

**Supporting Statement
for
Various International Agreement Pollution Prevention
Certificates and Documents, and Equivalency Certificates**

OMB No.: 1625-0041

COLLECTION INSTRUMENTS: CG-5352, CG-5352A, CG-5352B, CG-6047, CG-6047A, CG-6056, CG-6056A, CG-6056B, CG-6056C, CG-6057, CG-6059, CG-6059A, CG-6060, CG-6060A & Instruction

A. Justification

1. Circumstances that make the collection of information necessary.

Title 33 U.S.C. 1901-1911 requires implementation of the International Convention for the Prevention of Pollution from Ships 1973, as modified by the Protocol of 1978 (MARPOL 73/78). The United States Coast Guard is delegated the authority to implement the requirements of MARPOL. The requirement to possess an international certificate is mandated by the Act to Prevent Pollution from Ships 1980 (Pub. L. 96-478; 33 U.S.C. 1901-1911). Additionally, the Coast Guard has the authority to issue Flag State documents to prove equivalent compliance with MARPOL 73/78. The Coast Guard is also authorized to administer/enforce the International Convention on the Control of Harmful Anti-Fouling Systems on Ships (2001) (IAFS Conv) (Pub. L. 111-281, Title X).

–**MARPOL Certificates** and other related MARPOL requirements are listed below:

a) *IOPP Certificates and supplements (33 CFR 151.19) (forms CG-5352, CG-5352A & CG-5352B)*

Each U.S. oil tanker of 150 gross tons and above and each other U.S. ship of 400 gross tons and above; that engages on international voyages to ports or off-shore terminals under the jurisdiction of other parties to MARPOL 73/78.

b) *Evidence required for ships not party to MARPOL 73/78 (33 CFR 151.21)*

All oil tankers of 150 gross tons and above and all ships of 400 gross tons and above.

c) *Retain discharge data recorded by a cargo monitor (33 CFR 157.37(d))*

All tank vessels 150 gross tons or more carrying oil in bulk.

d) *Statement of Voluntary Compliance (International Maritime Organization resolutions MEPC.94(46) & MEPC.111(50)) (form CG-6057)*

Each U.S. single hull tank vessels 15 years old and older.

e) *International Air Pollution Prevention (IAPP) Certificates and International Energy Efficiency (IEE) Certificates (MARPOL 73/78 Annex VI) (forms CG-6056, CG-6056A, CG-6056B,*

CG-6056C, CG-6060 & CG-6060A)

Each U.S. ship of 400 gross tons and above; that engages on international voyages to ports or off-shore terminals under the jurisdiction of other parties to MARPOL 73/78.

–**IAFS Conv Certificates:**

f) *International Anti-Fouling Systems (IAFS) Certificates (IAFS Conv) (forms CG-6059 & CG-6059A)*

Each U.S. ship of 400 gross tons and above; that engages on international voyages.

–**Flag State documents:**

g) *Equivalency Certificate for MARPOL 73/78 (Revised) Annex IV (Sewage) International Convention for the Prevention of Pollution from Ships (33 CFR 159) (forms CG-6047 & CG-6047A)*

Annex IV applies to all new vessels built on or after September 27, 2003, which are 400 gross tons International Tonnage Convention (ITC), and above. The Annex also applies to new vessels less than 400 gross tons (ITC), which are certified to carry more than 15 passengers. Existing vessels 400 gross tons (ITC) and above and those existing vessels less than 400 GT (ITC) which are certified to carry more than 15 passengers need not comply until September 27, 2008. Existing federal regulations concerning sewage are outlined in 33 CFR 159 under 'Marine Sanitation Devices.'

h) *Ship-to-Ship (STS) Operations for MARPOL 73/78 (Annex I, Regs 40 & 41)*

Each oil tanker and tank barge of 150 gross tons and above, that engages in transfers of oil at sea.

a) IOPP Certificates and supplements. All ships engaged in international voyages are required to comply with IOPP certificate requirements. Due to the complex requirements of MARPOL 73/78 and the language difficulties associated with international trade, a uniform certificate listing vital information about the ship's characteristics in a standard form is necessary. The format of the certificate was agreed upon by the United States and other signatories to MARPOL 73/78. The IOPP Certificate is valid for a period of 5 years from the date of issue.

