

**STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)
1218-0241
October 2017**

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS CONTAINED IN THE
THE STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)¹
OFFICE OF MANAGEMENT AND BUDGET
(OMB) CONTROL NO. 1218-0241 (October 2017)**

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” or “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). The Act states further that “[t]he Secretary . . . shall prescribe such rules and regulations as [he/she] may deem necessary to carry out [his/her] responsibilities under this Act, including rules and regulations dealing with the inspection of an employer’s establishment” (29 U.S.C. 651).

The Act specifically authorizes the Occupational Safety and Health Administration (“OSHA” or “Agency”) to issue standards that “prescribe the use of labels or other appropriate forms of warning as are necessary to insure that workers are apprized 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). In addition, the OSH Act mandates 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 the Act . . .” (29 U.S.C. 657).

Under the authority granted by the OSH Act, the Agency published 29 CFR part 1926, subpart R. The subpart contains information collection requirements that: Notify designated parties, especially steel erectors, that building materials, components, steel structures, and fall-protection equipment meet required criteria; and ensure that workers exposed to fall hazards receive specified training in the recognition and control of the hazards.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.**

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

**STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)
1218-0241
October 2017**

The Subpart contains a number of information collection requirements. Each of the following paragraphs describes a requirement, specifies who uses it, and what purpose it serves.

Sections 1926.752(a)(1) and (a)(2). Description of the requirements: “**Before authorizing the commencement of steel erection**, the controlling contractor shall ensure that the steel erector is provided with the following written notifications (emphasis added):” Section (a)(1) “[that the] concrete in the footings, piers and walls, and the mortar in the masonry piers and walls has attained, on the basis of an appropriate ASTM standard test method of field-cured samples, either 75 percent of the intended minimum compressive design strength or sufficient strength to support loads imposed during steel erection.” Section (a)(2) “[that any] repairs, replacements and modifications to the anchor bolts were conducted in accordance with § 1926.755(b).” The Agency discusses the burden here for the § 1926.755(b)(1) and (b)(2) requirements: (b)(1) that anchor bolt changes must have had the approval of project structural engineer of record and (b)(2) that, if there were any such changes, the steel erector be provided written notification of the repair, replacement or modification of the anchor rods (anchor bolts) prior to erection of the column. Further OSHA calculates two burdens for § 1926.755(b)(1) and (b)(2) in the table with footnoted explanations. **Note:** OSHA will not enforce the requirements pertaining to adequate mortar strength in masonry piers and walls until such time as the Agency defines an appropriate substitute method or until an appropriate ASTM test method is published.

Use and purpose: The requirements ensure that the steel erector receives valid notification, before it is authorized by the controlling contractor to commence steel erection, that footing or pier concrete will provide the required support for safe structural steel assembly activities. The requirements also ensure that the anchor bolts, which attach steel members to the concrete foundation elements, meet appropriate design criteria. The two requirements in concert prevent collapses due to inadequate foundation preparation and ineffective steel to foundation anchoring. Collapses of structural steel endanger the lives of iron workers erecting the structure as well as pose life-threatening hazards to anyone within the steel’s impact zone.

§ 1926.753(c)(5)(ii). Description of the requirement. Employers must not deactivate safety latches on hooks or make the latches inoperable except when: “[...]equivalent protection is provided in the site-specific erection plan.

Use and purpose. Describing equivalent protection in the site-specific erection plan is an efficient means for employers to communicate to workers and others that the employers are deactivating safety latches for hoisting purlins and certain joists, and to specify the alternate protection for these lifting operations. Alternate protection, like lift paths designed to eliminate possible human impact, requiring slow hoisting speeds, prohibiting lifts in windy conditions and mandating tagline use, could provide alternate and equivalent protection. The alternates would

STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)

1218-0241

October 2017

protect iron workers on the structure as well as other people potentially exposed to the hazards of falling structural members.

§ 1926.753(e)(2). Description of the requirement. Employers may use multiple-lift rigging assemblies to hoist up to five beams and similar structural members simultaneously. The maximum capacity of the whole assembly, as well as of each of its individual attachment points, must be certified by the manufacturer or a qualified rigger based on the manufacturer's specifications with a 5 to 1 safety factor for all components. Manufacturer specification sheets are delivered for each piece of the system at the time of sale. In addition each piece of the system has a marking on it identifying its safe working load.

