

**INFORMATION COLLECTION REQUEST  
FOR EPA NATIONAL ENVIRONMENTAL PERFORMANCE TRACK PROGRAM  
ICR 1949.05**

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## **SECTION I: PART A OF THE SUPPORTING STATEMENT**

### **1. IDENTIFICATION OF INFORMATION COLLECTION**

#### **1(a) Title of Information Collection**

National Environmental Performance Track Program

#### **1(b) Short Characterization**

The National Environmental Performance Track is a voluntary EPA program that recognizes and rewards private and public facilities that demonstrate top environmental performance beyond current regulatory requirements. The program is based on the premise that government should complement existing programs with new tools and strategies that not only protect people and the environment, but also capture opportunities for reducing cost and spurring technological innovation.

Performance Track is a facility based program (not corporate-wide) that receives applications twice per year in April and May, and in September and October. Acceptance decisions are announced twice per year, generally in March and September. Applying facilities must meet four basic criteria: 1) a history of sustained compliance with environmental regulations; 2) an environmental management system that is certified by an independent third party, and in place for at least one full cycle of planning, implementing, review and improvement; 3) past and future environmental achievements, and a commitment to quantified continuous environmental improvement; and 4) public involvement and annual reporting. Once accepted, members remain in the program for three years, as long as they continue to meet the program criteria. After three years, they may apply to renew their membership through a streamlined application process.

EPA announced the National Environmental Performance Track Program on June 26, 2000, and a total of 401 facilities are current members. Information is collected by EPA in the following areas: applications, customer satisfaction questionnaire, regulatory incentives, and annual performance reports. Current and potential Performance Track member facilities, and States are the respondents for this program, and EPA and States are the recipients and reviewers of this information.

Applications submitted by facilities are used by EPA and participating regulatory entities to determine whether the applicant qualifies for the program (See the program website at [www.epa.gov/performancetrack](http://www.epa.gov/performancetrack) for the application form). Environmental Performance Track members are also required to submit an Annual Performance Report (APR) documenting their environmental performance relative to the commitments they made upon entry into the program (See the program website for the APR form). This information is important to determine whether participants are meeting their commitments, as well as to evaluate the effectiveness of the program. The public reporting elements of the program also provide information to the local community.

## **Applications**

Based on data collected since inception of Performance Track, EPA estimates the number of applications between 2007 and 2009 to be 110, 116, and 122, respectively. The Agency estimates the respondent burden to be 33 hours for each new applicant, and 23 hours for each renewal application. Applications and renewal applications are divided into two segments because for any year there are different numbers of applicants and renewal applicants, resulting in different burden hours and costs for each segment. EPA estimates 476 respondents annually over the life of this ICR; this is based on the average of each of the annual estimates for the next three years of 440, 475, and 512 in 2007, 2008, and 2009, respectively.

## **Customer Satisfaction Questionnaire**

In addition to increasing membership in the Performance Track program, EPA is interested in improving and increasing the value that Performance Track members receive from the Performance Track Program. In 2004 and 2006, under EPA ICR number 1949.03, EPA gathered feedback from all current Performance Track members through a Customer Satisfaction Questionnaire. EPA intends to administer questionnaire again in late 2006 and 2008.

Current Performance Track members reflect a broad array of industry categories and their opinions about the program's effectiveness and level of service are used to shape the development of future member services. The questionnaire assesses the satisfaction level of current members as well as identifies improvements to services that the program can implement to increase long-term member satisfaction. The questionnaire will ascertain the following information: program benefits and services that are important to members; member satisfaction with current services; potential improvements in communicating with members about the program; the level of promotion/publicity that members desire for their participation in the program; and any additional benefits and services that would increase member satisfaction.

The Customer Satisfaction Questionnaire is administered every two years online, via the worldwide web, to reduce the burden on respondents and encourage a high response rate. Notification is sent to all current members with passwords to allow them to access the survey. The questionnaire is administered for one month to further encourage all members to respond, allowing EPA to accurately assess member satisfaction and desired improvements to the program. Member responses are analyzed and a report produced at the conclusion of the one-month survey period. EPA estimates that 443 and 476 members will complete the survey in 2006 and 2008 respectively, with an estimated burden of 0.5 hours per facility needed to complete the questionnaire.

## **Regulatory Incentives**

As part of its efforts to encourage participation in the program and reward facilities that achieve better environmental performance than is required by existing regulations, Performance Track promulgated its first incentives rule on April 22, 2003 (69 FR 21737) which provides regulatory incentives under the Resource Conservation and Recovery Act (RCRA), and the

Maximum Achievable Control Technology (MACT) criteria. On April 4, 2006 EPA finalized a second RCRA regulatory incentive for Performance Track members, known as the Burden Reduction rule (71 FR 16862). Together, these two regulations include the following incentives:

- Reducing the frequency of reports required under the MACT provisions of the Clean Air Act. Through this incentive, EPA reduced the frequency of MACT reporting for all Performance Track facilities to which these criteria apply. EPA also further reduced reporting criteria for Performance Track facilities that achieve MACT or better emission levels through pollution prevention methods.
- Allowing large quantity hazardous waste generators participating in the Performance Track program up to 180 days to accumulate hazardous waste without a RCRA permit or interim status, provided that these generators meet certain conditions.
- Reducing the inspection frequency of permitted Treatment Storage and Disposal Facilities (TSDFs), interim status TSDFs, large quantity generators (LQGs), and small quantity generators (SQGs) of hazardous waste for containers, tank systems, containment buildings, and areas subject to spills.

Performance Track facilities eligible for these incentives voluntarily determine whether they would like to use these incentives or not. Since promulgation of the first rule, many states have taken steps to implement these incentives under their delegated programs.

Although many Performance Track members are eligible for the first incentives rule (57 members with minor air permits, and 165 members that are LQGs), annual performance reports submitted by members in the spring of 2006 indicate that two members have implemented the extended accumulation time for hazardous waste and EPA staff estimate that two members have availed themselves of the reduced MACT reporting incentive. Performance Track members eligible for the burden reduction rule include 14 operating TSDFs (permitted and interim status), 165 members with LQG status, and 92 members with SQG status. EPA anticipates that the number of facilities using these incentives will grow during the next three years.

### **Annual Performance Reports**

As part of the Performance Track program's criteria, members must submit annual performance reports (APRs) each year. The primary purpose of the APR is for Performance Track members to demonstrate that they continue to meet program criteria (maintenance of an EMS, commitment to public outreach, and sustained compliance), and are making good faith efforts toward meeting performance commitments. Additionally, APR data allows EPA to analyze and communicate the environmental improvements that members are making.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need/Authority for the Collection**

The information collected in this ICR is necessary to meet the fundamental goals of the Performance Track program. The Performance Track program was established in 2000 to provide an alternate path through which EPA can encourage facilities to improve their environmental performance. Performance Track was established in a public announcement on June 26, 2000, and in a Federal Register notice on July 6, 2000 (65 FR 41655).

Performance Track is a voluntary program for top environmental performer facilities. In order for EPA to determine if facilities meet in initially, and continue to meet the criteria for the program (described in section 1(b) of this ICR), several types of information are needed. These data include program applications and renewal applications, customer surveys, regulatory incentives use, and annual reporting.

### **2(b) Practical Utility/Users of the Data**

The applications collected for the National Environmental Performance Track program are used by EPA and states to determine whether the applicant qualifies for the program. The APR is used by EPA to assess the member's progress and environmental performance while in the program, and to determine whether they should remain in the program. Both components protect the credibility of the program by avoiding erroneous recognition of facilities with poor environmental performance. The public reporting element of the program will also provide information to the local community.

EPA uses results from the Customer Satisfaction Questionnaire to identify priority areas for the program to improve in future. Personally identifiable information is not shared with other agencies or organizations. The data analysis focuses on groups of respondents, not individual members, and the results are not linked to member facilities or companies. Reports are developed summarizing the results and to serve as a basis for program evaluation.

Each facility's notifications, reports, and applications to the Agency will be used by EPA and participating regulatory entities to monitor the facility's compliance with the incentives, and to determine whether the facility continues to be eligible for the incentives.

## **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) Nonduplication**

EPA currently does not have sources for the other information requested by the Performance Track Program. The information requested either as part of the Performance Track application or in the required reports is not available through any other source within the Agency. This information also is not available outside the agency.

EPA designed the Performance Track Program to allow facilities to select a limited number of performance measures upon which to report past performance and commit to future performance. EPA will encourage facilities to use the results and goals they have under existing local, state or federal programs in order to reduce the possibility for duplication of efforts. For example, a facility participating in an equivalent state leadership program could use the achievements documented in that program to meet the criteria for entry to the Performance Track program.

The information to be obtained through the Customer Satisfaction Questionnaire is not currently collected by EPA or any other agency. Member satisfaction with current benefits and services, information on the most effective means of communicating with members, and desired benefits can only be obtained partially through anecdotes from EPA's periodic contact with members. Use of the Customer Satisfaction Questionnaire will allow member facilities to provide regular feedback on the services provided by Performance Track, giving EPA the information necessary to make changes that will better suit the program as a whole.

Information requested by EPA to determine incentives eligibility and compliance is not currently being collected by EPA or any other agency, and will be needed to monitor implementation and the resulting benefits and costs associated with each incentive. This information will provide EPA with valuable feedback in order to guide future incentives efforts.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

In compliance with the 1995 Paperwork Reduction Act, EPA has begun soliciting public comments for a 60 day period prior to submission of the ICR to OMB. EPA issued a Federal Register Notice on June 22, 2006 (71 FR 35904) announcing the proposal to renew the existing Information Collection Request scheduled to expire on August 31, 2006 for EPA's Performance Track Program 1949.03, OMB 2010-0032. The federal register notice and all supporting materials can be found at [www.regulations.gov](http://www.regulations.gov) under Docket number EPA-HQ-OA-2006-0513.

### **3(c) Consultations**

This information collection was developed by Performance Track staff. Since the inception of the Performance Track Program, EPA has held public stakeholder meetings, hosted periodic meetings with Performance Track members and state and EPA regional representatives, and sought the monthly input of state and EPA regional representatives through teleconference calls. The purpose of these meetings and teleconferences was to solicit comments and questions about the implementation of the program, including elements of information collection. Most recently, EPA hosted a public meeting on October 19, 2005 in Chicago to solicit feedback on the preliminary results of the Environmental Council of States and EPA's collaborative efforts to strengthen the Performance Track Program and state performance based environmental programs to develop high value incentives for members.

