

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. Code (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. In 2022, the RRI was expanded to accommodate OSROs that maintain resources for Non-Floating Oils (NFO)/Dispersants.

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 this [LINK](#).

Coast Guard is revising this collection to include the addition of a new optional NFO/Dispersants application.

The statutory authority is 33 U.S.C. 1321(j)(2)(A).

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.

Regarding Usability Testing, this ICR—

- Public-facing instructions were tested by the staff of the CG Office of Standards Evaluation and Development (CG-REG) to ensure the use of plain language. Usability Testing participants reported that they had no difficulty navigating or understanding the instructions. As a result, Coast Guard did not make any changes to the collection. No changes were needed.
- Is not related to a public benefit program as detailed in OMB M-22-10 (titled "Improving Access to Public Benefits Programs Through the Paperwork Reduction Act" dated April 13, 2022).

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).

- Is voluntary/option.
- Does not require the use of a form.

4. Efforts to identify duplication.

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.

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 was published in the Federal Register to obtain public comment on this collection (See [USCG-2024-0234]; March 28, 2024, 89 FR 21528) and 30-Day Notice (July 16, 2024, 89 FR 57919) 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 88.
- The estimated number of annual responses is 88.
- The estimated hour burden is 1,964 hours.
- The estimated cost burden is \$147,300.

The burden to respondents is provided in Appendix A. We estimate that the time it takes an OSRO Specialist to enter data into the RRI varies based on whether it is—(1) a new application or update to application, (2) type of application (Floating Oils, NFO/Dispersants), and (3) the size of the OSRO.² For Floating Oils, 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. For NFO/Dispersants, we estimate that a new application takes about 1,000 hours and an application update about 500 hours. For the wage rate, we used the Bureau of Labor Statistics (BLS) wage rate for Management Analysts (13-1111) [May 2022, mean hourly wage, loaded 50%, and rounded].³

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 \$87,672 (see Appendix B). We estimate that the time it takes a Coast Guard Response Specialist varies based on several factors. For Floating Oils, 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. For NFO/Dispersants, we estimate that a new application review takes about 500 hours and an application update review about 250 hours.

We estimate that the reviews are conducted by a GS-12. For the wage rate, we used Office of Personnel Management (OPM) data [2024-RUS Salary Table, GS-12-Step 5, hourly basic rate, loaded 65%, and rounded].⁴

15. Reasons for the change in burden.

The change in burden is—

- a PROGRAM CHANGE, due to the addition of a new optional NFO/Dispersants application.
- an ADJUSTMENT, due to a change (i.e., decrease) in the estimated annual number of responses.

The methodology for calculating burden 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.

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.

³ <https://www.bls.gov/oes/2022/may/oes131111.htm>

⁴ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx

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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.