

**Supporting Statement
for
Characteristics of Liquid Chemicals Proposed for
Bulk Water Movement**

A. Justification

1) Circumstances which make the collection of information necessary.

The U.S. Coast Guard administers and enforces the certain laws and regulations for the safe transportation of hazardous materials by water. Title 46 CFR 30-40, 151, 153 and 154 contain regulations designed to promote safety in the transportation of hazardous materials on board tank vessels.

Chemical companies are constantly developing new products. If the demand is great enough, it becomes economically desirable to transport bulk quantities of a product by barge or tanker. In many cases, however, the Coast Guard does not have information on the hazardous properties of the proposed chemical. Therefore, it is necessary for the manufacturers to supply the data.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

U.S. Coast Guard:

- Safety
- Protection of natural resources

Prevention Directorate (CG-3P):

- 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.
- Economic Growth and Trade/Mobility: Reduce interruptions and impediments that restrict the economical movement of goods and people, while maximizing safe, effective, and efficient waterways for all users.

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

The Coast Guard evaluates the information and determines the kind and degree of precaution which must be taken to protect the vessel, operating personnel, surrounding environment, and those segments of the general public who reside along the proposed route.

3) Considerations of the use of improved technology.

The information required may be in any format (i.e., written or electronic). Form CG-4355 is available on the Internet. We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that 0% of reports are done electronically.

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

Each submission for these purposes is unique. No other agency or section requests the same type of information.

5) Methods used to minimize the burdens to small business if involved.

For reasons of safety, the carriage of hazardous materials must be in accordance with the type and degree of hazards they represent. The burden imposed on small businesses cannot be lessened relative to the burden on larger entities.

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

Information is not collected at any set frequency or schedule. Information is submitted only when a manufacturer seeks approval for materials not previously carried. If the information is not submitted at this time, then it would be impossible for the Coast Guard to prescribe precautions for the material's safe carriage.

7) Special collection circumstances.

The methods of this collection are 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-2006-26741; January 9, 2007; 72 FR 970). The USCG has not received any comments on this information collection.

9) Provide any payment or gift to respondents.

There are no payments or gifts to respondents.

10) Assurances of confidentiality provided to respondents.

All information collected complies with the Freedom of Information Act (FOIA), the Privacy Act, and OMB Circular A-108. Confidentiality is promised when requested, for information exempt from the mandatory public disclosure requirements of FOIA, or when the information is a trade secret.

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

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

12) Estimate of the hour and cost burden.

Approximately three hours are required to complete the form (CG-4355). This estimate includes time for gathering data from several sources. Completing the form for a chemical possessing unusual properties may take longer. These estimates are based upon informal consultation with respondents. **Total annual burden on respondents is 78 hours (26 submission x 3 hours/submission).**

The cost burden to respondents is summarized in Table 1.

Table 1. Cost to Respondents

3 hours to complete CG-4355 at \$69/hr ¹ (GS-13 equivalent)	\$207/submission
Cover letter ²	\$13/submission
Estimated cost for each submission	\$220/submission
Average annual number of submissions ³	26
Total cost to respondents	\$5,720/year

13) Total annualized capital and start-up costs.

There are no annualized capital or start-up costs.

14) Estimates of annualized cost to the Federal Government.

The following table summarizes the costs incurred by the Federal Government.

Table 2. Cost to Federal Government

8 hours to review CG-4355 at \$66/hr ⁴ (GS-13 equivalent)	\$528/submission
Administrative cost and overhead (1/3 labor cost)	\$176/submission
Estimated cost for each submission	\$704/submission
Average number of submissions	26
Total cost to Federal Government	\$18,304/year

¹ Wage rates set forth under COMDTINST 7310.11

² This cost reflects the construction of a standard cover letter that accompanies the required submission.

³ The average number of submissions is derived from a 7-year average between 1999-2005.

⁴ Wage rates set forth under COMDTINST 7310.11

15) Reasons for changes in burden.

The change in burden is an ADJUSTMENT due to a change in the annual submission estimate. This is due simply to a decrease in the average annual number of responses submitted from 36 to 26.

16) Plans for tabulation, statistical analysis and publication.

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

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

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

18) 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.