The Performance Track Program, the Customer Satisfaction Questionnaire, and incentives have been discussed with member facilities at Performance Track Annual Member events held in April 2005 and May 2006, through Performance Track newsletters, and Regional meetings. Responses to the initiatives have been positive. On a number of occasions, EPA has had general discussions with these facilities regarding the anticipated burden of providing information to support these programs.



### **3(d) Effects of Less Frequent Collection**

Performance Track participants are required to submit an APR documenting their environmental performance relative to the commitments they made upon entry into the program. This information is important to determine whether participants are meeting their commitments, as well as to evaluate the effectiveness of the program. Less frequent reporting could jeopardize the credibility and success of the program.

The Performance Track Customer Satisfaction Questionnaire will be given to members on a biennial schedule. This will allow EPA the time necessary to implement changes the members suggest through their responses to the questionnaire, and gauge how beneficial the changes are to the overall membership of Performance Track. EPA believes a two-year schedule for the Customer Satisfaction Questionnaire is an appropriate timetable to implement suggestions and monitor what effects they have on the program.

For the most part, the incentives rules reduce the reporting and compliance burdens for Performance Track members. The information requested by the rules will help EPA to determine whether Performance Track members continue to be eligible for the incentives.

### **3(e) General Guidelines**

This information collection adheres to the general guidelines set forth by the Office of Management and Budget and is consistent with the provisions at 5 CFR 1320.5(d)(2)(i) through (iv). There are no special circumstances with respect to 5 CFR 1320.5(d)(2)(v) through (viii), as the collection is not a statistical survey and does not use statistical classifications; nor does it include a pledge of confidentiality that is not supported by authority established in statute or regulation; or require proprietary, trade secret, or other confidential business information not protected by Agency procedures.

### **3(f) Confidentiality**

EPA shall treat information claimed as confidential business information (CBI) in accordance with the criteria of 40 CFR part 2. If the participant fails to claim the information as confidential upon submission, it may be made available to the public without further notice. EPA cannot guarantee that information submitted for application or reporting to the National Environmental Performance Track Program and claimed as confidential will be protected from release under the Freedom of Information Act (FOIA). State participants will maintain CBI confidentiality to the extent allowed by relevant state law. Note that some state laws provide for a greater degree of access to and narrower protections for information considered confidential under federal law.

### **3(g) Sensitive Questions**

Sensitive questions are defined in the ICR instructions as “questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.” The reporting criteria addressed in this information collection request do not include sensitive questions.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

#### 4(a) Respondents/North American Industry Classification System (NAICS) Codes

Potential applicants include all entities regulated by EPA, pursuant to its authority under the various environmental statutes, who voluntarily elect to participate in the Performance Track Program. Thus, potential respondents may fall under any NAICS code. Table 4.1 lists the Primary NAICS Codes for all Performance Track members as of February 2006.

<b>Table 4.1: Primary North American Industry Classification System (NAICS) Codes of Current Performance Track Members</b>		
<b>NAICS Code</b>	<b>Description</b>	<b>Number of Members</b>
325412	Pharmaceutical Preparation Manufacturing	16
541710	Research and Development in the Physical, Engineering, and Life Sciences	16
326211	Tire Manufacturing (except Retreading)	15
334413	Semiconductor and Related Device Manufacturing	13
721110	Hotels (except Casino Hotels) and Motels	13
325199	All Other Basic Organic Chemical Manufacturing	10
339112	Surgical and Medical Instrument Manufacturing	10
713930	Marinas	10
334511	Search, Detection, Navigation, Guidance, Aeronautical, and Nautical System and Instrument Manufacturing	9
322121	Paper (except Newsprint) Mills	8
325211	Plastics Material and Resin Manufacturing	8
326113	Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing	8
562213	Solid Waste Combustors and Incinerators	8
321213	Engineered Wood Member (except Truss) Manufacturing	6
33422	Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	6
325413	In-Vitro Diagnostic Substance Manufacturing	5
339113	Surgical Appliance and Supplies Manufacturing	5
928110	National Security	5
322110	Pulp Mills	4
322130	Paperboard Mills	4
32532	Pesticide and Other Agricultural Chemical Manufacturing	4
325411	Medicinal and Botanical Manufacturing	4
325414	Biological Product (except Diagnostic) Manufacturing	4
32551	Paint, Coating, and Adhesive Manufacturing	4
325991	Custom Compounding of Purchased Resins	4
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing	4
336411	Aircraft Manufacturing	4

**Table 4.1: Primary North American Industry Classification System (NAICS)  
Codes of Current Performance Track Members**

<b>NAICS Code</b>	<b>Description</b>	<b>Number of Members</b>
336414	Guided Missile and Space Vehicle Manufacturing	4
339111	Laboratory Apparatus and Furniture Manufacturing	4
532120	Truck, Utility Trailer, and RV (Recreational Vehicle) Rental and Leasing	4
712190	Nature Parks and Other Similar Institutions	4
212391	Potash, Soda, and Borate Mineral Mining	3
311930	Flavoring Syrup and Concentrate Manufacturing	3
321219	Reconstituted Wood Product Manufacturing	3
325910	Printing Ink Manufacturing	3
332991	Ball and Roller Bearing Manufacturing	3
336322	Other Motor Vehicle Electrical and Electronic Equipment Manufacturing	3
3391	Medical Equipment and Supplies Manufacturing	3
42	Wholesale Trade	3
45322	Gift, Novelty, and Souvenir Stores	3
31321	Broadwoven Fabric Mills	2
314110	Carpet and Rug Mills	2
325992	Photographic Film, Paper, Plate, and Chemical Manufacturing	2
331521	Aluminum Die-Casting Foundries	2
334119	Other Computer Peripheral Equipment Manufacturing	2
334411	Electron Tube Manufacturing	2
334412	Bare Printed Circuit Board Manufacturing	2
334515	Instrument Manufacturing for Measuring and Testing Electricity and Electrical Signals	2
336111	Automobile Manufacturing	2
336330	Motor Vehicle Steering and Suspension Components (except Spring) Manufacturing	2
336350	Motor Vehicle Transmission and Power Train Parts Manufacturing	2
336399	All Other Motor Vehicle Parts Manufacturing	2
336612	Boat Building	2
339114	Dental Equipment and Supplies Manufacturing	2
339920	Sporting and Athletic Goods Manufacturing	2
488310	Port and Harbor Operations	2
4911	Postal Service	2
541330	Engineering Services	2
551114	Corporate, Subsidiary, and Regional Managing Offices	2
812320	Drycleaning and Laundry Services (except Coin-Operated)	2
92711	Space Research and Technology	2

**Table 4.1: Primary North American Industry Classification System (NAICS)  
Codes of Current Performance Track Members**

<b>NAICS Code</b>	<b>Description</b>	<b>Number of Members</b>
212313	Crushed and Broken Granite Mining and Quarrying	1
221111	Hydroelectric Power Generation	1
221112	Fossil Fuel Electric Power Generation	1
221113	Nuclear Electric Power Generation	1
22112	Electric Power Transmission, Control, and Distribution	1
221320	Sewage Treatment Facilities	1
311611	Animal (except Poultry) Slaughtering	1
311823	Dry Pasta Manufacturing	1
313230	Nonwoven Fabric Mills	1
321113	Sawmills	1
321911	Wood Window and Door Manufacturing	1
321912	Cut Stock, Resawing Lumber, and Planing	1
321999	All Other Miscellaneous Wood Product Manufacturing	1
322122	Newsprint Mills	1
322222	Coated and Laminated Paper Manufacturing	1
322233	Stationery, Tablet, and Related Product Manufacturing	1
323113	Commercial Screen Printing	1
32411	Petroleum Refineries	1
32511	Petrochemical Manufacturing	1
325132	Synthetic Organic Dye and Pigment Manufacturing	1
325188	All Other Basic Inorganic Chemical Manufacturing	1
325191	Gum and Wood Chemical Manufacturing	1
325212	Synthetic Rubber Manufacturing	1
325222	Noncellulosic Organic Fiber Manufacturing	1
3254	Pharmaceutical and Medicine Manufacturing	1
325520	Adhesive Manufacturing	1
325611	Soap and Other Detergent Manufacturing	1
325613	Surface Active Agent Manufacturing	1
32562	Toilet Preparation Manufacturing	1
326121	Unlaminated Plastics Profile Shape Manufacturing	1
326199	All Other Plastics Product Manufacturing	1
326291	Rubber Product Manufacturing for Mechanical Use	1
327211	Flat Glass Manufacturing	1
327331	Concrete Block and Brick Manufacturing	1
32791	Abrasive Product Manufacturing	1
327999	All Other Miscellaneous Nonmetallic Mineral Product Manufacturing	1
33111	Iron and Steel Mills and Ferroalloy Manufacturing	1
331111	Iron and Steel Mills	1
331210	Iron and Steel Pipe and Tube Manufacturing from Purchased Steel	1

**Table 4.1: Primary North American Industry Classification System (NAICS)  
Codes of Current Performance Track Members**

<b>NAICS Code</b>	<b>Description</b>	<b>Number of Members</b>
3314	Nonferrous Metal (except Aluminum) Production and Processing	1
331492	Secondary Smelting, Refining, and Alloying of Nonferrous Metal (except Copper and Aluminum)	1
331500	Foundries	1
332321	Metal Window and Door Manufacturing	1
332322	Sheet Metal Work Manufacturing	1
332431	Metal Can Manufacturing	1
332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	1
332813	Electroplating, Plating, Polishing, Anodizing and Coloring	1
3329	Other Fabricated Metal Product Manufacturing	1
332913	Plumbing Fixture Fitting and Trim Manufacturing	1
332995	Other Ordnance and Accessories Manufacturing	1
332999	All Other Miscellaneous Fabricated Metal Product Manufacturing	1
33312	Construction Machinery Manufacturing	1
333295	Semiconductor Machinery Manufacturing	1
333313	Office Machinery Manufacturing	1
333314	Optical Instrument and Lens Manufacturing	1
333315	Photographic and Photocopying Equipment Manufacturing	1
333618	Other Engine Equipment Manufacturing	1
333911	Pump and Pumping Equipment Manufacturing	1
333991	Power-Driven Hand Tool Manufacturing	1
333996	Fluid Power Pump and Motor Manufacturing	1
33411	Computer and Peripheral Equipment Manufacturing	1
334111	Electronic Computer Manufacturing	1
33429	Other Communications Equipment Manufacturing	1
33441	Semiconductor and Other Electronic Component Manufacturing	1
334414	Electronic Capacitor Manufacturing	1
334417	Electronic Connector Manufacturing	1
334418	Printed Circuit Assembly (Electronic Assembly) Manufacturing	1
334419	Other Electronic Component Manufacturing	1
33451	Navigational, Measuring, Electromedical, and Control Instruments Manufacturing	1
334512	Automatic Environmental Control Manufacturing for Residential, Commercial, and Appliance Use	1
334513	Instruments and Related Products Manufacturing for	1

