

**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 onboard 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

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

- 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 on the new liquid chemical proposed for transport in bulk by water 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.

Proposals to transport new liquid chemicals in bulk by water can be mailed, faxed or electronically submitted via e-mail to the Coast Guard. Emails may be sent to: Hazmat@comdt.uscg.mil. We estimate that 100% of the reporting requirements can be done electronically. At this time, 100% of reports are done electronically.

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

The Coast Guard seeks to identify sources that provide duplicate information and use information submitted to other organizations as a means to reduce the burden on the industry. Since other organizations request similar data, the Coast Guard avoids duplication by allowing industry to submit the information we require using data forms from such organizations.

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.

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.

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

8) Consultation.

A 60-day Notice and 30-day Notice were published in the Federal Register to obtain public comment on this collection. (See USCG-2010-0266: April 20, 2010; 75 FR 20616; July 9, 2010, 75 FR 39551). The USCG has not received any comments on this information collection.

9) Provide any payment or gift to respondents.

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

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. In all instances the CG promises confidentiality due to proprietary information (i.e., trade secrets). The CG assumes the info provided is proprietary unless told otherwise by the chemical manufacturers.

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

There are no questions of sensitive language.

12) Estimate of the hour and cost burden.

- The estimated number of annual respondents is 10.
- The estimated number of annual responses is 20.
- The estimated hour burden is 600 hours.
- The estimated cost burden is \$43,800.

Every year, about 10 manufactures submit an estimated 2 chemical a year, making the total number of submissions 20. It takes approximately 30 hours for industry to complete and submit information regarding hazardous materials. This estimate includes time for gathering data from several sources. **Total annual burden on respondents is 600 hours (20 submissions x 30 hours¹).**

The cost burden to respondents is summarized in Table 1.

Table 1. Cost to Respondents

30 hours to complete at \$73/hr ² (GS-13 equivalent)	\$2,190/submission
Average annual number of submissions	20
Total cost to respondents	\$43,800/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

10 hours to review the information at \$67/hr ³ (GS-13 equivalent)	\$670/submission
Average number of submissions	20
Total cost to Federal Government	\$14,300/year

¹ Burden hours per response increased from 3 to 30 to reflect current complexity/detail provided in a submission. The prior 3 hour estimate was used unchanged for approximately 20 years.

² Wage rates set forth under COMDTINST 7310.1L

³ Wage rates set forth under COMDTINST 7310.1L

15) Reasons for changes in burden.

The change in burden is an ADJUSTMENT. The increase is due to the Coast Guard revising the burden estimate per response. The burden per response was increased from 3 hours to 30 hours per response to reflect the change in complexity/detail of the information provided. The three hour burden estimate had remained unchanged for approximately 20 years. This change in burden per response resulted in an increase in the estimated annual burden. Additionally, in this information collection request, the Coast Guard has dropped the reference to form CG-4355, as the document is no longer used.

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.

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

18) 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.