

MEMORANDUM

DATE: September 20, 2006

SUBJECT: Request for OMB Expedited Approval of “Tribal New Source Review (NSR) Customer Satisfaction Questionnaire” under EPA Information Collection Request #1711.04, OMB No 2090-0019

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THROUGH: Patricia A. Bonner
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TO: Robert Garnett
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The Environmental Protection Agency’s (EPA) Community and Tribal Program Group (CTPG) works with tribes and communities to protect public health and the environment through innovative approaches and regulation with an emphasis on:

- Protecting the sovereignty and cultural resources of American Indian Nations;
- Conducting effective public involvement;
- Protecting disproportionately affected communities;
- Supporting State and local government programs;
- Developing sustainable growth programs and policies.

CTPG works with tribes to ensure they have appropriate input and consultation into EPA’s regulatory programs. In part, this is accomplished by increasing tribal capacity through outreach, training and communication with tribes.

On August 9, 2006, EPA submitted a proposal to promulgate a Federal Implementation Plan (FIP) under the Clean Air Act (the Act) for tribes in Indian country. The FIP would include two basic air quality regulations for the protection of communities in Indian country. The first rule would apply to minor stationary sources and minor modifications at major stationary sources in Indian country (minor NSR rule). The second rule would apply to all new major stationary sources and major modifications located in areas of Indian country that are designated as not attaining the National Ambient Air Quality Standards (NAAQS) (nonattainment major NSR rule). These rules (together known as the “NSR Tribal rule”) would be implemented by EPA, or a

delegate tribal agency assisting EPA with administration of the rules, until replaced by an EPA-approved tribal implementation plan for an area of Indian country.

Due to the importance of the NSR Tribal Rule, it is critical that Tribes understand the proposal. To accomplish this, EPA is developing a training program to teach tribal representatives about the NSR Tribal Rule. The trainings will be conducted in classrooms and/or through WebEx sessions. Public comments on the proposal are due on or before November 20, 2006, although an extension of the public comment period may be requested.

CTPG has developed a customer satisfaction survey to evaluate the impact of the NSR Tribal Rule training. The purpose of the voluntary questionnaire is to allow CTPG to evaluate the effectiveness of the training on tribal representatives. The customer satisfaction survey will also provide CTPG with specific ideas about how to better meet customer needs and expectations.

The questionnaire consists of thirty-one questions addressing the following: 1) five demographic questions that will help CTPG define the needs and expectations of the customer groups and make more appropriate targeted improvements to the courses; 2) eight questions about how satisfied our customers are with the quality of the courses; and, 3) three open-ended questions.

The five demographic questions are designed to help CTPG evaluate whether the courses meet the training needs of the entire population of Tribal stakeholders. During evaluation of the survey results, we will be able to determine whether *work discipline* or *present employer* play a role in satisfaction with the training course. The course may be more or less valuable to students involved in specific types of work. In addition, the amount of *experience* with air pollution, as well as the *majority* and *percentage* of time spent on air quality issues, may affect how satisfied customers are with the training. The course may be more or less valuable to students with greater or lesser degrees of experience or amount of time in a present position. Also, customer satisfaction may vary according to the *principal duties* of respondents. Each of these variables may influence customer satisfaction with the entire or portions of the course. This feedback will allow us to determine whether the course meets the needs of the targeted audience. In addition, the question on how respondents *found out* about the course will let us know where to increase our outreach efforts.

We anticipate that a total of 75 tribal representatives will take the Tribal NSR training. CTPG will tabulate and evaluate all customer survey responses generated through the Tribal NSR training. JTC and EOG will determine whether to revise the survey instrument based on the results of the pilot test. EOG will submit the survey for OMB approval if revisions need to be made.

The survey should take respondents approximately 10 minutes to complete. This amounts to a total annual burden of about 12.5 hours to respondents. The estimated total annual burden to course providers (EPA Regions) for feedback collection and

submittal to CTPG is 4 hours. The estimated total annual burden to CTPG for feedback collection, analysis, and reporting is 6 hours.

Total Annual Burden Hours in 2006

<u>Year</u>	<u>Students</u>	<u>Student Burden Hours</u>	<u>Federal Burden Hours</u>
2006	75	12.5	10

The above table shows the estimated total annual burden hours for students and the federal government. The total federal burden consists of 4 burden hours for EPA Regions (course providers) and 6 burden hours for CTPG. The estimated total annual Federal burden hours represent the amount of time used for feedback collection, analysis, and reporting. All responses will be stored in a database. The resources invested in implementing recommendations will vary annually depending on results, availability of funds, and competing priorities.

Course Name _____

Date _____

Your input is critical to improving the quality of our training. Please take a few minutes and support our commitment to better serving you.

A) How many years experience do you have in the Air Pollution field?

- | | |
|-------------|--------------|
| Less than 1 | 6-10 |
| 1-2 | 11-20 |
| 3-5 | more than 20 |

B) In your present job, where do you spend the majority of your time?

- | | |
|---------------|--------------------|
| Air Quality | Natural Resources |
| Solid Waste | Indoor Air Quality |
| Water Quality | Other _____ |

C) What percentage of your time do you spend on air quality issues?

- | | | |
|----------|-----------|------------|
| None | 26 to 50% | 76 to 100% |
| 1 to 25% | 51 to 75% | |

D) What type of organization do you work for?

- | | |
|----------------------|------------------------------|
| Tribal Government | National Tribal Organization |
| Consortia | Other _____ |
| Inter-Tribal Council | |

E) How did you find out about this course?

- | | |
|--------------------------|---------------------|
| EPA Website | Tribal Air Listserv |
| OAQPS Staff | Other Tribes |
| EPA Regional Office | Other _____ |
| Monthly Tribal Air Calls | |

F) Please indicate the extent to which you agree with the following statement.

As a result of taking this course, I am comfortable with my understanding of the Tribal New Source Review Rule:

- Not at all Slightly Moderately Greatly

Public reporting burden for this collection of information is estimated to average 10 minutes per response, including the time for reviewing instructions, gathering information, and completing and reviewing the collection of information. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggestions for reducing the burden, including the use of automated collection techniques to the Director, Information Collections Division, Office of Environmental Information, United States Environmental Protection Agency (Mail Code 2822T), 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460; and to the Office of Information & Regulatory Affairs, Office of Management & Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number (1711.05) and the OMB control number (2090-0019) in any correspondence.