Use and purpose: This requirement effectively prevents multiple-lift rigging assembly failures due to overloading and saves those around or near the lifts from catastrophic harm.

§ 1926.757(a)(4). Description of the requirement. If "[...] steel joists at or near columns span more than 60 feet (18.3 m), [employers must] set the joists in tandem with all bridging installed." However, the employer may use an alternative method for erecting these joists if a qualified person develops the alternative method, which provides equivalent stability and is included in the site-specific erection plan.

Use and purpose. Including the alternative method in the site-specific erection plan provides an efficient means of informing steel erectors and workers on site about the alternative erection method. Doing so ensures that erector personnel install the joists safely and avoid hazardous collapses.

§ 1926.757(a)(7). Description of the requirement. Employers must not modify steel joists or steel joist girders in a way that affects their strength without the approval of the project structural engineer of record.

Use and purpose. Obtaining the engineer's approval to modify the strength of a steel joist or steel joist girder provides effective notification to steel erectors and their workers that these structural components have been altered and their strengths changed; misunderstood joist and joist girder strengths could lead to overloading and cause structural collapse.

§§ 1926.757(a)(9) and 1926.758(g). Description of the requirements. An employer must not use steel joists or steel joist girders, or purlins or girts as anchorage points for a fall-arrest systems without the written approval of a qualified person.

Use and purpose. Having a qualified person provide written approval effectively notifies steel erectors and their workers that certain structural components cannot sustain stresses imposed by

STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)

1218-0241

October 2017

fall-arrests. Further the approval ensures proper bracing for components that can withstand fall arrest forces. Both protect workers from catastrophic collapses.

§ 1926.757(e)(4)(i). Description of the requirement. An employer must install and anchor all bridging on joists and attach all joist bearing ends before placing a bundle of decking on the joists, unless: A qualified person determines that the structure or portion of the structure is capable of supporting the load and the employer documents this determination in the site-specific erection plan.

Use and purpose. Documenting alternative material storage procedures in the site-specific erection plan is the most direct and effective means for communicating the alternative storage method using joists to employer personnel. It ensures understanding of and compliance with the alternative safe loading procedures and prevents catastrophic collapse.

§ 1926.760(e) and (e)(1). Description of the requirement. The steel erector can leave its fall protection at the jobsite after completion of the erection activity only if the controlling contractor or its authorized representative directs the steel erector to do so and inspects and accepts responsibility for the fall protection.

Use and purpose. This requirement ensures continuity of fall protection on steel erection jobs for trades that follow after the steel erector leaves the project. It also relieves the steel erection contractor of responsibility for controlling the fall protection equipment. By having the controlling contractor assume control the standard protects workers on the jobsite from fall protection systems that are not properly maintained and from hazardous fall exposures.

§ 1926.761 The training requirements in § 1926.761 are not considered collections of information (However, the training certification component of a site-specific erection plan provided by Appendix A, paragraph (c)(7), is a collection of information, as described below in Item 2 (see: 1926.752(e) and Appendix A to Subpart R.)

Paragraph (c)(4)(ii) of Appendix G to Subpart R. Description of the requirement. This mandatory appendix duplicates the regulatory requirements of § 1926.502 (“Fall protection systems criteria and practices”), notably the requirements specified in paragraph (c)(4)(ii). This paragraph addresses the certification of safety nets as an option available to employers who can demonstrate that performing a drop test on safety nets is unreasonable. This provision allows such employers to certify that their safety nets, including the installation of the nets, protect workers at least as well as safety nets that meet the drop-test criteria. The employer must complete the certification process prior to using the net for fall protection, and the certificate must include the following information: Identification of the net and the type of installation used for the net; the date the certifying party determined that the net and its installation would

STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)

1218-0241

October 2017

meet the drop-test criteria; and the signature of the party making this determination. The most recent certificate must be available at the jobsite for inspection.

The Agency accounts for the burden hours and cost resulting from this provision under its ICR entitled “Construction Standards on Fall Protection Systems Criteria and Practice (§ 1926.502) and Training Requirements (§ 1926.503),” Office of Management and Budget Control Number 1218-0197.