**Table 4.1: Primary North American Industry Classification System (NAICS)  
Codes of Current Performance Track Members**

<b>NAICS Code</b>	<b>Description</b>	<b>Number of Members</b>
	Measuring, Displaying, and Controlling Industrial Process Variables	
334514	Totalizing Fluid Meter and Counting Device Manufacturing	1
334519	Other Measuring and Controlling Device Manufacturing	1
335110	Electric Lamp Bulb and Part Manufacturing	1
335221	Household Cooking Appliance Manufacturing	1
335931	Current-Carrying Wiring Device Manufacturing	1
335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing	1
336212	Truck Trailer Manufacturing	1
3363	Motor Vehicle Parts Manufacturing	1
336311	Carburetor, Piston, Piston Ring, and Valve Manufacturing	1
336312	Gasoline Engine and Engine Parts Manufacturing	1
33632	Motor Vehicle Electrical and Electronic Equipment Manufacturing	1
336360	Motor Vehicle Seating and Interior Trim Manufacturing	1
336391	Motor Vehicle Air-Conditioning Manufacturing	1
3364	Aerospace Product and Parts Manufacturing	1
336412	Aircraft Engine and Engine Parts Manufacturing	1
336413	Other Aircraft Part and Auxiliary Equipment Manufacturing	1
336611	Ship Building and Repairing	1
336999	All Other Transportation Equipment Manufacturing	1
337121	Upholstered Household Furniture Manufacturing	1
337122	Nonupholstered Wood Household Furniture Manufacturing	1
339115	Ophthalmic Goods Manufacturing	1
339999	All Other Miscellaneous Manufacturing	1
42472	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)	1
454311	Heating Oil Dealers	1
483114	Coastal and Great Lakes Passenger Transportation	1
541511	Custom Computer Programming Services	1
54169	Other Scientific and Technical Consulting Services	1
561110	Office Administrative Services	1
561520	Tour Operators	1
562219	Other Nonhazardous Waste Treatment and Disposal	1
6113	Colleges, Universities, and Professional Schools	1
62231	Specialty (except Psychiatric and Substance Abuse) Hospitals	1

<b>Table 4.1: Primary North American Industry Classification System (NAICS) Codes of Current Performance Track Members</b>		
<b>NAICS Code</b>	<b>Description</b>	<b>Number of Members</b>
713910	Golf Courses and Country Clubs	1
7211	Traveler Accommodation	1
721211	RV (Recreational Vehicle) Parks and Campgrounds	1
722212	Cafeterias	1
811111	General Automotive Repair	1
811213	Communication Equipment Repair and Maintenance	1
811310	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	1
921140	Executive and Legislative Offices, Combined	1
92119	Other General Government Support	1
924110	Administration of Air and Water Resource and Solid Waste Management Programs	1
924120	Administration of Conservation Programs	1
926120	Regulation and Administration of Transportation Programs	1

#### **4(b) Information Requested**

##### **Applications**

Facilities apply for membership into Performance Track by completing a standard online application. The application contains questions designed to document that the applicant meets the four program criteria: 1) environmental management system (EMS) implementation; 2) compliance with all applicable environmental regulations; 3) past environmental achievements and commitment to continuous environmental improvement; and 4) a commitment to public outreach on environmental issues and annual reporting.

##### *(i) Data Items*

Facilities who are interested in the Performance Track Program fill out an online application and self-certification. The application consists of four sections:

**Section A** asks for general information, such as the name, address, and size of the facility, name and phone number of a contact person, the number of employees, the nature of the business, the facility's NAICS code, and identification of currently applicable environmental requirements.

**Section B** asks the applicant to verify that the facility's environmental management system (EMS) includes the requested attributes, including an EMS policy, planning, implementation and operation, checking and corrective action, and management review.

Applicants are also asked to report on the method, data, and party who performed an independent assessment of the facility's EMS.

**Section C** asks the applicant to choose a minimum of one (small business) or two (large business) categories and document improvements that have been made with respect to performance during the current year and the previous year. Using the same or a different set of categories, the applicant must select a minimum of two (small business) or four (large business) categories for which the facility will commit to report on its performance during the three years following acceptance into the program. The categories include:

- Material Procurement
- Suppliers' Environmental Performance
- Material Use
- Energy Use
- Water Use
- Land and Habitat
- Air Emissions
- Waste
- Discharges to Water
- Noise
- Vibration
- Products

In reporting on these categories, several guidelines apply. First, facilities must indicate a specific baseline year against which to measure all future environmental improvements. Reporting of improvements must include raw data that incorporates appropriate standard units of measure. Facilities are encouraged to normalize the raw data by production level or number of employees, and a normalization rationale must be included. Facilities are asked to report on how they plan to achieve the proposed improvements in environmental performance. The results of the applicant's response to section C of the application, as well as the facility's APR (described below), are submitted to EPA and made available to the public on the program website.

**Section D** asks the applicant to answer four questions regarding how the facility responds to community concerns regarding the environmental impacts of their operations and how often the facility provides information to the local community about their environmental performance. In addition, this section requests a list of three local or state regulatory officials, and community/local references that may be contacted by EPA in reviewing the application.

*(ii) Respondent Activities*

The following are activities that a respondent performs during the application and renewal application phases:

1. Read the application instructions and program guide.
2. Gather information to complete the four sections of the application.
3. Complete and submit the four sections of the application to EPA.



(iii) *State Activities*

States participating in the application and renewal application phases of the program conduct the following activities:

1. Environmental compliance screen

(iv) *EPA Activities*

EPA conducts the following activities as part of the application process:

1. Environmental compliance screen for application
2. Review and evaluation of the application
3. Environmental compliance screen for renewal application
4. Review and evaluation of the renewal application
5. Notify applicants and renewal applicants of selection or rejection

The activities required by the components of this information collection request are not customary and usual business practice, except for the submission of EMS information. For facilities that have a well documented EMS in place, compiling and maintaining EMS data is a customary business practice.

### **Customer Satisfaction Questionnaire**

(i) *Data Items*

The Customer Satisfaction Questionnaire will be made available online to all members. Submission of the Questionnaire is voluntary and there are no benefits tied to completing it.

The **Customer Satisfaction Questionnaire** contains 30 questions. The questions are grouped together in the following sections:

- **Question 1** asks for the job title of the respondent. It will be important to know if the respondent works at the facility level, parent company level, or in another position to determine whether certain types of Performance Track services should be aimed at certain job responsibilities.
- **Questions 2 through 6** ask about the specific benefits of Performance Track that are important to members. This tells EPA which aspects of the program are most satisfactory and which might need more or less emphasis.
- **Questions 7 through 10** ask about the specific entities (e.g., EPA or state environmental agency, community members, customers, etc.) that are important to Performance Track members. This will be used to assess if promotion efforts have been satisfactorily targeted.
- **Question 11** asks about potential concerns members may have had when joining the program. This information will be used to potentially alter aspects of the program so

that prospective members will experience less burden in applying (e.g. application process or annual reporting). For example, if members respond that there was a lack of top management support, more outreach can be directed toward individuals at this level of facilities.

- **Questions 12 and 13** ask members about the Performance Track services they have used, and how useful they found these services. There is also an option to check if they were not aware of any of the services, so that EPA can determine which services have not been communicated effectively. EPA will use results from these questions to maintain or expand services that are widely used, and re-evaluate services that members do not find useful.
- **Questions 14 through 17** request member preferences for regulatory incentives. Members are asked which regulatory areas they would be interested in receiving incentives, and the particular types of incentives they would find most beneficial.
- **Questions 18 and 19** ask members to rate how satisfied they are with the recognition their facility has received for its membership in Performance Track and ask respondents for recommendations for ways to improve the recognition members receive.
- **Questions 20 and 21** ask about the most effective means for communicating with members regarding Performance Track services or events. If, for example, members agree that conferences and speaker events are effective ways to communicate program information, EPA can target these events to provide information about new Performance Track services.
- **Questions 22 through 25** ask members about their presence at conferences in the past three years and their preferences for receiving Performance Track information at these events. This information will assist EPA in determining the types of conferences, as well as the particular parts of the conferences, where Performance Track presence would be most useful to members.
- **Questions 26 through 29** ask about the ways that members use to promote and receive value for their participation in Performance Track. With this information, EPA can assist in promotional efforts to increase the value of Performance Track membership.
- **Question 30** is an open-ended question soliciting suggestions for improvements to the services Performance Track offers. These suggestions will also be evaluated as potential improvements to the program.

(ii) *Respondent Activities*

Members conduct the following activities to complete and submit the Customer Satisfaction Questionnaire:

1. Read the email announcing the survey, asking for their participation, and containing the instructions for taking the survey.
2. Complete and submit the survey online.

The activities required by the components of this information collection request are not customary and usual business practice.

(iii) *State Activities*

There are no activities states conduct for the customer satisfaction survey.

(iv) *EPA Activities*

EPA activities in analyzing these data are minimal.

### **Regulatory Incentives**

(i) *Data items*

Performance Track members that are eligible for the incentives contained in the incentives rulemakings will need to comply with the criteria of each of the incentives. This section identifies the data items required of Performance Track facilities by rule provision. The activities required by the components of this information collection request are not customary and usual business practice.

