

**Supporting Statement
for
Sewage and Graywater Discharge Records for Certain
Cruise Vessels Operating on Alaskan Waters**

A. Justification

1. Circumstances that make the collection of information necessary.

This information collection is needed to support Federal regulations that cover the discharges of graywater into the Alaskan navigable waterway. These rules are in response to Title XIV of Public Law 106-554 (passed on December 21, 2000), directing the Secretary to develop regulations incorporating an inspection regime into the commercial vessel examination program. This inspection regime verifies that cruise vessels transiting the applicable waters of Alaska are in full compliance with all treated and untreated sewage and graywater discharge laws and regulations. Collection of the information via the certification of participation under Quality Assurance/Quality Plan (QA/QCP), Vessel Specific Sampling Plan (VSSP), the Sewage & Graywater Discharge Record Book, and submission of a statement certifying compliance with the standards are necessary for two important reasons: (1) to determine compliance with the applicable laws and regulations, and (2) to create a historical record to prevent patterns that circumvent or nullify consistent compliance with the law and for the proper application of enforcement provisions of the applicable law and regulations.

Approximately 1,000,000 cruise vessel passengers and crew transited Southeast Alaska waters in the Summer of 2001, where a resident population of approximately 60,000 exists. Based on high levels of fecal coliform and total suspended solids found in graywater and treated sewage as a result of the voluntary testing conducted during the 2000 cruise vessel season, the Coast Guard has determined that a sampling and reporting regime is necessary to allow timely detection and corrective action.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

U.S. Coast Guard

- Protection of the Natural Resources

Prevention Directorate (CG-3P)

- 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.

The sampling protocol with a VSSP describes where samples are drawn on board cruise vessels, how those samples are transported to the lab, how the lab tests and analyzes the samples, the quality review applied to the test results, and how the information will be reported to the Coast Guard. Documentation of sewage and graywater discharges from cruise ships operating within certain waters of Alaska in the form of a Sewage and Graywater Discharge Record Book and reports of sewage and graywater discharge test results creates a reference for Coast Guard personnel to determine compliance with Public Law 106-554 and the regulations promulgated there under.

3. Consideration of the use of improved information technology.

In consideration of efficiencies of information technology, the sampling protocol with a vessel specific sampling plan and certification statements can be manually sent or submitted in an electronic format that is readable by both the Coast Guard and Alaska Department of Environmental Conservation's information data systems. The Sewage and Graywater Discharge Record Book is typically a manual system that requires various entries and signatures, which will be maintained on board each cruise vessel and available at all times the cruise vessel is operating within the jurisdiction of the United States by the Coast Guard. The Sewage and Graywater Discharge Record Book will not be required to be submitted to the Coast Guard, however, the Coast Guard may review and make copies of entries into the record during a visit to the vessel. These records will be generated during the normal course of a shipboard engineering watch and entries made in multiple locations throughout the ships engineering spaces. Original signatures and unalterable, manual record entries are required to ensure authenticity for enforcement purposes.

We estimate that 100% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that 25% is done electronically.

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

This requirement is not covered by any other law or regulation. Therefore, this is not a duplicative reporting requirement.

5. Methods to minimize the burden to small business if involved.

These regulations are applicable to operators of cruise vessels carrying 500 or more passengers, which are typically owned by corporations that do not qualify as small entities. Therefore, the Coast Guard believes that this rule does not have a significant economic impact on a substantial number of small entities.

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

Less frequent collection could result in an increase in the probability of an illegal discharge not being detected. Discharges create the possibility of the contamination of fish, other marine mammals and wildlife, with an overall negative impact to public health and safety and the ecology.

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

Information is collected in a 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-2007-27923]; May 3, 2007; 72 FR 24594). The USCG has not received any comments on this information collection.

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

No payment or gifts of any kind are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents.

No assurance of confidentiality is provided to respondents.

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

There are no issues of a sensitive nature involved in this information collection.

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

Table 12.1 depicts the hour and cost burdens associated with this collection.

