	The change is due to the increase in the number of marine terminals.
.26(d)(7) -- marking of stretcher closures concealed from front view	2	marking enclosed stretchers	26	52	3 min. (.05 hr.)	3	1	\$31.59	\$95	2	The change is due to the increase in the number of marine terminals.
.30(a)(1) -- development of emergency action	1	develop plan (generate)	1 new	1	2 hrs.	2	2	\$49.94	\$100	0	No change.

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plans											
.30(a)(5)(iii) -- maintain written plan and make available for employee review	1	maintain/disclose plan	525 existing + 1 new	526	3 mins. (.05 hr.)	26	11	\$23.17	\$602	15	The change is due to the increase in the number of marine terminals.
.42(b)(1) -- maintain manufacturer's recommended ratings for wire rope and wire rope slings for inspection	1	manufacturer's rating (maintain)	525 existing + 1 new	526	1 min. (.05 hr.)	26	11	\$23.17	\$602	15	The change is due to the increase in the number of marine terminals.
.42(b)(4) -- maintain manufacturer's recommendations for wire rope clips for inspection	1	manufacturer's rating (maintain)	525 existing + 1 new	526	1 min. (.02 hr.)	11	4	\$23.17	\$255	7	The change is due to the increase in the number of marine terminals.
.42(c)(1) -- maintain manufacturer's ratings for specific natural fiber rope for inspection	1	manufacturer's rating (maintain/)	525 existing + 1 new	526	1 min. (.02 hr.)	11	4	\$23.17	\$255	7	The change is due to the increase in the number of marine terminals.
.42(d)(1) -- maintain manufacturer's ratings and use recommendations for	1	manufacturer's rating (maintain)	525 existing + 1 new	526	1 min. (.02 hr.)	11	4	\$23.17	\$255	7	The change is due to the increase in the number of marine terminals.

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synthetic fiber rope											
.42(g)(3) – repaired slings shall be proof tested and the certificate made available for examination	BURDEN TAKEN UNDER 29 CFR PART 1919 (GEAR CERTIFICATION), OMB CONTROL NUMBER 1218-0003.										
.42(h)(1) -- maintain manufacturer's recommended ratings for safe working loads for the sizes of wrought iron and alloy steel chains and chain slings	1	manufacturer's rating (maintain)	525 existing + 1 new	526	1 min. (.02 hr.)	11	4	\$23.17	\$255	7	The change is due to the increase in the number of marine terminals.
.42(h)(3)(ii) -- Thorough inspections of chains in use are to be made quarterly to detect wear, defective welds, deformation or increase in length or stretch. The month of	1	inspect chains quarterly	525 existing + 1 new	526	4 hrs. (1 hr. per quarter)	2,104	852	\$31.59	\$66,465	1,252	The change is due to the increase in the number of marine terminals.

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inspection shall be indicated on each chain by color of paint on a link or by other equally effective means.										
.42(h)(4) – proof load testing of repaired chains returned to service/maintenance of test certificates	BURDEN HOURS COUNTED UNDER 29 CFR PART 1919 (GEAR CERTIFICATION), OMB CONTROL NUMBER 1218-0003									No change.
.42(h)(5) -- maintain heat treatment certificates of annealed or normalized wrought iron chains	1	certificate (maintain)	525 existing + 1 new	526	1 min. (.02 hr.)	11	4	\$23.17	\$255	7
.42(k)(2) – Storage of damaged pallets in designated areas and identified.	Storage areas for existing facilities are already established. Establish for new facility.		1 new	1	5 mins. (.08 hr.)	1	1	\$31.59	\$32	0
.43(b)(1) -- Modifications, such as adding	Once annually per establishment (burden includes time to change		525 existing + 1 new	526	1 hour	526	213	\$31.59	\$16,616	313

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counterweights, that might affect the vehicle's capacity or safety cannot be performed without either the manufacturer's prior written approval or the written approval of a professional engineer experienced with the equipment who has consulted with the manufacturer, if available. Capacity, operation and maintenance instruction plates, tags or decals shall be changed to conform to the equipment as modified.	instruction plates, tags, or decals)									terminals.
.43(b)(5) – Marking	MARKING PROVIDED BY THE MANUFACTURER UPON PURCHASE OF THE POWERED INDUSTRIAL TRUCK.									Usual and customary.

