

MEMORANDUM

DATE: March 19, 2009

SUBJECT: Request for OMB Approval of Customer Satisfaction Survey of Compliance Assistance Manual for Ethanol Facilities, ICR 1711.05, OMB 2090-0019

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TO: Heidi King, Office of Management and Budget

The purpose of this memo is to request approval of a customer satisfaction survey to receive feedback on EPA Region 7's compliance assistance manual *Environmental Laws Applicable to Construction and Operation of Ethanol Plants*. Region 7 seeks to gather information on its reasonability, quality of information and overall usefulness as a compliance assistance tool to ethanol facilities and ethanol facility contractors in the Region. EPA Region 7 is also interested in ways that the manual could be improved to increase customer satisfaction with the manual as a compliance assistance tool.

In order to increase awareness of the rules and regulations governing the construction and operation of ethanol plants in its Region, EPA Region 7 staff created and distributed a compliance assistance manual for these facilities in late 2007. The Region recognized the need to expand outreach to this sector, as between June 2005 and June 2008, 100 new ethanol plants were permitted in Region 7, as compared with just 30 plants in the previous 20 years. The compliance assistance manual *Environmental Laws Applicable to Construction and Operation of Ethanol Plants* has information on federal environmental programs and the roles of state and federal authorities in overseeing plant construction and operation. EPA Region 7, with support from OPEI, is interested in evaluating ethanol facilities' satisfaction with the Manual as a tool to assist them in their understanding of applicable Federal laws. Region 7 has prepared the attached survey to gather the information for this effort. The survey is strictly voluntary and seeks the opinions of facilities and contractors who have received this manual.

The survey includes four non-satisfaction questions that provide information to help EPA interpret the satisfaction information (e.g., to determine which position categories seem more or less satisfied with the Manual, what particular areas of interest are bringing people to the Manual, the means by which people are choosing to access the Manual). These four questions can be answered from memory and represent a minimal amount of burden to the individual responding to the survey.

This survey will be mailed to approximately 150 known ethanol facilities in Region 7 and approximately 15 ethanol facility contracting companies, and will also be available as an electronic survey on-line. Some of these facilities and contractors may no longer be in business,

so it is difficult to estimate the response rate to this survey. For the purposes of this request, we estimate that we will receive responses from 100 facilities and 15 contractors. We estimate that it will take a respondent approximately 15 minutes to complete the survey. An optional section of the survey could take an additional 10 minutes to complete, and we estimate that approximately half of the respondents (58) will complete this section.

Data will be compiled and analyzed to describe facility satisfaction with the compliance assistance manual and to identify areas for improvement in substance, structure, or accessibility of the manual. These data will also be used to inform future revisions of this compliance assistance manual and other similar manuals that EPA produces.

A copy of the survey is attached. If you have any questions, please contact me at 202-566-2198 or mandolia.michelle@epa.gov.

A. Respondents' Burden

The survey should take an average of about 15 minutes to complete for each of the approximately 115 customers expected to respond, amounting to a total of 28.75 burden hours. An optional section of the survey will take an additional 10 minutes, and we estimate that approximately half of the respondents will complete it, or an additional 9.66 burden hours.

Number of Respondents: 115

Minutes per Response: 15 minutes x 115 people = 1,725 minutes = 28.75 hours
(optional) 10 minutes x 58 = 580 minutes = 9.66 hours

Cost per hour: \$48.62¹

Total Burden: 38.41 hours = \$1867.49

B. Agency Burden

The total burden hours for OPEI personnel to review survey results is estimated at 15 total hours.

EPA Staff Time: 15 hours

Cost Per Hour: \$43.99²

Total Burden: \$659.85

¹ Figure obtained from the Bureau of Labor Statistics (BLS) of the U.S. Department of Labor Employer Cost for Employee Compensation, Table 5. Private Industry, by Major Occupational Group and Bargaining Status (<http://www.bls.gov/news.release/ecec.t05.htm>). Total compensation for management (professional and related) is \$48.62 per hour, which is the level of employee that would be expected to complete this survey.

² This rate is based on a 2009 GS-13/01 salary of \$70,615 or \$33.84 per hour with 30% overhead. The hourly rate is therefore \$43.99 for this estimate.