

## MEMORANDUM

**Date:** March 8, 2007

**Subj:** Request for OMB Approval of Survey to Capture Outcomes for Fiscal Year 2007  
Compliance Assistance Activities for Region 4

**From:** Denisse Diaz, Chief  
Enforcement & Compliance Planning and Analysis Section  
Office of Enforcement and Accountability  
Region 4

**Thru:** Carolyn Scully  
Office of Environmental Information

**To:** Amy Flynn, OIRA Desk Officer  
Office of Management and Budget

The Environmental Protection Agency, Region 4, is submitting an Information Collection Request (ICR) for approval under the generic ICR 1860.03 OMB Control #2020-0015 to survey recipients of compliance assistance in fiscal year 2007. This survey request is to measure the Region's success and to report under the Government Performance Results Act (GPRA) for outcomes achieved from direct compliance assistance provided to regulated entities. The three GRPA outcome measures include (1) the number of respondents reporting an increased understanding, (2) the number reporting a change in environmental practices, and (3) the number reporting a reduction in pollution. Through this time period, we estimate we will reach approximately 3,500 multi-sector recipients.

Information will be collected from facility visits, facility re-visits, on-going facility specific work, and response to inquiry. The method of survey delivery will be primarily through mailed surveys or phone conversations several months after the direct assistance was provided to determine if actual changes were made. Results will be recorded in the Compliance Assistance Module of the Integrated Compliance Information System (ICIS).

The audience for this ICR includes members of the regulated community and, to a lesser extent, state and local regulators and compliance assistance providers that receive EPA compliance assistance tools or services. Again, we estimate we will reach approximately 3,500 multi-sector recipients.

If you have any questions, please contact Wesley Hardegree, EPA Region 4, at (404) 562-9629.

cc: Hans Scheifele, OECA

Attachment

# REQUEST FOR APPROVAL OF INFORMATION COLLECTION ACTIVITY

March 8, 2007

EPA REGION 4

ENFORCEMENT & COMPLIANCE PLANNING AND ANALYSIS SECTION

Denisse Diaz, Section Chief, (404) 562-9610

Wesley Hardegree, Region 4 Compliance Assistance Coordinator, (404) 562-9629

## I. Background

Under The Government Performance and Results Act (GPRA), the region is required to report outcomes achieved from direct compliance assistance provided to regulated entities. Beginning in Fiscal Year 2007, the Region must report the percent of entities that (1) increased understanding, (2) changed environmental management practices, and (3) reduced, treated or eliminated pollution as a result of EPA assistance from Workshop/training, Facility Visit and Facility Re-visit activities that support the national priorities.

The region collects compliance assistance outcome data from many programs and numerous sector initiatives. Therefore, this survey will be used by regional staff contacting sector recipients from various media and programs. The audience for this Information Collection Request (ICR) includes members of the regulated community and, to a lesser extent, state and local regulators and compliance assistance providers that receive EPA compliance assistance tools or services. We estimate reaching approximately 3,500 recipients who received compliance assistance through September 31, 2007.

## II. Survey Purpose and Description

We propose to use the six (6) generic survey questions already approved by Office of Management and Budget (OMB), OMB control # 2020-0015.

Measurement will be collected from facility visits, facility re-visits, on-going facility specific work, response to inquiry, workshops, training courses, and presentations. Regulated entities receiving this direct assistance will be contacted several months after the event to review if knowledge of environmental requirements and best management practices was increased and acted upon.

The proposed survey below does not involve fact-finding for the purposes of regulatory development or enforcement.

## III. Survey Methodology and Use of Results

The region will normally notify the regulated entity at the time of compliance assistance delivery that EPA plans to follow up with them to assess the quality of the assistance. At this time regional staff will indicate the assessment method to be used (e.g., phone, letter, email).

The method of survey delivery will primarily be through mailed surveys or phone conversations conducted several months after the direct assistance to determine if actual changes were made.

Results will be recorded in the Compliance Assistance Module of the Integrated Compliance Information System (ICIS) and reported to regional managers for certification to Office of Compliance at mid-year and end-of-year.

