

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

A. Justification.

1) Circumstances that make the collection of information necessary.

Title 43 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 thus initiated and implemented regulations for the following:

- 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 USC 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.
- 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.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

Coast Guard

- Safety
- Protection of the Natural Resources

Marine Safety, Security and Stewardship Directorate (CG-5)

- 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) By whom, how, and for what purpose the information is to be used.

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 no longer 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 Minerals Management Service (MMS) has the authority to perform inspections on the fixed OCS facilities and to enforce Coast Guard regulations applicable to those facilities. At least annually, MMS 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 MMS's inspection process and to allow comparison between MMS'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) 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.

iv) 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.

v) 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.

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 MMS or Coast Guard. The form is available electronically at -- <http://www.uscg.mil/forms>. 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. Records identifying the legal status of individuals are also less easily documented electronically. Thus, we estimate that 20% of the reporting and recordkeeping requirements are done electronically.

4) Efforts to identify duplication. Why similar information cannot be used.

Examination of the regulations and OCS Orders promulgated by the MMS 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. MMS 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 collection of information does not significantly affect small businesses.

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) Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.

Information is collected in manner that is consistent with the guidelines.

8) Consultation.

A 60 day Notice was published in the Federal Register to obtain public comment on this collection. (See [USCG-2008-0202], April 8, 2008, 73 FR 19080). The USCG has not received any comments on this information collection.

9) Explain any decision to provide any payment or gift to respondents.

There are no payment or gift to respondents.

10) Describe any assurance of confidentiality provided to respondents.

All information collected complies with the Freedom of Information Act, The Privacy Act, and OMB Circular A-108.

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

This information collection does not involve any questions of sensitive nature.

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

i) Annual inspection of fixed OCS facilities.

The estimated annual number of respondents is 3,650.

The estimated annual number of responses is 3,650.

The estimated annual hour burden is 4,042.

The estimated annual cost burden is \$315,276.

The burden of information is an annual requirement. The Coast Guard estimates that 3,650 facilities are engaged in Outer Continental Shelf activities (784 manned and 2,866 unmanned facilities).

An average burden of 1 and 1.5 hours is estimated for unmanned and manned facilities respectively. Because unmanned platforms have fewer equipment and safety requirements that apply, the information collection is not as detailed as that for manned platforms. The total estimated hours are calculated as follows:

784 manned facilities * 1.5 hours + 2,866 unmanned facilities * 1 hour =
4,042 burden hours.

The wage of labor is assumed to be the equivalent to a LT.¹ and the corresponding wage for 'out of Government' is \$78 per hour for a LT (O-3). Therefore, the estimated cost of the collection would be as follows:

4,042 burden hours * \$78 per hour = \$315,276. See Table 1 below for a summary.

¹ All wage rates are based on official wage rates for 'out government' (private sector) in Enclosure (2) to COMDTINST 73101.1K.

TABLE 1: Annual Inspection of OCS Facilities Burden & Cost

Type of affected OCS facilities	Population / Respondents	Hour burden / facility	Total burden hours	Total cost
Manned facilities	784	1.5	1,176	\$91,728
Unmanned facilities	2,866	1.0	2,866	\$223,548
TOTAL	3,650		4,042	\$315,276

ii) Records to be kept by the employer.

The estimated annual number of respondents is 1,829.

The estimated annual number of responses is 10,638.

The estimated annual hour burden is 709.

The estimated annual cost burden is \$29,778.

The estimated population of personnel working on OCS facilities is 31,945. The figures are broken down by each OCS facility and vessel in Table 2.

TABLE 2: Population of Workforce for Employer Records

Type of OCS facility / vessel	Population of facilities and vessels / Respondents	Number of employees on each facility or vessel	Total workforce (Population * number of employees)
Floating OCS Facilities (TLP & SPAR)	10	40	400
Fixed Manned OCS Facilities	784	25	19,600
MODUs	134	40	5,360
MIDUs	4	30	120
OSVs	852	5	4,260
Industrial Vessels	45	49	2,205
TOTAL	1,829		31,945

Burden calculation:

The hourly employer burden for collecting and maintaining these records is estimated to be 3 minutes (0.05 hours) per worker at the initial stage of employment. Estimating that one-third of the total workforce is hired each year, or 10,638, the annual collection burden is **532 hours**.

The hourly burden for recordkeeping or responding to government spot-checking of the records is estimated to be **178 hours**. This figure is based on an estimated one minute (0.0167 hours) of response time per individual record (10,638 workers).

Total number of annual burden hours = 532 + 177 = 710.

