

**FIRE PROTECTION IN SHIPYARD EMPLOYMENT  
STANDARD (29 CFR PART 1915, Subpart P)  
OMB Control Number: 1218-0248  
Expiration Date: June 30, 2024**

**SUPPORTING STATEMENT FOR THE  
INFORMATION COLLECTION REQUIREMENTS OF THE  
FIRE PROTECTION IN SHIPYARD EMPLOYMENT STANDARD  
(29 CFR PART 1915, Subpart P)<sup>1</sup>  
OFFICE OF MANAGEMENT AND BUDGET (OMB)  
CONTROL NO. 1218-0248 (May 2024)**

The agency is seeking an extension of a currently approved data collection.

**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 the statute and regulation mandating or authorizing the collection of information.**

The main objective of the Occupational Safety and Health Act of 1970 (the 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 Act authorizes “the development and promulgation of occupational safety and health standards” (29 U.S.C. 651).

Section 6(b)(7) of the Act specifies that [a]ny standard promulgated under this subsection shall prescribe the use of labels or other appropriate forms of warning as are necessary to ensure that employees are apprised of all hazards to which they are exposed, relevant symptoms and appropriate emergency treatment, and proper conditions and precautions of safe use or exposure. This provision goes on to state that “[t]he Secretary, in consultation with the Secretary of Health and Human Services, may by rule promulgated according to section 553 of title 5, United States Code, make appropriate modifications in the foregoing requirements relating to the use of labels or other forms of warning . . . as may be warranted by experience, information, or medical or technological developments acquired after the promulgation of the relevant standard” (29 U.S.C. 655).

About recordkeeping, the Act specifies 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 this Act . . .” (29 U.S.C. 657). 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. 657).

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<sup>1</sup> This Supporting Statement analyzes and describes the burden hours and cost associated with provision of this Standard that contain paperwork requirements; this Supporting Statement does not provide information or guidance on how to comply with, or how to enforce, the Standard.

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Therefore, under the authority granted by the Act, the Occupational Safety and Health Administration (“OSHA” or “the agency”) published at 29 CFR part 1915, a standard on Fire Protection in Shipyard Employment (69 FR 55667). This Standard addresses methods of protecting employees in shipyards from fire 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.**

The Standard specifies the number of collections of information (paperwork) requirements. Each provision is described in detail below. In general, the Standard requires employers to develop a written fire safety plan and written statements or policies that contain information about fire watches and fire response duties and responsibilities. The Standard also requires the employer to obtain medical exams for certain employees and to develop training programs for a employee who are exposed to fire hazards. The Standard also requires employers to create and maintain records to certify that employees have been made aware of the details of the fire safety plan and the employees trained as required by the Standard.

• **1915.501 – General Provisions.**

Paragraph (d)(1)(i) of this section requires the host employer on multi-employer worksites to inform all employers (contract employers) at the worksite about the content of the host employer’s fire safety plan.

Paragraph (d)(2)(i) of this section requires that contract employers make sure the host employer is aware of fire-related hazards associate with the contract work and how the contract employer will address those hazards. Also, paragraph (d)(2)(ii) requires the contract employer to identify hazards that arise during work that was not identified as part of the information transfer required by paragraph (d)(2)(i) described above.

• **1915.502 – Fire Safety Plan.**

Paragraph (a) of this section requires the employer to develop a written fire safety plan covering the elements listed in paragraph (b), including the following information:

1. The identification of the significant potential fire hazard;
2. Procedures for recognizing and reporting unsafe conditions;
3. Alarm procedures;
4. Procedures for notifying employees of a fire emergency;
5. Procedures for notifying fire response organizations of a fire emergency;
6. Procedures for evacuation;
7. Procedures to account for all employees after an evacuation; and

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8. Names, job titles, or departments for individuals who can be contacted for further information about the plan.

Paragraph (c) requires the employer to review the fire safety plan with each affected employee at the following times:

1. Within 90 days of the effective date of the standard;
2. Upon initial assignment for new employees; and
3. When there is a change in the plan or a change of the employee's duties.

Paragraph (d) requires that the employer:

1. Keep the fire safety plan accessible to employees, employee representatives, and OSHA;
2. Review and update the plan at least annually, and when necessary;
3. Document that each affected employee was informed about the plan; and
4. Ensure that a copy of the current fire safety plan is given to outside fire response organizations that may respond to fires at the employer's worksite.

Paragraph (e) stipulates that contract employers must have a fire safety plan for contract employees that complies with the host employer's fire safety plan.

- **1915.504 – Fire Watches.**

Paragraph (a) requires employers to create and keep current a written policy specifying the following information:

1. The training that employees must be given;
2. The duties that employees are to perform;
3. The equipment that employees must be given; and
4. The personal protective equipment (PPE) that employers must supply employees with as required in 29 CFR 1915, subpart I, Personal Protective Equipment.

- **1915.505 – Fire Response.**

Paragraph (a)(2)(i) requires employers to create, maintain, and update a written policy that describes the internal and outside fire response organizations that the employer will use.

Paragraph (a)(2)(ii) requires employers to create, maintain, and update a written policy that defines the evacuation procedures employees must follow if the employer chooses to require a total or partial evacuation of the worksite at the time of a fire.

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Paragraph (b)(1) lists the information that must be included in the statement or policy if an internal fire response is to be used. The information includes the following:

1. The basic structure of the fire response organization;
2. The number of trained fire response employees;
3. The fire response functions that may need to be carried out;
4. The minimum number of fire response employees necessary, the number and types of apparatus, and a description of the fire suppression operations established by written standard operating procedures for each type of fire response at the employer's facility;
5. The type, amount, and frequency of training that must be given to fire response employees; and
6. The procedures for use of protective clothing and equipment.