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of powered industrial trucks with their rated capacities, which shall be visible to the operator.											
.43(e)(5)(i) – Marking of rated capacities of fork lift trucks.	THIS IS ALREADY DONE AT EXISTING ESTABLISHMENTS. ONLY REQUIRED TO BE DONE AT NEW ESTABLISHMENTS.	1 new	1	1 hour	1	1	\$31.59	\$32	0	No change.	
.44(e) -- posting of stop signs at main entrances and exits of structures where visibility is impaired, etc.	2	stops signs (replace)	26	52	30 mins. (.50 hr.)	26	11	\$31.59	\$821	15	The change is due to the increase in the number of marine terminals.

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.44(f) -- Vehicular routes, traffic rules, and parking areas shall be established, identified, and used.	USUAL AND CUSTOMARY ACTIVITY FOR EXISTING ESTABLISHMENTS; HOWEVER, NEW ESTABLISHMENTS WILL PERFORM ACTIVITY AND APPROXIMATELY ONE-THIRD OF EXISTING FACILITIES (526/3 =175) WILL NEED TO REDO PORTIONS OF VEHICULAR ROUTES AND PARKING AREAS.	1 new	1	20 hrs.	20	20	\$31.59	\$632	0	No change.	
		175	175	5 hrs.	875	355	\$31.59	\$27,641	520	The change is due to the increase in the number of marine terminals.	
.44(h) -- posting of signs indicating pedestrian traffic at vehicular check-in and check-out lines	2	signs (replace)	26	52	2 mins. (.03 hr.)	2	1	\$31.59	\$63	1	The change is due to the increase in the number of marine terminals.

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.45(b) -- Cranes and derricks (except for bridge cranes covered by paragraph (g) of this section) having ratings that vary with boom length, radius (outreach) or other variables shall have a durable rating chart visible to the operator, covering the complete range of the manufacturer's (or design) capacity ratings.	RATING CHART IS PROVIDED BY THE MANUFACTURER; HOWEVER, THE AGENCY ESTIMATES THAT APPROXIMATELY 10 OF THE FACILITIES (25) MAY HAVE TO CONTACT THE MANUFACTURER TO GET A REPLACEMENT CHART OR TO MAKE A CHART (SEE BELOW).										No change.
	10	replacement charts	10	100	10 mins. (.17 hr.)	17	17	\$31.59	\$537	0	
.45(f)(1)(i) – marking of crane and derrick operating controls or posting of a chart at the operator's position indicating their function.	CHARTS ARE PROVIDED BY THE MANUFACTURER/ EMPLOYERS NEED ONLY TO POST OR MARK THE INFORMATION IF REQUIRED.										The change is due to the increase in the number of marine terminals.
	5 cranes on average	requiring operating controls marked or a chart posted	26	130	2 mins. (.03 hr.)	4	2	\$31.59	\$126	2	

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.45(f)(4)(iv) -- posting of warning sign at foot of ladder or stairway where a moving part of a crane could strike an employee ascending or descending the ladder or stairway	3	signs	26	78	2 mins. (.03 hr.)	2	1	\$31.59	\$63	1	The change is due to the increase in the number of marine terminals.
.45(f)(6) -- manufacturer's or design specifications of ballast or counterweight location on cranes	1	manufacturer's specification (maintain)	525 existing + 1 new	526	1 min. (.02 hr.)	11	4	\$31.59	\$347	7	The change is due to the increase in the number of marine terminals.
.45(g)(2) – marking of rated loads of bridge cranes on each side of the crane and in the cab	BRIDGE CRANES PURCHASED FROM MANUFACTURERS ARE DELIVERED WITH THE RATED LOADS ALREADY MARKED. THE EMPLOYER NEEDS TO DO NOTHING. THEREFORE, NO BURDEN IS BEING TAKEN FOR THIS ACTIVITY.										No change.
.45(g)(3)(iii) -- posting of operating instructions for high wind conditions in the cab of each crane	1 crane on average per facility	requiring reposting of operating instructions (posting information)	525 existing + 1 new	526	2 mins. (.03 hr.)	16	6	\$31.59	\$505	10	The change is due to the increase in the number of marine terminals.

