

INFORMATION COLLECTION REQUEST
SUPERFUND SITE EVALUATION AND HAZARD RANKING SYSTEM
(RENEWAL)

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IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

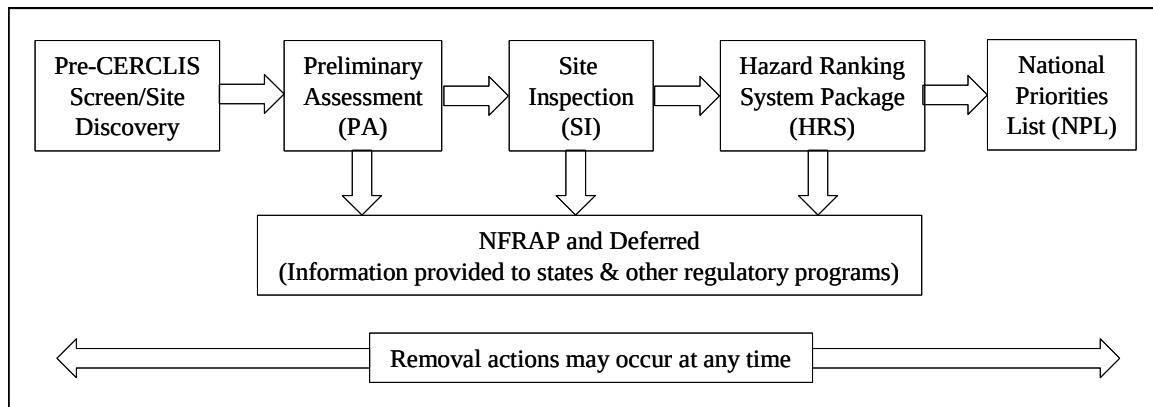
This Information Collection Request (ICR) is number 1488.07 (OMB control number 2050-0095) and is titled, "Superfund Site Evaluation and Hazard Ranking System (Renewal)." It is a revised version of the current ICR for the Superfund site assessment process.

1(b) Short Characterization/Abstract

In 1980, Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to address threats posed to human health and the environment by uncontrolled releases of hazardous substances into the environment. Section 105 of CERCLA required EPA to establish criteria for determining priorities among releases or threatened releases of hazardous substances for the purpose of taking remedial action. In response, EPA developed a model to systematically rank hazardous waste sites with regard to their relative threat to human health and the environment. This model, the Hazard Ranking System (HRS), was adopted by EPA in 1982 and later revised in December 1990. The HRS criteria take into account the population at risk, the hazard potential of the substances, as well as the potential for contamination of drinking water supplies, direct human contact, destruction of sensitive ecosystems, damage to natural resources affecting the human food chain, contamination of surface water used for recreation or potable water consumption, and contamination of ambient air.

The Superfund site evaluation process uses a series of progressively more complex site assessment phases to determine and implement the appropriate responses to releases of hazardous substances to the environment. Exhibit 1 outlines the major components of the site assessment process.

Exhibit 1: Major Components of EPA's Superfund Site Assessment Process



At the conclusion of each phase of the site assessment process, the HRS model is applied to derive a preliminary site HRS score. The HRS score is crucial since it is the primary mechanism used to determine whether a site is eligible to be included on the National Priorities List (NPL). The NPL is a list of those sites that are priorities for long-term evaluation and remedial response. Sites with HRS scores of 28.50 or greater are eligible for placement on the NPL. Only sites on the NPL are eligible for Superfund-financed remedial actions. Sites with HRS scores below 28.5 generally require no further Superfund site evaluation. Uniform application of the HRS by the EPA, States and Tribes enables EPA to identify and prioritize hazardous waste sites that warrant further investigation.¹

¹ 55 Federal Register 51532 (12/14/90) as codified in 40 CFR Part 300 at http://www.access.gpo.gov/nara/cfr/waisidx_03/40cfr300_03.html.

