

**Supporting Statement
for
Welding and Hot Work Permits; Posting of Warning Signs**

OMB No.: 1625-0016
COLLECTION INSTRUMENTS: CG-4201 & Instruction

A. Justification

1. Circumstances that make the collection of information necessary.

A) To conduct welding, cutting or other hot work on a Liquefied Natural Gas (LNG) and Liquefied Hazardous Gas (LHG) facility, the approval of the Coast Guard Captain of the Port (COTP) is required per 33 CFR 127.617 and 127.1603.¹ Upon determination that welding is safe, the Coast Guard COTP issues a permit allowing such activity. Hot work and welding have the capacity to cause fires and explosions that can lead to significant injuries and deaths, as well as structural damage. It is important that the COTP is informed about where hot work is being done and who is doing it. The permittee is required to supply the COTP with the following information:

- (a) Description of the work;
- (b) Location of the hot work in relation to dangerous cargo and/or vessel; and
- (c) Expected duration of the activity.

B) Warning signs must be posted as required under 33 CFR 126.15(a)(3)¹ on all designated Class I (Explosive) facilities. These signs should meet the requirements of the National Fire Protection Association (NFPA) 307.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Safety
- Protection of the Natural Resources

Prevention Policy & 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) COTPs use this information to ensure compliance with minimum safety standards. The COTP issues permits to facility owners/operators and vessel officers. These permits are issued by most COTPs for up to one year for most terminals, and on a job by job basis for vessels. Terminals and vessels report their hot work or welding operations at least 24 hours before the hot work operations begin. The COTP boarding teams check these reports and design their patrols to check that all safety precautions per the permit are being enforced.

B) Posting of warning signs is expected to contribute to a higher level of marine safety on waterfront facilities.

3. Consideration of the use of improved technology.

¹ The regulations are issued under the authority of Title 33 U.S.C. 1231.

The information may be submitted in writing or electronically via e-mail. The information is submitted to the COTP using form CG-4201. The form is available at this [LINK](#). . In most cases a phone call will suffice for renewal of the permit. Contact info for CG COTPs can be found at <https://www.uscg.mil/Units/Organization/>.

We estimate that 80% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that approximately 50% of these responses are collected electronically.

4. Efforts to identify duplication.

There is no other similar Federal requirement known to exist.

5. Methods to minimize the burden to small business 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.

The COTP would not be able to effectively target these activities for safety oversight.

7. Special collection circumstances.

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

8. Consultation.

A 60-day Notice (See [USCG-2018-1047], December 14, 2018, 83 FR 64349) and 30-day Notice (March 1, 2019, 84 FR 7093) 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. Estimates of annual hour and cost burdens to respondents.

- The annual number of respondents is 182.
- The annual number of responses is 746.
- The estimated annual hour burden is 435.
- The estimated annual labor cost burden is \$33,445.

The burden to respondents is provided in Appendix A. There are two components to this collection. One related to hot work permits, the other related to warning signs.

Hot Work Permits: LNG and LHG facilities must submit a request for welding or hot work permits prior to conducting that activity. On average, each facility submits 5 requests per year. We estimate that the preparation of a hot work permit request takes about 0.5 hours, and about 6 minutes (0.1 hours) for post-approval recordkeeping, for a total of 0.6 hours of shore side technical specialist time per response. The position of shore side technical specialist is analogous to a GS-12.

Warning Signs: Designated waterfront facilities that handle explosives must post warning signs. We estimate that 10% of all facilities will install or replace the warning signs per year and that each facility posts 4 signs. Additionally, we estimate that it takes a shore side worker about 0.25 hours per facility to complete the task. The position of a shore side worker is analogous to a WG-05.

The wage rates used are in accordance with the current edition of COMDTINST 7310.1(series) for "Out-Government" personnel.

13. Estimates of annualized 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 estimated annual Federal Government cost is \$40,185 (see Appendix B). For a hot work permit request, we estimate that it will take 0.6 hours by a Lieutenant Commander (LCDR; O-4) to review and process each response. The rate shown is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15. Explain the reasons for the change in burden.

The change in the burden is an ADJUSTMENT due to a change (i.e., decrease) in the estimated annual number of responses. There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and 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 Coast Guard will display the expiration date for OMB approval of this information collection.

18. Explain to the certification statement.

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

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.