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		provided by manufacturer)									
.45(g)(8) -- marking of crane's truck when the required clearance is not available on at least one side	1 crane (on average)	requires clearance remarking	525existing + 1 new	526	2 mins. (.03 hr.)	16	6	\$31.59	\$505	10	The change is due to the increase in the number of marine terminals.
.45(k) -- inspection of all functional components and accessible structural features of each crane or device at monthly intervals	12 per crane per year	inspections	525 existing + 1 new	6,312	30 mins. (.50 hr.)	3,156	1,278	\$31.59	\$99,698	1,878	The change is due to the increase in the number of marine terminals.
.45(k)(4) -- maintain record of monthly inspections	12	generate and maintain records	525 existing + 1 new	6,312	3 mins. (.05 hr.)	316	128	\$31.59	\$9,982	188	The change is due to the increase in the number of marine terminals.
.46(a)(1)(v) – marking of indicating system	THIS INFORMATION IS VITAL FOR THE SAFE OPERATION OF THE CRANE. IT IS USUAL AND CUSTOMARY FOR THE INFORMATION TO BE PROVIDED BY THE MANUFACTURER OF THE CRANE								No change.		
.50(c)(1) .50(c)(3)	BURDEN HOURS TAKEN UNDER 29 CFR PART 1919 (GEAR CERTIFICATION), OMB CONTROL NO. 1218-0003								No change.		

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.50(c)(4)(i) .50(c)(5)(i) .50(c)(5)(ii) .50(c)(5)(iii) .50(c)(5)(iv) .50(c)(5)(v) .50(c)(6) .50(e) .50(g)(1) .50(h)										
.71(a) -- marking of intermodal containers	IN LIEU OF MARKING, IT IS USUAL AND CUSTOMARY FOR THE SHIP OWNER TO USE THE CARGO STOWAGE PLAN (1917.71(b)(2)(ii). THEREFORE, OSHA IS NOT TAKING A BURDEN HERE.								No change.	
.71(b)(2)(i) -- marking of actual gross weight in the case of a loaded container	IN LIEU OF MARKING, IT IS USUAL AND CUSTOMARY FOR THE SHIP OWNER TO USE THE CARGO STOWAGE PLAN (1917.71(b)(2)(ii). THEREFORE, OSHA IS NOT TAKING A BURDEN HERE.								No change.	

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.71(b)(4)(ii) -- If the terminal has no scales, the actual gross weight may be calculated on the basis of the container's contents and the container's empty weight. The weights used in the calculation shall be posted conspicuously on the container, with the name of the person making the calculation and the date.	THE AGENCY ESTIMATES THAT APPROXIMATELY 95 PERCENT (202) OF ALL FACILITIES HAVE SCALES. THE REMAINING 5 PERCENT (11) WILL HAVE TO CALCULATE THE WEIGHT OF THE CONTAINERS. IT IS ESTIMATED TO TAKE APPROXIMATELY 50 HOURS PER ESTABLISHMENT ANNUALLY.		26	26	50 hours	1,300	550	\$31.59	\$41,067	750	The change is due to the increase in the number of marine terminals.
.71(b)(6)(ii) -- marking of closed dry van containers carrying vehicles	25 containers (on average)	marking of containers carrying vehicles	26	650	2 mins. (.03 hr.)	20	8	\$31.59	\$632	12	The change is due to the increase in the number of marine terminals.
71(f)(4) -- marking of flat bed and low boy trailers (mafis) with their cargo capacities	BURDEN TAKEN UNDER 1918.86(g)								No change.		

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.111(b) -- posting of maximum safe load limits of floors elevated above ground level and pier structures over the water	1 pier structure per facility 1 elevator floor per facility	posting of maximum safe load limits	26	52	2 mins. (.03 hr.)	2	1	\$31.59	\$63	1	The change is due to the increase in the number of marine terminals.
.113 -- posting of clearance heights where the height is insufficient for vehicles and equipment	2	posting of clearance heights	53 (10% of 525 total facilities) 3 (10% of 26 facilities)	112	2 mins. (.03 hr.)	3	1	\$31.59	\$95	2	The change is due to the decrease in the number of marine terminals.
.115(c) -- posting or marking of safe working loads of platforms and skids on or adjacent to platforms and skids	1	replacing posting or marking of safe working loads	525 existing + 1 new	526	2 mins. (.03 hr.)	16	6	\$31.59	\$505	10	The change is due to the decrease in the number of marine terminals.

