

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**The 2007 National Survey of Local Emergency Planning Committees (LEPCs)
(Reinstatement)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

The 2007 National Survey of Local Emergency Planning Committees (Reinstatement)

1(b) Short Characterization/Abstract

The Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), requires the establishment of Local Emergency Planning Committees (LEPCs). These broad committees, composed of representatives from public safety, health care, and industry sectors, as well as environmental/community organizations are charged with developing and maintaining emergency plans for their communities. LEPCs foster a valuable dialogue between members of government, industry, and the public to prevent and prepare for accidental (and terrorist-related) releases of hazardous chemicals.

The U.S. Environmental Protection Agency (EPA), Office of Solid Waste and Emergency Response (OSWER), Office of Emergency Management (OEM) plans to collect information through a one-time, web-based, voluntary survey of representatives of the approximately 3,500 LEPCs nationwide.

This proposed information collection will build upon the 1994 and 1999 nationwide LEPC surveys, which measured levels of compliance and proactivity of LEPCs. Since that time, no systematic nationwide analysis of LEPC activity has been conducted. In the six years since September 11th, local emergency planning has evolved, most notably, in the amount of information that is now available to assist LEPCs in preparing for and preventing chemical emergencies.

The primary goals of this research are to: (1) track the progress of LEPCs by assessing their current activity compared to some of the data collected in a 1999 survey; and (2) probe current LEPC practices and preferences regarding several important sets of issues, including: communication with local citizens, proactive accident prevention efforts, and the effectiveness of selected OEM products and services.

This collection will also contribute to reporting requirements of the Government Performance and Results Act (GPRA) of 1993, which stipulates that agencies evaluate program activities in terms of outputs and outcomes. This survey is necessary to gauge whether OEM is successfully providing national leadership and assistance to local communities in preparing for and preventing chemical emergencies.

The survey is designed to minimize the burden of the collection on respondents. The questions are self-selecting, such that those questions that are irrelevant to the respondent are eliminated. This reduces the overall burden on the respondent, and speeds completion of the survey. It is estimated that the information collection will involve 3,500 respondents and impose a burden of 875 hours (.25 hours per respondent). There are no capital/startup or operating & maintenance costs associated with this survey, and labor costs are estimated to be \$40,285.

This information collection was previously approved by the Office of Management and Budget (OMB), however since the survey is conducted infrequently (less than once every three years) this ICR was discontinued after its last expiration date of June 30, 2002.

2. Need For and Use of the Collection

2(a) Need/Authority for the Collection

This collection is pursuant to the Government Performance and Results Act (GPRA) of 1993. GPRA stipulates that agencies focus on evaluating program activities in terms of outputs and outcomes. This ICR is necessary to evaluate whether OEM is successfully providing national leadership and assistance to states and communities in preparing for and preventing chemical emergencies.

2(b) Practical Utility/Users of the Data

OEM will use this data as part of GPRA reporting requirements. The information will also be used in determining programmatic priorities and guiding the development of new (and revision of existing) OEM products and services. More importantly, this survey will greatly enhance efforts to provide the highest quality service to OEM customers.

3. Non-Duplication, Consultations, and Other Collection Criteria

3(a) Non-Duplication

LEPCs are unique preparedness and prevention organizations. As such, the information requested from respondents is not available (on a national level and in a uniform format) from other sources. The last nationwide survey of LEPCs was conducted in 1999 and information collected in the proposed 2007 National Survey will update and advance EPA's understanding of LEPCs, building upon, rather than duplicating, previously collected data.

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

In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), the Agency notified the public through a Federal Register notice of this ICR on September 13, 2005 (70 FR 54044). Although OEM anticipated administering the survey in 2005, because of the events of Hurricanes Katrina and Rita, OEM postponed the nationwide survey of LEPCs until 2007. EPA

received comments from four respondents. Comments were generally positive and supported this effort and confirmed that the burden estimates were reasonable.

3(c) Consultations

This ICR was prepared in consultation with EPA representatives and key stakeholders. In addition to the individual listed below, EPCRA Coordinators from all ten EPA Regions reviewed the survey.

Tim Gablehouse, Chairman
Jefferson County LEPC and Colorado SERC
Denver, CO
(303) 572-0050

3(d) Effects of Less Frequent Collection

This is a one-time collection, so a less frequent collection cannot be conducted.

3(e) General Guidelines

The information collection is consistent with the guidelines set forth in 5 CFR 1320.5 of the Paperwork Reduction Act Guidelines.

3(f) Confidentiality

No sensitive information is expected to be collected under this ICR. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the information being collected contains sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

The proposed information collection targets individuals who hold a leadership position on LEPCs. It is anticipated that the majority of respondents will be LEPC chairs. The LEPC is a planning organization; typically involved in the fields of public safety, local government, waste management, public health, and/or environmental quality.