Paragraph (b)(2) lists the information that must be included in the policy if outside fire response is to be used. The information includes the following:

1. The types of fire suppression incidents to which the fire response organization is expected to respond at the employer's facility or worksite;
2. The liaisons between the employer and the outside fire response organization; and
3. A plan for fire response functions that:
  - a. Address procedures for obtaining assistance from the outside fire response organization;
  - b. Familiarizes the outside fire response organization with the layout of the employer's facility or worksite, including access routes to controlled areas, and site-specific operations, occupancies, vessels or vessel sections, and hazards; and
  - c. Sets forth how hose and coupling connection threads are to be made compatible and includes where the adapter couplings are kept; or
  - d. States that the employer will not allow the use of incompatible hose connections.

Paragraph (d)(2) requires the employer to set up written administrative regulations, operating procedures, and departmental orders for fire response functions.

Paragraph (b)(3) lists the information to be included in the policy where a combination of internal and outside fire response is to be used. The information includes all the information from paragraphs (b)(1) and (b)(2) as listed above and the following information:

1. The basic organizational structure of the combined fire response;
2. The number of combined trained fire responders;
3. The fire response functions that need to be carried out;
4. The minimum number of fire response employees necessary, the number and types of apparatus, and a description of the fire suppression operations established by written

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standard operating procedures for each particular types of fire response at the worksite;  
and

5. The type, amount, and frequency of joint training must be given to fire response employees.

Paragraph (b)(4) prescribes the employee evacuation information that must be included in the employer's written policy required by (a)(2)(ii). That information includes the following:

1. Emergency escape procedures;
2. Procedures to be followed by employees who may remain longer at the worksite to perform critical shipyard employment operations during the evacuation;
3. The procedures to account for all employees after emergency evacuation is completed;
4. The preferred means of reporting fires and other emergencies; and
5. Names or job titles of the employees or departments to be contacted for further information or explanation of duties.

Paragraph (b)(5) prescribes the rescue and emergency response information that must also be included in the employer's written policy. That information includes the following:

1. A description of the emergency rescue procedures; and
2. Names or job titles of the employees who are assigned to perform them.

Paragraph (c)(2) requires that fire response employee who are required to wear respirators meet the medical requirements of the Respiratory Protection Program Standard in 1915.154. The paperwork burden for the respiratory protection requirements has been approved under OMB Control Number 1218-0099.

Paragraph (c)(3) requires annual medical exams for all fire response employees. There is no burden or cost for these medical exams because all employees affected, as a usual and customary practice, are now receiving the medical exams.

Paragraph (c)(4) requires that the medical records of fire response employees be kept as required in 1915.1020. The paperwork burden for access to medical records is approved under OMB Control Number 1218-0065.

Paragraph (d)(3) requires the employer to set up an incident management system (IMS) to coordinate and direct fire response functions, including the following:

1. Specific fire emergency responsibilities;
2. Accountability for all fire response employees participating in an emergency operation;  
and
3. Resources offered by outside organizations.

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Paragraph (d)(4) requires the employer to provide the information to the outside fire response organization to be used.

- **1915.507 – landside Fire Protection Systems.**

Paragraph (c)(2) requires employers to notify employees and take the necessary precautions to make sure employees are safe from fire if for any reason a fire extinguishing system stops working until the system is working again.

Paragraph (c)(5) requires the employer to post hazard warning or caution signs at both the entrances to and the inside of areas protected by fixed extinguishing systems that use extinguishing agents in concentrations known to be hazardous to employee safety or health.

- **1915.508 – Training.**

Paragraph (d)(1) requires the employer to have a written training policy stating that fire response employees are to be trained and capable of carrying out their duties and responsibilities at all times.

Paragraph (d)(2) requires the employer to keep written standard operating procedures that address anticipated emergency operations and to update these procedures as necessary. Note that operating procedures are also required in 1915.505(b)(1)(iv).

Paragraph (f) requires that employers keep records that demonstrate that employees have been trained as required by paragraphs (a) through (e). In accordance with paragraph (f)(1), the records must include the following information:

1. Employee's name;
2. The trainer's name;
3. The types of training; and
4. The date(s) on which the training took place.

Paragraph (f)(2) requires the employer to keep each training record for one year from the time it was made or until it is replaced, whichever is shorter, and to make it available for inspection and copying by OSHA personnel on request.

OSHA will use the records developed in response to this Standard to determine compliance with the safety and health provisions of the Standard. The employer's failure to generate and disclose the information required in this Standard will affect significantly OSHA's effort to control and reduce injuries and fatalities related to fires in shipyard employment.

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**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 automated, electronic, mechanical, or other technological information collection techniques, or other forms of information technology (e.g., electronic submission of responses) when establishing and maintaining the required records. The Agency wrote the paperwork requirements of the Standard in the performance-oriented language (i.e., in terms of what date to collect, not how to record the data). Advanced data processing programs permit easier accessibility to collect information during OSHA inspections. They also permit the storage of collected information at locations other than the place of inspection if the employer can deliver the data quickly to the place of inspection (i.e., e-mail, telefax, or other electronic data transfer method).

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in A.2 above.**

The requirements in the Standard for information, plans, and programs closely match those that shipyards already have developed. In some cases, smaller shipyards may not have established these policies in a written document. Since the existing information and programs are, in most cases, sufficient to satisfy the requirements of the standard, employers will not have to duplicate the same information just to satisfy the standard if they already have a program.

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

The information collection requirements specified by the Standard do not have a significant impact on a substantial number of small entities. The final standard uses performance language whenever possible to provide compliance flexibility to employers and reduce the impact on small businesses. Performance language may require the use of a level of safety and health technical competence not always available to small business employers. To reduce this burden upon small businesses or other small entities, OSHA developed a non-mandatory appendix to this standard to provide useful compliance information and guidance to small businesses and other small entities. Further, many states, through Federal grants, provide consultation programs to assist small businesses in their compliance efforts.

**6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

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The agency believes that the information collection frequencies required by the Standard are the minimum frequencies necessary to effectively regulate fire hazards in shipyard employment, and thereby, 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 Act at 29 U.S.C. 651.