Under this ICR, the States (including U.S. Territories) and Tribes will apply the HRS by collecting and documenting HRS data needs required for each site assessment phase conducted. EPA Regions work with States and Tribes to determine which sites will receive each type of assessment. The HRS data collected by States and Tribes during site assessment activities are derived from the sources described in this information collection, including conducting field reconnaissance, taking samples at the site, and reviewing available reports and documents. States and Tribes conclude each site assessment phase by completing and submitting the appropriate site assessment report to EPA. The number and type of assessment reports to be conducted by States and Tribes is a function of available funding, site assessment backlogs, Superfund site assessment goals, and site assessment priorities; therefore, the type of information collected under this ICR is considered to be a periodic report. The States and Tribes are reimbursed 100 percent of their costs to develop these reports, except for record maintenance.

EPA Regions review each site assessment report submitted by States and Tribes for accuracy and completeness, and to ensure conformance with Superfund site assessment guidance. EPA Regions then use this information to make a decision regarding next Superfund steps for a site. EPA Regions also enter summary information about each report and the associated decision on next steps into the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS). EPA maintains reports submitted by States and Tribes in site files.

The annual burden incurred by States and Tribes for collecting information necessary to move a site through the site assessment process is a function of the average estimated hours and dollars per site assessment activity, the estimated number of assessment activities completed per year, and State/Tribal infrastructure costs supporting these assessment activities. In order to calculate the burden for this ICR, EPA Regions provided annual average estimates of site assessment activities to be completed by States and Tribes from FY08 through FY10. EPA Regions also provided estimated average hours and dollars incurred by States and Tribes to complete each type of site assessment activity, along with estimated infrastructure costs used by States and Tribes to perform Superfund work.

Projected FY08-FY10 data provided by EPA regions show that the estimated annual hour and cost burden to State and Tribal respondents for performing site assessment activities is approximately 148,873 hours and \$11,740,260, respectively. However, one hundred percent of the respondent cost (\$11,740,260) is reimbursed by the EPA through cooperative agreements (CAs) as set forth by Section 104(d) of CERCLA, thus state and tribal respondents do not effectively bear any cost burden.² Section 6.0 of this document, *Estimating the Burden and Cost of Collection*, provides a more detailed discussion of the burden to respondents.

This ICR is prepared using the guidance contained in EPA's *ICR Handbook* revised November, 2005. This document is the most recent document for preparing an ICR and follows the provisions of the Paperwork Reduction Act (44 U.S.C. §1320) and the Office of Management and Budget (OMB) guidelines. It can be found on the EPA website at www.epa.gov/icr.

NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

CERCLA's passage in 1980 launched the Superfund program that provided EPA the authority needed to respond to threats posed by the uncontrolled releases of hazardous substances into the environment. The fundamental purpose of the Superfund program is to address threats and protect human health and the environment from releases or potential releases of hazardous substances from abandoned or uncontrolled hazardous waste sites. The HRS is a crucial part of EPA's Superfund program because its application enables EPA to evaluate the relative threats of hazardous waste sites. Collecting uniform information during the site assessment process enables EPA to consistently apply the HRS model. Consistent application of HRS by respondents enables EPA to identify and

² Section 104 of CERCLA can be found at http://www.access.gpo.gov/uscode/title42/chapter103_subchapteri_.html

classify those releases or threatened releases of hazardous substances that warrant further investigation in anticipation of corrective actions.

EPA submitted the Agency's *2006 - 2011 Strategic Plan*³ to Congress on September 29, 2006, as required under the Government Performance and Results Act (GPRA) of 1993. EPA's strategic plan includes a target for making a cumulative total of 40,491 final Superfund site assessment decisions by the end of FY 2011. The site assessment reports submitted by States and Tribes as described under this ICR are used to assist EPA in determining whether a final Superfund site assessment decision has been made.

CERCLA establishes the legal authority to perform site assessment and NPL listing activities. Specifically:

Section 105 of CERCLA required that the National Oil and Hazardous Substance Pollution Contingency Plan (NCP) be amended to include the following:

“[C]riteria for determining priorities among releases throughout the United States for the purpose of taking remedial action... Criteria and priorities... shall be based upon relative risk or danger to public health, welfare, or the environment... taking into account... the population at risk, the hazard potential of the hazardous substances... the potential for contamination of drinking water supplies, the potential for direct human contact, the potential for destruction of sensitive ecosystems... and other appropriate factors.”