#### IV. Respondents Burden

To minimize the respondent burden, the simple and clear six (6) generic survey questions approved by Office of Management and Budget (OMB) will be used.

- a) How many respondents do you anticipate will respond to the survey?

*National Priorities plus core program: 3,500*

- b) How long will it take to complete the survey?

10 minutes

- c) Calculate the cost per hour for the respondent. The ICR calculates \$68.63/hour

Total Burden Hours:

*National Priorities and Core Program:*

$(3,500 \times 10 \text{ min.}) \times (1 \text{ hour} / 60 \text{ min.}) = 583 \text{ hours in FY07}$

Total Respondents Cost:

*National Priorities and Core Programs:*

$583 \times \$68.63 = \$40,011.29 \text{ for FY07}$

#### V. Agency Burden

Time it will take staff to review the responses and conduct analysis. The ICR calculates \$41.25/hour.

Total Agency Burden (EPA staff time in hours multiplied by cost per hour):

*National Priorities and Core Program:*

$240 \text{ hours} \times \$41.25 = \$9,900 \text{ for FY07}$

## Region 4 FY 2007 Survey

1. What regulatory action(s) did you take as a result of the compliance assistance activity?
  - a. Filed a notification
  - b. Obtained a permit or certification
  - c. Provided data to EPA, state, or local regulator
  - d. Submitted reports to EPA, state, or local regulator
  - e. Complied with an environmental requirement
  - f. No regulatory action was taken
  - g. Other, specify \_\_\_\_\_
  
2. What process change(s) at your facility did you make as a result of the compliance assistance activity?
  - a. Changed the storage or handling of a waste or emission
  - b. Changed a process or practice
  - c. Purchased new process equipment
  - d. Implemented material or waste recycling system
  - e. Installed pollution control equipment (e.g., scrubbers, control technique)
  - f. Installed a waste treatment system
  - g. Switched to renewable energy
  - h. No process changes were made
  - i. Other, specify \_\_\_\_\_
  
3. What management change(s) at your facility did you take as a result of the compliance assistance activity?
  - a. Conducted a self audit
  - b. Instituted an environmental management policy, system or procedure
  - c. Instituted training or other communication to improve awareness and/or practices
  - d. Identified pollution prevention opportunity
  - e. No management actions were taken
  - f. Other, specify \_\_\_\_\_
  
4. Who (if anyone) did you contact for further assistance as a result of the compliance assistance activity?
  - a. A vendor
  - b. A state or local regulatory agency
  - c. A non-regulatory local source for additional compliance assistance
  - d. No contacts were made
  - e. Other, specify \_\_\_\_\_

5. Please identify any reductions or the elimination of a pollutant(s) that resulted from the actions taken as a result of the compliance assistance activity.

- reduced or eliminated waste (solid/hazardous)
- reduced or eliminated air emissions (air, fugitive)
- reduced or eliminated pollutant emissions (wastewater)
- other, specify \_\_\_\_\_
- none
- don't know.

6. Have you realized, or expect to realize, a cost savings from actions taken as a result of the compliance assistance activity.

- Yes
- No

**Thank you for your input!**

**Wes Hardegree  
Region 4 Compliance Assistance Coordinator  
Enforcement & Compliance Planning & Analysis Section  
Office of Environmental Accountability**

Public reporting burden for this collection is estimated to average 10 minutes per response, including time for reviewing instructions, gathering information, and completing and reviewing the information. Send comments on the Agency's need for this information, the accuracy of the provided burden estimate, and any suggestions for reducing the burden, including the use of automated collection techniques, to the Director, Office of Environmental Information, Collection Strategies Division, United States Environmental Protection Agency (mail Code 2822), 1200 Pennsylvania Ave, NW Washington, D.C. 20460; and to the Office of Information & Regulatory Affairs, Office of Management & Budget, 725 17<sup>th</sup> Street, NW, Washington D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR 1860.03 and the OMB control number 2020-0015 in any correspondence. Do not send your completed survey to this address. Approval expires March 31, 2008.