After a careful review of the Standard, the Agency has identified information collection requirements contained in Subpart R as follows:

§ 1926.752(e) and Appendix A to Subpart R, “Guidelines for Establishing the Components of a Site-specific Erection Plan: Non-mandatory Guidelines for Complying with 1926.752(e),” paragraph (a). Description of the requirement. Site-specific erection plan. Where employers elect, due to conditions specific to the site, to develop alternate means and methods that provide employee protection in accordance with § 1926.753(c)(5), § 1926.757(a)(4) or § 1926.757(e)(4), a site-specific erection plan shall be developed by a qualified person and be available at the work site. Guidelines for establishing a site-specific erection plan are contained in Appendix A to this subpart.

Use and purpose. This requirement provides employer protection by ensuring that proper planning takes place in situations where employers elect, based on site specific conditions, not to comply with § 1926.753(c)(5), § 1926.757(a)(4) or § 1926.757(e)(4). The site specific plan required in 1926.752(e) allows for alternate methods but requires that an equivalent level of protection be provided. Further, the provision requires that the site specific plan be developed by a qualified person and is available at the worksite.

Appendix A to Subpart R, paragraph (b). Description of the requirement. Paragraph (b) of the Appendix provides for the development of a site-specific erection plan. Preconstruction conference(s) and site inspection(s) are held between the erector and the controlling contractor, and others such as the project engineer and fabricator before the start of steel erection. The purpose of such conference(s) is to develop and review the site-specific erection plan that will meet the requirements of this section.

Use and purpose. Paragraph (b) of Appendix A provides for communication and coordination between the controlling contractor and other parties to ensure all affected parties understand their responsibilities under the site specific plan and actions they are required to take to implement it.

**STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)
1218-0241
October 2017**

Appendix A to Subpart R, paragraphs (c), (c)(1)-(c)(9), (d), (d)(1) and (d)(2). Description of the requirement. These paragraphs of Appendix A describe the components of a site-specific erection plan, including: the sequence of erection activity developed in coordination with the controlling contractor, a description of the crane and derrick selection and placement procedures, a description of the fall protection procedures that will be used to comply with § 1926.760, a description of the procedures that will be used to comply with § 1926.759, a description of the special procedures required for hazardous non-routine tasks, a certification for each employee who has received training for performing steel erection operations as required by § 1926.761, a list of the qualified and competent persons, a description of the procedures that will be utilized in the event of rescue or emergency response, the identification of the site and project, and signed and dated by the qualified person(s) responsible for its preparation and modification

Use and purpose. The purpose of paragraphs (c) through (d)(2) of appendix A is to provide safety for the wide ranging activities associated with steel erection process based on a confident site specific hazard assessment. It provides an extensive procedural oriented list of preventative measures and best practices associated with a site specific erection plan eliminating potential hazardous conditions.

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 any available technology to meet the paperwork requirements specified by the Subpart. The Agency wrote these provisions in performance-oriented language, i.e., in terms of what information to provide, not how to provide it.

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.

The collections of information in the Subpart are specific to each employer involved, and no other sources or agencies duplicate these requirements or can make the required information available to OSHA, i.e., the required information is available only from the parties designated in the Subpart.

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

The collections of information specified by the Subpart 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

**STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)
1218-0241
October 2017**

conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The Agency believes that the information collection frequencies required by the Subpart are the minimum frequencies necessary to fulfill its mandate “to assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources” as specified in the OSH Act at 29 U.S.C. 651. Accordingly, if employers do not perform the required information collections required, or delay in providing this information, workers are at risk of serious injuries or death while working on steel erection projects.

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; the paperwork requirements in the Subpart conform to the guidelines set forth 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 prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)

1218-0241

October 2017

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

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

As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice on September 28, 2017 in the *Federal Register* (82 FR 45314) soliciting comments on its proposal to extend the Office of Management Budget's (OMB) approval of the collections of information specified in the standard on Steel Erection (29 CFR Part 1926, Subpart R) (Docket No. OSHA-2011-0055). This notice was part of a preclearance consultation program that provided the general public and government agencies with an opportunity to comment. The Agency did not receive any public comments in response to this notice.

