

**Supporting Statement
for
Periodic Gauging and Engineering Analyses for
Certain Tank Vessels Over 30 Years Old**

OMB No.: 1625-0101
COLLECTION INSTRUMENTS: Instruction

A. Justification

1. Circumstances which make the collection of information necessary.

Section 4109 of the Oil Pollution Act (Pub. L. 101-380; OPA 90) required the issuance of regulations related to the structural integrity of all tank vessels “constructed or adapted to carry, or that carry, oil in bulk as cargo or cargo residue.” The regulations – found in 46 CFR 31.10-21a and 32.59-1 – establish minimum standards for plating thickness and require periodic gauging of the plating thickness of tank vessels over 30 years old. Gauging reports (survey data and associated engineering analysis) are submitted to comply. The Coast Guard needs these reports as part of the recertification inspection for the affected tank vessels.

The statutory authority is 46 U.S. Code 3703. This authority is delegated by the Secretary to the Coast Guard via the Department of Homeland Security Delegation No. 0170.1, Revision No. 01.2. (II)(92)(b).

2. Purpose of the information collection.

The gauging report is utilized by the Coast Guard to verify the structural integrity of an older tank vessel before reissuing it a Certificate of Inspection.

3. Considerations of the information technology to reduce burden.

Information—gauging surveys/engineering analysis—may be submitted in writing or electronically via e-mail. Information is submitted to the CG Officer in Charge, Marine Inspection (OCMI) at the local Sector Office, or the CG Marine Safety Center (MSC). Contact info for CG OCMI can be found at—<https://www.uscg.mil/Units/Organization/>. For information on submitting information to the CG MSC, go to — <http://www.dco.uscg.mil/msc/> > Contact the MSC. We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 100% of the responses are collected electronically.

Regarding Usability Testing, this ICR—

- Public-facing instructions were tested by the staff of the CG Office of Standards Evaluation and Development (CG-REG) to ensure the use of plain language. Usability testing participants reported that they had no difficulty understanding the instructions. As a result, the USCG did not make any changes to the collection.
- Is not related to a public benefit program as detailed in OMB M-22-10 (titled “Improving Access to Public Benefits Programs Through the Paperwork Reduction Act” dated April 13, 2022).
- Does not require the use of a form or specify a reporting format/method.
- Is required by international treaty, statute, and/or regulation as noted in section 1 of the Supporting Statement.

4. Efforts to identify duplication.

The collected information is expected mainly from owners/operators of domestic-service tank barges on inland waterways. There are no other agencies (Federal, state or private) that collect this information on these vessels. The collected information is vessel-specific. The Coast Guard accepts American Bureau of Shipping (ABS) classification or an international load line certificate as satisfactory evidence of

structural integrity and regulatory compliance.

5. Methods used to minimize the burdens to small business.

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

6. Consequences to the Federal program if collection were not done or conducted less frequently.

The collected information is not required until a tank vessel is 30 years old and then only once every five years thereafter. This is considered the longest allowable interval in order to detect corrosion-induced weakening of the vessel before its structural integrity is compromised.

7. Special collection circumstances.

The collected information is conducted in a 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-2025-0093]; March 10, 2025, 90 FR 11621) and 30-Day Notice (June 4, 2025, 90 FR 23692) 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), dated: September 3, 2009. The link to the MISLE PIA is provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf

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

There are no questions of sensitive language.

12. Estimates of information collection burden.

- The estimated annual number of respondents is 57.
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- The estimated annual hour burden is 3,306 hours.
- The estimated annual cost burden is \$311,321.

The burden to respondents is provided in Appendix A. Respondents are owners and operators of tank vessels (tank ships and tank barges). Tank vessels older than 30 years will probably have either an ABS certification or load line certification that also requires gauging reports and engineering analyses. The Coast Guard accepts ABS certification and load line certification as evidence of compliance with the requirement here. However, we consider the entire population as eligible for this collection of information as the number of tank vessels is small. As the periodic gauging and engineering analyses is conducted once every 5 years per vessel, the annual number of respondents and responses is 1/5 of the tank vessel population over 30 years of age.

Each gauging survey requires the following:

- The survey itself will require approximately 16 hours, by a subcontractor Industry Technician;
- Reverse-engineering of midship section drawing, analysis of the gauging data, and report write-up will require approximately 40 hours by a licensed Professional Engineer;
- Review and submittal of the report by the owner/operator will require 1 hour by an Industry Manager and 1 hour by a Clerical Specialist; and
- Non-labor costs to industry (equipment charges, travel, etc.) are estimated to be an additional 36% per survey.

For the wage rates, we used the Bureau of Labor Statistics (BLS) wage rates [May 2023, mean hourly wage, loaded 50%, and rounded] as follows—

- Industry Technician – 17-3026 Industrial Engineering Technologists and Technicians¹
- Professional Engineer – 17-2121 Marine Engineers and Naval Architects²
- Industry Manager – 11-1021 General and Operations Managers³
- Clerical Specialist – 43-4199 Information and Records Clerks, All Other⁴

13. Total 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 cost.

The estimated annual Federal Government cost is \$29,697 (see Appendix B). We estimate that the review and processing of a periodic gauging and engineering analysis report by the Coast Guard will require 1 hour by a Commander (CDR; O-5), 4 hours by a Lieutenant (LT; O-3), and 1 hour by a Petty Officer (E-4). The rates shown are in accordance with the current edition of COMDTINST 7310.1(series) for “In-Government” personnel.

15. Reasons for change in the burden.

The change in burden is an ADJUSTMENT due to a change in the estimated annual number of responses. The number of responses has increased by 464 since the last review. 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 to not display expiration date.

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 statement of this information collection.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.

¹ <https://www.bls.gov/oes/2023/may/oes173026.htm>

² <https://www.bls.gov/oes/2023/may/oes172121.htm>

³ <https://www.bls.gov/oes/2023/may/oes111021.htm>

⁴ <https://www.bls.gov/oes/2023/may/oes434199.htm>