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Paragraph Number and Collection of Information	No. of Projects Annually		No. of Facilities Affected	Total Responses	Time Per Activity	Burden Hours Requeste d	Existing Burden Hours	Hourly Wage Rate	Cost Under #12	Burden Hour Change	Explanation of Adjustment
116(e) -- yearly and monthly inspections of elevators and escalators posting of records of	12 inspections	5 cranes with elevators	525 existing + 1 new	31,560	10 mins. (.17 hr.)	5,365	2,173	\$31.59	\$169,480	3,192	The change is due to the decrease in the number of marine terminals.

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the results of the latest annual elevator inspection in the elevator posting of records of annual escalator inspections in the vicinity of the escalator or make available at the terminal	1 record	posted in 5 cranes	525 existing + 1 new	2,630	2 mins. (.03 hr.)	79	32	\$31.59	\$2496	47	The change is due to the decrease in the number of marine terminals.
.116(g) – posting of the elevator's or escalator's maximum load limits both inside and outside	average of 5 cranes with elevators	post load limits inside and outside the car of the crane	26	130	3 mins. (.05 hr.)	7	3	\$31.59	\$221	4	The change is due to the decrease in the number of marine terminals.
.117(a) -- monthly inspections of manlifts by a designated person	12 inspections	Average of 100 manlifts in all facilities —generate, maintain, post		1,200	1.08 hr.	1,296	1,296	\$31.59	\$40,941	0	No change.

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		and record								
117(b) -- weekly inspections of the safety switches/ maintain inspection records and post the most recent inspection in the vicinity of the manlift or in the terminal	40 inspections	100 safety switches -- generate, maintain & post record	4,000	10 mins. (.17 hr.)	680	680	\$31.59	\$21,481	0	No change.
.117(d) – posting of manlift use instructions	MANLIFT INSTRUCTIONS ARE PROVIDED BY THE MANUFACTURER. BURDEN TAKEN FOR POSTING INSTRUCTIONS ONLY (SEE ROW BELOW)									No change.
	10% of 100 manlifts (10) posting of instructions requiring reposting of instructions	10	10	2 mins. (.03 hr.)	1	1	\$31.59	\$32	0	
.117(e) -- posting of an illuminated sign and red light provided	10% of 100 manlifts	obtain illuminated sign and red	10	10	1 hour	10	\$31.59	\$316	0	No change.

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under the top floor opening of the manlift to warn the user to get off at that floor	(10)	light and post requiring obtaining and posting of sign and red light									
.117(f) -- posting of bottom floor warning sign visible to descending passengers	100 manlifts (10% of manlifts)	requiring signs be replaced	1	10	2 mins. (.03 hr.)	1	1	\$31.59	\$32	0	No change.
.117(l) -- maintain manufacturer's specifications for manlifts	100 manlifts	maintain specs.		100	1 min. (.02 hr.)	2	2	\$23.17	\$46	0	No change.
.118(e)(4)(i) -- maintain manufacturer's instructions for ladder safety devices	1	maintain and manufacturer's instructions	525 existing + 1 new	526	1 min. (.02 hr.)	11	4	\$23.17	\$255	7	The change is due to the decrease in the number of marine terminals.
.119(e) -- tagging as unusable of ladders with defects if kept on the premises	0	ladders tagged		0	0	0	0	\$0	\$0	0	No burden is being taken here. Based on staff expertise, defective ladders are thrown away; not

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											tagged.
.122(a) -- marking of employee exits	4	exits	26	104	10 mins. (.17 hr.)	18	8	\$31.59	\$569	10	The change is due to the decrease in the number of marine terminals.
.122(b) -- posting of directional signs indicating exit routes if exit is not visible from employees work stations	4	posting of directional signs	26	104	10 mins. (.17 hr.)	18	8	\$31.59	\$569	10	The change is due to the decrease in the number of marine terminals.
.128(b)(1)-(4) -- posting of signs indicating locations of first aid facilities; locations of telephones; telephone numbers of closest ambulance service, hospital or other source of medical attention, police, fire department, and emergency squad (if	2	posting of placards (replacements)	26	52	20 min. (.33 hr.)	17	7	\$31.59	\$537	10	The change is due to the decrease in the number of marine terminals.