The IOPP certificates serve the necessary function of providing, in standard format and language, for ships of various countries, all the information needed by an inspecting official to efficiently determine whether a ship is in compliance with the requirements of MARPOL 73/78.

b) Evidence required for ships not party to MARPOL 73/78. This implements Article 5(4) of MARPOL 73/78, and is intended to prevent a ship from obtaining more favorable treatment due to its non-party status. Such ships will be required to have surveys conducted and valid documentation that the ship is in compliance with MARPOL 73/78.

c) Retain discharge data recorded by a cargo monitor. The installation and use of cargo monitor and control systems on tank vessels that are 150 gross tons or more is required by 33 CFR 157. Each tank vessel must retain the printout of discharge data from that system for at least three years.

d) Statement of Voluntary Compliance. In order to satisfy signatory port states, owners of single hull tankers 15 years old and older may voluntarily comply with the Condition Assessment Scheme outlined in International Maritime Organization (IMO) resolution MEPC.94(46). The format of the certificate was agreed upon by IMO and other signatory nations the revised to MARPOL 73/78 regulations 13G and 13H. The Statement of Voluntary Compliance is valid for a period of not more than 5 years from the date of issue. The Certificate may never be valid beyond a single hull tanker's phase-out date required by the Oil Pollution Act of 1990.

e) IAPP and IEE Certificates. All ships engaged in international voyages are required to comply with IAPP & IEE certificate requirements. Due to the complex requirements of MARPOL 73/78 and the language difficulties associated with international trade, a uniform certificate listing vital information about the ship's characteristics in a standard form is necessary. The format of the certificate was agreed upon by the United States and other signatories to MARPOL 73/78. The IAPP Certificate is valid for a period of 5 years from the date of issue. The IEE Certificate is issued without expiration date.

f) IAFS Certificates. Each U.S. ship of 400 gross tons and above; that engages on international voyages must demonstrate compliance with the IAFS Convention. The IAFS Certificate is valid until the anti-fouling system is changed or replaced, or upon transfer of the ship to the flag of another country.

g) Flag State document for MARPOL 73/78 Annex IV (Sewage). Since MARPOL 73/78 Annex IV has not been ratified by the United States, and U.S. flagged vessels on international voyages sailing in the

waters of countries that have adopted MARPOL 73/78 Annex IV will be subjected to Port State control boardings, these vessels will need to demonstrate equivalent compliance through the Flag State documents issued by the US Coast Guard.

h) STS Operations (Transfer of Oil Cargo between Oil Tankers at Sea) (MARPOL 73/78 Annex I, Regs 40 & 41).

Each oil tanker and tank barge of 150 gross tons and above, that engage in transfers of oil at sea, and that engage in an STS oil-transfer operation is required to carry and follow an "STS Operations Plan," based on the International Maritime Organization (IMO) Manual on Oil Pollution, Section 1: Prevention. Regulation 41 also requires that the person in charge of STS Operations be qualified to perform all relevant duties, and that records of STS Operations be retained on board for 3 years.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Maritime Safety
- Protection of the Natural Resources

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

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

2. Purpose of the information collection.

a) and b) This data is used by Coast Guard inspectors to prepare for inspections requested by ship owners or operators and to issue an IOPP Certificate in a minimum amount of time. The IOPP Certificate makes possible the efficient and effective enforcement of MARPOL 73/78, saving both the government and the ship owner/operator time and expense. Without a standard IOPP Certificate, the routine inspection of a ship upon entry to a port would be extremely burdensome and time consuming for both the government inspector and ship operator. The potential delay represents a significant expense to the ship owner due to lost time for the ship to transfer cargo.

c) This recordkeeping requirement stems directly from the requirements of Regulation 15(3)(a) of Annex I of MARPOL 73/78 that each vessel retain the printout of cargo monitor discharge data from the recording device (part of the control system for three years.) This requirement has been incorporated in 33 CFR 157.37(d). These printouts verify the vessel's compliance with oil discharge standards. There is no requirement that these printouts be submitted to any agency.

In the event of an oil discharge this information will be used to verify if the vessel causing the discharge violated the oil discharge limits of MARPOL 73/78. If the vessel did not, it could be used by the vessel operator as mitigating evidence regardless of the presence of visible traces of oil. This would not be possible if this information was not available. However, this information is not required to be submitted to an agency, merely retained by the vessel and/or ashore for 3-years. In addition, this is a specific requirement of MARPOL 73/78, to which the United States is party, and under the terms of this treaty, must be implemented.

d) MARPOL 73/78 Annex I Regulations 13G and 13H have not been ratified by the U.S. Senate, however, certain U.S. flag vessels may be required by signatory nations to prove compliance with those provisions through Flag State documents. In order to satisfy signatory port states, owners of single hull tankers 15 years old and older may voluntarily comply with the Condition Assessment Scheme outlined in International Maritime Organization resolution MEPC.94(46).

