

# PAPERWORK REDUCTION ACT SUBMISSION

Please read the instructions before completing this form. For additional forms or assistance in completing this form, contact your agency's Paperwork Clearance Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 17th Street NW Washington, DC 20503.

1. Agency/Subagency originating request  Dept. of Homeland Security/US Coast Guard		2. OMB control number a. <u>1 6 2 5 - 0 0 2 5</u> b. <input type="checkbox"/> None - - - -	
3. Type of information collection (check one) a. <input type="checkbox"/> New collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input checked="" type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change, of a previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change, of a previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions		4. Type of review requested (check one) a. <input checked="" type="checkbox"/> Regular submission b. <input type="checkbox"/> Emergency - Approval requested by: ___/___/___ c. <input type="checkbox"/> Delegated 5. Small entities. Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
7. Title Carriage of Bulk Solids Requiring Special Handling -- 46 CFR Part 148		6. Requested expiration date a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other Specify: ___/___/___	
8. Agency form number(s) (if applicable) n/a			
9. Keywords Cargo, Handling, Permit, Pollution Prevention, Shipping, Special Permit, Vessel			
10. Abstract  The information in an application for a Special Permit allows the Coast Guard to determine the manner of safe carriage of unlisted materials. The information required by Dangerous Cargo Manifests and Shipping Papers permits vessel crews and emergency personnel to properly and safely respond to accidents involving hazardous substances.			
11. Affected public (Mark primary with "P" and all others that apply with "X") a. ___ Individuals or households d. ___ Farms b. <u>P</u> Business or other for-profit e. ___ Federal Government c. ___ Not-for-profit institutions f. ___ State, Local or Tribal Gov't		12. Obligation to respond (Mark primary with "P" and all others that apply with "X") a. <input type="checkbox"/> Voluntary b. <input checked="" type="checkbox"/> Required to obtain or retain benefits c. <input type="checkbox"/> Mandatory	
13. Annual reporting and recordkeeping hour burden a. Number of respondents <u>577</u> b. Total annual responses <u>762</u> 1. Percentage of these responses collected electronically <u>50</u> % c. Total annual hours requested <u>760</u> d. Current OMB inventory <u>910</u> e. Difference <u>- 150</u> f. Explanation of difference 1. Program change 2. Adjustment <u>- 150</u>		14. Annual reporting and recordkeeping cost burden (in thousands of dollars) a. Total annualized capital/startup costs <u>0</u> b. Total annual costs (O&M) <u>0</u> c. Total annualized cost requested <u>0</u> d. Current OMB inventory <u>0</u> e. Difference f. Explanation of difference 1. Program change 2. Adjustment	
15. Purpose of information collection (Mark primary with "P" and all others that apply with "X") a. ___ Application for benefits e. ___ Program planning or management b. ___ Program evaluation f. ___ Research c. ___ General purpose statistics d. ___ Audit g. <u>P</u> Regulatory or compliance		16. Frequency of recordkeeping or reporting (check all that apply) a. <input checked="" type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting 1. <input checked="" type="checkbox"/> On occasion 2. <input type="checkbox"/> Weekly 3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly 5. <input type="checkbox"/> Semi-annually 6. <input type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially 8. <input checked="" type="checkbox"/> Other (describe) <u>4-years</u>	
17. Statistical methods Does this information collection employ statistical methods?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		18. Agency contact (person who can best answer questions regarding the content of this submission)  Name: <u>Mr. David A. Du Pont</u>  Phone: <u>(202) 372-1497</u>	

**Supporting Statement  
for  
Carriage of Bulk Solids Requiring Special Handling – 46 CFR Part 148**

OMB No.: 1625-0025  
COLLECTION INSTRUMENTS: Instruction

**A. Justification**

1. Circumstances that make the collection necessary.

The U.S. Coast Guard administers and enforces the laws, regulations and international conventions for the safe transportation and stowage of hazardous materials, including bulk solids. The International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 74/83) contains, in Chapter VII Regulation 7-2, a requirement that Shipping Papers and a Dangerous Cargo Manifest accompany all shipments of hazardous materials in bulk solid form. This international requirement is translated into U.S. regulation in 46 CFR Part 148.