Table 12.1

	Logbook Entries (See note 1)	Submission of Participation Cert	Submission of Compliance Cert	Submission of VSSP
# Vessels (= # of respondents)	47	47	47	47
Annual # of Responses/Vessel	150	1	1	1
TOTAL Annual Responses	7,050	47	47	47
GRAND TOTAL ANNUAL RESPONSES	7,191			
TOTAL # RESPONDENTS	47			
Engineer Burden Hours/Response	0.07	0.25	0.5	1
Clerical Burden Hours/Response	0	0.25	0.5	0.5
Annual Engineer Hour Burden	494	12	24	47
Annual Clerical Hour Burden	0	12	24	24
Subtotal Annual Hour Burden	494	24	48	71
TOTAL Engineer Annual Hour Burden	577			
Engineer Hourly Wage Rate	\$75			
TOTAL Clerical Annual Hour Burden	60			
Clerical Hourly Wage Rate	\$31			
GRAND TOTAL ANNUAL HOUR BURDEN	637			
GRAND TOTAL ANNUAL COST BURDEN	\$45,135			

Note 1: Log entries will be made during the cruise vessels' Summer cruise season, typically running from May to September, and only while in the applicable waters of Alaska. The

Coast Guard assumes that each vessel will make one log entry per day, on each of the 150 days in the cruising season.

Note 2: The hourly burden associated with each element of this collection consists of both licensed engineer effort and clerical effort, except in the case of the log entries, requiring no clerical time. The estimated burden for each reflects time for the engineer to review the document for accuracy, and for the clerical staff to duplicate and transmit it. Log entries are made by the licensed engineer, and require no clerical effort. The responsibilities of a licensed engineer and clerical staff are commensurate with that of a Lieutenant (O-3) and a GS-5, respectively. The wage rates are for “Out-Gov’t,” taken from the current edition of COMDTINST 1310.1J.

13. Estimate of capital and start-up costs.

There are no annualized capital or start-up costs.

14. Estimated of annualized Federal Government costs.

The annualized cost to the Coast Guard is shown in Table 14.1.

Table 14.1

	Review of Logbook Entries	Review of Participation Cert	Review of Compliance Cert	Review of VSSP
# Vessels	47	47	47	47
Review Hour Burden/Document	0.25	0.5	0.5	2
Total Annual Review Time	12	24	24	94
GRAND TOTAL ANNUAL HOUR BURDEN	153			
Reviewer Hourly Rate	\$62			
TOTAL ANNUAL COST BURDEN	\$9,471			

Annualized costs to the Coast Guard for associated travel expenses are estimated to be \$1,000 for Coast Guard members to oversee the sampling effort. It is expected that .25 Full Time Equivalency (FTE) will be utilized in reviewing reports and conducting expanded environmental compliance exams of cruise vessels as required. During the Summer 2000 season, three such oversight trips were made at an approximate cost of \$1,000. It is anticipated that these oversight trips will continue at approximately the same frequency. Again, this is all an estimate, based on last year's sampling oversight efforts. As the program evolves, this could change. It is unknown at this time what those changes may be. It is not anticipated that the Coast Guard will receive additional FTE for this and therefore the review of reports and examination of cruise vessels will be at no additional cost.

15. Explain the reasons for the change in burden.

The change (i.e., increase) in hour burden is strictly due to an increase in the vessel population. The Coast Guard now uses a relatively new data base--MISLE--for estimating vessel populations and this allows us to more accurately estimate the vessels impacted by this COI. The methodology for estimating hour burden per respondent per year remains unchanged.

The change in the number of responses is due to a change in the methodology used to determine number of Refuse Discharge Log (RDL) responses. Previously, the Coast Guard estimated the number of annual RDL responses as equal to the number of respondents. In this periodic renewal, we have changed the methodology to account for the estimated number of recordkeeping actions taken by each respondent for a year. Thus, instead of 1 response per respondent per year, we are estimating about 417 responses per respondent per year. We believe this more accurately reflects the amount of activity needed to comply with the RDL recordkeeping requirement. As stated above, the methodology for estimating hour burden per respondent per year remains unchanged. We have before, and continue, to estimate RDL hour burden per action (now equal to a response).

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

This information will not be published and there are no complex analytical techniques involved.

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