**MACT Provisions:** Minor and area sources that need to submit MACT reports on a semi-annual basis are eligible under this final rule. If such Performance Track facilities choose to avail themselves of this incentive, their reporting frequency would be reduced to an annual basis. In addition, those Performance Track facilities that use pollution prevention technologies or techniques to meet MACT may submit an annual certification, instead of an annual report.

**RCRA extended accumulation time:** Performance Track facilities that avail themselves of the additional accumulation time for hazardous waste provided in the rulemaking must provide prior written notification to the authorized regulatory program, and amend facility contingency plans to reflect the potential risks of additional accumulated waste. Such facilities are required to report on the impact of the additional accumulation time in their APRs including the number of waste shipments, types of destination facilities, changes in on-site and off-site waste management practices occurring as a result of extended accumulation times, and information on any spills or accidents occurring at (or from) extended accumulation units.

**RCRA reduced self-inspections:** For Performance Track facilities seeking to reduce their inspection schedule for hazardous waste tank systems, containers, containment buildings, and areas subject to spills must submit an application to the regulatory agency identifying themselves as a member of the program and request a reduction in self inspection frequency. For those members that are also permitted treatment, storage and disposal facilities, the application must be in the form of a Class 1 permit modification with prior approval.

- (ii) *Respondent Activities* - The following are activities a respondent must perform if the respondent chooses to avail itself of a particular incentive contained in the rulemakings.

**MACT Provisions:**

1. Submit annual periodic report or certification, depending on whether pollution prevention technology or technique is being used, rather than semi-annual report.

**RCRA Provisions for extended accumulation time:**

1. Submit prior written notification to the authorized regulatory program.
2. Submit amendment to contingency plan.

**RCRA Provisions for reduced inspection frequency:**

1. Submit Class 1 permit modification (with prior approval), or a request to the Director (state) for a reduction in self-inspection frequency.
2. Submit notice to the Director of termination from PT, regardless of cause.

- (iii) *State/Local Agency Activities* - The following are activities certain State and local agencies must perform in order to make the particular incentive available to Performance Track facilities located in their jurisdictions.

**MACT Provisions:**

1. Review annual reports or annual certifications (for facilities meeting MACT through Pollution Prevention) for Performance Track members in their jurisdiction.

**RCRA Provisions:**

1. Review notifications of waste accumulation in excess of 90 days for facilities that wish to accumulate hazardous waste up to 180 (or 270) days.
2. Review applications for requests to reduce member's self-inspection frequency. If member is also a permitted treatment, storage and disposal facility, review Class 1 permit modification.

- (iv) *EPA Activities* - Regulatory activities that apply to PT members generally are all delegated to the states through EPA standard delegation processes. In rare instances, where a state is not the delegated authority to run the program, EPA may experience this burden, but for the purpose of this ICR, it is assumed that all burden, both positive and negative, will fall to the states.

**Program Participation**

Participation in Performance Track requires that members submit an "Annual Performance Report" each spring. In addition, one of the tenets of PT is that EPA conducts a site visit at up to 20% of all members each year. Experience has typically resulted in a site visit rate at about 8% - 10% of the total membership per year.

(i) *Data items*

The Annual Performance Report (APR) requires members to report on: 1) the results of compliance and EMS audits conducted during the year; 2) actual and normalized progress on the performance measures selected for continuous improvement, as well as the methods by which improvements are made; 3) public outreach activities and results; and 4) the public distribution mechanism for the APR.

Site visits result in some burden for members. Members typically spend time preparing for a site visit, spend time with EPA and the state during a visit, and time conducting some follow up activities.

(ii) *Respondent Activities* - The following are activities a respondent must perform while participating in the National Environmental Performance Track Program:

1. Read the APR directions and program guide. Submit annual report and make report available to the local community.
2. Certify that the facility will continue to meet the Performance Track participation criteria.
3. Prepare, coordinate, and participate in site visit (only if selected as part of annual site visit program).

(iii) *State/Local Agency Activities* – States do not spend time on PT annual performance reports. States experience some burden to plan, participate and follow up on site visits.

(iv) *EPA Activities* – EPA conducts the following activities as part of program participation:

1. EPA leads the planning and implementation of the site visit programs through its headquarters and regional offices.
2. EPA receives, reviews, communicates with respondents, and processes all data from annual performance reports.

## **5. THE INFORMATION COLLECTED- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a). Agency Activities**

Performance Track participants are selected by a review team consisting of EPA representatives. EPA coordinates with the relevant state environmental agency during review of the applicants. Selection decisions are based on whether the applicant facility meets all of the criteria outlined in the application, including a compliance screen. The compliance screen is based on the Agency's *Screening Guidance for Partnership Programs*. If the applicant does not meet the criteria, the facility is not accepted into Performance Track.

EPA generally responds to applicants within 90 days after the close of the “open season” period. Facilities are notified in writing whether they qualify. Facilities that are not accepted for the program may reapply at future open seasons.

The following is a list of itemized Agency activities for the program elements of the Performance Track program:

1. Receive and evaluate applications from interested facilities
2. Perform comprehensive compliance screen for applications
3. Receive and evaluate renewal applications from interested facilities
4. Perform comprehensive compliance screen for renewal applications
5. Notify applicant of selection or rejection
6. Perform annual compliance screen for participating facilities
7. Review and evaluate annual performance reports
8. Conduct site visit at selected facilities

Agency activities in relation to the Customer Satisfaction Questionnaire are minimal because of the information and experience gained during the development and administration of the survey in 2004 and 2006; it is therefore not included in this ICR.

### **5(b) Collection Methodology and Management**

The quality of data EPA receives through applications, customer satisfaction survey, and annual performance reports is first pre-screened, and then checked by EPA headquarters and regional staff. All data are received electronically through an on-line application and reporting system that EPA designed specifically for this program. Data are received via the internet, and is registered and password protected for respondents security. Data are placed in a database that is controlled by EPA. The public may access non-sensitive data through EPA Performance Track website at [www.epa.gov/performance-track](http://www.epa.gov/performance-track).

### **5(c) Small Entity Flexibility**

Applicants to the Performance Track Program vary in size. The burden to small facilities was recognized during the development of the program, and the necessity of developing program criteria flexible enough to stimulate interest in participation by small facilities was considered. As such, small businesses must select commitments in two (as opposed to four) criteria, and demonstrate one (rather than two) past environmental achievements.

### **5(d) Collection Schedule**

Table 5.1 summarizes the program's collection schedule.

<b>Table 5.1: Collection Schedule</b>	
<b>Applications</b>	
<b>Activity</b>	<b>Schedule</b>
EPA accepts applications and renewal applications	Open Season (2 months, twice annually)

<b>Table 5.1: Collection Schedule</b>	
EPA reviews applications and renewal applications, performs compliance screen	During open season, and up to 90 days from close of open season
EPA selects Performance Track members, notifies all applicants of selection status	Up to 90 days from close of open season
<b>Customer Satisfaction Questionnaire</b>	
<b>Activity</b>	<b>Schedule</b>
EPA sends email requesting completion of survey with instructions	On a biennial schedule (2008)
EPA sends reminder after one week to remaining non-respondents	One week after sending survey
EPA sends reminder after two weeks to remaining non-respondents	Two weeks after sending survey
EPA makes phone calls after three weeks to remaining non-respondents	Three weeks after sending survey
EPA analyzes results and compiles report	Within six weeks of sending survey
<b>Regulatory Incentives</b>	
<b>Activity</b>	<b>Schedule</b>
Receipt of facility notification to state and EPA of intent to use RCRA extended accumulation time	No specific time required, must be prior to beginning of extended accumulation time
Receipt of facility's class 1 permit modification request	No specific time required, must be prior to using incentive
Receipt of facility notification of termination from the program from EPA	To state: immediately upon receipt on information from EPA
<b>Annual Performance Report</b>	
<b>Activity</b>	<b>Schedule</b>
Members prepare and submit annual performance report	Annually
EPA reviews and evaluates annual performance reports	Annually

## 6 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

### 6(a) Estimating Respondent Burden



This section presents EPA’s estimates of the respondent’s burden hours to complete the activities associated with this information collection. EPA considers respondents to be applicants and member facilities of the Performance Track Program. In certain instances states are also respondents. EPA and States generally are not respondents for this ICR, but rather are the recipients and reviewers of the data collected.

Table 6.1 summarizes projected membership, application levels, responses to the biennial customer satisfaction questionnaire, and use of regulatory incentives.

<b>Table 6.1: Projected Membership and Response Levels by Number of Facilities</b>			
<b>Year</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>
Membership <sup>1</sup>	440	475	512
New applications	110	116	122
Renewals of applications <sup>2</sup>	185	123	128
Expected number of Customer Satisfaction Questionnaire responses <sup>3</sup>	443	N/A	476
Expected number of members using the hazardous waste accumulation incentive.	15	30	45
Expected number of members using the MACT reduced reporting incentive.	5	10	15
Expected number of members using the reduction in self-inspection of tank systems, containers, containment buildings, and areas subject to spills.	15	30	45

<sup>1</sup> There are 401 members in the Performance Track program as of May 2006. Based on the program’s average historical application growth (12.8%), and acceptance rate (74%), over the history of the program.

<sup>2</sup> Renewals of applications are based on how many current members are scheduled to reach the end of a 3-year term of membership and could renew their membership in the program. Historical renewal application and acceptance rates are 70%.

<sup>3</sup> The next customer satisfaction questionnaire will be administered in the summer of 2008 to a projected 475 members. Based on the 2004 questionnaire response rate (73%), EPA estimates that 347 members will respond.

### **Applications and Renewal Applications**

The following are activities that respondents perform during the application and renewal application phases:

1. Read the application and guidance document.
2. Gather information to complete the four sections of the application.
3. Complete and submit the four sections of the application to EPA.

Based on its experience in administering the program, EPA has adjusted its estimate (from ICR 1949.02) for respondent burden to complete its application and renewal application to 33 and 23 hours, respectively.