To meet these requirements, the HRS was adopted and enacted as part of the revised NCP in July 1982. Section 105(8)(B) of CERCLA requires the NCP to include a “list.... of national priorities among the known releases or threatened releases throughout the United States...” Application of the HRS determines whether an uncontrolled hazardous waste site may be eligible for inclusion on the NPL. Each State is also required to “establish and submit for consideration by the President priorities for remedial action among known releases and potential releases in that State based upon the criteria” in Section 105(8)(A).

In 1986, CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA). EPA modified the HRS in 1990 so that, “to the maximum extent feasible, [it] accurately assesses the relative degree of risk to human health and the environment posed by sites and facilities subject to review.” Section 105 of SARA mandates that the HRS take into account, to the extent possible, the following:

- Human health risks associated with the contamination or potential contamination of surface water that is or can be used for recreation or potable water consumption;
- Damage to natural resources that may affect the food chain; and
- Contamination or potential contamination of the ambient air, which is associated with the release or threatened release.

Section 118 of CERCLA requires that a high priority be given to facilities where the release of hazardous substances or pollutants has resulted in the closing of drinking water wells or a principal drinking water supply.

Section 125 of CERCLA requires the HRS to assess sites containing a substantial volume of waste as described in Section 3001(b)(3)(A)(I) of the Solid Waste Disposal Act. These wastes include fly ash wastes, bottom ash wastes, slag wastes, and flue gas emission control wastes generated primarily from the combustion of coal or other fossil fuels. Section 125 of CERCLA requires EPA to consider each of the following site-specific characteristics:

- Degree of risk to human health and the environment;
- Quantity, toxicity, and concentrations of hazardous constituents; and
- Extent of and the potential for the release of hazardous constituents into the environment.

³ EPA's 2006-2011 Strategic Plan can be found at http://www.epa.gov/ocfo/plan/2006/entire_report.pdf

The specific sections of CERCLA cited above can be found at http://www.access.gpo.gov/uscode/title42/chapter103_subchapteri.html.

2(b) Practical Utility/Users of the Data

The data collected through the site assessment process described in this ICR are used to support a site decision regarding the need for further Superfund action. The various data elements gathered, which relate to the HRS criteria, are used to complete the HRS score. All of this information is used within the Superfund program to:

- Identify sites that pose a potential threat to human health and the environment;
- Determine if sites pose a potential hazard and whether further action is necessary;
- Refer sites to EPA's removal program if removal actions may be needed;
- Develop preliminary and final HRS scores;
- Set priorities for further assessment work;
- Allocate resources (e.g., money, staff); and
- Evaluate Superfund program performance.

In addition, EPA Headquarters' staff use the information collected to aid in the general management and oversight of the Superfund program. Currently, EPA uses the information to assess resource needs; allocate funds; prepare site assessment guidance materials; list NPL sites; conduct quality assurance (QA) reviews of HRS packages; and track Regional and State Superfund performance. Headquarters also uses the information to respond to information requests, and perform analyses for EPA management, OMB, Congress, and the general public.

Staff at the ten EPA Regions use Superfund site assessment data for purposes similar to Headquarters, including: developing operating budgets and program plans; allocating resources; tracking State-by-State performance; responding to information inquiries under the Freedom of Information Act (FOIA); and supplying input to CERCLIS. Regions must also respond to inquiries from EPA Headquarters. As a function of their program authority, EPA Regions also have the responsibility for overseeing site assessments and generating HRS scores.

State and Tribal use of site assessment data is more site-specific. These authorities use the data to perform site assessments; generate HRS scores; maintain site files; track site status; and respond to information inquiries under FOIA. They also use the information gathered to maintain their own site files. Exhibit 2 summarizes the use and users of site assessment and HRS information.