**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 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 prove 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 using the procedures specified by this item. The requirements are within 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.**

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**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 in the Federal Register on March 6, 2024 (89 FR 16033) soliciting public comment on its proposed extension of the information collection requirements specified by the Standard on Fire Protection in Shipyard Employment (29 CFR part 1915, subpart P) under Docket Number OSHA-2011-0010. This notice was part of a preclearance consultation program intended to provide those interested parties the opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the information collection requirements found in the above Standard. The agency did not receive any public comments in response to this notice.

**9. Explain any decision to provide any payments or gifts to respondents, other than reenumeration 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 Standard 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 reasons 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 provisions in the Standard do not involve the collection of sensitive information.

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

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- **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 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. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

**Respondent Burden-Hour and Cost Determinations**

The burden hours and estimated costs determinations used in this ICR are based primarily on the Final Economic Analysis (FEA) of the Standard prepared by OSHA's Office of Regulatory Analysis. Table 12 summarizes the burden hours and costs associated with each provision in the Standard that contains a paperwork requirement.

For the sole purpose of calculating burden hours and costs under the Paperwork Reduction Act, this supporting statement has rounded certain numbers up to obtain the totals stated in the supporting statement equations. Such presentation makes it easier for the public to read and evaluate the estimates for the burden hour and cost in supporting statement.

**Wage Rates:**

OSHA determined the loaded wage rates using the mean hourly wage rate from *Occupational Employment and Wage Statistics, May 2022 National Occupational Employment and Wage Estimates*, Bureau of Labor Statistics, U.S. Department of Labor, and the fringe benefits<sup>2</sup> from the Friday, December 15, 2023 News Release, *Employer Costs for Employee Compensation – September 2023*. The total employee compensation rate for private industry includes an adjustment of 29.4 percent in fringe benefits and accounting for 70.6 percent in employer cost.

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<sup>2</sup>Employer Costs for Employee Compensation – September 2023, [Employer Costs for Employee Compensation - September 2023 \(bls.gov\)](https://www.bls.gov/news.release/empcosts23.pdf)

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<b>Table 1 – Wage Rate Estimates</b>				
<b>Occupation</b>	<b>SOC<sup>3</sup> Code</b>	<b>Mean Hourly Wage (A)</b>	<b>Fringe Benefits (B)</b>	<b>Loaded Hourly Wage Rate (C) = [(A)/(1-B)]</b>
Manager – First-line Supervisor of a Firefighting and Prevention Worker	33-1021	\$40.78	0.294	\$57.76
Shipyards Worker	47-2000	\$27.17	0.294	\$38.48
Supervisor - First-line Supervisor for construction trade and Extraction Worker	47-1011	\$37.33	0.294	\$52.88
Fire Trainer	33-2021	\$36.98	0.294	\$52.38

The number of affected establishments and employees for this ICR are listed in Table 2 *Affected Establishments and Employees*). OSHA updated the industrial profiles by using the 2021 County Business Patterns Data from the US Census Bureau. OSHA estimates that there are 489 affected establishments in the shipyard industry employing 100,139 affected (“production”) workers.

**Table 2 – Affected Establishments and Employees by Size in Shipyards**

<b>Industry Code</b>	<b>Industry Name</b>	<b>Establishment Size</b>	<b>Number of Affected Establishments</b>	<b>Number of Affected Employees</b>
336611	Ship Building and Repairing	1-19	239	1,646
336611	Ship Building and Repairing	20-99	154	7,157
336611	Ship Building and Repairing	100-499	78	15,191
336611	Ship Building and Repairing	500+	18	76,145
<b>Total</b>			<b>489</b>	<b>100,139</b>

Source: US County Business Patterns, 2021

**Estimating the number of shipyard establishments, shipyard employers, and shipyard workers**

<sup>3</sup>

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Based on revised estimates from the Agency's Office of Regulatory Analysis, OSHA estimates there are 96<sup>4</sup> host employers and 489 total establishments (2021 County Business Patterns (NAICS 336611))<sup>5</sup>. However, for purposes of this ICR, OSHA estimates that the number of affected establishments/employers is 222 employers. The establishments of non-compliance estimates are based on the following: (393 small establishments x 50% non-compliance = 197) + (78 mid-size establishments x 25% non-compliance = 20) + (18 large establishments x 25% non-compliance = 5) = 222<sup>6</sup>. The number of affected workers is 100,139 including 8,211 fire response workers<sup>7</sup>. The 8,211 fire response workers are an estimate of the number of workers that may be assigned fire response duties.<sup>8</sup>

There are several collections of information requirements in the rule as indicated below:

**1. General Provisions**

**§ 1915.501 – Inform Contractors About the Fire Safety Plan**

Paragraph (d)(1)(i) requires that the host employer on multi-employer worksites inform all employers at the worksite about the content of the host employer's fire safety plan. OSHA envisions that to comply with its provision, the host employer will provide a copy of the written fire safety plan to other employers at the worksite (identified as contract employers) and discuss its contents. OSHA believes some exchange of information about hazards on the job would be normal and customary; however, it is not normal and customary to provide written documents. OSHA estimates that it will take about 10 minutes (10/60 hour) for the host employers to make a copy of the written plan and give it to the contract employer and approximately 20 minutes (20/60 hour) will be spent exchanging information, for a total of 30 minutes (30/60 hour) for this activity. OSHA estimates that each host employer will have an average of four contractors on their site.<sup>9</sup> OSHA estimated the number of contract employers based on the size of the establishment. Thus, establishments with 1-19 workers were assumed to be contractors. A supervisor would perform the duties of this requirement.

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<sup>4</sup> The 393 host employer estimate is based on preliminary analysis. OSHA assumes that employers with 100 or more employees use contractors and are, therefore, host employers. Of the 489 total establishments, 96 establishments employ 100 or more employees.