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any); and locations of firefighting and emergency equipment and fire exits											
.151(e)(5) – marking of saw hood of the rotation direction and indication of the end of the saw to be used	PROVIDED BY THE MANUFACTURER OF THE SAW.			0	0	0	0	0	0	0	No change.
.152(d)(2)(v) -- tagging of leaking fuel gas cylinders .152(d)(2)(vi) -- tagging of cylinder if a plug or safety device leaks	5	tagging of leaking fuel gas cylinders	525 existing + 1 new	2,630	2 mins. (.03 hr.)	79	32	\$31.59	\$2,496	47	The change is due to the decrease in the number of marine terminals.
Disclosure of certification records under 29 CFR part 1917				0		0	1	\$49.94	0	-1	This is no longer a collection of information.
TOTALS FOR PART 1917				108,377		28,264	12,680		\$883,059	15,584	

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TABLE 2 – Affected Longshoring Establishments

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Paragraph Number and Collection of Information	No. of Projects Annually		No. of Facilities Affected ⁵	Total Responses	Time Per Activity	Burden Hours Requested	Existing Burden Hours	Hourly Wage Rate	Cost Under Item 12	Burden Hour Change	Explanation of Adjustment
.22(g) -- marking of gangway bridles which cannot be moved in order to provide unobstructed passage to alert employees of the danger	1	gangway bridle marking	10% of 871 facilities (87)	87	2 mins. (.03 hr.)	3	2	\$31.59	\$95	1	No change.
.24(i)(l) -- tagging of ladders as unusable if defective			0	0	0	0	0	\$0	\$0	0	Based on staff expertise, ladders are usually thrown away immediately rather than being tagged as unusable.
.61(b)(2) -- marking of cargo handling gear with a safe working load greater than five short tons	10 pieces of gear	marking	87	870	2 mins. (.03 hr.)	26	25	\$31.59	\$821	1	The change is due to the increase in the number of longshoring operations.

⁵This number accounts for 10 percent of the existing 871 establishments and one (1) new establishment or an estimated number of establishments that may be required to perform a particular task.

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Paragraph Number and Collection of Information	No. of Projects Annually		No. of Facilities Affected	Total Responses	Time Per Activity	Burden Hours Requested	Existing Burden Hours	Hourly Wage Rate	Cost Under Item 12	Burden Hour Change	Explanation of Adjustment
.61(c) -- marking of weight on any article of stevedoring gear weighing more than 2,000 lbs.	10 pieces of gear	marking of weight	87	870	2 mins. (.03 hr.)	26	25	\$31.59	\$821	1	The change is due to the increase in the number of longshoring operations.

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Paragraph Number and Collection of Information	No. of Projects Annually	No. of Facilities Affected	Total Responses	Time Per Activity	Burden Hours Requested	Existing Burden Hours	Hourly Wage Rate	Cost Under Item 12	Burden Hour Change	Explanation of Adjustment
61(f)(1) -- inspection and testing of special stevedoring gear with a Safe Working Load (SWL) greater than five short tons	BURDEN COUNTED UNDER 29 CFR PART 1919 ,GEAR CERTIFICATION; (OMB CONTROL NUMBER 1218-0003)									No change.
.61(f)(2) -- inspection and testing of special stevedoring gear with a SWL of five short tons or less										
.61(g) – inspection and testing of spreaders not a part of ship's gear and used for handling intermodal containers										

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.61(h) – proof load testing of cargo handling gear with a SWL greater than five short tons											
.61(i) – maintain certificates and inspection and test records											
.62(b)(1) -- maintain and disclose manufacturer's recommended ratings for wire rope and wire rope slings	1	rating	871 existing + 1 new	872	1 min. (.02 hr.)	17	16	\$23.17	\$394	1	The change is due to the increase in the number of longshoring operations.
.62(b)(5) -- maintain and disclose manufacturer's recommended ratings for wire rope clips used to form eyes	1	rating	871 existing + 1 new	872	1 mins. (.02 hr.)	17	16	\$23.17	\$394	1	The change is due to the increase in the number of longshoring operations.
.62(c)(1) -- maintain and disclose	1	rating	871 existing +	872	1 min. (.02 hr.)	17	16	\$23.17	\$394	1	The change is due to the increase in

