

**Supporting Statement
for
Outer Continental Shelf (OCS) Activities–Title 33 CFR Subchapter N**

OMB No.: 1625-0044
COLLECTION INSTRUMENTS: CG-5432 & Instruction

A. Justification.

1. Circumstances that make the collection of information necessary.

Title 43 U.S. Code (U.S.C.) 1333(d), as part of the 1978 amendments to the Outer Continental Shelf (OCS) Lands Act (the Act), states that the Coast Guard has the authority to promulgate and enforce reasonable regulations promoting the safety of life and property on OCS facilities. The Coast Guard OCS regulations include the following reporting and recordkeeping requirements:

- Annual inspection of fixed OCS facilities. The regulations provide for scheduled on-site inspection, at least once a year, of each facility on the OCS subject to any environmental or safety regulation promulgated pursuant to the Act. Regulations that require self-inspection of fixed OCS facilities follow the statutory on-site inspection requirements of 43 U.S.C. 1348(c). The collection requirement can be found in 33 CFR 140.103(c).
- Records to be kept by the employer. The regulations ensure compliance with the statutory mandate of the Act (43 U.S.C. 1356) to man OCS facilities or OCS vessels with U.S. citizens or permanent resident aliens. The collection requirement can be found in 33 CFR 141.35.
- Facility Certificate (or letter). For certain Floating OCS Facilities (FOF), the Coast Guard will issue a Facility Certificate (or letter) per the requirements in 33 CFR 143.120.
- Station bill. The regulations require Station bills on all manned OCS facilities (with the exception of Mobile Offshore Drilling Units (MODUs)). The Station bills provide an efficient means of disseminating information to all personnel with regard to their duties, duty station, and signals used during emergencies and drills. The collection requirement can be found in 33 CFR 146.130.
- Emergency Evacuation Plan. The regulations require a comprehensive, site-specific contingency plan for the evacuation of all personnel from manned fixed facilities and MODUs operating on the OCS. The collection requirement can be found in 33 CFR 146.140 & 146.210.
- Equivalent Equipment or Procedures. The regulations make provision for the use of alternate equipment or procedures for safety on the OCS so long as they insure a degree of safety comparable to or greater than that provided by the minimum standards in Subchapter N. If these alternate measures are to be used, then a submittal to the Coast Guard is required. The Coast Guard then determines whether the type of equipment or procedure to be used is safe. The collection requirement is outlined in 33 CFR 140.15.

The statutory authority is 43 U.S.C. 1333, 1348, 1350 and 1356, and 46 U.S.C. 3102, 70001, 70105 and 70116.

2. Purposes of the information collection.

i) Annual inspection of fixed OCS facilities: The self-inspection program allows the owner or operator of a fixed OCS facility to conduct annual inspections utilizing a combination check-off list and reporting form developed by the Coast Guard (CG-5432). Submission of the inspection form CG-5432 to the Coast Guard is not necessary. Documentation is necessary to verify that the required inspection was conducted. The form is kept on the facility or at the nearest manned fixed OCS facility in the area for 2 years after the inspection.

The Department of the Interior's Bureau of Safety and Environmental Enforcement (BSEE) has the authority to perform inspections on the fixed OCS facilities and to enforce Coast Guard regulations applicable to those facilities. At least annually, BSEE visits all of the fixed OCS facilities to inspect for violations. Requiring that a copy of the self-inspection form be kept on board each facility is to expedite

BSEE's inspection process and to allow comparison between BSEE's inspection and the last 2 years self-inspection by the owner or operator.

ii) Records to be kept by the employer: Records identifying the status of an employee – whether a U.S. citizen or a permanent resident alien – are required, so that the Marine Safety Program can ascertain the validity of the claim and thus enforce the legal requirement.

iii) Facility Certificate (or letter): The person in charge of certain manned OCS facilities must post this information to ensure that employees are familiar and comply with it.

iv) Station bill: The person in charge of each manned OCS facility must collect and post this information to ensure that employees are familiar with their duties in the event of an emergency, and to reduce the likelihood of personnel injuries during such emergencies.

v) Emergency Evacuation Plan: This information is primarily designed to provide the persons on board an OCS facility with proper emergency evacuation instructions. It does this by identifying those conditions that warrant an evacuation, as well as outlining the procedures and equipment that should not be used during evacuation.

The operator of the facility is required to draw up the plan and submit it to the Coast Guard for approval. The Coast Guard requires submission as a means of ensuring that proper precautions are taken. Thus in order to satisfy Coast Guard review, the Emergency Evacuation Plan (EEP) must comply with the regulations.

vi) Equivalent Equipment or Procedures: This information is to be used by the Coast Guard for comparison with existing standards or procedures to insure that at least an equivalent level of safety is maintained as provided for in the regulations. Not reviewing this information would hinder the Coast Guard's efforts to determine whether certain unspecified equipment or procedures are as safe as those specified in 33 CFR Subchapter N and would limit the alternatives available to industry.

3. Consideration of the use of improved information technology.

Information may be submitted in writing or electronically via e-mail. Information may be submitted to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office. Contact info for CG OCMI's can be found at— <https://www.uscg.mil/Units/Organization/>.

