



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Review of Compliance Assistance Centers Survey under ICR No. 1860.03 (OMB 2020-0015)

FROM: Emily Chow
Office of Compliance

THRU: Carolyn Scully
Office of Environmental Information

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

Attached for your review is a survey for evaluating the effectiveness of the Post Inspection Storm water Web Site. EPA seeks to gather information to see if this web site is meeting the needs of its intended users and if it helps them to better achieve compliance or beyond compliance with EPA or state environmental regulations. If so, EPA may expand this program to include other sectors that are priority sectors for the Office of Enforcement and Compliance Assurance.

The survey will be posted on the Post Inspection Storm water Web Site and it will be used as a phone survey to determine the usefulness and effectiveness of the site.

Note: EPA will not have access to names or addresses of individuals who fill out the online survey and will not use information gathered from both surveys for inspection or enforcement purposes. For comments or questions on the survey, please contact Emily Chow at 202-564-7071.

If you have any questions about the ICR or this survey submission, please contact me Carolyn Scully at 202-566-1457

Thank you for your cooperation in this matter.

Attachment

Request for Approval of Information Collection Activity

I. Background:

The Environmental Protection Agency (EPA) initiated a pilot project to provide compliance assistance to the construction sites that have recently been inspected by EPA. After each storm water inspection at a construction site, EPA will send a letter to the site manager referring them to the Post Inspection Storm water Web Site to obtain compliance assistance resources developed specifically for this industry. The web site will also provide links to the regional and state assistance resources. EPA Region I was the first to implement a similar program and received favorable feedback. As a result, the Office of Enforcement and Compliance Assurance (OECA) in EPA Headquarters wants to implement such a program nationwide. If the post inspection storm water pilot is well received, EPA will consider expanding this program to other OECA priority sectors.

II. Survey Purpose and Description:

EPA seeks feedback on the usefulness and effectiveness of the Post Inspection Storm water Web Site and the post inspection approach in providing compliance assistance. Based on the feedback, EPA will determine if the storm water construction web site pilot should be expanded to include information for other OECA priority sectors. Specifically, EPA may use the information obtained from survey respondents to:

- change compliance assistance tool marketing strategies to increase awareness;
- identify methods to improve compliance assistance tools and delivery; and
- develop new compliance assistance tools to address identified problem areas.

The information obtained through this survey event will not be used for regulatory development or to make broad generalizations or claims.

III. Survey Methodology and Use of Results

The target audience for the survey is the Post Inspection Letter recipients and the Post Inspection Storm water Web Site users. EPA plans to sponsor the posting of the survey instrument on-line in addition to conducting a phone survey. The on-line survey will be accessible through the Post Inspection Storm water Web Site, and EPA's contractor will follow-up with each Post Inspection Letter recipients to conduct the phone survey. The on-line survey respondents will be anonymous to EPA. We anticipate that approximately 35 users will respond to the on-line survey and 350 will respond to the phone survey. We estimate that it will take a respondent

approximately three minutes to complete the survey. The surveys will be made accessible to potential respondents through the storm water web site through September 30, 2007.

EPA's contractor will gather information from these two surveys and aggregate all survey responses and summarize the findings. Aggregated survey results from three questions on increased understanding, behavior change and pollution reduction will be used for reporting to Congress under Goal 5 or our Government Performance and Results Act (GPRA) reporting requirements for compliance assistance.

IV. Respondents= Burden

Number of respondents:	385
Minutes per response:	3 minutes
Cost per hour:	\$82.74 (\$39.40 + 110%)*
Cost per response:	$\$82.74 \times 3/60 = \4.14
Total burden hours:	$385 \times 3/60 = 20$ hours
Total burden dollar cost:	$20 \text{ hours} \times \$82.74 = \$1,654.80$

*These rates are from the United States Department of Labor, Bureau of Labor Statistics, September, 2004, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

V. Agency Burden

EPA Staff Time:	15 hours
Cost per hour:	\$56.02**
Total burden hours:	$15 \text{ hours} \times \$56.02 = \$840.30$

**Based on a 2005 GS 13/01 salary of \$74,782 or \$35.01/hr with overhead the hourly rate is \$56.02.

Survey Questions

19888. Please choose the category that best describes you:

- Corporate Environmental Manager
- Owner of a construction site
- Developer
- Contractor
- Sub-contractor
- Construction Foreman

19889. How did you hear about the Post-Inspection Stormwater Construction Web Site:

- I received the Post-Inspection Fact Sheet during the inspection
- I received the Post-Inspection Fact Sheet/Letter a few weeks after the inspection
- I heard from a colleague who received the Fact Sheet/Letter
- I heard from my trade association
- Other _____ (Please specify)

19890. The Post-Inspection Fact Sheet is a good way for EPA to follow up on the inspection.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

19891. If the answer to question #3 is “disagree” or “strongly disagree,” please specify what is the best way to provide compliance assistance to you:

19892. Providing all relevant stormwater construction information on one web site is helpful.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

19893. Which part of the Post-Inspection Stormwater Web Site is most helpful to you and why? Please specify.

19894. The Post-Inspection Stormwater Web Site helps me understand the environmental regulations that apply to my industry.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Have never used the Post-Inspection Stormwater Web Site for this purpose

19895. What action(s) have you taken to improve environmental practices, in whole or in part, due to information you have found through the Post-Inspection Stormwater Web Site: (Select all that apply)

- contacted a vendor
- changed the handling of waste or emission
- performed a self audit
- contacted a regulatory agency
- changed a process or practice
- obtained a permit or certification
- took an action other than listed above to comply with a regulatory requirement
- Identified a pollution prevention opportunity
- other: _____
- I have never taken an action to improve an environmental practice as a result of using the Post-Inspection Stormwater Web Site

19896. Please identify whether you reduced, treated, or eliminated water pollution as a result of using the Post-Inspection Stormwater Web Site:

- Prevented, reduced or eliminated stormwater discharges to receiving waters
- other, please specify _____
- none
- don't know

If possible, please provide the amount of pollution you prevented, reduced or eliminated. _____

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10. Please identify whether you reduced, treated, or eliminated other pollutions as a result of using the Post-Inspection Stormwater Web Site:

- Prevented, reduced or eliminated waste (solid/hazardous)
- Prevented, reduced or eliminated air emissions (air, fugitive)

- other, please specify _____
- none
- don=t know

If possible, please provide the amount of pollution you prevented, reduced or eliminated. _____

11. Has using the Post-Inspection Stormwater Web Site, or the actions taken above, resulted in cost savings to you? (Cost includes time as well as dollars)

- Yes No Don=t know

If yes, please provide details _____

12. What would you suggest to improve the Post-Inspection Stormwater Web Site?

Thank you for your input!

**Emily Chow
Office of Compliance
Office of Enforcement and Compliance Assurance
EPA Headquarters**

Public reporting burden for this collection is estimated to average 3 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 17th 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.