<sup>5</sup> The website is [2021 SUSB Annual Data Tables by Establishment Industry \(census.gov\)](https://www.census.gov/data/tables/2021/susb/tables-by-industry.html).

<sup>6</sup> OSHA uses the following criteria to classify establishment size: small establishments – 1-99 employees; medium establishments – 100-499 employees; and large establishments – 500+ employees.

<sup>7</sup> Total number of affected employees x 8.2% (100,139 affected employees x 8.2% = 8,211 fire response workers.)

<sup>8</sup> In preparing this ICR, OSHA has based its burden hour calculation using the number of employers not currently in compliance with the standard (222). Based on the information provided during the negotiated rulemaking process, it became apparent that many employers covered by the rule are already, as a usual and customary business practice, complying with the provisions of the standard.

<sup>9</sup> The host employer is the owner of the shipyard.

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**Burden hours:** 96 host employers x 4 contractors x 30/60 hour = 192 hours

**Cost:** 192 burden hours x \$52.88 = \$10,153

Paragraph (d)(2)(i) requires that the contract employer make sure the host employer knows about fire hazards associated with the contract work and how the contract employer will address those hazards. Also, paragraph (d)(2)(ii) requires the contract employer to identify hazards that arise during work that is not identified as part of (d)(2)(i). OSHA considers this exchange of information about job hazards to be a normal and customary practice for employers in every industry and, thus, is not assigning a “paperwork” burden to the collection of information requirements in these paragraphs.

**2. Developing the Fire Safety Plan**

**§ 1915.502 (a)**

Paragraph (a) requires employers (222) to develop a written fire safety plan. The specific elements of the plan are listed in paragraph (b) of section 1915.502. OSHA estimates that it will take employers 4-12 hours to develop the plan, depending on the size of the firm. Establishments with 1-99 workers (197) will incur a burden of 4 hours the first year and 2 hours the second and subsequent years. Establishments with 100-499 workers (20) will incur a burden of 6 hours the first year and 3 hours the second and subsequent years. Establishments with 500 or more workers (5) will incur a burden of 12 hours the first year and 6 hours the second and subsequent years. Keeping the same turnover rate, OSHA estimates there is a 10 percent turnover of establishments.<sup>10</sup>

*a. Developing the Plan:*

**Table 3 – Burden Hours and Cost to Develop Plan**

<b>Establishment Size</b>	<b>Affected Employers</b>	<b>Turnover Rate</b>	<b>New Employers</b>	<b>Time per Response</b>	<b>Burden Hours</b>	<b>Loaded Wage</b>	<b>Cost</b>
1-99	197	10%	20	4	80	\$57.76	\$4,621
100-499	20	10%	2	6	12	\$57.76	\$693
500+	5	10%	1	12	12	\$57.76	\$693
<b>Total</b>			<b>23</b>		<b>104</b>		<b>\$6,007</b>

*b. Updating the Plan:*

**Table 4 – Burden Hours and Cost to Update Plan**

<sup>10</sup> Insurers currently require shipyards to have fire prevention measures which serve as a starting point in preparing the fire safety plan. A safety and health manager would develop the plan.

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Establishment Size	Affected Employers	Turnover Rate	Existing Employers	Time per Response	Burden Hours	Loaded Wage	Cost
1-99	197	90%	177	2	354	\$57.76	\$20,447
100-499	20	90%	18	3	54	\$57.76	\$3,119
500+	5	90%	5	6	30	\$57.76	\$1,733
<b>Total</b>			<b>200</b>		<b>438</b>		<b>\$25,299</b>

**3. Review Fire Safety Plans with Workers**

**§ 1915.502(c)**

Paragraph (c) requires employers (222) to review the fire safety plan with each affected worker within 90 days of the effective date of the standard; upon the initial assignment for new workers; when there is a change in the plan; and when the worker’s duties change. OSHA estimates that it will take 15 minutes (15/60 hour) to review the plan. OSHA assumes that all 222 employers will meet with workers in a group setting for the initial review and for subsequent reviews where the plan has changed, at least annually. OSHA assumes other reviews (due to worker turnover or new hires and when a worker’s duties have changed) will be conducted with the individual, the affected worker. OSHA estimates the turnover rate for workers in the shipyard industry at 24 percent. Using this percentage, OSHA estimates that a review of the plan will be held with 24,033 (100,139 affected workers x 24% turnover rate) new/turnover workers each year. Also, OSHA assumes that each year 2 employers (1 percent of all 222 employers) will make a change to the fire safety plan and 1,001 workers (1 percent of all workers (100,139 x 1%)) will have a change in duty triggering another review of the plan. A safety and health manager would conduct a review with each worker. Therefore, the burden is estimated as follows:

**Table 5 – Burden Hours and Cost to Review Plan**

	Number Affected	Review Rate	Total Responses	Time per Response	Burden Hours	Loaded Wage	Cost
Managers	222	100%	222	15/60	56	\$57.76	\$3,235
Workers	100,139	24%	24,033	15/60	6,008	\$57.76	\$347,022
Managers	222	1%	2	15/60	1	\$57.76	\$58
Workers	100,139	1%	1,001	15/60	250	\$57.76	\$14,440
<b>Total</b>					<b>6,315</b>		<b>\$364,755</b>

**4. Posting the Fire Safety Plan**

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**§ 1915.502(d)(1)**

The burden hour estimate listed for the review of the fire safety plan also includes the time to provide the general training information (1915.508(a)). The general training essentially requires the employer to ensure that workers are trained in the fire safety plan. Therefore, as noted in the Final Economic Analysis (FEA) from the final rule (76 FR 24576), OSHA assumes 15 minutes (15/60 hour) will cover activities as well as the generation and maintenance of certification records for the two activities.