Exhibit 2: Use and Users of the Site Assessment Data

EPA HEADQUARTERS
<ul style="list-style-type: none"> • List NPL sites • QA HRS packages • Prepare site assessment guidance manuals • Establish national Superfund budget • Track Regional and State Superfund performance • Respond to Congress • Respond to information inquiries (FOIA)
EPA REGIONS
<ul style="list-style-type: none"> • Oversee site assessment • Review HRS scores • Supply input to Congress • Track site status • Coordinate with other programs • Maintain site files • Respond to information inquiries (FOIA)
STATES/TRIBES
<ul style="list-style-type: none"> • Perform site assessment • Generate HRS scores • Track site status • Coordinate with other environmental programs • Maintain site files • Respond to information inquiries (FOIA)

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

The primary sources of data required to complete site assessments and prepare HRS packages are Federal, State, and local government agencies and private parties. Data are gathered through the performance of actual on-site investigations (e.g., samples, on-site measurements). Much of the information (i.e., site history, population surrounding the site, location of drinking water supplies) is collected from readily available public information sources, thereby minimizing the amount of collection of this primary information. The field data gathered during the site assessment activities covered under this ICR are not generally collected by any other Federal agency.

Through pre-CERCLIS screening, EPA screens out sites being addressed by other parties to prevent duplication of assessment activities. Generally, the SI is the first investigation to collect and analyze waste and environmental samples. In instances where prior sampling has been completed and analytical data has been collected, performance of additional sampling may not be necessary.

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

A notice stating this ICR was up for renewal was published in the *Federal Register* on September 4, 2007 (72 *FR* 50679). This initiated a 60-day comment period which closed on November 5, 2007. No comments were received during the comment period.

3(c) Consultations

In order to calculate the burden of site assessment activities on the States and Tribes and present the results in this report, State and Tribal burden information was based on average annual site assessment activity projections for FY 2008 through FY 2010. As part of obtaining the State and Tribal burden information, EPA Regions were contacted to determine the nature of site assessment activities performed by States and Tribes in each respective Region and the costs (dollars and hours) associated with these activities. EPA Regions reviewed cooperative agreement progress reports submitted by States and Tribes as necessary to gather the State and Tribal data for this ICR.

3(d) Effects of Less Frequent Collection

Site assessment information collection does not occur on a regularly scheduled basis. Yearly collection activities associated with the site assessment process are based on the number of sites discovered, the number of sites in the CERCLIS inventory needing assessment work, the amount of available Superfund funding, and Superfund site assessment goals and priorities. The frequency of collection is driven by the schedule established in Section 116(b) of CERCLA. Section 116(b) requires an HRS evaluation (if warranted) within four years of the site's entry into CERCLIS.⁴ For sites brought to EPA's attention via a citizen's petition, Section 105(d) of CERCLA requires completion of a Preliminary Assessment (PA), or an explanation of why a PA is not appropriate, within one year after receiving the petition. Less frequent collection of site assessment reports may compromise EPA's ability to comply with statutory schedules and could negatively impact EPA's progress towards achieving the strategic target for making final site assessment decisions.

3(e) General Guidelines

The reporting frequency guideline set forth in 5 CFR 1320.6 of the Paperwork Reduction Act Guidelines may not be met depending on the nature of new sites discovered and urgency of assessment work needed. Collection of information occurs continually as new sites are identified. EPA is currently operating NPL development activities so that as sites with higher priorities are identified, the information is forwarded to the appropriate office for review and validation.

States and Tribes have at least 30 days in which to respond to any information requests specified in the NCP. This time frame is in compliance with the Paperwork Reduction Act guidelines. The record retention period for administrative records is not specified in the National Contingency Plan. The site records are to be maintained for the duration of the assessment and any subsequent remediation at sites and for as long as necessary for litigation purposes. Responsibility for these files will continue beyond the three year ICR period, as assessment and, if necessary, remediation may take more than three years.

3(f) Confidentiality

Application of the HRS does not typically require collection of information that is considered confidential. EPA handles instances where confidentiality claims are asserted by private parties on a case-by-case basis. States and Tribes (the respondents) have been informed that any confidential information submitted to document an HRS score must be marked clearly as such and sent under separate cover so that it is properly handled.

3(g) Sensitive Questions

⁴ Section 116 of CERCLA as amended by SARA can be found at http://www.access.gpo.gov/uscode/title42/chapter103_subchapteri_.html.

Sensitive questions are not associated with the information collection activities performed during site assessment and HRS score preparation.⁵

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents Standard Industrial Classification (SIC) Codes

Activities conducted as part of the Superfund site assessment process require that information be gathered from Federal, State, and local government agencies. While the performance of the various phases of site assessment will require the involvement of State and local agencies, identification of the particular State or local agency involved is not possible until a site has been identified. SIC codes associated with environmental protection agencies (governmental) are classified in Division J, Public Administration; Major Group 95, Administration of Environmental Quality and Housing Programs; Industry Group 951, Administration of Environmental Quality; and 9511 Air and Water Resource and Solid Waste Management. The corresponding North American Industry Classification System (NAICS) code is 924110: Administration of Air and Water Resource and Solid Waste Management Programs.

