

**U.S. Coast Guard (USCG) Supporting Statement
for
Oil Skimmers**

A. Justification.

1) Circumstances that make the collection of information necessary.

The explosion of the Deepwater Horizon Mobile Offshore Drilling Unit (MODU) on April 20, 2010 caused the current massive oil spill in the Gulf of Mexico. This environmentally devastating oil spill has been declared a "Spill of National Significance" by the President of the United States. Titles 46 USC 55113, 46 USC 501(b) and overall spill response authority in 33 USC 1321(c) authorize the U.S. Coast Guard (USCG) to collect information from manufacturers, vendors, owners of oil skimming equipment to aid in oil pollution recovery operations for Oil Spill Incidents. The Federal On-Scene Coordinator (FOSC), the National Incident Command (NIC), and the USCG are responsible for the management of conducting all oil clean-up operations in the Gulf of Mexico for this Spill of National Significance. As such, the NIC (at USCG Headquarters in Washington, DC) is the primary Command Center for all incident activities. These activities include the development of strategies and tactics to conduct incident operations. On June 16, 2010, the FOSC for the Deepwater Horizon Oil Spill (RADM J. A. Watson, USCG) determined that there is an inadequate supply of oil skimming equipment capable of keeping pace with the flow of oil escaping from the well. The USCG must have a very aggressive skimming strategy and examine every possible opportunity to bring additional oil skimming equipment to bear for the Deepwater Horizon Response.

The request for information is strictly voluntary and will enable the USCG to determine the availability of skimmers that could potentially be used for the Deepwater Horizon Response in the Gulf of Mexico. The USCG is specifically looking for oil skimming equipment, which utilizes proven technology and has previously demonstrated its capability. The system will use an online form posted on the USCG's Homeport website to collect oil skimming equipment information from the public.

The information collected is critical for the urgent response to this Spill of National Significance (SONS). On June 30, 2010, the Coast Guard and Environmental Protection Agency published a joint Emergency temporary interim rule titled "Temporary Suspension of Certain Oil Spill Response Time Requirements To Support Deepwater Horizon Oil Spill of National Significance (SONS) Response," which suspended oil spill response time requirements, and certain identification and location requirements, for facilities and vessels whose response resources are relocated in support of the Deepwater Horizon SONS response. Oil Spill Removal Organizations (OSROs) will have the temporary opportunity to relocate response resources from current locations to the Gulf of Mexico. This rule and this collection directly assist in the urgently needed immediate relocation of nationwide oil spill response resources to the Gulf of Mexico to aid in the response to the Deepwater Horizon SONS.

The information collected is critical for the urgent response to the SONS. The collection also supports the following strategic DHS and USCG responsibilities and mandates:

Department of Homeland Security (DHS)
Prevention
Protection

USCG
Marine Safety
Protection of the Natural Resources

USCG Marine Safety, Security and Stewardship Directorate, COMDT (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.

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

The USCG will be the primary user of the information submitted. It will be collected electronically (via online submission) to the USCG's Homeport website—<https://homeport.uscg.mil/>. All of the skimming equipment and contact information will be retained at USCG Headquarters COMDT (CG-432). These records will be retained permanently as part of the oil and hazardous waste program. Such records will be transferred to the National Archives and Records Administration ten (10) years after case is closed. The purpose of the information collected will determine the availability of oil skimmers that could potentially be used for the Deepwater Horizon Response in the Gulf of Mexico. The information will be shared with the FOSC and the NIC if oil skimming equipment is determined to be viable for use in the Deepwater Horizon Response. The equipment and contact information may be shared with other USCG offices and components of the NIC if the oil skimming equipment is determined to be viable for use in the Deepwater Horizon Response. We will contact the submitter and obtain consent prior to release to any person or entity outside of the Federal Government.

3) Consideration of the use of improved information technology.

The USCG has determined that the use of improved IT systems are being used to electronically collect the information (via online) to the USCG's Homeport website—<https://homeport.uscg.mil/>. 100% of the reporting and recordkeeping requirements will be done via the web.

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

While an inventory list exists in OSRO, it does not provide the level of detail needed. In addition, this information is not collected through any other means, and therefore is not duplicated elsewhere.

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

The information requested is strictly voluntary. Therefore, it does not have any impact on small businesses or other small entities.

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

This first-ever collection of oil skimming information is extremely critical and must be conducted by USCG to determine the availability of skimmers for the Deepwater Horizon Response. The dire consequences of not collecting this data would be very ineffective and inefficient to the clean-up in the Gulf of Mexico. If this will be an on-going collection, USCG plans to proceed using the normal clearance process to retain approval.

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

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

8) Consultation.

After OMB authorizes the collection of information, the Joint Information Center for the FOSC and the NIC will announce to the media the establishment of the request for oil skimmers via CG Form 3146 (posted on the USCG's Homeport website – <https://homeport.uscg.mil/>). If USCG seeks to renew this collection, a 60 Day and 30 Day Federal Register Notice will be published to seek public comments.

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

There is no offer of monetary or material value to the respondents for the voluntary submissions of oil skimmer information. Furthermore, this request for information does not obligate the USCG to procure the oil skimmers identified. If USCG requires additional data, we may seek a follow-on information collection.

10) Describe any assurance of confidentiality provided to respondents.

There are assurances of confidentiality provided to the respondents for this information collection. The system has been certified by the government standard to handle confidential information. The Privacy Threshold Analysis (PTA) for this collection was submitted to DHS on June 19, 2010 and approved. A revised PTA was submitted on 29 June 2010 for concurrence.

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

There are no questions regarding sensitive language.

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

- **The annual number of respondents is 2,500.**
- **The annual number of responses is 2,500.**
- **The estimated completion time per person is 10 minutes.**
- **The estimated annual burden hours is 417.**

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.

The estimated annualized cost to the USCG is \$107,500. This cost is based on annual estimate of 2,500 respondents with an average of one (1) hour of government time to evaluate and record each submittal at a rate of \$43 per hour.

The estimated time per person to complete the submission is 10 minutes.

15) Explain the reasons for the change in burden.

There is no change in burden because this is a new request.

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

The USCG does not intend to employ the use of statistics or the publication thereof for this information collection.

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

The USCG will display the expiration date for OMB approval of this Information Collection.

18) Explain each exception to the certification statement.

The USCG 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.