Paragraph (d)(1) requires employers (222) to keep the fire safety plan accessible to workers, worker representatives, and OSHA. OSHA estimates it will take 5 minutes (5/60 hour) to post the plan or to place it in an area where it is accessible. The plan is updated yearly; therefore, it will be a yearly burden to post the plan/make it accessible.

**Burden hours:** 222 employers x 5/60 hour = 18 hours

**Cost:** 18 burden hours x \$52.88 = \$952

**5. Certification Record Review of the FSP**

**§ 1915.502(d)(3)**

Paragraph (d)(3) requires the employer to certify in writing that each worker was informed about the plan at the intervals dictated by paragraph (c). OSHA estimates it will take 3 minutes (3/60 hour) to generate and maintain each of the required certifications. The burden of preparing the certification record for the initial review is included in the burden hour estimate listed above for 1915.502(c). In the second and subsequent years, the burden will be as follows. Each year the employer will have to review and update the plan, triggering a review of the plan with all workers at the same time. A certification of this review will take 3 minutes (3/60 hour). The standard also requires a certification of the review for new/turnover workers and for workers whose duties change as a result of changes to the plan made at times other than the annual updating of the plan. OSHA estimates the burden for these certifications at 3 minutes (3/60 hour) *per worker*, (this review will be conducted with the individual workers). Total new and turnover workers are estimated at 24,033 and workers with a change of duty are estimated at 1,001 for a total of 25,034 workers receiving an individual review per year after the first year. Finally, OSHA estimates that 1% of the employers (10) will make a change to the plan, triggering an all worker review requiring another certification record.

**Table 6 – Burden Hours and Cost to Certify Review of the Plan**

	<b>Review Plan</b>	<b>Time per Response</b>	<b>Burden Hours</b>	<b>Loaded Wage</b>	<b>Cost</b>
Managers	222	3/60	11	\$52.88	\$582

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Workers	25,034	3/60	1,252	\$52.88	\$66,206
Managers	10	3/60	1	\$52.88	\$53
<b>Total</b>	<b>25,266</b>		<b>1,264</b>		<b>\$66,841</b>

The burden for (d)(2), the annual review and updating of the plan, is shown as the second and subsequent year burden under 1915.502(a) above.

**6. Give Fire Safety Plan to Outside Fire Response Organization**

**§ 1915.502(d)(4)**

Paragraph (d)(4) requires employers to give the fire safety plan to the outside fire response organizations that may be expected to respond to fires at the employer’s worksite. OSHA estimates it will take 10 minutes (10/60 hour) for each employer to provide the document to the outside fire response organizations. This will be an on-going activity.

**Burden hours:** 222 employers x 10/60 hour = 37 hours

**Cost:** 37 burden hours x \$52.88 = \$1,957

A supervisor would perform the activity required by paragraph (d).

**7. Fire Watch Policy**

**§ 1915.504**

Paragraph (a) requires the employer to prepare and keep current a written policy specifying the information listed in (a)(1)-(4). OSHA estimates that it will take employers 4-12 hours to develop the policy, depending on the size of the establishment. Establishments with 1-99 workers (197) will incur a burden of 4 hours the first year and 2 hours the second and subsequent years. Establishments with 100-499 workers (20) will incur a burden of 6 hours the first year and 3 hours the second and subsequent years. Establishments with 500 or more workers (5) will incur a burden of 12 hours the first year and 6 hours the second and subsequent years. OSHA estimates there is a 10 percent turnover of establishments. A safety and health manager would develop a written policy.

*a. Developing the Policy:*

**Table 7 – Burden Hours and Cost to Develop Policy**

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1-99	197	10%	20	4	80	\$57.76	\$4,621
100-499	20	10%	2	6	12	\$57.76	\$693
500+	5	10%	1	12	12	\$57.76	\$693
<b>Total</b>			<b>23</b>		<b>104</b>		<b>\$6,007</b>

*b. Update Policy:*

**Table 8 – Burden Hours and Cost to Update Policy**

Establishment Size	Affected Employers	Turnover Rate	Existing Employers	Time per Response	Burden Hours	Loaded Wage	Cost
1-99	197	90%	177	2	354	\$57.76	\$20,447
100-499	20	90%	18	3	54	\$57.76	\$3,119
500+	5	90%	5	6	30	\$57.76	\$1,733
<b>Total</b>			<b>200</b>		<b>438</b>		<b>\$25,299</b>

**8. Fire Response**

**§ 1915.505 (a)(2)**

Paragraph (a)(2)(i) requires employers to create, maintain, and update a written policy that describes the internal and outside fire response organizations that the employer will use.

Paragraph (a)(2)(ii) requires employers to create, maintain, and update a written policy that defines the evacuation procedures workers must follow. Paragraphs (b)(1), (b)(2), and (b)(3) discuss what should be included in the written statement based on internal, external, or a combination of fire responses.<sup>11</sup> Specifically, section 1915.502 requires the employer to include the procedures for evacuation and the procedures to account for all workers after evacuation in the fire safety plan. OSHA estimates that employers with less than 100 workers (197) will incur a burden of 1 hour to develop the initial two policies/statements and 1 hour to update annually; employers (20) with 100 to 499 workers will incur a burden of 6 hours initially and 3 hours to update yearly thereafter, and employers (5) with more than 500 workers will incur a burden of 12 hours initially and 6 hours to update to information required by paragraphs (a)(2) and (d)(2) [described below] of section 1915.505. A safety and health manager would perform the activities required in paragraph (a)(2).

*a. Developing the Policy:*

<sup>11</sup> The burden for this activity takes into consideration that some of the information required in the written statement or policy has already been generated and included in the fire safety plan (see 1915.502).