The following is a list of NAICS codes associated with survey respondents:

Standard	NAICS Codes
Emergency and Other Relief Services	62423
Executive Offices	92111
American Indian and Alaska Native Tribal Governments	92115
Police Protection	92212
Fire Protection	92216
Other Justice, Public Order and Safety	92219
Administration of Public Health Programs	92312
Air, Water, and Solid Waste Management	92411

4(b) Information Requested

(i) Data Items

The majority of the questions in the survey are presented in multiple-choice format, with selectable answers provided. No narrative answers are required. Some of the questions are asked contingent upon the answers given to prior questions, so not all respondents will answer all of the listed questions. The following data elements will be requested from the LEPCs who voluntarily participate in the survey:

Demographic Questions:

The state in which the LEPC is located.
The size and characteristics (i.e. rural, suburban, or urban) of the population the LEPC serves.

LEPC Structure Questions:

A description of how the LEPC's chairperson is chosen.
A description of the organizations represented on the LEPC.
Whether there is Citizen Corps Council within the LEPC's service area. If applicable, a description of the working relationship between the LEPC and Citizen Corps Council.
A description of how the LEPC's chairperson is chosen.

LEPC Meeting Questions:

The frequency with which the LEPC met in the past 12 months. If applicable
Whether and
The frequency with which the LEPC met in the past 12 months. If applicable

Emergency Plan Questions:

The primary author of the LEPC's emergency plan.
The last time the LEPC's plan was reviewed and updated by the LEPC and the SERC.
A ranking of the average LEPC member's familiarity with the emergency plan.
A description of what is included in the LEPC's emergency plan.

Data Use and Management Questions:

A description of how the LEPC receives, manages, and uses EPCRA Tier I and Tier II data.
Whether the LEPC uses RMP data. If applicable, how the data is used and a description of the sources of the RMP data.

Whether and, if applicable, for what purposes the LEPC uses CAMEO.
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Communication Questions:

Whether the LEPC has a Web site.

Whether and, if applicable, how the LEPC notifies the public of its emergency plan and chemical hazard information.

Whether and, if applicable, how the LEPC notifies the public of a chemical release requiring evacuation or shelter in place.
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The amount of public inquiries the LEPC received during the past 12 months.

The frequency and nature of interactions between the LEPC and chemical facilities in its service area.
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Funding

Whether the LEPC has an operating budget.

A description of any direct and in-kind funding the LEPC receives.
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Support from Federal Agency Questions:

Whether the LEPC received technical assistance or guidance from federal agencies. If applicable, a description of which federal agencies provided the LEPC with funding.
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If applicable, a rating of whether support from EPA plays a significant role in LEPC activities.
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The frequency with which the LEPC visits OEM's Web site, and an evaluation of the Web site's effectiveness.

Homeland Security Questions:

A rating of how the LEPC's overall activity level has changed since the events of 9/11.

A rating of how the frequency of public requests for chemical risk information has changed since the events of 9/11.
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A rating of how the LEPC has changed the way chemical risk information is made available to the public since the events of 9/11.
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Strengths and Additional Needs Questions:

The single greatest factor contributing to the success of the LEPC and the single greatest obstacle to the success of the LEPC.

A list of areas in which the LEPC could use assistance (e.g., data management, conducting drills and exercises, coordinating with state and federal agencies, etc.).
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A rating of the LEPC's impact on chemical safety in the LEPC's service area.
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OEM will retain on file the survey, responses, analyses, and reports. This survey seeks to gauge status, activity level, and customer satisfaction, therefore, the survey should not require respondents to extensively search existing records, or reformat information to submit to the Agency. There will be no public record keeping activities under this ICR.

(ii) Respondent Activities

Respondents will be sent a preliminary email informing them of the survey. During the survey field period, respondents will receive a second email with a user name (their email

address) and a randomly generated alpha-numeric password. After reading survey instructions, respondents will complete and submit the voluntary online survey.

5. The Information Collected – Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

Agency activities associated with the 2007 National Survey of Local Emergency Planning Committees consist of the following:

- Develop and finalize survey questions;
- Develop web-based survey instrument;
- Pre-test survey instrument;
- Notify participants of the voluntary online survey;
- Launch survey and provide technical support;
- Track, analyze, and maintain data collected from the survey in a database; and
- Issue a summary of the data collected through the survey.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use a web-based survey with associated database software. While previous surveys were paper-based with telephone follow-up interviews, this survey will be administered electronically, thereby reducing burden on respondents while increasing efficiency and improving data quality. This robust system will store the data and export that data to excel files for analysis. A high-level summary report of the findings will be shared with the public on OEM's Web site, <http://www.epa.gov/oem>.

5(c) Small Entity Flexibility

There are no small businesses or small governmental jurisdictions adversely affected by this information collection.