e) This data is used by Coast Guard inspectors to prepare for inspections requested by ship owners or operators and to issue an IAPP or IEE Certificate in a minimum amount of time. The Certificates makes possible the efficient and effective enforcement of MARPOL 73/78, saving both the government and the ship owners and operator's time and expense. Without standard Certificates, the routine inspection of a ship upon entry to a port would be extremely burdensome and time consuming for both the government inspector and ship operator. The potential delay represents a significant expense to the ship owner due to lost time for the ship to transfer cargo. MARPOL 73/78, Annex VI entered into force for the U.S. on January 8, 2009.

f) This data is used by Coast Guard inspectors to prepare for inspections requested by ship owners or operators and to issue an IAFP Certificate in a minimum amount of time. The IAFS Certificate makes possible the efficient and effective enforcement of IAFS Convention, saving both the government and the ship owner/operator time and expense. Without a standard IAFS Certificate, the routine inspection of a ship upon entry to a port would be extremely burdensome and time consuming for both the government inspector and ship operator. The potential delay represents a significant expense to the ship owner due to lost time for the ship to transfer cargo.

g) Since MARPOL 73/78 Annex IV has not been ratified by the United States, and U.S. flagged vessels on international voyages sailing in the waters of countries that have adopted MARPOL 73/78 Annex IV will be subjected to Port State control boardings, these vessels will need to demonstrate equivalent compliance through the Flag State documents--Certificates of Equivalency or Statements of Voluntary Compliance—issued by the US Coast Guard.

h) This data is used to ensure compliance with the STS Operation requirements, including the development and periodic review of STS Operations Plan, and retention of records are required by the Plan.

3. Considerations of the use of improved technology.

Information is not submitted to the Coast Guard. Upon successful completion of an inspection, the CG will issue the appropriate Certificate(s). The Certificate(s) should be posted on the vessel. For oil tanker discharge monitoring and control systems, per Resolution MEPC.108(49) dated 18 July 2003, monitoring and control system data may be recorded and stored electronically (paragraphs 6.9.1 & 6.9.3). This information is not sent to the Coast Guard, rather it is made available upon inspection. We estimate that 50% of all recordkeeping is done electronically.

4. Efforts to identify duplication.

The Coast Guard is the only agency, Federal, State or private that requires this information collection and that administers these MARPOL 73/78 requirements on commercial vessels. The regulations allow foreign vessels to show compliance through an IOPP Certificate, or an Equivalency Certificate, rather than directly submitting information to the Coast Guard. This avoids duplication on an international level.

5. Methods used to minimize the burdens to small entities if involved.

This information collection does not have an impact on small businesses or other small entities.

6. Consequences to the Federal program if collection were conducted less frequently.

Without these international Certificates and Statements of Voluntary Compliance, a ship could encounter severe international trade restrictions and delays. Most certificates are reissued every 5 years. Without the cargo monitor discharge data, engine fuel and exhaust emissions data, or the Certificate of Equivalency for MARPOL 73/78 Annex IV (Sewage), it would not be possible to confirm that the ship is operating in compliance with U.S. regulations and/or international pollution prevention-related treaties.

7. Special collection circumstances.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation.

A 60-Day Notice (see USCG-2015-0757, November 19, 2015, 80 FR 72446) and 30-Day Notice (May 3, 2016, 81 FR 26572) were published in the *Federal Register* to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

9. Provide any payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

11. Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12. Estimate of annual hour and cost burdens to respondents.

- The estimated annual respondents are 1,566.
- The estimated annual responses are 11,527.
- The estimated annual burden hours are 73,900.
- The estimated annual cost is \$3,026,953.

The burden to respondents is provided in Appendix A. Table 2, available at the end of these calculations in this section, provides a summary of all the different components involved in this collection of information with the grand totals.

a) IOPP Certificates and supplements.

The total number of U.S. vessels affected by the IOPP Certificate requirements is estimated to be 1,556 (1,044 Nontank Vessels + 461 Tank Barges + 51 Tank Ships as shown in Table 1). This figure was obtained from the U.S. Coast Guard Marine Information for Safety and Law Enforcement database (MISLE). The required posting of an IOPP Certificate and supplement take approximately twenty minutes (0.33 hours) per ship. The IOPP Certificate will be issued once every five years. Approximately 1,556 vessels are required to have an IOPP Certificate. The total number of annual responses is estimated to be 311 (rounding 1,556 ships / 5 years). The total estimated annual burden on the public is 103 hours (rounding up 311 x 0.33 hours/ship). Total cost to the public is estimated to be \$6,283 per year (103 hours/year x \$61 hour¹).

b) Evidence required for ships not party to MARPOL 73/78.