9. Explain any decision to provide any payment or 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 Subpart 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 reason 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 Subpart do not involve sensitive information.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not**

**STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)
1218-0241
October 2017**

include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage-rate categories.**

Table A12 below provides a summary of the annual burden hour and cost estimates for each paragraph of the Subpart that contains an information collection requirement (and described under Item 2 above). The table also provides the values used by the Agency to calculate estimates, including the number of projects covered by the collections of information, the frequency with which the requirement occurs per project, the time required to perform each occurrence, the labor category involved in performing the requirement, and the hourly wage rate for the labor category.

Establishment and Employment ICR Estimates

OSHA estimated Table A12 numbers using national industry-specific data from the Bureau of Labor Statistic's *Occupational Employment Statistics*. Since the construction industry has gone through several years of changes, which have increased and decreased different segments of the industry differently, OSHA chooses to use the percent change in structural iron and steel worker employment from May of 2013 through May of 2016 to recalculate the total number of projects and numbers of each affected project type for the table below. In May 2013, BLS data indicated 57,480 were employed as structural iron and steel workers. In May 2016, BLS data indicates there are 69,440 employed as structural iron and steel workers, which is a 20.8% increase from the previous ICR. Assuming the average number of workers per project has remained constant since the previous ICR, conservatively, OSHA applies the 20.8% increase to the estimated 13,864 affected projects reported in the 2013 ICR to estimate affected projects in 2016, or 16,748 (rounded) projects annually. $((69,440 - 57,480) \div 57,480 = 20.8\%)$ and $(13,864 \times (1 + .208) = 16,748$ projects).

Wage Rates

The Agency determined average wage rates from mean hourly wage earnings to represent the cost of employee time. For the relevant occupational category, OSHA adjusted the earnings reported in the *Occupational Employment Statistics (OES), May 2016 National Industry-Specific Occupational Employment and Wage Estimates*, Bureau of Labor Statistics, U.S. Department of Labor for NAICS 238100, "Foundation, Structure, and Building Exterior Contractors." (OES data is available at: <https://www.bls.gov/oes/tables.htm>. To access these

**STANDARD ON STEEL ERECTION (29 CFR PART 1926, SUBPART R)
1218-0241
October 2017**

wage rate, select the year, “National Industry-Specific and by Ownership,” and the Standard Occupational Classification (SOC) code.)

To account for fringe benefits, the Agency used the benefit rate reported in the *Economic News Release, Employer Costs for Employee Compensation –December 2016*, Bureau of Labor Statistics (BLS), U.S. Department of Labor (https://www.bls.gov/news.release/archives/ecec_03172017.htm). BLS reported that for civil workers, fringe benefits accounted for 31.6 percent of total compensation and wages accounted for the remaining 68.4 percent. To calculate the loaded hourly wage for each occupation, thus the Agency divided the mean hourly wage by 68.4 percent. The wage rates are calculated as follows:

Field and Structural Engineer (SOC 17-2051)	$\$40.98/.684 = \59.91
Project Manager (SOC 11-9021)	$\$46.14/.684 = \67.46
Qualified Rigger (SOC 47-2221)	$\$27.63/.684 = \40.39

Table A12- Estimated Annualized Respondent Burden Hours and Costs

Collections of Information	No. of Respondents (Projects Covered ²) [a]	No of Responses per Respondent/Frequency [b]	Total No. of Responses [c] (a x b=c)	Avg. Burden per Response (in Hrs.) [d]	Total Burden Hours [e] (c x d=e)	Respondent Type	Mean Wage Rate [f]	Total Burden Costs [g] (e x f= g)
Notification of Concrete and Mortar Strength 1926.752(a) (1) ³ -- Controlling contractor provides written notification to steel erector of concrete and mortar strength	16,748	2	33,496	0.08	2,680	Field Engineer	\$59.91	\$160,559
Engineer Approval of Anchor Bolt Repair 1926.752(a)(2) – Before commencement of steel erection - Repairs to anchor bolts in accordance with 1926.755(b) 1926.755(b)(1) ⁴ –	5,527	1	5,527	0.08	442	Project Manager	\$67.46	\$29,817
	2,847	1	2,847	3	8,541	Structura	\$59.91	\$511,691

2 This Table assumes that each employer has one project. Unless indicated otherwise in the footnotes below, the respondent numbers were estimated by multiplying the existing estimates from the previous ICR by 1.208. (See “Establishment and Employment ICR Estimates” in Item 12, above.)