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**Table 9 – Burden Hours and Cost to Develop Policy**

Establishment Size	Affected Employers	Turnover Rate	New Employers	Time per Response	Burden Hours	Loaded Wage	Cost
1-99	197	10%	20	1	20	\$57.76	\$1,155
100-499	20	10%	2	6	12	\$57.76	\$693
500+	5	10%	1	12	12	\$57.76	\$693
<b>Total</b>			<b>23</b>		<b>44</b>		<b>\$2,541</b>

*b. Update Policy:*

**Table 10 – Burden Hours and Cost to Update Policy**

Establishment Size	Affected Employers	Turnover Rate	Existing Employers	Time per Response	Burden Hours	Loaded Wage	Cost
1-99	197	90%	177	1	177	\$57.76	\$10,224
100-499	20	90%	18	3	54	\$57.76	\$3,119
500+	5	90%	5	6	27	\$57.76	\$1,560
<b>Total</b>			<b>200</b>		<b>258</b>		<b>\$14,903</b>

Paragraph (d)(2) requires the employer to set up written administrative regulations, operating procedures, and departmental orders for fire response functions. The burden for the activity is included in the burden estimate for paragraph (a)(2) above.

Paragraph (d)(3) requires the employer to set up an incident management system to address specific areas. The information in the incident management system is also required in the policy statements required by (a)(2) above, therefore, no additional burden is calculated for this provision.

**9. Fire Response – Provide Information to Outside Fire Response Organizations**

**§ 1915.505 (d)(4)**

Paragraph (d)(4) requires that the information created by paragraph (d)(2) and (d)(3) above be provided to the outside fire response organizations that will be used by the employer. OSHA estimates it will take a supervisor about 10 minutes (10/60 hour) to make a copy of the documents and provide the documents to the liaison with the outside fire response organization. OSHA estimate that 197 establishments (affected establishments with 1-99 workers) will use an outside fire response organization. A supervisor will perform this activity.

**Burden hours:** 197 employers x 10/60 hour = 33 hours

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**Cost:** 33 burden hours x \$52.88 = \$1,745

**10. Landside Fire Protection Systems**

**§ 1915.507**

Paragraph (c)(2) requires employers to notify workers when fixed extinguishing systems are not working. No burden is calculated for this information collection activity because it is considered normal and customary to notify workers of situations that may affect their safety.

**11. Landside Fire Protection Systems – Posting Hazard Warning and Caution Signs**

**§ 1915.507 (c)(5)**

Paragraph (c)(5) requires employers to post hazard warning signs and caution signs at both the entrance to and inside of areas protected by certain types of fixed extinguishing systems. OSHA estimates that there would be few situations (once in each of the 96 shipyards per year) where an employer would have to post hazard warning signs. Also, it would be a usual and customary business practice for employers to have warning and caution signs readily available for posting. OSHA estimates it takes about 5 minutes (5/60 hour) to post signs. The posting activity will be a one-time burden unless a sign becomes damaged and needs to be replaced. OSHA estimates that each shipyard may have one instance per year where the signs initially posted will need to be replaced. A production worker would perform this task.

**Burden hours:** 96 shipyard x 5/60 hour = 8 hours (replacement posting)

**Cost:** 8 burden hours x \$38.48 = \$308

**12. Training**

**§ 1915.508**

Paragraph (d)(1) requires employers to have a written training policy; paragraph (d)(2) requires employers to keep written standard operating procedures. OSHA believes a supervisor has prepared the written training policy and is maintaining the standard operating procedures. OSHA estimates it will take 1 minute (1/60 hour) for the training plan and 1 minute (1/60 hour) for the standard operations procedures for a total of 2 minutes (2/60 hour). Thus, estimated burdens are:

**Burden hours:** 222 employers x 2/60 = 7 hours

**Cost:** 7 burden hours x \$52.88 = \$370

**13. Training Certification Records**

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**§ 1915.508 (f)**

Paragraph (f) requires the employer to keep a record of the training. The record must include the worker’s name; the trainer’s name; the type of training; the dates of training. The employer must keep the training record for one year or until replaced, whichever is shortest. OSHA estimates that it will take 3 minutes (3/60 hour) to generate and maintain the training record. Every worker will receive some type of training under this standard each year and at least once a year thereafter. Also, fire response workers (8,211) are trained quarterly beginning in the second year on additional training elements.

**Table 11 – Burden Hours and Cost of Training Records**

<b>Occupation</b>	<b>Training Records</b>	<b>Annual Frequency</b>	<b>Total Records</b>	<b>Time per Response</b>	<b>Burden Hours</b>	<b>Loaded Wage</b>	<b>Cost</b>
Shipyards Workers	100,139	1	100,139	3/60	5,007	\$52.88	\$264,770
Fire Response Workers	8,211	4	32,844	3/60	1,642	\$52.88	\$86,829
<b>Total</b>			<b>132,983</b>		<b>6,649</b>		<b>\$351,599</b>

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**Table 12 – Estimated Annualized Respondent Hour and Cost Burdens\***

Information Collection Requirements	Frequency	Occupation <sup>12</sup>	No. of Respondents	Number of Responses per Respondent	Total No. of Responses	Time per Response (In Hours)	Total Burden Hours	Loaded Hourly Wage	Total Cost Burden (rounded)
1. General Provisions – Inform Contractors About the Fire Safety Plan (1915.501(d)(1)(i))									
	Annual	Supervisor	96	4	384	30/60	192	\$52.88	\$10,153
<b>Subtotals</b>					<b>384</b>		<b>192</b>		<b>\$10,153</b>
2. Develop a Fire Safety Plan (1915.502(a))									
a. Develop Plan									
New Establishments	One time	Manager	197	0.1	20	4	80	\$57.76	\$4,621
New Establishments	One time	Manager	20	0.1	2	6	12	\$57.76	\$693
New Establishments	One time	Manager	5	0.1	1	12	12	\$57.76	\$693
<b>Subtotals</b>					<b>23</b>		<b>104</b>		<b>\$6,007</b>
b. Update Plan									

<sup>12</sup> See Table 1 for complete occupational name and its associated SOC code.