Cost calculation:

The collection and maintenance cost is based on 3 minutes per record at an average hourly rate of \$42 hour (equivalent to GS-7). Total cost for collecting and maintaining citizen records is estimated to be \$22,344 annually (532 hours x \$42 hour), estimating one-third of the total workforce, or 10,638, is replaced.

The annual cost to industry for assistance to the government during spot-checking is \$7,434 (178 hours x \$42 hour), estimating one-third of the workforce, or 10,638, is replaced.

Total annual cost burden to industry for collecting and maintaining citizen records and being available for government spot-checking is therefore \$29,778 (= \$22,344 + \$7,434). Please see Table 3 below for a summary of burden hours and cost.

TABLE 3: Employer Records Burden Hours & Cost

Population of employees on facilities & vessels needing records activity	Burden hours / worker	Total burden hours	Total cost (wage rate of \$29/hour)
10,638	0.05 for recordkeeping	532	\$22,344
10,638	0.0167 for spot-checking	178	\$7,476
TOTAL		709	\$29,820

iii) Station bill

The burden of information submission is not an annual requirement. Information must be supplied when information on the Station Bill changes. Total population of manned facilities is, as mentioned previously, 784.

The estimated annual number of respondents is 261.

The estimated annual number of responses is 261.

The estimated annual hour burden is 522.

The estimated annual cost burden is \$27,144.

The following assumptions and cost factors were used to derive the total burden hour and cost:

- An estimated 1/3 of the 784 facilities, or 261, will prepare new, or modify, existing station bills annually. A facility is assumed to prepare or modify a station bill once during this 3-year collection period.
- Hours per year are based on 2 hours of response time per facility. Total annual response time is 2 hours x 261 facilities = 522 hours.
- Wage costs to prepare station bills are estimated to be \$52/hour, equivalent to GS-10. Therefore total cost is = 522 hours x \$52 hour = \$27,144.

Please see Table 4 below for a summary of burden hours and cost associated with the collection for Station bills.

TABLE 4: Station Bills Burden Hours & Cost

Population of facilities ²	Burden hours / facility	Total burden hours	Total cost (wage rate of \$52/hour)
261	2.0	522	\$27,144
TOTAL		522	\$27,144

iv) EEPs.

The burden of information submission is not an annual burden. 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. As a result not all members of the regulated population will have to submit EEPs each year, and when they are submitted the EEPs will sometimes be mere revisions.

The estimated annual number of respondents is 922.

The estimated annual number of responses is 195 [55 + 140].

The estimated annual hour burden is 860.

The estimated annual cost burden is \$26,660.

The annual reporting burden and cost to industry is estimated to be 860 hours and \$26,660. This was derived using the following cost factors:

OCS Facilities/MODUs/MIDUs

- OCS facilities = 784; MODUs = 134; MIDUs = 4
- An estimated 52 new manned OCS facilities, including MODUs are added each year
- 5% of existing OCS facilities will have to resubmit EEPs each year (39 renewals)
- An estimated 50 MODUs change locations twice annually (100 revisions)
- An estimated 3 new plans and 1 revision will be submitted annually by MIDUs
- We estimate 8 hours of admin support per new plan submission, and 3 hours of support per renewal at an hourly rate of \$31. (Hourly rate compares with GS-4 pay scale.)
- Total # of annual new submissions (52 new manned facilities; 3 new MIDU plans)= 55; total # of renewals/revisions (39 renewals from existing OCS facilities, 50 MODUs change locations twice annually for 100 revisions, and 1 revision from a MIDU)= 140

Please see Table 5 below for a summary of the above.

² The total number of manned fixed OCS facilities is 784, but only 1/3, or 261, are expected to prepare new, or modify, station bills.

TABLE 5: EEP Submissions & Revisions

Type of OCS facility	Population	New Submissions	Renewals / Revisions
Manned Fixed Facilities	784	52 new facilities are added annually, including MODUs	39
MODUs	134	(See above)	100
MIDUs	4	3	1
TOTAL	922	55	140

- Hours to prepare new submissions annually = 440 hours [55 submissions x 8 hours preparation]
- Hours to prepare renewals/revisions annually = 420 hours [140 submissions x 3 hours preparation]
- Total hour burden = 860
- Annual cost = \$26,660 = [(440 + 420)*\$31]

Please see Table 6 below for a summary of annual burden hours and cost associated with EEPs.