4(b) Information Requested

The data collection requirements associated with the various phases of the site assessment process are designed to enable the consistent application of the HRS. Information gathering activities are intended to help EPA determine whether hazardous substances are present at the site, and whether they are migrating to the surrounding environment. Data required for the site assessment process and HRS score preparation are often collected from readily available public information sources such as State and local government offices, Regional EPA offices, and potentially responsible parties (PRPs). The amount of data collected during the site assessment process and the activities associated with collection vary from site to site depending on the level of proposed threat. Data collection activities also vary from phase to phase of the site assessment process based on the type of information needed to satisfy the HRS requirements such as waste characterization and target assessments. Although reporting activities (e.g., data collection, report preparation) comprise the majority of the site assessment effort, approximately 13 percent of the total effort can be attributed to recordkeeping activities (e.g., developing and maintaining databases, entering data, and filing).

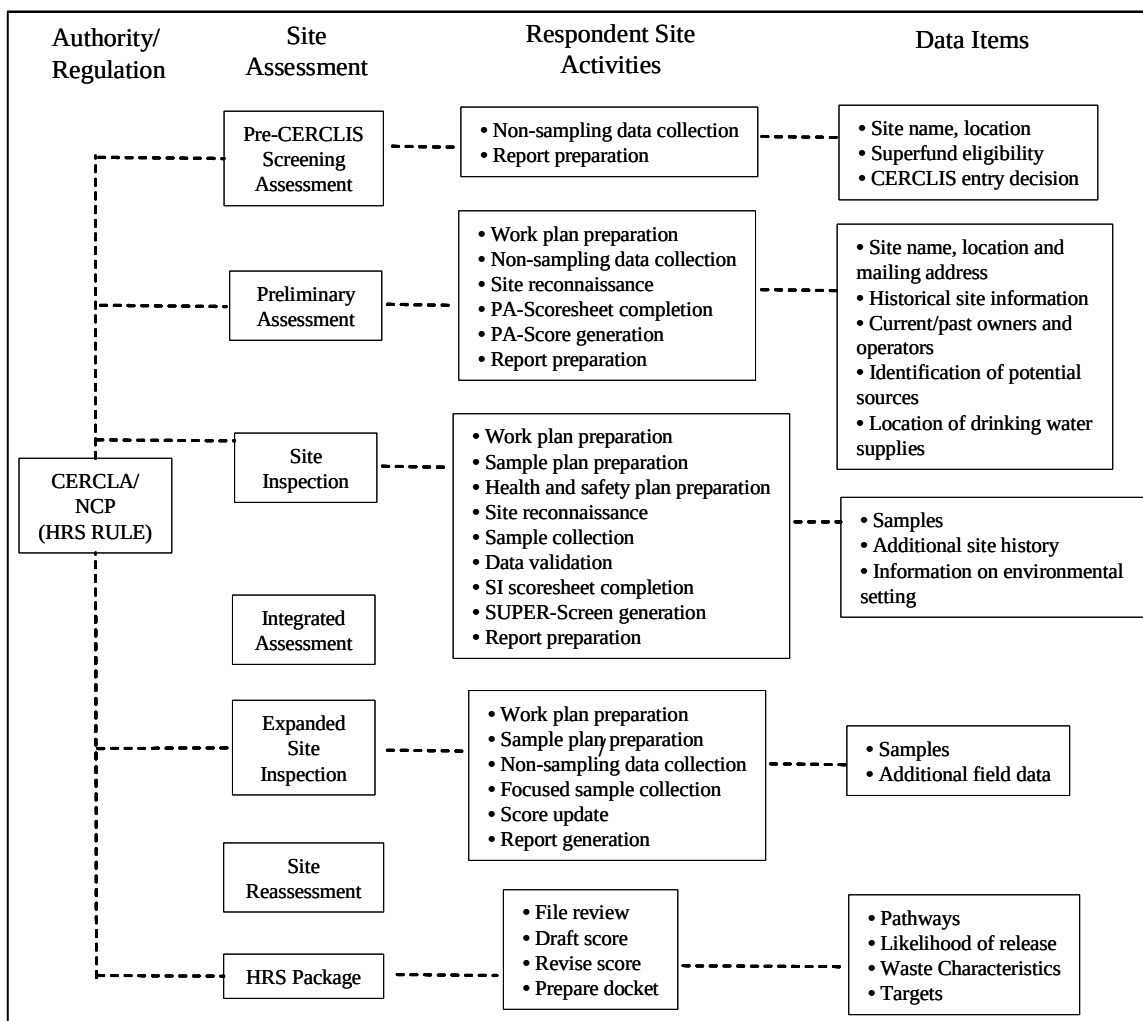
This section provides a detailed description of the type of data that needs to be collected to complete a site assessment and the activities associated with this collection process. It also provides estimates of the average annual projections of number of respondent activities from FY 2008 through FY 2010. State and Tribal respondents submit a site assessment report to EPA for each activity conducted. EPA enters key information contained in these reports into CERCLIS.