The Coast Guard does not maintain the data required to calculate burden on foreign-flagged vessels trading in U.S. waters that are not signatory to MARPOL 73/73. We have historically estimated this population to be approximately 10. The presentation and compilation of the required information needed

¹ See Enclosure (2) to COMDTINST 7310.1N (equivalent to the GS-11 out-of-govt. rate).

is expected to take approximately twenty hours per ship. The total estimated annual burden on the public is 200 hours (10 ships x 20 hours/ship). Total cost is estimated to be \$12,200 per year (200 hours/year x \$61 hour²).

c) Retain discharge data recorded by a cargo monitor.

There are approximately 512 tank vessels in the U.S. fleet that are required to keep records of cargo monitor discharge data (461 Tank Barges + 51 Tank Ships). To estimate the annual burden the following assumptions are made:

- each vessel operates for 350 days a year;
- a ballast discharge is made every 20 days, making approximately 17 discharges per year;
- recordkeeping takes ¼ hour per ballast discharge; and .
- a person with an equivalent wage to a GS-11 would be in charge of keeping the record, receiving an hourly salary of \$61³.

The total number of annual responses is estimated to be 8,704 (rounding 512 ships * 17 discharges per year). The total estimated annual burden on the public is 2,176 hours (rounding up 8,704 x 0.25 hours/ship). Total cost to the public is estimated to be \$132,736 per year (2,176 hours/year x \$61 hour⁴).

d) Statement of Voluntary Compliance.

The total number of U.S. vessels affected by the Statement of Voluntary Compliance (SVC) is estimated to be 0 (0 Tank Barges + 0 Tank Ships). This figure was obtained from the data available from the MISLE database. The completion of the SVC is estimated to take approximately thirty minutes (0.17 hours) per vessel. The SVC lasts for five years and approximately 0 vessels are applicable for the program. The total number of annual responses is estimated to be 0 (0 ships /0 years). The total estimated annual burden on the public is 0.00 hours (0 x 0.17hours/ship). Total cost to the public is estimated to be \$0 per year (0.00 hours/year x \$61 hour⁵).

e) IAPP & IEE Certificates.

The total number of U.S. vessels affected by the IAPP & IEE Certificate requirements is estimated to be 1,556 (1,044 Nontank Vessels + 461 Tank Barges + 51 Tank Ships as shown in Table 1). This figure was obtained from the MISLE database. The required posting of a Certificate takes approximately ten minutes (0.17 hours) per ship. An IAPP Certificate is issued once every five years.

Approximately 311 vessels (1,556/5) will receive an IAPP Certificate annually. The total estimated annual burden on the public is 53 hours (311 x 0.17 hours/ship (rounded)). Total cost to the public is estimated to be \$3,233 per year (53 hours/year x \$61/ hour⁶).

f) IAFS Certificates.

The total number of U.S. vessels affected by the IAFS Certificate requirements is estimated to be 0 at this time. The total number of annual responses is estimated to be 0 (0 ships /0 years). The total estimated annual burden on the public is 0.00 hours (0 x 0.17 hours/ship). Total cost to the public is estimated to be \$0 per year (0.00 hours/year x \$61 hour⁷).

g) Flag State documents (Certificates of Equivalency) for MARPOL 73/78 Annex IV (Sewage).

² See Enclosure (2) to COMDTINST 7310.1N (equivalent to the GS-11 out-of-govt. rate).

³ See Enclosure (2) to COMDTINST 7310.1N (equivalent to the GS-11 out-of-govt. rate).

⁴ See Enclosure (2) to COMDTINST 7310.1N (equivalent to the GS-11 out-of-govt. rate).

⁵ See Enclosure (2) to COMDTINST 7310.1N (equivalent to the GS-11 out-of-govt. rate).

⁶ See Enclosure (2) to COMDTINST 7310.1N (equivalent to the GS-11 out-of-govt. rate).

⁷ See Enclosure (2) to COMDTINST 7310.1N (equivalent to the GS-11 out-of-govt. rate).