5(d) Collection Schedule

Upon OMB approval, EPA will initiate the information collection. An advance letter (via email) will be sent to LEPC contacts approximately two weeks before the survey launch. This letter will describe the purpose of the survey, alert LEPCs that the survey will be available online, and provide the timeframe for completion. Once the survey is launched, respondents will receive a second correspondence from EPA with information on how to access the survey [Web link, survey log-in (email address) and randomly generated unique alpha-numeric password]. The survey field period will be approximately two weeks. EPA will analyze the data, develop a report of findings, and post the report on its Web site within six weeks of the close of the survey.

6. Estimating the Burden and Cost of the Collection

Table 1 (attached) documents the computation of individual burdens for participants in this survey. The individual burden is expressed under a heading believed to be consistent with the concept of burden under the Paperwork Reduction Act. Responses to this information collection are not mandatory.

6(a) Estimating Respondent Burden

The average one-time burden to respondents to this survey is estimated to be 875 hours. These hours are based on Agency experience with prior surveys, test-runs of the survey itself, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses a Technical Labor Rate of \$46.05 per hour. This rate is taken from the United States Department of Labor, Bureau of Labor Statistics, September 2006, "Employer Costs for Employee Compensation." This rate is an average of employer costs per hour worked for employee compensation and costs as a percent of total compensation for state and local government workers (from Table 4) and private industry (from Table 5) by occupational and industry group.

Although occupations of LEPC leaders differ, it is likely that those LEPC leaders taking the survey will be part of the management, professional, and related occupational group. For this reason, the labor rates used to estimate respondent cost were derived from this section of the tables referenced above.

(ii) Estimating Capital/Startup and Operating and Maintenance (O&M) Costs

The only type of costs associated with this information collection activity are labor costs. There are no estimated Capital/Startup and Operating and Maintenance Costs associated with participation in this voluntary collection of information.

(iii) Capital/Startup vs. Operating and Maintenance (O&M) Costs

There are no estimated Capital/Startup and Operation and Maintenance Costs associated with participation in this voluntary collection of information.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with administration, analysis, and utilization of the collected information.

The average Agency cost for the administration of the survey contained in this ICR is estimated to be \$62,510.00 (see Table 2, attached). This cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total hourly rate of \$43.31.

These rates are from the Office of Personnel Management (OPM) “2007 General Schedule” which excludes locality rates of pay. These rates can be obtained from the OPM Web site, <http://www.opm.gov/oca/07tables/index.asp>. Details upon which this estimate is based appear in Table 2 below.

6(d) Estimating the Respondent Universe and Total Burden and Costs

EPA estimates that a total of 3,500 respondents will participate in this voluntary one-time information request. The total burden for respondents is expected to be \$40,285 (see Table 1 below).

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents appear in Tables 1 and 2 below. The annual respondent burden for this collection of information is estimated to average .25 hours per response.

6(f) Reasons for Change in Burden

As this ICR was previously discontinued, there are no currently approved burdens and costs. Accordingly, this ICR requests a new one-time labor burden of 875 hours.

6(g) Burden Statement

For this survey, the burden is estimated to be 0.25 hours for each respondent. This estimate includes time for gathering information and completing the online instrument.

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 valid OMB Control Number. The OMB Control Numbers for EPA’s regulations are listed at 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-SFUND-2004-0014, which is available for public viewing at the Superfund Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue., N.W., Washington, D.C. The EPA Docket Center 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 Reading Room is (202) 566-1744, and the telephone number for the Superfund Docket is (202) 566-0276. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET 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. Once 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, N.W., Washington, D.C. 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-SFUND-2004-0014 and OMB Control Number 2050-0162 in any correspondence.

**Table 1. Total Annual Respondent Burden and Cost:
2007 National Survey of Local Emergency Planning Committees**

Activity	Unit Burden Hours	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Average number of responses	Total Burden (Hours)	Total Cost (Dollars)
Completing the Survey	0.25	\$46.05	\$11.51	3,500	875	\$40,285

**Table 2. Total Annual Agency Burden and Cost:
2007 National Survey of Local Emergency Planning Committees**

Activity	Unit Burden Hours	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Average number of responses	Total Burden (Hours)	Total Cost (Dollars)
Develop and finalize survey questions	0.05	\$43.31	\$2.17	3,500	175	\$7,595.00
Develop web-based survey instrument	0.075	\$43.31	\$3.25	3,500	262.5	\$11,375.00
Pre-test survey instrument	0.0125	\$43.31	\$0.54	3,500	43.75	\$1,890.00
Notify participants of the voluntary on-line LEPC survey	0.0125	\$43.31	\$0.54	3,500	43.75	\$1,890.00
Launch survey and provide technical support	0.0125	\$43.31	\$0.54	3,500	43.75	\$1,890.00
Track, analyze, and maintain data collected from the survey in a database	0.125	\$43.31	\$5.41	3,500	437.5	\$18,935.00
Issue a summary of the data collected through the survey	0.125	\$43.31	\$5.41	3,500	437.5	\$18,935.00
Total					1,443.75	\$62,510.00