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manufacturer's recommended ratings for natural fiber rope and natural fiber rope slings provided for use aboard ship			1 new								the number of longshoring operations.
.62(d)(1) -- maintain and disclose manufacturer's ratings and use recommendations for the specific synthetic fiber rope and synthetic fiber rope slings provided for use aboard ship	1	rating	871 existing + 1 new	872	1 min. (.02 hr.)	17	16	\$23.17	\$394	1	The change is due to the increase in the number of longshoring operations.
.62(g)(3) -- maintain and disclose certificate of the proof test of repaired synthetic web slings	50 repaired synthetic web slings (estimated for each facility)	maintain certificate of proof test	871 existing + 1 new	43,600	1 min. (.02 hr.)	872	809	\$23.17	\$20,204	63	The change is due to the increase in the number of longshoring operations.
.62(g)(4) -- maintain	1	rating	871	872	1 min.	17	16	\$23.17	\$394	1	The change is due

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29 CFR PART 1918											
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and disclose manufacturer's use recommendations for synthetic web slings			existing + 1 new		(.02 hr.)						to the increase in the number of longshoring operations.
.62(h)(1) -- maintain and disclose manufacturer's recommended ratings for safe working loads for the size of wrought iron and alloy steel chains and chain slings	1	rating	871 existing + 1 new	872	1 min. (.02 hr.)	17	16	\$23.17	\$394	1	The change is due to the increase in the number of longshoring operations.
.62(h)(3)(ii) -- quarterly inspections of chains to detect wear, defective welds, deformation or increase in length or stretch; month of inspection shall be shown of each chain by color of paint of a		inspect chains quarterly	871 existing + 1 new quarterly (872 x 4)	3,488	1 hour	3,488	3236	\$31.59	\$110,186	252	The change is due to the increase in the number of longshoring operations.

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link .62(h)(4) -- maintain and disclose test certificates											
.62(h)(5)(i) -- Wrought iron chains in constant use shall be annealed or normalized at intervals not exceeding six months. Heat treatment certificates shall be available for inspection. Alloy chains shall not be annealed.	HEAT TREATMENT IS RARELY PERFORMED.										No change.
.62(h)(8) – Chain slings shall bear identification of size, grade and rated capacity.	IT IS USUAL AND CUSTOMARY FOR THE MANUFACTURER TO PROVIDE IDENTIFICATION.										
.64(k)(l) -- locking out and tagging out of	2 conveyors	tagged for maintenance/	10 percent of	174	2 mins. (.03 hr.)	5	5	\$31.59	\$158	0	The change is due to the increase in

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power sources to conveyors during maintenance, repair, and servicing .64(k)(2) -- locking out and tagging out the starting device in the stop position before attempting to remove the cause of a jam or overload of the conveying medium		repair twice a year	total facilities (87) have conveyors								the number of longshoring operations.
.65(b)(1) -- marking of rated capacities on mechanically powered vehicles used aboard vessels .65(b)(2) – marking of rated capacities, with and without removable counterweights on the vehicle. The vehicle weight, with and without a	15 vehicles per facility	marked (rated capacities come from manufacturer)	87	1,305	2 mins. (.03 hr.)	39	37	\$31.59	\$1,232	2	The change is due to the increase in the number of longshoring operations.

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counterweight, shall be similarly marked.											
.65(e)(2) -- Approved power-operated industrial trucks shall bear a label or other identification indicating testing laboratory approval.	IT IS USUAL AND CUSTOMARY FOR THE MANUFACTURER TO PROVIDE IDENTIFICATION									No change.	
.66(a)(2) -- posting of the crane weight on cranes hoisted aboard vessels for temporary use	10 cranes per facility	post weight	87	870	2 mins. (.03 hr.)	26	24	\$31.59	\$821	2	The change is due to the increase in the number of longshoring operations.
.66(a)(8) -- maintain and disclose manufacturer's or design specifications for ballast or counterweights	1	manufacturer's or design specification per facility	871 existing + 1 new	872	1 mins. (.02 hr.)	17	16	\$23.17	\$394	1	The change is due to the increase in the number of longshoring operations.
.66(a)(9) -- maintain and disclose manufacturer's	1	manufacturer's specification or design data	871 existing + 1 new	872	1 min. (.02 hr.)	17	16	\$23.17	\$394	1	The change is due to the increase in the number of