Collection activities are discussed for the major phases of site assessment including: Pre-CERCLIS Screening, Preliminary Assessment, Site Inspection, and HRS Package Preparation. Other assessment activities are also described, including: Integrated Removal/Remedial Evaluation (Integrated Assessment), Expanded Site Inspection and Site Reassessment.

Exhibit 3 provides an overview of the activities performed and data items collected for the various phases of site assessment. It also illustrates where the sub-phases may be utilized and the various outcomes that can occur. Section 6.0, *Estimating the Burden and Cost of Collection*, provides the estimated average hours associated with each of the phases of the site assessment process.

⁵ As stated in EPA's *ICR Handbook*, revised November 2005, sensitive questions are those concerning sexual behavior, attitudes, religious beliefs, or matters usually considered private.

Exhibit 3: Detailed Site Assessment Activities and Data Collected



Pre-CERCLIS Screening

Pre-CERCLIS screening is the process of reviewing data on a potential hazardous waste site brought to EPA's attention to determine whether it should be entered into CERCLIS for further evaluation or response action.⁶ Pre-CERCLIS screening is intended to be a low-cost effort to ensure uncontaminated or lightly contaminated sites are not arbitrarily entered into CERCLIS for Superfund-financed evaluation, cleanup, or oversight activities. The process can be initiated through the use of several mechanisms, such as a phone call or referral by a State or other Federal agency. Following notification of a potential site to EPA, Regions generally contact State, Tribal, or other appropriate Federal staff to determine whether the site is already being addressed by another party and to define EPA's role at the site. From FY 2008 through FY 2010, EPA projects an annual average of 342 Pre-CERCLIS screenings will be performed by States or Tribes.

⁶ USEPA, *Improving Site Assessment: Pre-CERCLIS Screening Assessments*, OSWER 9375.2-11FS, October 1999.

Preliminary Assessment

The preliminary assessment (PA) is a relatively rapid, low-cost compilation of readily available information pertaining to the site and its surroundings.⁷ From FY 2008 through FY 2010, EPA projects an annual average of 111 PAs will be performed by States or Tribes to identify target populations and other targets that may be affected by contamination at sites. The scope of the PA must be sufficient to complete several activities, including:

- Reviewing existing information about the site;
- Conducting a site and environmental reconnaissance;
- Collecting information about the site, with the emphasis on target information;
- Evaluating all information and developing a preliminary HRS score; and
- Preparing a brief site summary report and site characteristics form.

Data collected during PA activities include: site-specific data, historical site information, potential contamination sources, types of hazardous waste, target information, and location of drinking water supplies. Sampling activities are not performed during this phase of site assessment.

In certain situations, an Abbreviated PA (APA)⁸ may be conducted in lieu of a full PA. APAs are appropriate when the following conditions exist:

- A site has been inappropriately listed in CERCLIS because it is either not eligible or it could be deferred to another response program;
- A site can be addressed as part of another site already in CERCLIS;
- Available information allows EPA to make an early decision to undertake a Site Inspection (SI); or
- A NFRAP designation can be made without completing a full PA.