Form CG-5432 does not need to be submitted to the OCMI. A facility may keep the form in any media it desires as long as the information is available upon request by BSEE or Coast Guard. The form is available electronically at this [LINK](#). The EEP can also be transmitted electronically to the Coast Guard and retained in electronic format. Station bills, on the other hand, must be posted and do not lend themselves to the use of electronic transmission. We estimate that 95% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that 90% of the reporting and recordkeeping requirements are done electronically.

4. Efforts to identify duplication.

Examination of the regulations and OCS Orders promulgated by the BSEE and the regulation promulgated by the Coast Guard indicated no areas of duplication. The items subject to the reporting requirements of the self-inspection program are regulated by Coast Guard requirements. BSEE has the authority to inspect the facilities and to view the self-inspection form to ensure compliance with safety regulations. Similarly, there is no duplication of information for station bills, employer records, EEPs, or the use of equivalent equipment or procedures.

5. Methods to minimize the burden to small businesses 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.

If the reporting and recordkeeping requirements were less frequent, the safety of OCS personnel would be compromised.

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 was published in the Federal Register to obtain public comment on this collection (See [USCG-2021-0175]; March 9, 2021, 86 FR 13573) and 30-Day Notice (May 24, 2021, 86 FR 27868) 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 payments or gifts 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
- <http://edocket.access.gpo.gov/2009/E9-14906.htm>

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

There are no questions of sensitive language.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

- The estimated annual number of respondents is 6,683.
- The estimated annual number of responses is 31,439.
- The estimated annual hour burden is 9,582.
- The estimated annual cost burden is \$624,605.

The burden to respondents is provided in Appendix A.

i) Annual inspection of fixed OCS facilities: We estimate that it will take a technical specialist about 1.5 hour to document a manned facility inspection and about 1 hour to document an unmanned facility inspection (because an unmanned facility has fewer equipment and safety requirements). We estimate that a technical specialist's wage rate is equivalent to the Bureau of Labor Statistics (BLS) wage rate for Marine Engineers and Naval Architects (17-2121) [May 2019, mean hourly wage, loaded 50%, and rounded].¹

ii) Records to be kept by the employer: We estimate that it will take a clerical specialist about 3 minutes (0.05 hours) for recordkeeping per worker at the initial stage of employment and 1 minute (0.02 hours) of time per individual record to respond to government spot-checking of the records. We estimate that the number of employees on each manned facility or vessel is—25 per fixed OCS facility, 40 per floating OCS

¹ <https://www.bls.gov/oes/2019/may/oes172121.htm>

facility, 40 per MODU, 30 per MIDU², 5 per OSV, and 49 per industrial vessel. Additionally, we estimate 1/3 of the total workforce is hired each year. We estimate that a clerical specialist's wage rate is equivalent to the BLS wage rate for Information and Records Clerks, All Others (43-4199) [May 2019, mean hourly wage, loaded 50%, and rounded].³

iii) Facility Certificate (or letter): We expect that it will take a safety specialist about 6 minutes (0.1 hours) to post the documents. We estimate that a safety specialist's wage rate is equivalent to the BLS wage rate for Occupational Health and Safety Specialists (19-5011) [May 2019, mean hourly wage, loaded 50%, and rounded].⁴

vi) Station bill: We estimate that it will take a safety specialist about 2 hours to prepare a new or modify an existing Station Bill. Additionally, we estimated 1/3 of the manned OCS facilities perform this activity each year.

iv) EEPs: We estimate that it will take a safety specialist about 8 hours to prepare and submit a new EEP and about 2 hours to revise and submit an existing EEP. Additionally, we estimated 5% of the manned OCS facilities, MODUs and MIDUs submit a new EEP each year, and that 15% of this population submit a revised EEP each year. The position of a safety specialist is analogous to a GS-10. NOTE—The information must be supplied when a new OCS facility is put in place, a MODU/MIDU moves to a new location, or substantial changes are made to either an OCS facility or a MODU/MIDU. In the case of a MODU/MIDU changing location or changes made, an operator need only submit a revision to the facility's existing EEP.

v) Equivalent Equipment or Procedures: We estimate that it will take a shore side technical specialist about 10 hours to document and submit the use of alternate equipment or procedures. We estimate that a shore side technical specialist's wage rate is equivalent to the BLS wage rate for Administrative Services and Facilities Managers (11-1310) [May 2019, mean hourly wage, loaded 50%, and rounded].⁵

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 \$166,992 (see Appendix B). For the review of an annual inspection report, we estimate that it takes about 15 minutes. For each spot check of an employee record, we estimate that it takes about 1 minute (0.02 hours). For the development and issuance of a Facility Certificate (or letter), we estimate it will take about 2 hours. For the review of a new or revised EEP, we estimate it takes about 1 hour or .5 hours respectively. For the review of an equivalent equipment or procedure request, we estimate that it takes about 4 hours. For the above activities, we estimate that the CG work is performed by a Lieutenant (LT, O-3). The wage rate used 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.

There is no change in burden. In anticipation of a change in Coast Guard FOF policy, this collection includes the addition of the Facility Certificate (or letter) (i.e., recordkeeping requirements). The reporting requirements, and the methodology for calculating burden, remain unchanged.

16. Plans for tabulation, statistical analysis, and publication.

² MIDU—Mobile Inshore Drilling Unit.

³ <https://www.bls.gov/oes/2019/may/oes434199.htm>

⁴ <https://www.bls.gov/oes/2019/may/oes195011.htm>

⁵ <https://www.bls.gov/oes/2019/may/oes111310.htm>

1625-0044

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 each 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.