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specifications or design data for outrigger use											longshoring operations.
.66(a)(11) -- locking out and tagging out of power source to energized equipment -- designated persons may work on energized equipment only if necessary during inspection, maintenance, or repair	MOST REPAIRS ON SHIPS ARE CONDUCTED BY THE SHIP'S CREW WHICH IS NOT REGULATED BY OSHA's JURISDICTION. OCCASIONALLY, LOCKOUT/TAGOUT IS PERFORMED BY EMPLOYERS ON OWN EQUIPMENT.										No change.
	2 pieces of equipment	tagging	871 existing + 1 new	1,744	2 mins. (.03 hr.)	52	49	\$31.59	\$1,643	3	The change is due to the increase in the number of longshoring operations.
	CHARTS ARE PROVIDED BY THE MANUFACTURER. EMPLOYERS NEED ONLY TO POST OR MARK THE INFORMATION.										

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.66(a)(15) -- marking or posting a chart at the operator's position showing the function of crane and derrick operating controls	5 cranes	operating controls marked or a chart posted	87	435	2 mins. (.03 hr.)	13	12	\$31.59	\$411	1	The change is due to the increase in the number of longshoring operations.
.66(d)(2) -- monthly inspections of functional components and accessible structural features of each crane or device	10 cranes per facility (MOST COVERED UNDER 29 CFR part 1917)	conduct 12 inspections annually (maintain record)	871 existing + 1 new	104,640	18 mins. (.3 hr.)	31,392	29,088	\$31.59	\$991,673	2,304	The change is due to the increase in the number of longshoring operations.
.66(d)(4) -- maintain and disclose record of each monthly inspection for six months											
.85(a) – marking of intermodal containers when empty	CONTAINERS ARE MARKED BY THE MANUFACTURER AS A USUAL AND CUSTOMARY PROCEDURE. NO BURDEN TAKEN BY OSHA.									No change.	
.85(b)(1) – Identifying whether a	IN LIEU OF MARKING, IT IS USUAL AND CUSTOMARY FOR THE SHIP OWNER TO USE THE CARGO STOWAGE PLAN (1917.71(b) (2)(ii)). THEREFORE, OSHA IS NOT TAKING A BURDEN FOR THIS PROVISION.									No change.	

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<p>container to be hoisted is loaded or empty. Methods of identification may include cargo plans, manifests, or markings on the container.</p> <p>.85(b)(2)(i) -- For a loaded container: The actual gross weight shall be plainly marked and visible to the crane or other hoisting equipment operator or signalman, or to every supervisor or job boss on site and in charge of the operation; or</p> <p>.85(b)(2)(ii) -- The cargo stowage plan or equivalent permanently recorded</p>										

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display serving the same purpose, containing the actual gross weight and the serial number or other positive identification of that specific container, shall be provided to the crane or other hoisting equipment operator and signalman, and to every supervisor and job boss on site and in charge of the operation.											
85(b)(4)(ii) -- posting weight of container if the terminal has no scales from the container's contents and the container's empty weight	BURDEN TAKEN UNDER 29 CFR PART 1917.									No change.	
.85(b)(6)(ii) -- The container is marked	25 containers	marking of containers	5% of 871	1,100	2 mins. (.03 hr.)	33	30	\$31.59	\$1,042	3	The change is due to the increase in

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on the outside so that an employee can readily discern that the container is carrying vehicles	(on average) carrying vehicles	carrying vehicles	facilities (44)								the number of longshoring operations.
.85(k)(13) – establish and implement a procedure to retrieve personnel safely in case of a fall	1	Procedure	1 new	1	2 hour	2	2	\$49.94	\$100	0	No change.
.86(b) -- marking of ramps with load capacities	SECTION 1918.86 DEALS WITH ROLL-ON ROLL-OFF (RO-RO) OPERATIONS. IT PERTAINS TO CONTAINER CARRYING VESSELS CALLING AT U.S. PORTS. NOT ALL FACILITIES WILL HAVE THESE VESSELS CALLING AT THEIR PORTS. BASED ON OSHA'S FINAL ECONOMIC ANALYSIS FOR THE LONGSHORING AND MARINE TERMINALS STANDARDS, THERE ARE 147 VESSELS CONDUCTING RO-RO OPERATIONS. THE AGENCY HAS TAKEN AN INITIAL BURDEN FOR THIS PROVISION; THEREFORE, IT IS NOT TAKING A BURDEN IN THIS ICR.										No change.
.86(e) -- marking of hazardous routes that could be mistaken for normal drive-on/drive-off		done with a barrier or roping off	10% of 237 vessels (24)	24	5 mins. (.08 hr)	2	2	\$31.59	\$63	0	No change.