For such sites, the typical PA reporting requirements are abbreviated.

Site Inspection

SIs build upon and supplement the information collected during the PA. The primary purpose of the SI is to gather enough information to determine whether further Superfund action is warranted as a result of a significant threat to human health and the environment.⁹ From FY 2008 through FY 2010, EPA projects an annual average of 75 SIs will be performed by States or Tribes. During the SI, the respondent will collect data to determine whether the site is an NPL candidate or if it should receive a NFRAP or other decision (i.e., deferral to RCRA, further assessment needed). The SI consists of five major activities:

- Reviewing available information including analytical data;
- Organizing the project team and developing an SI work plan, sample plan, health and safety plan, and investigation-derived wastes (IDW) plan;
- Performing field work to visually inspect the site and collect samples;
- Evaluating all information and developing a site score based on the HRS; and
- Preparing a site summary report.

Data collected during the SI could include additional non-sampling data (e.g., field observations, site-specific information) and sampling data collected during the on-site reconnaissance.

⁷ USEPA, Guidance for Performing Preliminary Assessments Under CERCLA, OSWER 9345.0-01A, September 1991.

⁸ USEPA, Improving Site Assessment: Abbreviated Preliminary Assessments, OSWER 9375.2-09FS, October 1999

⁹ USEPA, Guidance for Performing Site Inspections Under CERCLA, Interim Final, OSWER 9345.1-05, September 1992.

Integrated Removal/Remedial Evaluations (Integrated Assessments)

Site assessment and removal assessment activities may be combined into a single Integrated Assessment activity if the appropriate site conditions exist.¹⁰ Integrated Assessments further reduce repetitive tasks and costs on site characterization. The two most common types of Integrated Assessments include: Integrated Removal Assessment & PA; and Integrated Removal Assessment & SI. From FY 2008 through FY 2010, EPA projects an annual average of 7 Integrated Assessments will be performed by States or Tribes. The stand-alone requirements from the site assessment and removal assessment activities must be met even though the data will be integrated.¹¹

Expanded Site Inspection

The ESI further investigates critical hypotheses proposed in the SI regarding the nature and extent of contamination at a site. ESIs typically include additional site sampling, which in some cases, may require specialized techniques or equipment (e.g., installation of monitoring wells, geophysical surveys). Data generated are used to modify the preliminary HRS score developed during the SI. An ESI report is the final product of this phase. ESI activities should include:

- Organizing the project team and developing ESI work plan, sample plan, health and safety plan, and IDW plan;
- Investigating and documenting critical new hypotheses or assumptions;
- Collecting samples to attribute hazardous substances to site operations;
- Collecting samples to establish representative background levels;
- Collecting other missing non-sampling data for pathways of concern; and
- Preparing a site summary report.

The data collected during the ESI may be used to support previous documentation or references, and fulfill remaining HRS data requirements for pathways of concern.¹² From FY 2008 through FY 2010, EPA projects an annual average of 30 ESIs will be performed by States or Tribes.

Site Reassessment

The Site Reassessment represents the gathering and evaluation of new information on a site previously assessed under the Federal Superfund program to determine whether further Superfund attention is needed. The scope of work for a Site Reassessment activity is flexible, but will usually represent a component of PA or SI activities. As such, it serves as a supplement to previous assessment work, and not as a substitute for an initial PA or SI.¹³ From FY 2008 through FY 2010, EPA projects an annual average of 84 site reassessments will be performed by States or Tribes.

HRS Package Preparation

The final phase in the site assessment process is HRS package preparation. The primary activities associated with this phase of site assessment are:

- File review;
- Determining site score;
- Revising site score; and

10 USEPA, Improving Site Assessment: Integrating Removal and Remedial Site Evaluations, OSWER-9360.0-39FS, April 2000.

11 USEPA, Superfund Program Implementation Manual Fiscal Year 2008/2009, EPA 9200.3-14-1G-S, April 2007.

12 USEPA, Guidance for Performing Site Inspections Under CERCLA, Interim Final, OSWER 9345.1-05, September 1992.

13 USEPA, Superfund Program Implementation Manual Fiscal Year 2008/2009, EPA 9200.3-14-1G-S, April 2007.

- Preparing the documentation record and supporting information.

