

Supporting Statement for National Response Resource Inventory

A. Justification

1. Circumstances that make the collection of information necessary.

The Oil Pollution Act of 1990 (OPA 90) (Pub. L. 101-380) requires the Coast Guard to centralize information concerning the amount and location of response equipment for oil spills. After the many problems associated with combating the M/V EXXON VALDEZ disaster, those involved in the response effort recognized that slow response was a major reason that extensive damage occurred in environmentally sensitive areas.

The Coast Guard developed the Oil Spill Removal Organization (OSRO)¹ classification process to facilitate the preparation and review of vessel and facility response plans, and this collection is an inventory of certain response materials.

The collection of information also supports the following strategic goals:

Department of Homeland Security

- Protection
- Recovery
- Response

Coast Guard

- Protection of Natural Resources

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

- 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.

This information will assist in maintaining the established centralized response equipment inventory. The collected information will allow for better organization and response in situations similar to the M/V EXXON VALDEZ disaster, thus helping to reduce environmental damage. The information has been used to record the location and availability of response resources.

3. Consideration of the use of improved information technology.

¹ An Oil Spill Removal Organization (OSRO) owns or controls oil spill removal resources that are designed for, or capable of, removing oil from the water or shoreline. OSROs provide response equipment and services, individually or in combination with subcontractors, directly to an owner or operator of a tank vessel or facility required to have a response plan under 33 U.S.C. 1321(j)(5).

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 80% of the responses are collected electronically.

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

There is no State or local regulation relating to this issue. No similar information collection is conducted by other federal agencies. Similar information does not exist in a centralized location.

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

An OSRO is required to supply the information only if it decides to participate in the Coast Guard classification process. Due to a program change in the classification of the OSROs in October 2002, small OSROs are no longer maintained in the database. Only large and medium OSROs are maintained in the database.

This information collection does not have an impact on small businesses or other small entities.

6. Consequences to the Federal program if collection were not done or conducted less frequently.

If information were collected less frequently, neither the Coast Guard nor the OSROs would have complete knowledge of response equipment amounts and location. This could significantly slow response to a vessel emergency and result in increased environmental damage from oil spills near environmentally sensitive areas.

Timely collection or verification of resource data offers several benefits: better organization in the case of an emergency, a potential decrease in the amount of time needed to respond to a spill, and the prospect that the plan holders will use the information for their contingency planning.

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

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

8. Consultation.

A 60 day (See [USCG-2008-1240], February 4, 2009, 74 FR 6044) and 30-day Notices (See [USCG-2008-1240], April 27, 2009, 74 FR 19100) were published in the Federal Register to obtain public comment on these collections. The USCG has not received any comments on these information collections.

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

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

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection.

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

There are no questions of sensitive language.

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

Burden Estimates to Industry

The estimated annual burden to the industry will be approximately 1,296 hours at a dollar cost of \$61,560.

Annual costs are calculated by using the expected number of respondents (according to company size) multiplied by the estimated hour burden (according to company size) multiplied by the estimated hourly cost.

Number of Respondents

The Coast Guard expects a total of 102 respondents per year for the next 3 years (96 medium-sizes and 6 large-sizes). This takes into consideration the number of new applicants and the number of OSROs that report/interact regularly. Classified OSROs will only report voluntarily when there are changes to their response resources. The Coast Guard expects an average of 90 classified OSROs to report/interact annually for the next three years (84 medium-sizes and 6 large-sizes), plus an additional 12 new OSRO applicants that are verified and classified by the Coast Guard (12 medium-sizes), which bring the total of OSRO respondents to 102. This is summarized in the table below.

Annual Number or Respondents			
Company Size	Report/Interact	New Applicants	Total
Medium	84	12	96
Large	6	0	6
Total	90	12	102

Hour Burden

The Coast Guard estimates that it takes medium-size companies 12 hours to complete a survey and large-size companies 24 hours. Total number of burden hours is estimated to be the following:

- 1,152 hours for medium-size companies (12 hours x 96), and
- 144 hours for large-size companies (24 hours x 6).
- **1,296** total annual hour burden to the industry.

Estimated Cost

For medium-size and large-size companies, it is assumed that management (assuming a pay equivalent of a GS-12) will need to determine actual amounts of equipment, with clerical staff (GS-5) assisting at some point. It is assumed that 50% of the required average time will be situated with management, and the other 50% with the clerical staff.

Estimated Hourly Cost for Average Respondents

Company Size	Clerical		Management		Total
	Hours	*Pay	Hours	*Pay	
Medium	6.0	\$33.00	6.0	\$62.00	\$570.00
Large	12.0	\$33.00	12.0	\$62.00	\$1,140.00

*Source: 2008 COMDTINST 7310. 1L

Total Annual Costs

The annual burden on the entire industry would be the following:

- \$54,720 for medium-size companies (\$570 x 96 respondents); and
- \$6,840 for large-size companies (\$1,140 x 6).
- **\$61,560** total annual burden to respondents.

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

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

14. Estimates of annualized Federal Government costs.

It is expected that on average, it will take a Coast Guard specialist (GS-12, at \$58/hour) 15 hours, and 40 hours to review, record and update information for medium and large companies, respectively. This will result in the following annual hour burden:

- 1,440 hours for processing medium-size companies (15 x 96), and
- 240 hours for processing large-size companies (40 x 6).
- **1,680** hours in total

This is estimated to have a cost of **\$97,440** annually for the Coast Guard (1,680 hours x \$58/hour).

15. Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change in the OSRO population.

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 collection will not be published for statistical purposes.

17. Approval to not display expiration date.

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

18. Explain each exception to the certification statement.

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.