

**Information Collection Request:
Questionnaire for Nominees for the Annual National
Clean Water Act Recognition Awards**

**EPA ICR # 1287.09
OMB Control No. 2040-0101**

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Prepared for
U.S. Environmental Protection Agency
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Section 1: Identification of the Information Collection

1(a) Title of the Information Collection

Questionnaire for Nominees for the Annual National Clean Water Act Recognition Awards. EPA ICR No. 1287.09, OMB Control No. 2040-0101

1(b) Short Characterization/Abstract

This questionnaire is developed to collect information for the Environmental Protection Agency's (EPA) National Clean Water Act Recognition Awards Program, formerly the National Wastewater Management Excellence Awards Program.

In 1985, EPA established the Operations and Maintenance (O&M) awards program to provide a positive incentive for compliance with the National Pollutant Discharge Elimination System (NPDES). Because of the successes of the O&M Awards program, in 1988, EPA established the Beneficial Biosolids Use awards (formerly Sludge awards). In 1989, the Pretreatment awards were added. In 1990, EPA established the Combined Sewer Overflow (CSO) and Storm Water (SW) Management awards programs. The questionnaire provides the mechanism for the applicant to demonstrate outstanding and innovative wastewater management practices. The Pretreatment awards program is covered by ICR (OMB Control No. 2040-0009, EPA ICR No. 0002.12), approved through September 30, 2007. A framework to implement the awards recognition program is at 40 CFR part 105. A copy is attached in Appendix A.

The respondent will read the instructions for completing the questionnaire. The respondent will use existing files, planning and progress reports, and institutional memory to complete the questionnaire. Based on the instructions provided with the questionnaire, the respondent will compile the requested information. The requested design and operating information should be readily available from wastewater treatment facility or pollution abatement program operating records. The data collection will include flow, permit, operating and environmental data.

The information collection will be used by the respective awards program in the Office of Water, Office of Wastewater Management to evaluate and determine which pollution abatement achievements should be recognized. Based on the collection, national panels will evaluate the nominee's efforts and recommend finalists. As currently structured, the O&M awards program has nine sub-categories to recognize municipal achievements based on plant flows and treatment level. The Biosolids awards program has four sub-categories which recognize municipal biosolids operations, technology and research achievements, and public acceptance. The CSO awards program has one sub-category which recognizes municipal programs, and the SW awards program has two sub-categories which recognize municipal and industrial programs. Regions and States may also have recognition awards programs and are included in these estimates. National second place category winners may also be recognized. Additionally, nominated activities may sometimes receive an honorable mention or special award. The national Clean Water Act Recognition Awards are presented annually at an EPA ceremony.

Total estimated burden for this collection is 2,030 hours and \$85,738. The cost to the Federal government is \$139,983 per year.

Section 2: Need for and Use of the Collection

2(a) Need/Authority for the Collection

Section 501(e) of the CWA, as amended (copy attached in Appendix B) authorizes a program to recognize municipalities and industries that demonstrate outstanding technological achievements, innovative processes, devices or other outstanding methods in their waste treatment and pollution abatement programs. Recognition is made through EPA's National Clean Water Act awards program. The program also heightens public awareness of the contributions wastewater treatment facilities and programs make to clean water, and encourages public support for effective operations and maintenance. The design, operating, and environmental compliance information of the wastewater treatment facility or pollution abatement programs is needed to complete the questionnaire.

2(b) Practical Utility/Users of the Data

Information collected will be used for the National Clean Water Act Recognition Awards by EPA's Office of Water, Office of Wastewater Management.

Section 3: Non-duplication, Consultations, and Other Collection Criteria

3(a) Non-duplication

The design, operating, and environmental compliance information needed to complete the questionnaire is not immediately available in the database or files of a State or Federal office. If such data is available, it may exist in an outdated report or database which cannot be timely or readily cross-referenced to the requested data. Outstanding and innovative program accomplishments must be provided from the wastewater management facilities and programs as it is not available from any other source.

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

In compliance with the 1995 Paperwork Reduction Act (PRA), any agency developing a non-rule-related ICR must solicit public comments before submitting the ICR to OMB. These comments, which are used partly to determine realistic burden estimates for respondents, must be considered when completing the Supporting Statement that is submitted to OMB.