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Information Collection Requirements	Frequency	Occupation	No. of Respondents	Number of Responses per Respondent	Total No. of Responses	Time per Response (In Hours)	Total Burden Hours	Loaded Hourly Wage	Total Cost Burden (rounded)
Existing Establishments	Annual	Manager	197	0.9	177	2	354	\$57.76	\$20,447
Existing Establishments	Annual	Manager	20	0.9	18	3	54	\$57.76	\$3,119
Existing Establishments	Annual	Manager	5	0.9	5	6	30	\$57.76	\$1,733
<b>Subtotals</b>					<b>200</b>		<b>438</b>		<b>\$25,299</b>
<b>3. Review Fire Safety Plan w/Workers (1915.502(c))</b>									
	Annual	Manager	222	1	222	15/60	56	\$57.76	\$3,235
	Annual	Manager	24,033	1	24,033	15/60	6,008	\$57.76	\$347,022
	Annual	Manager	2	1	2	15/60	1	\$57.76	\$58
	Annual	Manager	1,001	1	1,001	15/60	250	\$57.76	\$14,440
<b>Subtotals</b>					<b>25,258</b>		<b>6,315</b>		<b>\$364,755</b>
<b>4. Post Fire Safety Plan (1915.502(d)(1))</b>									
		Supervisor	222	1	222	5/60	18	\$52.88	\$952

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Information Collection Requirements	Frequency	Occupation	No. of Respondents	Number of Responses per Respondent	Total No. of Responses	Time per Response (In Hours)	Total Burden Hours	Loaded Hourly Wage	Total Cost Burden (rounded)
<b>Subtotals</b>					<b>222</b>		<b>18</b>	<b>\$52.88</b>	<b>\$952</b>
5. Certification Record of Review of FSP (1915.502(d)(3))									
	Annual	Supervisor	222	1	222	3/60	11	\$52.88	\$582
	Annual	Supervisor	25,034	1	25,034	3/60	1,252	\$52.88	\$66,206
	Annual	Supervisor	10	1	10	3/60	1	\$52.88	\$53
<b>Subtotals</b>					<b>25,266</b>		<b>1,264</b>		<b>\$66,841</b>
6. Give Fire Safety Plan to Outside Fire Response Organization (1915.502(d)(4))									
	On-going	Supervisor	222	1	222	10/60	37	\$52.88	\$1,957
<b>Subtotals</b>					<b>222</b>		<b>37</b>		<b>\$1,957</b>
7. Fire Watch Policy (1915.504(a))									
a. Develop Policy									
	One time	Manager	197	0.1	20	4	80	\$57.76	\$4,621
	One time	Manager	20	0.1	2	6	12	\$57.76	\$693
	One time	Manager	5	0.1	1	12	12	\$57.76	\$693

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Information Collection Requirements	Frequency	Occupation	No. of Respondents	Number of Responses per Respondent	Total No. of Responses	Time per Response (In Hours)	Total Burden Hours	Loaded Hourly Wage	Total Cost Burden (rounded)
<b>Subtotals</b>					<b>21</b>		<b>104</b>		<b>\$6,007</b>
b. Update Policy									
	Annual	Manager	197	0.9	177	2	354	\$57.76	\$20,447
	Annual	Manager	20	0.9	18	3	54	\$57.76	\$3,119
	Annual	Manager	5	0.9	5	6	30	\$57.76	\$1,733
<b>Subtotals</b>			<b>222</b>		<b>200</b>		<b>438</b>		<b>\$25,299</b>
8. Fire Response Policies (1915.505(a)(2)(i) and (ii))									
a. Develop Policy									
	One time	Manager	197	0.1	20	1	20	\$57.76	\$1,155
	One time	Manager	20	0.1	2	6	12	\$57.76	\$693
	One time	Manager	5	0.1	1	12	12	\$57.76	\$693
<b>Subtotals</b>					<b>23</b>		<b>44</b>		<b>\$2,541</b>
b. Update Policy									
	Annual	Manager	197	0.9	177	1	177	\$57.76	\$10,224

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Information Collection Requirements	Frequency	Occupation	No. of Respondents	Number of Responses per Respondent	Total No. of Responses	Time per Response (In Hours)	Total Burden Hours	Loaded Hourly Wage	Total Cost Burden (rounded)
	Annual	Manager	20	0.9	18	3	54	\$57.76	\$3,119
	Annual	Manager	5	0.9	5	6	30	\$57.76	\$1,733
<b>Subtotals</b>					<b>200</b>		<b>261</b>		<b>\$15,076</b>
<b>9. Fire Response – Provide Information to Outside Fire Response Organizations (1915.505(d)(4))</b>									
	Annual	Supervisor	197	1	197	10/60	33	\$52.88	\$1,745
<b>Subtotals</b>					<b>197</b>		<b>33</b>		<b>\$1,745</b>
<b>11. Landside Fire Protection Systems – Posting Hazard Warning and Caution Signs (1915.507(c)(5))</b>									
	Annual	Shipyards Worker	96	1	96	5/60	8	\$38.48	\$308
<b>Subtotals</b>					<b>96</b>		<b>8</b>		<b>\$308</b>
<b>12. Training Fire Response (1915.508(d))</b>									
	Annual	Supervisor	222	1	222	2/60	7	\$52.88	\$370
<b>Subtotals</b>					<b>222</b>		<b>7</b>		<b>\$370</b>
<b>13. Training Certification Records (1915.508(f))</b>									

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Information Collection Requirements	Frequency	Occupation	No. of Respondents	Number of Responses per Respondent	Total No. of Responses	Time per Response (In Hours)	Total Burden Hours	Loaded Hourly Wage	Total Cost Burden (rounded)
	Annual	Supervisor	100,139	1	100,139	3/60	5,007	\$52.88	\$264,770
	Annual	Supervisor	8,211	4	32,844	3/60	1,642	\$52.88	\$86,829
<b>Subtotals</b>					<b>132,983</b>		<b>6,649</b>		<b>\$351,599</b>
<b>Totals</b>					<b>185,519</b>		<b>15,912</b>		<b>\$878,909</b>
<b>First Year Totals</b>	New Employer				69		252		\$14,555
<b>Annual Totals</b>	Existing Employer				185,450		15,660		\$864,354
<b>Annualized Total Over 3 Years</b>					<b>185,473</b>		<b>15,744</b>		<b>\$869,206</b>

\*The total number of respondents for this paperwork package is 489 establishments.