The Coast Guard estimates that the 1,556 vessels are candidates for the Certificate of Equivalency. We also assume that only 75% of the eligible vessels will apply for the certificate. Approximately 1,556 vessels will have 1,167 responses (1,556 vessels *75%). We assume that it takes 10 minutes to post the Certificate of Equivalency, and that someone of rank equivalent to O-4 posts the document, and the equivalent wage rate for this is \$104/hour.⁸ The estimated annual burden for posting the Certificate of Equivalency is 200 hours and the cost is \$20,800. See Appendix A, table 2 for details.

h)(1) Initial STS Operations Plan preparation

The Coast Guard estimates that there are 512 oil tankers and tank barges of 150 gross tons and above, that engage in transfers of oil at sea, and that engage in an STS oil-transfer operation. We assume that it takes 135 hours to prepare an initial STS Operations Plan per vessel and assume that training and development specialists will prepare the STS Operations Plan at the rate of \$40.07.⁹ The estimated one-year burden for the STS Operations Plan is 69,120 hours. The total cost to the public is estimated to be \$2,769,638 for one year (69,120 hours/year x \$40.07 hour).

h)(2) Recurring STS Operations Plan update

The Coast Guard estimates that there are 512 oil tankers and tank barges of 150 gross tons and above, that engage in transfers of oil at sea, and that engage in an STS oil-transfer operation. We assume that it takes 4 hours to prepare an annual recurring STS Operations Plan update per vessel and assume that specialists will prepare the STS Operations Plan at the rate of \$40.07.¹⁰ The estimated one-year burden for the STS Operations Plan update is 2,048 hours. The total cost to the public is estimated to be \$82,063 per year (2,048 hours/year x \$40.07 hour).

13. Estimate of annual capital and start-up costs.

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

14. Estimates of annualized Federal Government costs.

The annualized Federal Government cost estimate is \$126,398. This cost is comprised of 2 elements.

a) International treaty Certificates

It takes the Coast Guard an average of 2.0 hours to complete each Certificate. We assume a GS-13 is involved with the issuance of the forms, at an hourly rate of \$85. For the Statement of Voluntary Compliance, it takes approximately 30 minutes for the Coast Guard to review the form. Regarding cargo monitor discharge records, we assume no specific costs are associated with them, as these records would be examined in the general course of a Coast Guard inspection or investigation. The total cost of this element is \$105,740 [$\$85 * 2.0 * 622$].

b) Issuing Flag State documents

These documents are generally completed by someone of a rank equivalent to W-3, and the applicable government wage rate is \$106/hour. We estimate that it takes about 10 minutes a document, and since the total number of applications is 1,167 the total cost to the government is \$20,658 [$\$106 * 0.167 * 1,167$].

15. Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., increase) in the estimated annual number of responses. The increase is due to recent STS requirement regulations put in place by the

⁸ See Enclosure (2) to COMDTINST 7310.1M (equivalent to the O-4 out-of-govt. rate).

⁹ <http://www.bls.gov/oes/2012/may/oes131151.htm> median wage rate is used * 1.49 loaded wage rate.

¹⁰ <http://www.bls.gov/oes/2012/may/oes131151.htm> median wage rate is used * 1.49 loaded wage rate.

MARPOL Annex I Final Rule published on February 4, 2015. The recordkeeping requirements, and the methodology for calculating burden, remain unchanged.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

The certificates associated with this collection are prescribed by an international treaty (e.g., MARPOL) that the U.S. Government is signatory to. These certificates either have specific five year expiration dates related to requirements set out in treaty, or are valid indefinitely. The addition of an expiration date to these certificates—that for OMB approval—may cause several problems. First, it may cause U.S.-flag vessel owner/operators to interact with the Coast Guard more frequently than required to reconcile the existence of up to 2 expirations dates on their ships' certificates. Second, it may cause confusion with foreign Port State Control boarding officers, resulting in U.S.-flag ships being delayed or detained in foreign ports due to up to 2 differing expiration dates. It is for these reasons that expiration dates for OMB approval are not displayed on the certificates associated with this collection. However, the OMB expiration date is displayed on the Instruction sheet related to the information collection request.

18. Exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.

Appendix A

TABLE 1. Vessels with Int'l treaty Certificates
(Carry oil and are greater than 150 gt., and all other ships greater than 400 gt.)