This ICR was published in the Federal Register on July 3, 2007 (72 FR 36449). The notice included a request for comments on the content and impact of these information collection requirements on the regulated community. EPA received one comment on this ICR. EPA's response to the comment is addressed by this ICR and summarized in Appendix D of this supporting statement.

3(c) Consultations

The program is in its twenty-first year of making awards. EPA strives to minimize the burden on all respondents, especially small communities/businesses. Each year comments are provided by the award recipients, selection panel, and State and Regional EPA personnel. EPA asks the

Regional and State personnel to assist the respondents where necessary in completing the questionnaire. Regions also ensure that the nominees' environmental compliance records are reviewed and approved before they complete the questionnaire.

EPA managers solicit feedback on its questionnaire from non-Federal panelists and from past municipal winners in a very informal manner. EPA managers also receive indirect comments from Regional EPA employees, who also are in contact with municipal and industrial entities and State officials. Positive and negative feedback are both evaluated. Feedback from the State's facility operators is that the national application form for awards is complex and is a significant burden for the plant staff. In order to improve participation, some Regions use a short form to get the facilities into the award process for local, State and Regional competition. Once the facilities have been selected for nomination to the national competition, they complete the questionnaire to compete for the national award. The questionnaire is revised if the burden on the respondent is determined to unnecessarily outweigh the information being requested to evaluate achievement.

3(d) Effects of Less Frequent Collection

If the collection is conducted on a less frequent basis, the merits and goals of the program would be seriously impacted. Recognition awards are held annually. The information collection schedule is contained in the respondent's questionnaire instructions. The questionnaire and instructions for the awards program are distributed by mail, email and are available through the internet by December/January of each year. The completed questionnaire is received by Headquarters in May/June, and the panel reviews the questionnaires in June/July.

3(e) General Guidelines

This information collection request is consistent with guidelines contained in 5 CFR 1320.5(d) (2).

3(f) Confidentiality

No confidential information is involved for this collection activity.

3(g) Sensitive Questions

The questionnaire does not request any information that would be of a sensitive nature.

Section 4: The Respondents and the Information Requested

4(a) Respondents/SIC and NAICS Codes

The Standard Industrial Classification (SIC) and North American Industry Classification System (NAICS) codes for the respondents affected by this information collection activity are as follows:

SIC: 4952; NAICS: 22132 - Sewerage Systems

SIC: 4953; NAICS: 56292, 562211-262213, 562219 - Refuse Systems

SIC: 8221; NAICS: 61131 - Colleges, Universities, Professional Schools

SIC: 8711; NAICS: 54133 - Engineering Services

SIC: 8734; NAICS: 54138 - Testing Laboratories

SIC: 9511; NAICS: 92411 - Air and Water Resource and Solid Waste Management
(Administration of Environmental Quality)

4(b) Information Requested

i) Data items, including record keeping requirements

The requested design and operating information should be readily available from facility operating records. The information collection will include flow, permit, operating, and environmental compliance data.

ii) Respondent Activities

To be considered for National Clean Water Act Recognition Awards, the respondent will voluntarily complete the questionnaire and provide design, operating and environmental information about their facility or program. The respondents will read the instructions for completing the questionnaire. The respondent will use existing files when possible, planning and progress reports, and institutional memory to complete the questionnaire. A copy of the current questionnaires is attached in Appendix C.

Section 5: The Information Collected-Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

The completed questionnaire is reviewed by State/Regional officials, as appropriate, prior to forwarding them to Headquarters. Not all States have awards programs. Participation for the Regional awards may vary each year for each award program category. After the questionnaires are received at Headquarters, they are provided to the respective review panels consisting of representatives from EPA's Headquarters and regions, state water pollution control agencies or affiliated associations for consideration of a national award. The panels make recommendations to EPA. All nominees complete a series of compliance screenings. National nominees are invited to an EPA awards ceremony for presentation of an engraved plaque in recognition of their outstanding and innovative technological achievements. First place winners also receive plant flags.

EPA Headquarters releases the names of the municipalities and industries to be recognized, and summaries of awards justifications may be published in reports, news articles, journals, and Federal Register Notices.

5(b) Collection Methodology and Management

The regions may send information electronically as much as possible to transmit completed questionnaires and other information to Headquarters. All nominees are screened for environmental compliance by the State and EPA. Data quality information will be retrieved from the Agency's Permit Compliance System (PCS)—in the process of being replaced by the Integrated Compliance Information System (ICIS)—and other environmental reports, and professional knowledge of the facility or program.