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**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 estimates 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 in 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.**

All costs under this item for complying with the Standard are included under those costs in Item 12. There are no costs to the respondent other than their time.

**14. Provide estimates of the 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), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Item 12, 13, and 14 into a single table.**

There is no cost to the Federal Government.

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

OSHA is requesting an adjustment decrease from 16,251 to 15,744 burden hours, a total difference of 507 burden hours. The total burden hours requested are annualized over three

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years. This adjustment decrease is a result of a decrease in the number of affected establishments. See Table 13 below.

**Table 13 – Annualized Adjustment of the Current and Requested Burden Hours Determinations**

<b>Information Collection Requirements</b>	<b>Frequency</b>	<b>Current Burden Hours</b>	<b>Requested Burden Hours</b>	<b>Adjustment</b>
<b>1. General Provisions</b>				
Inform Contractors About the Fire Safety Plan (1915.501(d)(1)(i))	Annual	336	192	-144
<b>Subtotal</b>		<b>336</b>	<b>192</b>	<b>-144</b>
<b>2. Develop Fire Safety Plan (1915.502(a))</b>				
a. New Establishments - Developing the Plan	One time	84	80	-4
	One time	12	12	0
	One time	28	12	-16
<b>Subtotal</b>		<b>124</b>	<b>104</b>	<b>-20</b>
b. Existing Establishments - Updating Plan	Annual	378	354	-24
	Annual	54	54	0
	Annual	124	30	-94
<b>Subtotal</b>		<b>556</b>	<b>438</b>	<b>-118</b>
<b>3. Review Fire Safety Plan w/Workers (1915.502(c))</b>				
All Employers will Review Plan	Annual	63	56	-7
New Workers (24%) will Review Plan	Annual	5,998	6,008	10
Employers will be triggered to Review Plan	Annual	1	1	0
Worker change in duty trigger Review of Plan	Annual	250	250	0
<b>Subtotal</b>		<b>6,312</b>	<b>6,315</b>	<b>3</b>
<b>4. Post Fire Safety Plan (1915.502(d)(1))</b>				
	Annual	21	18	-3
<b>Subtotal</b>		<b>21</b>	<b>18</b>	<b>-3</b>
<b>5. Certification Record of Review of FSP (1915.502(d)(3))</b>				
	Annual	13	11	-2
	Annual	1250	1,252	2
	Annual	1	1	0
<b>Subtotal</b>		<b>1,264</b>	<b>1,264</b>	<b>0</b>
<b>6. Give Fire Safety Plan to Outside Fire Response Organization (1915.502(d)(4))</b>				

**FIRE PROTECTION IN SHIPYARD EMPLOYMENT  
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Information Collection Requirements	Frequency	Current Burden Hours	Requested Burden Hours	Adjustment
	Annual	42	37	-5
<b>Subtotal</b>		<b>42</b>	<b>37</b>	<b>-5</b>
7. Fire Watch Policy (1915.504(a))				
a. New Establishments	One time	84	80	-4
	One time	12	12	0
	One time	28	12	-16
<b>Subtotal</b>		<b>124</b>	<b>104</b>	<b>-20</b>
b. Existing Establishments	Annual	378	354	-24
	Annual	54	54	0
	Annual	124	30	-94
<b>Subtotal</b>		<b>556</b>	<b>438</b>	<b>-118</b>
8. Fire Response Policies (1915.505(a)(2)(i) and (ii))				
a. New Establishments	One time	21	20	-1
	One time	12	12	0
	One time	28	12	-16
<b>Subtotal</b>		<b>61</b>	<b>44</b>	<b>-17</b>
b. Existing Establishments	Annual	189	177	-12
	Annual	54	54	0
	Annual	124	30	-94
<b>Subtotal</b>		<b>367</b>	<b>261</b>	<b>-106</b>
9. Fire Response – Provide Information to Outside Fire Response Organizations (1915.505(d)(4))				
	Annual	35	33	-2
<b>Subtotal</b>		<b>35</b>	<b>33</b>	<b>-2</b>
11. Landside Fire Protection Systems – Posting Hazard Warning and Caution Signs (1915.507(c)(5))				
	Annual	14	8	-6
<b>Subtotal</b>		<b>14</b>	<b>8</b>	<b>-6</b>
12. Training Fire Response (1915.508(d)(1))				
	Annual	8	7	-1
<b>Subtotal</b>		<b>8</b>	<b>7</b>	<b>-1</b>
13. Training Certification Records (1915.508(f))				
Training Records for Shipyard Workers	Annual	4998	5,007	9
Training Records for Fire Response Workers	Annual	1639	1,642	3
<b>Subtotal</b>		<b>6,637</b>	<b>6,649</b>	<b>12</b>
<b>Totals</b>		<b>16,457</b>	<b>15,912</b>	<b>-545</b>

**FIRE PROTECTION IN SHIPYARD EMPLOYMENT  
STANDARD (29 CFR PART 1915, Subpart P)  
OMB Control Number: 1218-0248  
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<b>Information Collection Requirements</b>	<b>Frequency</b>	<b>Current Burden Hours</b>	<b>Requested Burden Hours</b>	<b>Adjustment</b>
One time		309	252	-57
Annual		16,148	15,660	-488
Annualized over 3 Years		16,251	15,744	-507

**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 Standard.

**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 information collection requirement. (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 in Item 19.**

OSHA is not seeking an exception to the certification statement.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

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