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routes											
.86(g) -- marking of flat bed and low boy trailers with their cargo capacities	According to the final economic analysis at the time the final rule was published, there were 307 establishments affected by this requirement, 80 percent of which were already in compliance. For purposes of calculating burden hours for the provision, OSHA is assuming a 95 percent compliance rate $495 \times .05 = 25$)	25	25	8 hours	200	200	\$31.59	\$6,318	0	No change.	
.86(h) -- marking of cargo to be handled via a Ro-Ro ramp	MOST CARGO IS ALREADY MARKED WHEN COMING INTO A TERMINAL May have to calculate weight for those not marked	10% of 237 vessels (24)	24	15 mins. (.25 hr.)	6	6	\$49.94	\$300	2	The change is due to the increase in the number of longshoring operations.	
.93(b) -- testing of atmosphere prior to	4 tests per facility	871 existing +	3,488	15 mins. (.25 hr.)	872	809	\$31.59	\$27,546	63	The change is due to the increase in	

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employee entry when the employer knows, or has reason to believe, that a space on a vessel contains or has contained a hazardous atmosphere			1 new								the number of longshoring operations.
93(d)(4) -- posting of warning signs at all means of access to spaces identified as having hazardous, flammable or oxygen-deficient atmospheres	2 means of access	1 time per facility	87	174	2 mins. (.03 hr.)	5	5	\$31.59	\$158	0	No change.
94(c) -- maintain and disclose notification and warranty of fumigated tobacco	1 notification	maintain	41	41	1 min. (.02 hr.)	1	1	\$23.17	\$23	0	No change.
96(e)(2) --locking out or tagging out of the power supply to machines	BURDEN TAKEN UNDER 1918.66(a)(11).										No change.
.97(d)(7) -- marking	BURDEN TAKEN UNDER 1917.26(d)(7).										No change.

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of stretchers concealed from view to indicate the location of the lifesaving equipment										
.99(a) -- Any employer who receives a package of hazardous material that is required to be marked, labeled or placarded in accordance with the U.S. Department of Transportation's Hazardous Materials Regulations (49 CFR parts 171 through 180) shall retain those markings, labels and placards on the package until the packaging is										

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sufficiently cleaned of residues and purged of vapors to remove any potential hazards. .99(b) -- Any employer who receives a freight container, rail freight car, motor vehicle, or transport vehicle that is required to be marked or placarded in accordance with the Hazardous Materials Regulations shall retain those markings and placards on the freight container, rail freight car, motor vehicle or transport vehicle until the hazardous materials that require the marking or placarding										

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are sufficiently removed to prevent any potential hazards. .99(c) -- Markings, placards and labels shall be maintained in a manner that ensures that they are readily visible.											
.100(a) -- develop and implement an emergency action plan in writing	1	Emergency action plan	87	87	2 hours	174	164	\$49.94	\$8,690	10	The change is due to the increase in the number of longshoring operations.
100(e)(3) -- maintain	1 plan	maintain plan	872	872	1 mins.	17	16	\$23.17	\$394	1	The change is due

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and disclose the plan upon request					(.02 hr.)						to the increase in the number of longshoring operations.
Disclosure of records, plans, etc., under 29 CFR part 1918		OSHA inspections	0	0		0	3	\$49.94	0	-3	This is no longer a collection of information.
TOTALS FOR PART 1918			170,903		37,430	34,718		\$1,177,115	2,712		
TOTALS FOR PART 1917			108,377		28,264	12,680		\$883,059	15,584		
TOTALS FOR PART 1918			170,903		37,430	34,718		\$1,177,115	2,712		
TOTALS FOR BOTH PARTS 1917 AND 1918			279,280		65,694	47,398		\$2,060,174	18,296		

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