3 The requirement in this section generates a notification to the steel erector before the controlling contractor authorizes commencement of steel erection. The requirement in § 1926.752(b) assures that the steel erector receives the notification before it starts steel erection.

4 As in previous ICRs, OSHA continues to estimate that controlling contractors repaired, replaced, or modified anchor bolts in about 33% of all projects, an assumption consistent with previous ICRs. The time required for controlling contractors to notify erectors in writing of the engineer’s approval is five minutes (.08

Collections of Information	No. of Respondents (Projects Covered) [a]	No of Responses per Respondent/Frequency [b]	Total No. of Responses [c] (a x b=c)	Avg. Burden per Response (in Hrs.) [d]	Total Burden Hours [e] (c x d=e)	Respondent Type	Mean Wage Rate [f]	Total Burden Costs [g] (e x f= g)
Before commencement of steel erection - Anchor bolt changes must have structural engineer approval						1 Engineer		
Site-specific Erection Plan, Development and certification of training 1926.752(e)/App. A, paragraph (b) –Site-specific plan, paragraphs (c) and (d) – Certification of training ⁵	5,083	1	5,083	1	5,083	Project Manager	\$67.46	\$342,899
Site Specific Erection Plan Provision-Equivalent Protection for Safety Latch Deactivation	5,083	2	10,166	0.08	813	Project Manager	\$67.46	\$54,845

hour), with the engineer’s time being negligible for about half of these projects (which, in large part, involved replacing or repairing existing bolts). The Agency also estimates that 17% of all projects involve extensive engineering review and examination of modified bolts, taking up to three hours to complete, also an assumption consistent with previous ICRs.

5 For those employers who opt to use a site-specific steel erection plan, the sample plan found in subpart R, Appendix A, provides them an expedient means for creating a plan electronically or even with “paper and pencil.” OSHA estimates that establishments who have workers engaged in steel erection will use the site-specific plan option (See Appendix A). The Agency assumed that the number of establishments affected by 1926.753(c)(5) is the total number of establishments developing site-specific plans. Also, OSHA estimates that all affected construction establishments will require training and retraining each year for their workers. The Agency recognizes that training is not individualized but presented to groups of workers at cyclic or regular intervals. As a usual form of certification, employers use a sign-in roster to certify that each employee has received training for performing steel erection operations as required by §1926.761. OSHA assumes that a competent person requires a total of one hour to develop a plan for a specific work site and to certify workers receiving periodic training.

Collections of Information	No. of Respondents (Projects Covered) [a]	No of Responses per Respondent/Frequency [b]	Total No. of Responses [c] (a x b=c)	Avg. Burden per Response (in Hrs.) [d]	Total Burden Hours [e] (c x d=e)	Respondent Type	Mean Wage Rate [f]	Total Burden Costs [g] (e x f= g)
1926.753(c)(5) – Describing equivalent protection for deactivating safety latches or hooks or make the latches inoperable in the site-specific erection plan								
Maximum Capacity Certification-Multiple Lift Rigging Assembly 1926.753(e)(2) ⁶ – Certified maximum capacity by a qualified rigger for multiple-lift riggingassemblies	5,083	2	10,166	0.08	813	Qualified Rigger	\$40.39	\$32,837
Anchor Bolt Change Notification 1926.755(b)(1) – Throughout steel erection, controlling contractor must notify the steel erector in writing of anchor bolt changes	3,353	1	3,353	0.08	268	Project Manager	\$67.46	\$18,079

⁶ To calculate frequency, OSHA estimates that each project uses two multiple lift rigging assemblies.

Collections of Information	No. of Respondents (Projects Covered) [a]	No of Responses per Respondent/Frequency [b]	Total No. of Responses [c] (a x b=c)	Avg. Burden per Response (in Hrs.) [d]	Total Burden Hours [e] (c x d=e)	Respondent Type	Mean Wage Rate [f]	Total Burden Costs [g] (e x f= g)
Anchor Bolt Repair Approval 1926.755(b)(2) ⁷ – Throughout steel erection, structural engineer must approve repair of anchor rods (anchor bolts)	2,542	1	2,542	3	7,626	Structural Engineer	\$59.91	\$456,874
Site Specific Erection Plan Provision – Alternative Joist Erection Method 1926.757(a)(4) – Including alternative method for erecting joists in the site-specific plan	678	1	678	0.08	54	Project Manager	\$67.46	\$3,643
Engineering Approval-Steel Joist or Girder Modification 1926.757(a)(7) ⁸ – Engineer must approve	695	1	695	5	3,475	Structural Engineer	\$59.91	\$208,187