The Coast Guard issues Special Permits as part of its mission to ensure maritime safety and facilitate U.S. commerce. These Special Permits are issued to allow the carriage of hazardous bulk solid materials that are not addressed in 46 CFR Part 148.

The statutory authority is 33 U.S. Code 1602, 46 U.S.C. 3306 and 49 U.S.C. 5103.

2. Purpose of the information collection.

The Special Permits allow the Coast Guard to control the conditions under which shipments of hazardous materials can be made, and at the same time allow the shipping industry a greater amount of flexibility than would otherwise be afforded without the Special Permit provision. The information that must be submitted when applying for a Special Permit allows the Coast Guard to make a well-informed determination as to the severity of the hazard posed by the material in question, and allows them to set specific guidelines for safe carriage or, if it is determined that a material presents too great a hazard, to deny permission for shipping the material. If the required information were not submitted, the Coast Guard would be unable to issue Special Permits with adequate precautions for shipping the cargo, and thus could not permit shipment.

Shipping Papers and Dangerous Cargo Manifests are not required to be submitted to the Coast Guard and are not required to be retained on board the vessel once the cargo has been off-loaded. However, the information contained in these documents may be used in an emergency situation, which is why they are required to be in a readily retrievable location. If an emergency such as a fire occurs on board the vessel, the required documents will provide the master with: (1) the identity of the cargo and its hazards, and a point of contact for additional information about the cargo (the shipping paper); and (2) the quantity and location of the material on board the vessel (Dangerous Cargo Manifest).

3. Consideration of the use of improved technology.

The required information for Special Permits may be submitted to the Coast Guard by email, fax, or regular mail, depending on the vessel owners' preferences. Shipping Papers and Dangerous Cargo Manifests are not submitted to the Coast Guard, but are instead retained as records on the vessel in any format. We estimate that 100% of this collection's reporting requirements can be done electronically. At this time, we estimate that 50% are done 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. No changes were needed.

- 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).
- Is voluntary/option.
- Does not require the use of a form or specify a reporting format/method.
- Is required by international treaty, statute, and/or regulation as notes in section 1 of the Supporting Statement.

#### 4. Efforts to identify duplication.

The Coast Guard have made an effort in the regulations to eliminate the duplicate submission of information when requesting a Special Permit. Previously, each individual desiring to ship a cargo not listed in Part 148 was required to submit detailed information concerning the material and the proposed method of transport. The regulations require that the first person to request the permit submit detailed information on the proposed method and on the cargo to be carried. This cargo information may be submitted in the form of a Material Safety Data Sheet (MSDS). The MSDS is required by the Occupational Safety and Health Administration (OSHA) for all hazardous materials handled in land-based operations, and thus should be readily available, reducing the need to develop duplicate information for submission to the Coast Guard.

#### 5. Methods used to minimize the burden on small businesses if involved.

Special Permits are necessary for the safety of the vessel and its personnel. The required submissions are the minimum consistent with this objective. The respondent's size is not relevant to safety. However, since the shipping industry is comprised mainly of large corporations, it is anticipated that few, if any, small businesses will be affected.

#### 6. Consequences to the Federal program if collection were conducted less frequently.

The only information submitted to the Coast Guard is the Special Permit. The original submission is required when a Special Permit is requested. By law, any exemption issued under the rules promulgated by the Secretary must be issued for a period not to exceed 4 years. Therefore, permit holders must renew their Special Permit every 4 years. To ensure that the carriage requirements imposed by the Special Permit are sufficient and that the permit holder is complying with the terms of the permit, it is necessary to require the submission of information concerning the history of shipments made under the terms of the Special Permit.

#### 7. Special collection circumstances.

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

#### 8. Consultation.

A 60-day Notice will be published in the *Federal Register* to obtain public comment on this collection.