Types of Vessels	
Nontank Vessels	
Freight Barge	189
Freight Ship	229
MODU	47
Oil Recovery	46
Towing Vessel	34
Industrial Vessel	93
OSV	268
Research Vessel	16
School Ship	4
Passenger Inspected.	118
Tank Vessels	
Tank Barge	461
Tank Ship	51
Ships – TOTAL	1,556

Table 2. Summary of the Requirements for COI 1625-0041

Requirement	Annual Respondents	Annual Responses	Annual Burden Hours	Wage Rate	Annual Costs
a) IOPP Certificates and supplements	1,556	311	103	\$61	\$6,283
b) Evidence required for ships not party to MARPOL 73/78	10	10	200	\$61	\$12,200
c) Retain discharge data recorded by a cargo monitor	512*	8,704	2,176	\$61	\$132,736
d) Statement of Voluntary Compliance	0*	0	0	\$61	\$0
e) IAPP & IEE Certificates	311*	311	53	\$61	\$3,233
f) IAFS Certificates	0*	0	0	\$61	\$0
g) Flag State documents (Certificates of Equivalency)	1,167*	1,167	200	\$104	\$20,800
h(1)) Initial STS Operations Plan preparation	512*	5 12	6 9,120	\$40.07	\$2,769,638
h(2)) Recurring STS Operations Plan update	512*	512	2,048	\$40.07	\$82,063
TOTAL	1,566	11,527	73,900		\$3,026,953

NOTE—These respondents are the same as, or a subset of, the respondents listed in row (a).

Table 3 Estimate of Annual Burden for Vessels that Retain Cargo Monitor Discharge Data

Type of Vessel	Number of Vessels	Annual Discharges (17 per vessel)	Hour Burden (0.25 hrs. per discharge)	Cost Burden (\$61 per hr.)
Tank Barges	461	7,837	1,959	\$119,499
Tank Ships	51	867	217	\$13,237
Total*	512	8,704	2,176	\$132,736

*NOTES—Figures may be rounded

The totals from this Table are shown in Table 2 row (c).

Table 4 Estimate of Annual Burden for Vessels with the Certificate of Equivalency for MARPOL 73/78 Annex IV (Sewage)

Types of vessels that are candidates for Flag State documents	Number of vessels in each category	Annual burden hours (assuming 10 minutes – 0.17 hours – to post the document)	Cost of burden hours (wage rate \$104/hour)
Freight Ship	229	39	\$4,056
Towing Vessel	34	6	\$624
Tank Ship	51	9	\$936
Passenger Inspected	118	20	\$2,080
Industrial Vessel	93	16	\$1,664
Freight Barge	189	32	\$3,328
MODU	47	8	\$832
OSV	268	46	\$4,784
Research Vessel	16	3	\$312
School Ship	4	1	\$104
Tank Barge	461	78	\$8,112
Oil Recovery	46	8	\$832
Total*	1,556	266	\$27,664
About 75% will actually apply for the Certificate of Equivalency *	1,167	200	\$20,800

*NOTES—Figures may be rounded.

The totals from this Table are shown in Table 2 row (g).

Table 5 Hour Burden per Vessel – Initial STS Operations Plan preparation

Procedures	Hours per procedure	Hourly Cost	Total Cost
General requirements	12	\$40.07	\$480.84
Step-by-step description of the entire STS Operation	12	\$40.07	\$480.84
A description of the mooring and unmooring procedures and arrangements, including diagrams where necessary, and procedures for tending the oil tankers' moorings during the transfer of cargo;	12	\$40.07	\$480.84
A description of the cargo and ballast transfer procedures, including those used while underway or anchored and procedures for connecting and testing integrity of cargo hoses and hose to manifold interface, topping off cargo tanks and disconnecting cargo hoses	12	\$40.07	\$480.84
The titles, locations and duties of all persons involved in the STS operation;	12	\$40.07	\$480.84
Procedures for operating the emergency shut-down and communication systems and for rapid breakaway;	12	\$40.07	\$480.84
A description of the drip trays and procedures for emptying them	12	\$40.07	\$480.84
Procedures for reporting spillages of oil into the water;	12	\$40.07	\$480.84
An approved contingency plan which meets the requirements of 6.2.9; and	12	\$40.07	\$480.84
A cargo and ballast plan	12	\$40.07	\$480.84
Records retention: records of STS operations shall be retained on board for three years and be readily available for inspection	3	\$40.07	\$120.21
An approved contingency plan which meets the requirements of 6.2.9; and	12	\$40.07	\$480.84
Burden per Vessel	135		\$5,409.45
Total Burden for 512 Vessels (respondents & responses)	69,120		\$2,769,638

NOTE—The totals from this Table are shown in Table 2 row (h)(1).