⁷ Under § 1926.755(b)(2), throughout steel erection the controlling contractor must notify the steel erector in writing of additional repairs, replacements, and modifications of anchor bolts (rods);
 § 1926.755(b)(1) requires that these repairs, replacements and modifications not be made without approval from the project structural engineer of record.

⁸ Agency staff estimate that on average it takes a project engineer of record five hours for research and analysis to provide approval for modifications to steel joist or joist girders. These structural steel components are easily damaged and weakened if mishandled or modified because of their open web construction. They rely on sophisticated bracing designs to keep them properly oriented to take the loads they are designed to support. The engineer’s approval is based on an understanding of the components ability to maintain design performance once modified.

Collections of Information	No. of Respondents (Projects Covered) [a]	No of Responses per Respondent/Frequency [b]	Total No. of Responses [c] (a x b=c)	Avg. Burden per Response (in Hrs.) [d]	Total Burden Hours [e] (c x d=e)	Respondent Type	Mean Wage Rate [f]	Total Burden Costs [g] (e x f= g)
modifications of steel joists or steel joist girders in a way that affects their strength								
Fall Protection-Anchor Point Approval 1926.757(a)(9) and § 1926.758(g) – Written approval of a qualified person for use of steel joists or steel joist girders, or purlins or girts as anchorage points for a fall-arrest system	1,357	1	1,357	0.5	679	Field Engineer	\$59.91	\$40,679
Site Specific Erection Plan Provision- Load Determination of Decking 1926.757(e) (4)(i) --Before placing a bundle of decking on the joist, include a determination in the site-specific plan that the structure is capable of supporting the load	339	1	339	0.08	27	Project Manager	\$67.46	\$1,821
Fall Protection Procedure Coordination 1926.760(e) and 1926.760 (e)(1) ⁹ – Controlling contractor	15,911	1	15,911	0.02	318	Project Manager	\$67.46	\$21,452

Collections of Information	No. of Respondents (Projects Covered) [a]	No of Responses per Respondent/Frequency [b]	Total No. of Responses [c] (a x b=c)	Avg. Burden per Response (in Hrs.) [d]	Total Burden Hours [e] (c x d=e)	Respondent Type	Mean Wage Rate [f]	Total Burden Costs [g] (e x f= g)
directs steel erector to leave its fall protection at the jobsite								
Total	70,329		92,160		30,819			\$1,883,383

9 In past telephone interviews Agency staff learned from three steel erectors, independently, that 95%, 100%, and 90-95% of controlling contractors direct steel erectors to leave fall protection in place after completion of the erection activity; therefore, the Agency used an estimate of and has discerned no evidence to change its estimate of 95% to determine “No. of Projects Covered.” OSHA assigned a value of 0.02 hours, approximately one minute to “Time to Perform (Hours)” because project managers (i.e., the controlling contractor’s authorized representative) can state this simple direction to steel erectors orally; for “Frequency per Project,” the Agency used a value of one because project managers must provide the information only when steel erectors finish their steel-erection activities. Additionally it is a usual and customary practice that the direction be in writing, but the standard does not require it to be.

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 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.**

There are no additional costs to the respondents other than their time.

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.

The Agency has no annualized cost associated with enforcing the Standard. OSHA would only review records in the context of an investigation of a particular employer to determine compliance with the Standard. These activities are outside the scope of the PRA. See 5 CFR 1320.4(a)(2).

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

The Agency is requesting an adjustment increase of 9,426 burden hours (from 21,393 hours to 30,819). This increase is due in part to an increase in estimated worksites associated with this Subpart from 13,864 to 16,748. The increase also results from the Agency's determination that information collections requirements identified in Subpart R-Steel Erection's non-mandatory Appendix A are covered by the PRA.

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 Subpart.

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 collections of information, (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.

OSHA is not requesting an exception to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This Supporting Statement does not contain any collections of information that employ statistical methods.