EPA estimates burden hours by projecting program membership levels from a February 2006 baseline. As of February 2006 there were 401 Performance Track member facilities, including “Round 11” acceptances. Based on data collected since inception of Performance Track, EPA estimates the number of applications during 2007 to 2009 to be 110, 116, and 122. The Agency estimates the respondent burden to be 33 hours for each new applicant and 23 hours for each renewal application. Applications and renewal applications are divided into two segments because for any year there are different numbers of applicants and renewal applicants, resulting in different burden hours and costs for each segment. EPA estimates 476 respondents annually over the life of this ICR; this is based on the average of each of the annual estimates of membership for the next three years of 440, 475, and 512 in 2007, 2008, and 2009 respectively. These estimates account for projected attrition associated with re-application. EPA assumes for purposes of estimating burden that 70% of member facilities eligible for renewal will apply and be accepted. This estimate is based on historical information for the program to date.

EPA estimated the hourly labor rates of managerial, legal, technical, and administrative professionals according to the Bureau of Labor Statistics’ *National Occupational Employment and Wage and Employer Costs for Employee Compensation* datasets. The hourly labor rate estimate for EPA activity was obtained from the U.S. Office of Personnel Management *2006 General Schedule Pay Chart*<sup>1</sup>.

### **Customer Satisfaction Survey**

Members conduct the following activities to complete and submit the Customer Satisfaction Questionnaire:

1. Read the email announcing the survey, asking for their participation, and containing the instructions for taking the survey.
2. Complete and submit the survey online.

The activities required by the components of this information collection request are not customary and usual business practice. EPA estimates that respondents to the Customer Satisfaction Questionnaire will take 0.5 hours to read the instructions and complete the online survey. This estimate is based on timed pre-tests of the questionnaire instrument, in which EPA contractor staff and seven Performance Track members completed the questionnaire online, and experience with the 2004 questionnaire.

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<sup>1</sup> Based on the *2006 General Schedule Pay Chart*, and adding benefits and overhead costs pursuant to the Office of Management and Budget’s *Estimating Paperwork Burden* guidance, EPA estimates an average adjusted hourly labor cost of \$46.03 for technical staff responsible for EPA activities in the National Environmental Performance Track.

Based on the 2004 survey response rate, EPA anticipates that 443 and 476 respondents member facilities will complete the Customer Satisfaction Questionnaire in 2006 and 2008 respectively.

### **Incentives**

The following are activities a respondent must perform if the respondent chooses to avail itself of a particular incentive contained in the rulemakings.

#### **MACT Provisions:**

1. Submit annual periodic report or certification, depending on whether pollution prevention technology or technique is being used, rather than semi-annual report.

#### **RCRA Provisions for extended accumulation time:**

1. Submit prior written notification to the authorized regulatory program.
2. Submit amendment to contingency plan.

#### **RCRA Provisions for reduced inspection frequency:**

1. Submit application for Class 1 permit modification, or request for reduced self-inspections.
2. Submit notification of termination of PT membership

EPA estimates that Performance Track members availing themselves of the MACT reduction in reporting frequency each will save 25.5 hours per year. To use the RCRA waste accumulation incentive, EPA estimates that each member who uses the incentive will spend 1 hour per year. This estimate is based on the notification being a one-time requirement. EPA estimates that 15 new facility members will use this incentive each year. For the RCRA reduced self-inspection frequency for tank systems, etc., EPA analyzed the applicable information collection requests and costs benefit analyses to determine existing burden estimates.<sup>2</sup> EPA estimates that the reduced inspection frequency incentive will result in 206 fewer burden hours for each facility that uses all four provisions- containers, tanks, containment buildings, and areas subject top spills.

### **Annual Performance Reports and Site Visits**

The following are activities a respondent must perform while participating in the National Environmental Performance Track Program:

1. Read the APR directions and program guide. Submit annual report and make report available to the local community.
2. Certify that the facility will continue to meet the Performance Track participation criteria.
3. Prepare, coordinate, and participate in site visit (only if selected during that year).

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<sup>2</sup> See Resource Conservation and Recovery Act Burden Reduction Initiative Final Rule: Cost-Benefit Analysis, November 4, 2005, page D-4.

EPA estimates that facilities will need an average of 8.5 hours to complete an annual performance report, and 32 hours for site visit activities (only if selected for a site visit).

## **6(b) Estimating Respondent Costs**

### *(i) Estimating Labor Costs*

EPA estimates total average annualized respondent costs for the number of expected members to be \$506,572. This figure includes projected costs and cost savings for respondents, which includes states. The estimate includes costs and savings for applications, compliance screens, customer service questionnaire, annual performance reports, site visits, and use of incentives. For each respondent per year, average hours are 3.33, and average costs are estimated to be \$491 inclusive of all aspects of the Performance Track program.

**Please refer to Tables 6.2 (application and participation in the program) and 6.3 (incentives) for detailed annualized respondent burden and cost estimates.**

Preparing and submitting the application is a one-time event; member re-applications occur once every three years; and program participation activities occur annually. The customer satisfaction questionnaire occurs on the biannual schedule.

Tables 6.3 and 6.4 use the following equation to obtain labor costs: (Clerical Hours x \$31.49/ hour) + (Technical Hours x \$59.00/hour) + (Managerial Hours x \$75.02/hour) = Labor Cost/Year/Respondent. For Respondent labor costs, EPA uses the Bureau of Labor Statistics' *Employer Costs for Employee Compensation* (ECEC) data from September 2005 (<http://stats.bls.gov/news.release/eccec.t02.htm> for managers, <http://stats.bls.gov/oes/current/oes172199.htm> for technical staff, and <http://stats.bls.gov/oes/current/oes436011.htm> for clerical staff). Legal Services wage rates for Respondents, not available from the ECEC data, are derived from the Bureau of Labor Statistics' *National Occupational Employment and Wage Data* used for 2004 (the most recent available year <http://stats.bls.gov/oes/current/oes231011.htm>). In order to obtain total hourly burden and total cost estimates for Table 6.2, the following equations were used for each of the three ICR components:

$$\begin{aligned} \text{Respondent Hours/Year} \times \text{Number of Respondents} &= \text{Total Hours/Year} \\ \text{Labor Cost/Year/Respondent} \times \text{Number of Respondents} &= \text{Total Cost/Year} \end{aligned}$$

**Please refer to tables 6.3 (state application and program participation) and 6.4 (state incentives).**

### *(ii) Estimating Capital and Operations Maintenance Costs.*

Most of the facilities applying to the Performance Track maintain environmental compliance data as a customary business practice. EPA does not expect any start-up or capital costs to affect applicants or participants in Performance Track beyond those labor costs outlined in the worksheets in this section.

## **6(c) Estimating State Burden and Costs**

Tables 6.4 (application and program participation) and 6.5 (incentives) below provide detailed annualized state burden and cost estimates. EPA estimates that participating regulatory agencies will spend 2 hours per facility during the application review phase, and 14 hours for each site visit, comprising pre-visit coordination, travel, site visit, and a post-visit report. EPA estimates that State Agency representatives will attend 75% of all Site visits. EPA estimates the annual cost to states to be \$109 per respondent in the Performance Track program. EPA estimates the hours per respondent to be 2.2. These data can be found in Tables 6.4 and 6.5

States are not involved in the customer satisfaction questionnaire portions of the Performance Track program, and thus there will be no burdens for States associated with this activity.

#### **6(d) Estimating Agency Burden and Cost**

This section presents EPA's estimates of the Agency's burden hours and costs during the application phase, customer satisfaction questionnaire, delivery of regulatory incentives, and the annual performance reviews. The burden included in the tables is based on EPA's experience with developing, gathering information, and providing oversight and coordination for the Performance Track Program and its experience administering the program over the past six years. Table 6.6 below provides a summary of annualized Agency burden and costs during the three years of this ICR (application and participation in the program) and 6.7 (incentives) below provide detailed annualized Agency burden and cost estimates.

EPA estimates it will expend 8 and 7 hours respectively per facility during the application and renewal application phases, and 4 hours reviewing participants' annual environmental performance reports. This ICR estimates 28 hours for the Site visit, comprising pre-visit coordination, travel, site visit, and a post-visit report. EPA estimates that it will conduct site visits at 10% of all Performance Track facilities on an annual basis. The annual cost to the agency is \$71 per respondent, representing 4.6 hours.

In administering the Customer Satisfaction Questionnaire, EPA anticipates minimal costs on account of the development and administration of the survey in 2004, so we have not included any burden estimates for the Agency in this ICR.

EPA uses the U.S. Office of Personnel Management's *2006 General Pay Schedule* (<http://www.opm.gov/oca/06tables/indexGS.asp>) for EPA labor rates. Consistent with the Office of Management and Budget's 1999 guidance *Estimating Paperwork Burden* (<http://www.whitehouse.gov/omb/fedreg/5cfr1320.html>), EPA uses an adjusted labor rate reflective of benefits and overhead costs.

In order to obtain total hourly burden and total cost estimates for Table 6.3, the following equations were used:

$$\begin{aligned} \text{Agency Hours / Response} \times \text{Number of Responses} &= \text{Total Hours / Year} \\ \text{Labor Cost / Response} \times \text{Number of Responses} &= \text{Total Cost / Year} \end{aligned}$$

#### **6(e) Estimating the Respondent Universe and Total Burden and Costs**

EPA estimates that there will be 4,742 annual responses required for all respondents. The total burden hours and costs for respondents is 23,249, and \$ \$1,519,716, respectively, during the period of this ICR, this translates to annualized hours and dollars of 7,750 and \$506,572.

The total burden hours and costs for states are 2,454, and \$ \$123,166, respectively, during the period of this ICR, which translates to annualized hours/dollars of 818, and \$41,055.

The total burden hours and costs for the Agency are 15,376, and \$235,925, respectively, during the period of this ICR, this translates to annualized hours/dollars of 5,125, and \$78,642.

**6(f) Bottom Line Burden Hours and Cost Tables**

*(i) Respondent Tally, (ii) State Tally, (iii) Agency Tally*

performance reporting hours. Estimated burden hours per facility for the customer satisfaction survey have not changed. Finally, EPA has gained tremendous experience in the last three years about implementing its Performance Track Program, and assessing ICR burden in ICR amendments 1949.03 and 1949.04. As a result of this experience, EPA believes that current estimates in ICR 1949.05 to be significantly more accurate than previous estimates.

Renewal ICR 1949.05 estimates total burden hours to be 23,249, which is 7,750 hours on an annualized basis. The previous ICR, 1949.03, estimated total hours to be 340,317, which is 113,439 hours on an annual basis. The *reduction* from ICR 1949.03 to 1949.05 is 317,068 total hours, or 105,689 annual hours.

