

Supporting Statement for National Response Resource Inventory

OMB No.: 1625-0102
COLLECTION INSTRUMENTS: Instruction

A. Justification

1. Circumstances that make the collection 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)¹ 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/nswfweb/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 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.

There is no State or local regulation relating to this issue. No similar information collection is conducted

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).

by other Federal agencies. Similar information does not exist in a centralized location.

5. Methods to minimize the burden to small businesses.

An OSRO supplies information only if it voluntarily 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 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 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 of response resources during 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. 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 (See [USCG-2016-1093], February 10, 2017, 82 FR 10375) and 30-Day Notice (August 10, 2017, 82 FR 37464) 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. 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. This information collection request is covered by the Coast Guard Maritime Information eXchange (CGMIX) Privacy Impact Assessment (PIA) and Marine Information for Safety and Law Enforcement (MISLE) System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- <https://www.dhs.gov/publication/dhsuscgpia-022-coast-guard-maritime-information-exchange>
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

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 to respondents.

- The estimated number of annual respondents is 147.
- The estimated number of annual responses is 147.
- The estimated hour burden is 1,378 hours.
- The estimated cost burden is \$100,594.

The burden to respondents is provided in Appendix A. The wage rates used are in accordance with the current edition of COMDTINST 7310.1(series) for "Out-Government" personnel.

We estimate that the time it takes an OSRO specialist to enter data into the RRI depends on whether it is a new OSRO application or an update to an existing OSRO application. The time also depends on the size of the OSRO.² We estimate that a new application takes about 40 hours for a large-size OSRO, 20 hours for a medium-size OSRO, and 10 hours for a small-size OSRO. We estimate that an application update takes 24 hours for a large-size OSRO, 12 hours for a medium-size OSRO, and 6 hours for a small-size OSRO. The position of an OSRO specialist is analogous to a GS-12.

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 annual Federal Government cost is \$61,472 (see Appendix B). We estimate that the time it takes a Coast Guard response specialist to review an OSRO application (new or update) depends on the size of the OSRO. We estimate that a new application review takes 24 hours for a large-size OSRO, 16 hours for a medium-size OSRO, and 8 hours for a small-size OSRO. We estimate that an application update review takes 12 hours for a large-size OSRO, 8 hours for a medium-size OSRO, and 4 hours for a small-size OSRO. We estimate that the reviews are conducted by a GS-12. The wage rate shown is in accordance with the current edition of COMDTINST 7310.1(series) for "In-Government" personnel.

15. Reasons for the change in burden.

The change in burden (i.e., decrease) is an ADJUSTMENT due to a change in the methodology for calculating burden. In past ICRs we did not differentiate between the industry hour burden for inputting a new RRI submission or updating an existing RRI submission. In this ICR, we estimate that it takes fewer hours (i.e., 50% fewer hours) to review/update an existing RRI submission than to input a new submission. There is no proposed change to the reporting requirements of this collection. The reporting requirements remain unchanged.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

17. Approval for not displaying 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.

² For estimation purposes, we have grouped OSROs by the number of Captain of the Port (COTP) zones and/or Alternative Classification Cities (ACCs) that they offer coverage. A small-size OSRO provides coverage in 5 or fewer COTP zones/ACCs. A medium-size OSRO provides coverage in 6 to 30 COTP zones/ACCs. A large-size OSRO provides coverage in 31 or more COTP zones/ACCs.