5(c) Small Entity Flexibility

This information collection activity does not concern a rulemaking. A framework to implement the awards recognition program is at 40 CFR, part 105. EPA strives to minimize the burden on all respondents, especially small communities/businesses. EPA Regions and States ensure that Regional personnel review the nominee's environmental compliance records before the nominee is asked to complete the questionnaire. Depending on the respective program, Regions and States may be available to assist respondents to answer the questionnaire to compete for the national award. The questionnaire is shortened or revised if the burden on the respondent appears to unnecessarily outweigh the information requested.

5(d) Collection Schedule

The information collection schedule is contained in the respondents' questionnaire. The respective awards program manager sends out the questionnaire and instructions in December/January of each year. The completed questionnaire is received by Headquarters in May/June, and the panel reviews the questionnaire in June/July. Recognition awards are held annually in October at an EPA awards ceremony.

Section 6: Estimating the Burden and Cost of the Collection

The total number of applicant respondents is estimated to be 145, including 100 for the O&M program, 25 for the Biosolids program, 10 for the CSO program, and 10 for the SW program. The responses are collected once annually. The respondents reporting burden of 8 person hours per response (2 hours for manager to read instructions and search data; 5 hours for staff to gather information and complete the questionnaire; and 1 hour for administrative support staff to prepare forms—see Table 1) is estimated to be 1,160 hours and a cost of \$49,721. The States' review burden of 6 person hours per response (1 hour for management review; 4 hours for staff to review and verify data and make nominations for awards; and 1 hour for administrative support—see Table 2) is 870 hours and a cost of \$36,017. Although not all states are expected to participate in the award programs, all are eligible to participate. Total estimated burden for this collection is 2,030 hours and \$85,738. The cost to the Federal government is \$139,983 per year. An explanation follows:

6(a) Estimating Applicants Respondents Burden and Cost

Table 1 presents the burden and cost to applicants respondents. A labor rate of \$50.41 hour was used for managers, \$44.10 for staff, and \$21.58 for administrative support. These rates are based on the mean hourly cost of employment for all occupations, including benefits. These hourly rates were based on the average hourly wage for civilian workers as determined by the U.S. Department of Labor.¹

¹ From U.S. Department of Labor, Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 2, "Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by occupational and industry group, December 2006.": Management, business, and financial: \$50.41, Professional and related: \$44.10, Office and administrative support: \$21.58. (<http://stats.bls.gov/news.release/ecec.t02.htm>)

Table 1. Burden and Cost for Applicants Respondents

Activity	No. of Responses	No. Person Hours per response	Total Burden	Cost per Hour	Total Annual Labor Cost
Manager reads instructions and search existing data sources	145	2	290	\$50.41	\$14,619
Staff gathers information and complete the questionnaire	145	5	725	\$44.10	\$31,973
Administrative support prepares forms	145	1	145	\$21.58	\$3,129
TOTAL		8	1160	---	\$49,721

6(b) Estimating State Respondents Burden and Cost

Table 2 presents the burden and cost to state respondents. A labor rate of \$50.41 hour was used for managers, \$44.10 for staff, and \$21.58 for administrative support. These rates are based on the mean hourly cost of employment for all occupations, including benefits. These hourly rates were based on the average hourly wage for civilian workers as determined by the U.S. Department of Labor.²

Table 2. Burden and Cost for State Respondents

Activity	No. of Responses	No. Person Hours per response	Total Burden	Cost per Hour	Total Annual Labor Cost
Management review	145	1	145	\$50.41	\$7,309
Staff review/verify data and make nominations for awards	145	4	580	\$44.10	\$25,578
Administrative Support	145	1	145	\$21.58	\$3,129
TOTAL		6	870		\$36,017

6(c) Estimating Agency Burden and Cost

For tables 3 and 4, the hourly labor rates for the federal government are based on the hourly rates by grade and step, from the US Office of Personnel Management, assuming overhead costs of 50 percent. (http://www.opm.gov/oca/07tables/html/g_s_h.asp)