## **6(h) Burden Statement**

The average annual respondent burden for the Performance Track Program is 3.33 hours and \$491 per response. This includes all applications, compliance screens, annual reporting, incentives participation, and site visits.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OA-2003-0001, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person at the EPA Docket Center, EPA/DC, EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566-1744, and the telephone number for the Office of Administrator Docket is (202) 566-1752). An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID EPA-HQ-OA-2003-0001, and OMB Control Number 2010-0032 in any correspondence.

<b>Table 6.2: Respondent Application and Program Participation Burden, September 1, 2006 - August 31, 2007</b>									
Information Collection Activity	Legal (\$90.02/Hour)	Mgr. (\$75.02/Hour)	Tech. (\$59.00/Hour)	Clerical (\$31.49/Hour)	Resp. Hours/Year	Labor Cost/Year	# Resp.	Total Hours/Year	Total Cost/Year
<b>Applications</b>									
New Applications	4	4	24	1	33.0	\$2,108	110	3,630	\$231,842
Renewal Applications	2	4	16	1	23.0	\$1,456	185	4,255	\$269,288
<b>Program Participation</b>									
Performance Report (APR)	0	0.5	7.5	0.5	8.5	\$496	414	3,519	\$205,243
Site Visit	0	0	32	0	32.0	\$1,888	40	1,280	\$75,520
Customer Satisfaction Questionnaire	0	0.5	0	0	0.5	\$38	415	8 <sup>20</sup>	\$15,567
<b>TOTAL 2006-2007</b>	<b>6</b>	<b>8.5</b>	<b>79.5</b>	<b>2.5</b>	<b>96.5</b>	<b>\$5,947</b>	<b>1164</b>	<b>12,684</b>	<b>\$781,892</b>

<b>Table 6.2: Respondent Application and Program Burden, September 1, 2007 - August 31, 2008</b>									
Information Collection Activity	Legal (\$90.02/Hour)	Mgr. (\$75.02/Hour)	Tech. (\$59.0/Hour)	Clerical (\$31.49/Hour)	Resp. Hours/Year	Labor Cost/Year	# Resp.	Total Hours/Year	Total Cost/Year
<b>Applications</b>									
New Applications	4	4	24	1	33.0	\$2,108	116	3,828	\$244,487
Renewal Applications	2	4	16	1	23.0	\$1,456	123	2,829	\$179,040
<b>Program Participation</b>									
Performance Report (APR)	0	0.5	7.5	0.5	8.5	\$496	433	3,681	\$214,662
Site Visit	0	0	32	0	32.0	\$1,888	44	1,408	\$83,072
<b>TOTAL 2007-</b>	<b>6</b>	<b>8.5</b>	<b>79.5</b>	<b>2.5</b>	<b>96.5</b>	<b>\$5,947</b>	<b>716</b>	<b>10,33</b>	<b>\$721,261</b>



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Table 6.2: Respondent Application and Program Burden, September 1, 2008 - August 31, 2009									
Information Collection Activity	Legal (\$90.02/Hour)	Mgr. (\$75.02/Hour)	Tech. (\$59.00/Hour)	Clerical (\$31.49/Hour)	Resp. Hours/Year	Labor Cost/Year	# Resp.	Total Hours/Year	Total Cost/Year
<b>Applications</b>									
New Applications	4	4	24	1	33.0	\$2,108	122	4,026	\$257,133
Renewal Applications	2	4	16	1	23.0	\$1,456	128	2,944	\$186,318
<b>Program Participation</b>									
Performance Report (APR)	0	0.5	7.5	0.5	8.5	\$496	457	3,885	\$226,560
Site Visit	0	0	32	0	32.0	\$1,888	48	1,536	\$90,624
Customer Satisfaction Questionnaire	0	0.5	0	0	0.5	\$38	415	8 <sup>20</sup>	\$15,567
<b>Total 2008-2009</b>	<b>6</b>	<b>8.5</b>	<b>79.5</b>	<b>2.5</b>	<b>96.5</b>	<b>\$5,947</b>	<b>1170</b>	<b>12,391</b>	<b>\$760,635</b>
<b>Total application and program burden 2006-2009</b>	<b>18</b>	<b>26</b>	<b>239</b>	<b>8</b>	<b>290</b>	<b>\$ 17,841.05</b>	<b>3,050</b>	<b>35,412</b>	<b>\$2,263,789</b>
<b>Annualized Burden</b>	<b>6</b>	<b>9</b>	<b>80</b>	<b>3</b>	<b>97</b>	<b>5,947</b>	<b>1,017</b>	<b>11,804</b>	<b>\$754,596</b>

<b>Table 6.3: Respondent Incentives Burden, 2006-2007</b>								
Information Collection Activity	Mgr.	Tech.	Clerical	Resp. Hours/Year	Labor Cost/Year	# Resp.	Total Hours/Year	Total Cost/Year
	\$75.02	\$59.00	\$31.49					
<b>MACT Provisions</b>								
Reduced Reporting Frequency (with or without P2)	-3	-16	-6.5	-25.5	-\$1,373.75	15	-382.5	-\$20,606.18
<b>MACT Information Collection Subtotal</b>	<b>-3</b>	<b>-16</b>	<b>-6.5</b>	<b>-25.5</b>	<b>-\$1,373.75</b>		<b>-382.5</b>	<b>-\$20,606.18</b>
<b>RCRA HW Accumulation</b>								
Prior Written Notification to Authorized Regulatory Program of Waste Accumulation in Excess of 90 Days	0	0.5	0	0.50	\$29.50	15	7.5	\$442.50
Amendment to Contingency Plan	0	0.5	0	0.50	\$29.50	15	7.5	\$442.50
<b>RCRA HW Accumulation Subtotal</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>\$59.00</b>		<b>15.0</b>	<b>\$885.00</b>
Less Potential RCRA Transportation Cost Savings	0	0	0	0.00	-\$368.98	15	0.0	-\$5,534.70
<b>HW Accumulation Subtotal</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>-\$309.98</b>		<b>15.0</b>	<b>-\$4,649.70</b>
<b>RCRA Inspection Frequency</b>								
Submit permit mod or request for reduced inspections to Director 264.15 & 265.15	0	1	0	1	\$59.00	5	5.0	\$295.00
Inspections of container areas 264.74	0	-55.7	0	-55.7	-\$3,286.30	5	-278.5	-\$16,431.50
Inspections of Tanks 264.195	0	-65.5	0	-65.5	-\$3,864.50	5	-327.5	-\$19,322.50
Inspections of Containment buildings 264.1101	0	-20	0	-20	-\$1,180.00	5	-100.0	-\$5,900.00
Inspections of Areas subject to spills 264.15 & 265.15	0	-65.5	0	-65.5	-\$3,864.50	5	-327.5	-\$19,322.50
Submit notification of termination of PT membership 264.15	0	0	0	0	\$0.00	0	0.0	\$0.00
<b>HW Inspection Frequency Subtotal</b>	<b>0</b>	<b>-205.7</b>	<b>0</b>	<b>-205.7</b>	<b>\$12,136.30</b>		<b>-1028.5</b>	<b>-\$60,681.50</b>
<b>Total Burden 2006-2007</b>	<b>-3</b>	<b>-220.7</b>	<b>-6.5</b>	<b>-230.2</b>	<b>\$13,820.03</b>		<b>-1396.0</b>	<b>-\$85,937.38</b>

<b>Table 6.3: Respondent Incentives Burden, 2007-2008</b>								
Information Collection Activity	Mgr.	Tech.	Clerical	Resp. Hours/Year	Labor Cost/Year	# Resp.	Total Hours/Year	Total Cost/Year
	\$75.02	\$59.00	\$31.49					
<b>MACT Provisions</b>								
Reduced Reporting Frequency (with or without P2)	-3	-16	-6.5	-25.5	-\$1,373.75	30	-765.0	-\$41,212.35
MACT Information Collection Subtotal	-3	-16	-6.5	-25.5	-\$1,373.75		-765.0	-\$41,212.35
<b>RCRA HW Accumulation</b>								
Prior Written Notification to Authorized Regulatory Program of Waste Accumulation in Excess of 90 Days	0	0.5	0	0.50	\$29.50	15	7.5	\$442.50
Amendment to Contingency Plan	0	0.5	0	0.50	\$29.50	15	7.5	\$442.50
RCRA HW Accumulation Subtotal	0	1	0	1	\$59.00		15.0	\$885.00
Less Potential RCRA Transportation Cost Savings	0	0	0	0.00	-\$368.98	15	0.0	-\$5,534.70
HW Accumulation Subtotal	0	1	0	1	-\$309.98		15.0	-\$4,649.70
<b>RCRA Inspection Frequency</b>								
Submit permit mod or request for reduced inspections to Director 264.15 & 265.15	0	1	0	1	\$59.00	15	15.0	\$885.00
Inspections of container areas 264.74	0	-55.7	0	-55.7	-\$3,286.30	20	-1114.0	-\$65,726.00
Inspections of Tanks 264.195	0	-65.5	0	-65.5	-\$3,864.50	20	-1310.0	-\$77,290.00
Inspections of Containment buildings 264.1101	0	-20	0	-20	-\$1,180.00	20	-400.0	-\$23,600.00
Inspections of Areas subject to spills 264.15 & 265.15	0	-65.5	0	-65.5	-\$3,864.50	20	-1310.0	-\$77,290.00
Submit notification of termination of PT membership 264.15	0	0	0	0	\$0.00	0	0.0	\$0.00
					-			
HW Inspection Frequency Subtotal	0	-205.7	0	-205.7	\$12,136.30		-4119.0	-\$243,021.00
					-			
<b>Total Burden 2007-2008</b>	<b>-3</b>	<b>-220.7</b>	<b>-6.5</b>	<b>-230.2</b>	<b>\$13,820.03</b>		<b>-4869.0</b>	<b>-\$288,883.05</b>