#### 9. Decisions to provide payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

#### 10. Assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- [https://www.dhs.gov/sites/default/files/publications/privacy\\_pia\\_uscg\\_misle.pdf](https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf)
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

11. Additional justification for questions of a sensitive nature.

There are no questions of sensitive language.

12. Estimate of the hour and cost burdens.

- The estimated annual number of respondents is 577.
- The estimated annual number of responses is 762.
- The estimated annual hour burden is 760.
- The estimated annual cost burden is \$30,290.

The burden to respondents is provided in Appendix A.

We estimate that a Chemical Manufacturing Specialist will take about 15 hours complete and submit a Special Permit petition. For the wage rate, we used the Bureau of Labor Statistics (BLS) wage rate for Chemical Engineers (17-2041) [May 2022, mean hourly wage, loaded 50%, and rounded].<sup>1</sup>

The Coast Guard estimate that a Crewmember or shore side Technical Specialist will take about 30 minutes (0.5 hours) to prepare a Dangerous Cargo Manifest<sup>2</sup> and 1 hour to prepare a vessel's Shipping Papers.<sup>3</sup> For the wage rate, we used the BLS wage rate for Sailors and Marine Oilers (53-5011) [May 2022, mean hourly wage, loaded 50%, and rounded].<sup>4</sup>

13. Total annualized capital and start-up costs.

There are no recordkeeping, capital, start-up, or maintenance costs associated with this information collection.

14. Estimates of annualized cost to the Federal Government.

The estimated annual Federal Government cost is \$2,340 (see Appendix B). The Coast Guard estimate that it takes a Technical Specialist (GS-12) about 15 hours to review and process each Special Permit petition. For the wage rate, we used Office of Personnel Management (OPM) data [2024-RUS Salary Table, GS-12-Step 5, hourly basic rate, loaded 65%, and rounded].<sup>5</sup>

15. Reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change (i.e., decrease) in the estimated annual number of special permit petitions. The reporting and recordkeeping requirements, and the methodology for calculating burden, remain unchanged.

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

This information collection will not be published for statistical purposes.

17. Approval for not explaining the expiration date for OMB approval.

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<sup>1</sup> <https://www.bls.gov/oes/2022/may/oes172041.htm>

<sup>2</sup> Dangerous Cargo Manifests are not required when the cargo otherwise regulated by 46 CFR 148 is carried on an unmanned barge.

<sup>3</sup> All shippers of cargos regulated by 46 CFR 148 are required to develop Shipping Papers.

<sup>4</sup> <https://www.bls.gov/oes/2022/may/oes535011.htm>

<sup>5</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx)

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Exception to the certification certificate.

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.

**Appendix A: Estimates of Annual Hour and Cost Burdens to Respondents****No. of Respondents:**

Special Permit petitioners:	2
VsIs that prepare Dangerous Cargo Manifests:	45
VsIs that prepare Shipping Papers:	530
<b>Total:</b>	<b>577</b>

Requirement	Responses	Hour Burden per Response	Total Hour Burden	Wage Rate	Total Cost Burden
Special Permit petitions	2	15	30	\$85	\$2,550
Dangerous Cargo Manifests	60	0.5	30	\$38	\$1,140
Shipping Papers	700	1	700	\$38	\$26,600
<b>Total</b>	<b>762</b>		<b>760</b>		<b>\$30,290</b>

*Total*

<b>Total Respondents</b>	<b>577</b>
<b>Total Responses</b>	<b>762</b>
<b>Total Hour Burden</b>	<b>760</b>
<b>Total Cost Burden</b>	<b>\$30,290</b>

\*Estimates may not sum due to rounding

**Appendix B: Estimated Annual Federal Government Cost**

Requirement	Responses	Hours per Response	Total Hours	Wage Rate	Total Cost
Special Permit petition reviews	2	15	30	\$78	\$2,340

*Total*

<b>Total Cost</b>	<b>\$2,340</b>
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\*Estimates may not sum due to rounding