TABLE 6: EEP Burden Hours & Cost

Population	Burden hours / facility	Total burden hours	Total cost (wage rate of \$17/hour)
New submissions = 55	8.0	440	\$13,640
Renewals = 140	3.0	420	\$13,020
TOTAL		860	\$26,660

v) Equivalent Equipment or Procedures

There are approximately 10 submissions a year made to the Coast Guard, requesting the use of alternate equipment or procedures. The Coast Guard estimates that each

submission takes approximately 10 hours to put together, and that it is compiled by someone of rank equivalent to a GS-12, and so the equivalent wage rate is \$71/hour³.

The number of respondents is 10.

The number of responses is 10.

The annual hour burden is 100 hours (= 10 submissions * 10 hours)

The annual cost is \$7,100 (= 100 hours * \$71)

TABLE 7: Equivalent Equipment or Procedures

Number of submissions/ Responses	Burden hours / submission	Total burden hours	Total cost (wage rate of \$48/hour)
10	10	100	\$7,100
TOTAL		100	\$7,100

Table 8 below shows the total number of annual burden hours and cost for all collections of information discussed above, for 'Subchapter N–OCS Activities'.

The total number of annual burden hours is 5,867, the annual cost is about \$247,000, the number of responses is 10,630, & the number of respondents is 6,064.

³ See Enclosure (2) to COMDTINST 73101.1K.

TABLE 8: Cumulative Total for Sub N Burden Hours & Cost

COI Requirement	Number of Respondents	Number of Responses	Annual Burden Hours	Annual Cost
Annual Inspection of Fixed OCS Facilities	3,650	3,650	4,042	\$315,276
Employer Records	1,829	10,638	710	\$29,820
Station bills	261	261	522	\$27,144
EEPs	922	195	860	\$26,660
Equivalent Equipment or Procedures	10	10	100	\$7,100
TOTAL	6,672	14,745	6,234	\$406,000

13) Estimates of annualized capital and start-up costs.

There are no annualized capital and start-up costs.

14) Estimates of annualized Federal Government costs.

The total cost to Government is \$77,810, as explained below. Also, please see Table 9 for a summary.

i) Annual inspection of fixed OCS facilities. Government costs arise from the examination of the self-inspection form CG-5432 by MMS or Coast Guard. This is assumed to be 15 minutes per facility. The total estimated hours are calculated as follows:

- 3,650 facilities * 0.25 hours (15 minutes) = 912.5 burden hours (round up to 913 hours).

The wage of labor for MMS is assumed to be the equivalent to a LT. The corresponding wage for 'in government' is \$62 per hour for a LT (O-3). Therefore the cost of the collection would be as follows:

- 913 burden hours * \$62 per hour = \$56,606.

ii) Employer records. The estimated cost to the Federal Government is \$11,036. This is based on approximately 178 hours of spot-checking at approximately \$62 per hour, as explained above.

iii) Station bills. There is no estimated cost to the Federal Government.

iv) EEP. It is estimated that it takes a LT. with a wage rate \$62/hour, as explained above, about one hour to review a new plan and about half an hour to review a revision. The total cost is therefore \$7,750 (\$62*125).

v) Equivalent equipment or procedures. It is estimated that it takes someone at the Coast Guard 4 hours to review each submission. This person is usually of rank LT. Which corresponds to a wage rate of \$62/hour (O-3). The cost to the government for reviewing 10 submissions a year is therefore \$2,480 (= 10 * 4 * \$62).

TABLE 9: Federal Government Costs Associated with Subchapter N Collections of Information

<u>Item</u>	Number of units (e.g. OCS facilities, EEPs)	Time per unit	CG Hourly Rate⁴ (A)	Hours per year (B)	Total Cost to Govt. (A*B)
Annual Inspection of OCS Facilities	3,650	0.25 hours	\$62	913	\$56,606
Employer records			\$62	178	\$11,036
Station bills			0	0	\$0
Emergency Evacuation Plans – Manned OCS Facilities, MODUs & MIDUs (estimated 0.5 hours per revision, 1 hour per new)	140 revisions	0.5/hr & 1.0/hr	\$62	70	\$7,750
	55 new			55	
Equivalent equipment or procedures	10	4 hours	\$62	40	\$2,480
Total Annualized Government Hours and Cost				1,256	\$77,872

15) Explain the reasons for the change in burden.

⁴ Labor costs are the 'in government rates' from USCG Standard Rates (COMDTINST 7310.1K)

The change in burden is an ADJUSTMENT due to a change in the population of vessels and facilities on the OCS.

- 16) For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

There are no plans to use statistical analysis or to publish this information.

- 17) Explain the reasons for seeking not to display the expiration date for OMB approval of the information of collection.

We are not seeking such approval. The OMB Number will appear on appropriate PRA disclosure information.

- 18) Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

This information collection does not employ statistical methods.