<b>Table 6.3: Respondent Incentives Burden, 2008-2009</b>								
Information Collection Activity	Mgr.	Tech.	Clerical	Resp. Hours/Year	Labor Cost/Year	# Resp.	Total Hours/Year	Total Cost/Year
	\$75.02	\$59.00	\$31.49					
<b>MACT Provisions</b>								
Reduced Reporting Frequency (with or without P2)	-3	-16	-6.5	-25.5	-\$1,373.75	45	(1,147.50)	-\$61,818.53
MACT Information Collection Subtotal	-3	-16	-6.5	-25.5	-\$1,373.75		(1,147.50)	-\$61,818.53
<b>RCRA HW Accumulation</b>								
Prior Written Notification to Authorized Regulatory Program of Waste Accumulation in Excess of 90 Days	0	0.5	0	0.50	\$29.50	15	7.50	\$442.50
Amendment to Contingency Plan	0	0.5	0	0.50	\$29.50	15	7.50	\$442.50
RCRA HW Accumulation Subtotal	0	1	0	1	\$59.00		15.00	\$885.00
Less Potential RCRA Transportation Cost Savings	0	0	0	0.00	-\$368.98	15	-	-\$5,534.70
HW Accumulation Subtotal	0	1	0	1	-\$309.98		15.00	-\$4,649.70
<b>RCRA Inspection Frequency</b>								
Submit permit mod or request for reduced inspections to Director 264.15 & 265.15	0	1	0	1	\$59.00	15	15.00	\$885.00
Inspections of container areas 264.74	0	-55.7	0	-55.7	-\$3,286.30	35	(1,949.50)	-\$115,020.50
Inspections of Tanks 264.195	0	-65.5	0	-65.5	-\$3,864.50	35	(2,292.50)	-\$135,257.50
Inspections of Containment buildings 264.1101	0	-20	0	-20	-\$1,180.00	35	(700.00)	-\$41,300.00
Inspections of Areas subject to spills 264.15 & 265.15	0	-65.5	0	-65.5	-\$3,864.50	35	(2,292.50)	-\$135,257.50
Submit notification of termination of PT membership 264.15	0	0	0	0	\$0.00	0	-	\$0.00
HW Inspection Frequency Subtotal	0	-205.7	0	-205.7	\$12,136.30		(7,219.50)	-\$425,950.50

<b>Total Burden 2008-2009</b>	<b>-3</b>	<b>-220.7</b>	<b>-6.5</b>	<b>-230.2</b>	<b>\$13,820.03</b>	<b>-</b>	<b>(8,352.00)</b>	<b>-\$492,418.73</b>
<b>Grand Total Incentives Burden 2006-2009</b>	<b>-9.0</b>	<b>-662.1</b>	<b>-19.5</b>	<b>-690.6</b>	<b>\$41,460.08</b>	<b>0.0</b>	<b>(14,617.00)</b>	<b>-\$867,239.15</b>
<b>Annualized burden</b>				<b>(230.20)</b>	<b>\$13,820.03</b>	<b>-</b>	<b>(4,872.33)</b>	<b>-\$289,079.72</b>
<b>Grand Total apps, prog and incentives burden 2006-2009</b>				<b>(400.60)</b>	<b>\$23,581.52</b>	<b>-</b>	<b>20,795.00</b>	<b>\$1,412,116.18</b>
<b>Annualized apps, prog and incentives burden 2006-2009</b>				<b>(133.53)</b>	<b>-\$7,860.51</b>	<b>-</b>	<b>6,931.67</b>	<b>\$470,705.39</b>
<b>annualized per facility</b>							<b>14.56</b>	<b>\$ 988.88</b>

<b>Table 6.4: State Application and Program Participation Burden, September 1, 2006 - August 31, 2007</b>						
	Tech. (\$50.19/Hour)	Respondent Hours/Year	Labor Cost/Year	# Respondents	Total Hours/Year	Total Cost/Year
<b>Applications</b>						
Environmental Compliance Screen-applications and renewals	2	2	\$100.38	295	590	\$29,612
Application Subtotal	2	2	\$100.38	295.00	590	\$29,612
<b>Program Activities</b>						
Site Visit	14	14	\$702.66	30	420	\$21,080
Program Activities Subtotal	14	14	\$702.66	30.00	420	\$21,080
<b>Total 2006-2007</b>	<b>16</b>	<b>16</b>	<b>\$803.04</b>	<b>325.00</b>	<b>1010</b>	<b>\$50,692</b>

<b>Table 6.4: State Application and Program Participation Burden, September 1, 2007 - August 31, 2008</b>						
	Tech. (\$50.19/Hour)	Respondent Hours/Year	Labor Cost/Year	# Respondents	Total Hours/Year	Total Cost/Year
<b>Applications</b>						
Environmental Compliance Screen-applications and renewals	2	2	\$100.38	239	478	\$23,991
Application Subtotal	2	2	\$100.38	239	478	\$23,991
<b>Program Activities</b>						
Site Visit	14	14	\$702.66	33	462	\$23,188
Program Activities Subtotal	14	14	\$702.66	33	462	\$23,188
<b>Total 2007-2008</b>	<b>16</b>	<b>16</b>	<b>\$803.04</b>	<b>272.00</b>	<b>940</b>	<b>\$47,179</b>

**Table 6.4: State Application and Program Participation Burden, September 1, 2008 - August 31, 2009**

	Tech. (\$50.19/Hour)	Respondent Hours/Year	Labor Cost/Year	# Respondents	Total Hours/Year	Total Cost/Year
<b>Applications</b>						
Environmental Compliance Screen- applications and renewals	2	2	\$100.38	250	500	\$25,095
Application Subtotal	2	2	\$100.38	250	500	\$25,095
<b>Program Activities</b>						
Site Visit	14	14	\$702.66	36	504	\$25,296
Program Activities Subtotal	14	14	\$702.66	36	504	\$25,296
<b>Total 2008-2009</b>	<b>16</b>	<b>16</b>	<b>\$803.04</b>	<b>286.00</b>	<b>1,004</b>	<b>\$50,391</b>
<b>Grand Total 2006-2009</b>		<b>48</b>	<b>\$2,409.12</b>	<b>883</b>	<b>2,954</b>	<b>\$148,261</b>
<b>Annualized Total</b>		<b>16</b>	<b>\$803.04</b>	<b>294</b>	<b>985</b>	<b>\$49,420</b>
<b>ROCIS total 2006-2009</b>		<b>6</b>	<b>\$301.14</b>	<b>784.00</b>	<b>1,568</b>	<b>\$78,698</b>
<b>ROCIS annualized total</b>		<b>2</b>	<b>\$ 100</b>	<b>261</b>	<b>523</b>	<b>\$ 26,233</b>

**Table 6.5: State Incentives Burden, 2006 - 2007**

		Tech.		Resp.	Labor	#	Total	Total
Information Collection Activity	\$46.70	\$50.19	\$23.80	Hours/Year	Cost/Year	Resp.	Hours/Year	Cost/Year
MACT Provisions								
Review Annual Reports or Annual Certifications (For P2 Facilities)	0.0	-6.0	0.0	-6.0	\$ (301.14)	15	-90.0	-\$4,517.10
MACT Information Collection Subtotal	0.0	-6.0	0.0	-6.0	\$ (301.14)	15	-90.0	-\$4,517.10
RCRA HW Accumulation								
Review Notifications of Waste Accumulation in Excess of 90 Days	0	0.25	0	0.25	\$ 12.55	15	3.8	\$188.21
Review contingency plan		0.25		0.25	\$ 12.55	15	3.8	\$188.21
HW Accumulation Subtotal [see note]	0.0	0.3	0.0	0.5	\$ 25.10	30	7.5	\$376.43
RCRA Inspection Frequency								
Review permit mod or request for reduced inspection 264.15 & 265.15	0.0	0.3	0.0	0.3	\$ 12.55	5	1.3	\$62.74
Notify PT member of approval or denial	0.0	0.3	0.0	0.3	\$ 12.55	5	1.3	\$62.74
Inspection frequency subtotal [see note]	0.0	0.5	0.0	0.5	\$ 25.10	10.0	2.5	\$125.48
<b>Total Burden 2006-2007</b>	<b>0.0</b>	<b>-5.3</b>	<b>0.0</b>	<b>-5.0</b>	<b>\$ (250.95)</b>	<b>55.00</b>	<b>-80.0</b>	<b>-\$4,015.20</b>

**NOTE:** Affect on reporting requirements undetermined for this draft (presumed to be reduction)

**Table 6.5: State Incentives Burden, 2007 - 2008**



		Tech.		Resp.	Labor	#	Total	Total
Information Collection Activity	\$46.70	\$50.19	\$23.80	Hours/Year	Cost/Year	Resp.	Hours/Year	Cost/Year
MACT Provisions								
Review Annual Reports or Annual Certifications (For P2 Facilities)	0.0	-6.0	0.0	-6.0	\$ (301.14)	30	-180.0	-\$9,034.20
MACT Information Collection Subtotal	0.0	-6.0	0.0	-6.0	\$ (301.14)	30	-180.0	-\$9,034.20
RCRA HW Accumulation								
Review Notifications of Waste Accumulation in Excess of 90 Days	0	0.25	0	0.25	\$ 12.55	15	3.8	\$188.21
Review contingency plan		0.25		0.25	\$ 12.55	15	3.8	\$188.21
HW Accumulation Subtotal [see note]	0.0	0.3	0.0	0.5	\$ 25.10	30	7.5	\$376.43
RCRA Inspection Frequency								
Review permit mod or request for reduced inspection 264.15 & 265.15	0.0	0.3	0.0	0.3	\$ 12.55	15	3.8	\$188.21
Notify PT member of approval or denial	0.0	0.3	0.0	0.3	\$ 12.55	15	3.8	\$188.21
Inspection frequency subtotal [see note]	0.0	0.5	0.0	0.5	\$ 25.10	30.0	7.5	\$376.43
<b>Total Burden 2007-2008</b>	<b>0.0</b>	<b>-5.3</b>	<b>0.0</b>	<b>-5.0</b>	<b>\$ (250.95)</b>	<b>90.00</b>	<b>-165.0</b>	<b>-\$8,281.35</b>