Table 3. Summary of Costs to EPA Headquarters

Activity	Person Hours	Estimated Cost per Hour	Total Annual Cost
Branch Chiefs (Average hourly rate of GS-15, Step 10 plus 50% overhead burden)	8	\$86.96	\$696
Awards Program Managers (Average hourly rate of GS-13, Step 5 plus 50% overhead burden)	192	\$54.56	\$10,476
TOTAL	200	-	\$11,171
Branch Chiefs: 2 person hours x 4 categories = 8 person hours.			
Awards Program Managers: 48 person hours (6/ 8hr days) x 4 categories = 192 person hours			

² From U.S. Department of Labor, Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 2, "Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by occupational and industry group, December 2006.": Management, business, and financial: \$50.41, Professional and related: \$44.10, Office and administrative support: \$21.58. (<http://stats.bls.gov/news.release/ecec.t02.htm>)

Table 4. Summary of Costs to EPA Regions

Activity	Person Hours	Estimated Cost per Hour	Total Annual Cost
Awards Program Managers (Average hourly rate of GS-13, Step 5 plus 50% overhead burden)	1,920	\$54.56	\$104,755
Administrative Support and Typing (Average hourly rate of GS-8, Step 5 plus 50% overhead burden)	80	\$28.64	\$2,291
TOTAL	2,000	-	\$107,046

Awards Program Managers: 48 person hours (6/ 8hr days) x 10 Regions x 4 categories = 1,920 person hours
Administrative Support and Typing: 2 person hours x 10 regions x 4 categories = 80 person hours.

Table 5. Summary of Federal Travel to National Awards Conference

Activity	No of Travelers	Estimated Cost per Traveler ^a	Total Annual Cost
EPA Awards Presenters	2	\$1,099	\$2,198
O&M Awards	1	\$1,099	\$1,099
Biosolids Awards	1	\$1,099	\$1,099
Storm Water Awards	1	\$1,099	\$1,099
Combined Sewer Overflow Awards	1	\$1,099	\$1,099
TOTAL			\$6,594

a. Costs from the previous ICR (EPA ICR No. 1287.07) updated to December 2006 dollars using Consumer Price Index data from the U.S. Department of Labor, Bureau of Labor Statistics

Table 6. Federal Recognition Awards Cost Summary

Activity (Includes Pretreatment)	No. of Items	Cost per Item ^a	Total Annual Cost
Regional O&M Award Plaques (2 per region)	20	\$49	\$980
National awards plaques	42	\$49	\$2,058
National awards certificates	42	\$27	\$1,134
National first place awards flags	20	\$550	\$11,000
TOTAL			\$15,172

a. Costs from the previous ICR (EPA ICR No. 1287.07) updated to December 2006 dollars using Consumer Price Index data from the U.S. Department of Labor, Bureau of Labor Statistics

6(d) Estimating the Respondents Universe and Total Burden and Cost

The total number of respondents is estimated to be 145, including 100 for the O&M program, 25 for the Biosolids program, 10 for the CSO program, and 10 for the SW program. The responses are collected once annually. The respondents reporting burden of 8 person hours per response is estimated to be 1,160 hours and a cost of \$49,721. The States' review burden of 6 person hours per response is 870 hours and a cost of \$36,017. Although not all states are expected to participate in the award programs, all are eligible to participate. Total estimated burden for this collection is 2,030 hours and \$85,738.

6(e) Bottom Line Burden Hours and Cost Estimates

Table 7. Aggregate Burden for Respondents and States Activities

Entity	Respondents	Total Burden (Hours)
Applicants Respondents	145	1,160
States Respondents	50	870
Total Respondents	195	2,030

6(f) Reasons for change in burden

Information collection activity for the National Clean Water Act Recognition Awards Program currently has OMB approval for 2,030 burden hours for 145 respondents. The respondent's cost

in the previous ICR was estimated to be \$66,265. We predict no change in the estimated burden for the next three years. Cost will change to \$85,738 due to changes in labor rates and the effects of inflation.

6(g) Burden Statement

The public reporting burden for respondents is estimated to average 8 hours per response per year. For State respondents, the reporting burden is estimated to average 6 hours per response per year. 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 No. EPA-HQ-OW-2003-0064, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 Water Docket is (202) 566-2426. An electronic version of the public docket is available through the Federal Docket Management System (FDMS) at <http://www.regulations.gov/>. Use FDMS 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, 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, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OW-2003-0064 and OMB control number 2040-0101 in any correspondence.
