

**Supporting Statement  
for  
National Response Resource Inventory**

OMB No.: 1625-0102  
COLLECTION INSTRUMENTS: Instruction

**A. Justification.**

1. Circumstances that make the collection of information necessary.

The Oil Pollution Act of 1990 (OPA 90) (Pub. L. 101-380 sec. 4202(a); 33 U.S.C. 1321 (j)(2)(A)) mandated the creation of a national database of response resources maintained by the Coast Guard. This voluntary equipment locator system is known as the Response Resource Inventory (RRI).

In 1995, the RRI was expanded to accommodate the Coast Guard's Oil Spill Removal Organization (OSRO)<sup>1</sup> classification initiative. The OSRO classification process can streamline the preparation and review of vessel and facility response plans by allowing planholders to list OSROs by name and classification as an alternative to listing extensive resources in their plans, since their resources are listed in the RRI. OSRO classification is a strictly voluntary program which planholders can use for regulatory planning compliance purposes. An OSRO does not have to be classified and planholders do not have to limit their response resources to Coast Guard classified OSROs. Information about the OSRO classification program and how to participate in it is at—

<http://www.uscg.mil/hq/nsfweb/nsf/nsfcc/ops/ResponseSupport/RRAB/rrab.asp>.

The collection of information supports the following strategic goals:

Department of Homeland Security

- Protection
- Recover
- Response

Coast Guard

- Protection of Natural Resources

Response Policy Directorate (CG-5R)

- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

2. Purpose of the information collection.

The voluntary submission of this information will assist in maintaining the established centralized response equipment inventory. The collected information will allow for better organization and response time in events similar to the M/V EXXON VALDEZ disaster, and thus help reduce environmental damages. The information has been used to record the location and availability of response resources.

3. Consideration of the use of improved information technology.

The information is submitted electronically via the web at <https://cgrri.uscg.mil>. We estimate that 100% of the reporting requirements are done electronically.

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

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<sup>1</sup> 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).

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 supplies information only if it decides to participate in the Coast Guard classification process. 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 or locations. This could significantly slow response efforts to vessel emergencies and potentially increase environmental damages from oil spills near environmentally sensitive areas.

Timely collection or verification of resource data offers several benefits: (1) better organization in the case of an emergency, (2) potential decreases in the amount of time needed to respond to a spill, and (3) the possibility of using acquired information for contingency planning by the plan holders.

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 Notice (See [USCG-2013-0782], September 5, 2013, 78 FR 54666) and 30-Day Notice (December 10, 2013, 78 FR 74156) were published in the *Federal Register* to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

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.

- **The estimated number of annual respondents is 137.**
- **The estimated number of annual responses is 137.**
- **The estimated hour burden is 1,752 hours.**
- **The estimated cost burden is \$92,856.**

*Burden estimates to industry.* 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 137 respondents per year for the next 3 years (128 medium-sizes and 9 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 114 classified OSROs to report/interact annually for the next three years (105 medium-sizes and 9 large-sizes), plus an additional 23 new OSRO applicants based on previous years data and professional judgment (all medium-sizes), which bring the total of OSRO respondents to 137. This is summarized in the Table 1 of Appendix A.

*Hour Burden.* The Coast Guard estimates that it takes medium-size companies 12 hours to complete a survey and large-size companies 24 hours. The total estimated hour burden is summarized in the Table 2 of Appendix A.

*Cost Burden.* It is assumed that management (at a GS-12 equivalent pay level) will determine the amount of equipment necessary with some clerical staff (at a GS-5 pay level) assistance; the work is expected to be split 50% by management and 50% by clerical staff (see Table 3). The total estimated cost burden is summarized in the Table 4 of Appendix A.

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 Federal Government cost is \$148,200 annually (see Table 5 of Appendix A).

15. Explain the reasons for the change in burden.

The change in burden (i.e., increase) is an ADJUSTMENT due to an increase in the estimated annual number of respondents. There is no proposed change to the reporting requirements of this collection. The reporting requirements remain unchanged.

The following items listed below are changes to the collection:

- Updates are provided for cost burden associated with this collection of information.
- The Coast Guard has updated printable instructions for this collection of information (i.e., the addition of the OMB expiration date, and in the burden statement (footer) the update of the CG's mailing address).

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.