**NOTE:** Affect on reporting requirements undetermined for this draft (presumed to be reduction)

**Table 6.5: State Incentives Burden, 2008 - 2009**

Information Collection Activity	\$46.70	Tech. \$50.19	\$23.80	Resp. Hours/Year	Labor Cost/Year	# Resp.	Total Hours/Year	Total Cost/Year
MACT Provisions								
Review Annual Reports or Annual Certifications (For P2 Facilities)	0.0	-6.0	0.0	-6.0	\$ (301.14)	45	-270.0	\$13,551.30
MACT Information Collection Subtotal	0.0	-6.0	0.0	-6.0	\$ (301.14)	45	-270.0	\$13,551.30
RCRA HW Accumulation								
Review Notifications of Waste Accumulation in Excess of 90 Days	0	0.25	0	0.25	\$ 12.55	15	3.8	\$188.21
Review contingency plan		0.25		0.25	\$ 12.55	15	3.8	\$188.21
HW Accumulation Subtotal [see note]	0.0	0.3	0.0	0.5	\$ 25.10	30	7.5	\$376.43
RCRA Inspection Frequency								
Review permit mod or request for reduced inspection 264.15 & 265.15	0.0	0.3	0.0	0.3	\$ 12.55	15	3.8	\$188.21
Notify PT member of approval or denial	0.0	0.3	0.0	0.3	\$ 12.55	15	3.8	\$188.21
Inspection frequency subtotal [see note]	0.0	0.5	0.0	0.5	\$ 25.10	30.0	7.5	\$376.43
<b>Total Burden 2008-2009</b>	<b>0.0</b>	<b>-5.3</b>	<b>0.0</b>	<b>-5.0</b>	<b>\$ (251)</b>	<b>105</b>	<b>-255</b>	<b>\$ (12,798)</b>
<b>Total Burden 2006-2009</b>	<b>0.0</b>	<b>-10.5</b>	<b>0.0</b>	<b>-15.0</b>	<b>\$ (753)</b>	<b>250</b>	<b>-500</b>	<b>\$ (25,095)</b>
<b>Annualized Burden</b>	<b>0.0</b>	<b>-3.5</b>	<b>0.0</b>	<b>-5.0</b>	<b>\$ (251)</b>	<b>83</b>	<b>-167</b>	<b>\$ (8,365)</b>
<b>ROCIS total 2006-2009</b>				<b>-15.0</b>	<b>\$ (753)</b>	<b>250</b>	<b>-500</b>	<b>\$ (25,095)</b>
<b>ROCIS annualized total</b>				<b>-5.0</b>	<b>\$ (251)</b>	<b>83.3</b>	<b>-166.7</b>	<b>\$ (8,365)</b>

**NOTE:** Affect on reporting requirements undetermined for this draft (presumed to be reduction)

**Table 6.6: EPA Application and Program Participation Burden, September 1, 2006 - August 31, 2007**

	Tech. (\$46.03/Hour)	Hours/Year	Labor Cost/Year	# Respondents	Total Hours/Year	Total Cost/Year
<b>Applications</b>						
Application Compliance Screen	0.8	0.8	\$36.82	110	88	\$4,051
Evaluation of Application	8	8	\$368.24	110	880	\$40,506
Notify Applicant of Selection Status	0.25	0.25	\$11.51	110	27.5	\$1,266
Renewal applications	7	7	\$322.21	188	1316	\$60,575
Renewal application compliance screen	0.8	0.8	\$36.82	188	150.4	\$6,923
Application Subtotal	16.85	16.05	\$775.61	706	2462	\$113,321
<b>Program Activities</b>						
Site Visit	28	28	\$1,288.84	40	1120	\$51,554
Review Annual Performance Report	4	4	\$184.12	414	1656	\$76,226
Program Activities Subtotal	32	32	\$1,472.96	454	2776	\$127,779
<b>Total 2006-2007</b>	<b>48.85</b>	<b>48.85</b>	<b>\$2,248.57</b>	<b>1160</b>	<b>5238</b>	<b>\$241,101</b>

<b>Table 6.6: EPA Application and Program Participation Burden, September 1, 2007 - August 31, 2008</b>						
	Tech. (\$46.03/Hour)	Respondent Hours/Year	Labor Cost/Year	# Respondents	Total Hours/Year	Total Cost/Year
<b>Applications</b>						
Application Compliance Screen	0.8	0.8	\$36.82	116	92.8	\$4,272
Evaluation of Application	8	8	\$368.24	116	928	\$42,716
Notify Applicant of Selection Status	0.25	0.25	\$11.51	116	29	\$1,335
Renewal applications	7	7	\$322.21	124	868	\$39,954
Renewal application compliance screen	0.8	0.8	\$36.82	124	99.2	\$4,566
Application Subtotal	16.85	16.05	\$775.61	596	2017	\$92,843
<b>Program Activities</b>						
Site Visit	28	28	\$1,288.84	44	1232	\$56,709
Review Annual Performance Report	4	4	\$184.12	433	1732	\$79,724
Program Activities Subtotal	32	32	\$1,472.96	477	2964	\$136,433
<b>Total 2007-2008</b>	<b>48.85</b>	<b>48.85</b>	<b>\$2,248.57</b>	<b>1073</b>	<b>4981</b>	<b>\$229,275</b>

**Table 6.6: EPA Application and Program Participation Burden, September 1, 2008 - August 31, 2009**

	Tech. (\$46.03/Hour)	Respondent Hours/Year	Labor Cost/Year	# Respondents	Total Hours/Year	Total Cost/Year
<b>Applications</b>						
Application Compliance Screen	0.8	0.8	\$36.82	122	97.6	\$4,493
Evaluation of Application	8	8	\$368.24	122	976	\$44,925
Notify Applicant of Selection Status	0.25	0.25	\$11.51	122	30.5	\$1,404
Renewal applications	7	7	\$322.21	113	791	\$36,410
Renewal application compliance screen	0.8	0.8	\$36.82	113	90.4	\$4,161
Application Subtotal	16.85	16.05	\$775.61	592	1986	\$91,393
<b>Program Activities</b>						
Site Visit	28	28	\$1,288.84	48	1344	\$61,864
Review Annual Performance Report	4	4	\$184.12	457	1828	\$84,143
Program Activities Subtotal	32	32	\$1,472.96	505	3172	\$146,007
<b>Total 2008-2009</b>	<b>48.85</b>	<b>48.85</b>	<b>\$2,248.57</b>	<b>1097</b>	<b>5158</b>	<b>\$237,400</b>
<b>Grand Total 2006- 2009</b>				<b>3330</b>	<b>15,376</b>	<b>\$707,776</b>
<b>Annualized</b>				<b>1110</b>	<b>5,125</b>	<b>\$235,925</b>

**Table 6.7: EPA Incentives Burden, 2006 - 2007**

		Tech.		Resp.	Labor	#	Total	Total
Information Collection Activity	\$46.70	\$50.19	\$23.80	Hours/Year	Cost/Year	Resp.	Hours/Year	Cost/Year
MACT Provisions								
Review Annual Reports or Annual Certifications (For P2 Facilities)	0.0	0.0	0.0	0.0	0.00	15	0.0	\$0.00
MACT Information Collection Subtotal	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
RCRA HW Accumulation								
Review Notifications of Waste Accumulation in Excess of 90 Days	0	0	0	0.00	0.00	15	0.0	\$0.00
Review contingency plan		0		0.00	0.00	15	0.0	\$0.00
HW Accumulation Subtotal [see note]	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
RCRA Inspection Frequency								
Review permit mod or request for reduced inspection 264.15 & 265.15	0.0	0.0	0.0	0.0	0.00	5	0.0	\$0.00
Notify PT member of approval or denial	0.0	0.0	0.0	0.0	0.00	5	0.0	\$0.00
Inspection frequency subtotal [see note]	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
<b>Total Burden 2006-2007</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.00</b>		<b>0.0</b>	<b>\$0.00</b>

**NOTE:** EPA incentives burden projected to be incurred by states

**Table 6.7: EPA Incentives Burden, 2007 - 2008**

		Tech.		Resp.	Labor	#	Total	Total
Information Collection Activity	\$46.70	\$50.19	\$23.80	Hours/Year	Cost/Year	Resp.	Hours/Year	Cost/Year
MACT Provisions								
Review Annual Reports or Annual Certifications (For P2 Facilities)	0.0	0.0	0.0	0.0	0.00	30	0.0	\$0.00
MACT Information Collection Subtotal	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
RCRA HW Accumulation								
Review Notifications of Waste Accumulation in Excess of 90 Days	0	0	0	0.00	0.00	15	0.0	\$0.00
Review contingency plan		0		0.00	0.00	15	0.0	\$0.00
HW Accumulation Subtotal [see note]	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
RCRA Inspection Frequency								
Review permit mod or request for reduced inspection 264.15 & 265.15	0.0	0.0	0.0	0.0	0.00	15	0.0	\$0.00
Notify PT member of approval or denial	0.0	0.0	0.0	0.0	0.00	15	0.0	\$0.00
Inspection frequency subtotal [see note]	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
<b>Total Burden 2007-2008</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.00</b>		<b>0.0</b>	<b>\$0.00</b>

**NOTE:** EPA incentives burden projected to be incurred by states

**Table 6.7: EPA Incentives Burden, 2008 - 2009**

		Tech.		Resp.	Labor	#	Total	Total
Information Collection Activity	\$46.70	\$50.19	\$23.80	Hours/Year	Cost/Year	Resp.	Hours/Year	Cost/Year
MACT Provisions								
Review Annual Reports or Annual Certifications (For P2 Facilities)	0.0	0.0	0.0	0.0	0.00	45	0.0	\$0.00
MACT Information Collection Subtotal	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
RCRA HW Accumulation								
Review Notifications of Waste Accumulation in Excess of 90 Days	0	0	0	0.00	0.00	15	0.0	\$0.00
Review contingency plan		0		0.00	0.00	15	0.0	\$0.00
HW Accumulation Subtotal [see note]	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
RCRA Inspection Frequency								
Review permit mod or request for reduced inspection 264.15 & 265.15	0.0	0.0	0.0	0.0	0.00	15	0.0	\$0.00
Notify PT member of approval or denial	0.0	0.0	0.0	0.0	0.00	15	0.0	\$0.00
Inspection frequency subtotal [see note]	0.0	0.0	0.0	0.0	0.00		0.0	\$0.00
<b>Total Burden 2008-2009</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.00</b>		<b>0.0</b>	<b>\$0.00</b>
<b>Total Burden 2006-2009</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>\$0.00</b>
<b>Annualized Burden</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>\$0.00</b>

**NOTE:** EPA incentives burden projected to be incurred by states