



## Comment Submitted by John Doran

The is a Comment on the **Coast Guard (USCG) Notice: Information Collection Request to Office of Management and Budget; OMB Control Number: 1625-0030**

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Comment Period Closed

Oct 2 2017, at 11:59 PM ET

ID: USCG-2017-0109-0002

Tracking Number: 1k1-8xwc-ski8

### Comment

The Information Collection Request to Office of Management and Budget; OMB Control Number: 1625-0030 contains a summary statement that says:

Summary: Vessels with a cargo capacity of 250 barrels or more of oil or hazardous materials must develop and maintain transfer procedures. Transfer procedures provide basic safety information for operating transfer systems with the goal of pollution prevention.

33 CFR 155.720 Transfer procedures however requires: The operator of a vessel with a capacity of 250 or more barrels of oil, hazardous material, or liquefied gas as regulated in Table 4 of 46 CFR part 154 shall provide transfer procedures that meet the requirements of this part and part 156 of this chapter for transferring - to or from the vessel; and from tank to tank within the vessel. It is therefore requested that the information collection request be clarified to address the specific regulation, as the summary statement insinuates that that transfer procedures are only required for vessels with a cargo capacity of 250 barrels or more of oil or hazardous materials vs. with a capacity of 250 or more barrels of oil, hazardous material, or liquefied gas as regulated in Table 4 of 46 CFR part 154, or that the information request is simply limited to vessels with a cargo capacity of 250 barrels or more of oil or hazardous materials.

For example, a towing vessel with a capacity of 250 or more barrels (10,500 gallons) of oil is required to have Oil Transfer Procedures as per 33 CFR 155.720, yet your summary statement insinuates that Oil Transfer Procedures are only required for vessels carrying the oil as cargo. The same applies for vessels with a capacity of 250 or more barrels of liquefied gas as fuel or cargo.

### Document Information

**Date Posted:**

Aug 4, 2017

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oversight. Certainly, the COTP needs operational oversight and there may be stipulations on WHERE these transfers take place and that adequate response resources, if required, are made ready. But specific approval should not be required, just simple notification to the cognizant OCMI/COTP/Sector. The existing regulation is woefully outdated and should be replaced or deleted.