After completion of the site evaluation, compiled data are used to score a site using scoresheets based on the HRS model. Under the HRS, numerical values are assigned to a site based on various aspects of the site and its immediate surroundings through the evaluation of four pathways: (1) ground water migration; (2) surface water migration; (3) soil exposure; and (4) air migration. The scoring system for each pathway is based on a number of individual factors grouped into three factor categories: (1) likelihood of release or, for the soil exposure pathway, likelihood of exposure; (2) waste characteristics; and (3) targets (i.e., potentially affected populations, etc.). Individual factors are evaluated and the factor values are calculated to produce four category values. An example of the scoresheets used during HRS package preparation can be found at <http://www.epa.gov/superfund/training/hrstrain/htmain/3path.htm>.

From FY 2008 through FY 2010, EPA projects an annual average of 7 HRS packages will be performed by States or Tribes.

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

5(a) EPA Activities

EPA region offices review and manage sites assessed under Superfund by States and Tribes, and provide oversight for State and Tribal site assessment cooperative agreements. EPA generally performs the following duties for each of the site assessment activities covered under this ICR:

- Coordinate site specific work and review draft documents and reports;
- Prepare summary reports and decision documents;
- Identify stakeholders and communicate site assessment plans and progress;
- Respond to information requests; and
- Perform data management activities to record and track assessments.

5(b) Collection Methodology and Management

Data gathered during the site assessment process fall into three main categories: historical; field related; and HRS related. At each phase of assessment, data from these broad categories are collected and analyzed in order to screen out sites that do not need to be addressed by the Superfund program. As a site moves from one phase to another in the site assessment process, it must satisfy an increasing number of data requirements for the HRS model. Sites may be screened out of the site assessment process based on a Pre-CERCLIS screening to determine whether a potential hazardous waste site should be added into CERCLIS for further evaluation or response. In addition, sites may also be screened out based on the HRS score generated; a referral to other Federal and State programs; or a referral to the removal program.

Following entry of a site discovery into CERCLIS, the PA process is initiated. During the PA, professional judgment is used to make assumptions for unavailable data. Information collection at this phase is accomplished mostly from the desktop by reviewing historical documents and conducting telephone interviews. The majority of the data collected is historical information and target information for the HRS model. A site drive-by may also be conducted to verify the site location and status. During the PA, the HRS is applied through development of a preliminary HRS score. A PA report is the final product of this phase. Information collected during the PA is incorporated into subsequent work.

A site that is recommended for continued Superfund evaluation after PA completion proceeds to the SI phase. Data collection goals for this phase are similar in scope to the PA with the addition of detailed field data (e.g., site samples). During this phase, a field team conducts an on-site visit and sampling. Site sampling is limited in scope; generally, about 15 samples are collected per site. The media selected for sampling depends on the perceived threat and may include all or some of the following: ground water, surface water, sediment, soil, and air. Source samples may also be taken when deemed necessary. Detailed chemical analysis and data validation is performed on each sample taken. During the SI, the HRS model is applied by revising the preliminary HRS score developed during the PA. An SI report is the final product of this phase. Information collected during the SI is incorporated into subsequent assessment work.

A site that is recommended for continued investigation may have an ESI performed. At this stage, specific information is usually gathered for the pathway of greatest concern. The goal of this investigation is to test remaining theories about the nature and extent of contamination proposed in the SI. Additional field data that are collected usually require specialized techniques or equipment (e.g., installation of monitoring wells, geophysical surveys). Data generated are used to modify the preliminary HRS score developed during the SI. An ESI report is the final product of this phase. Information collected during the ESI is incorporated into subsequent assessment work.

A site that generates a preliminary HRS score of 28.50 or greater after all assessment work is complete is eligible for proposal to the NPL, although additional factors are considered before EPA moves forward with proposing a site. To propose a site, a detailed and defensible HRS Scoring Package must be prepared. This phase of data collection brings together all of the information collected during the site assessment process. The HRS Package is thoroughly and meticulously referenced. The final product of this phase is the final HRS score. A public docket for a proposed site is maintained by EPA to provide an opportunity for all interested parties to examine and comment on the HRS Package before it is finalized in the *Federal Register*.

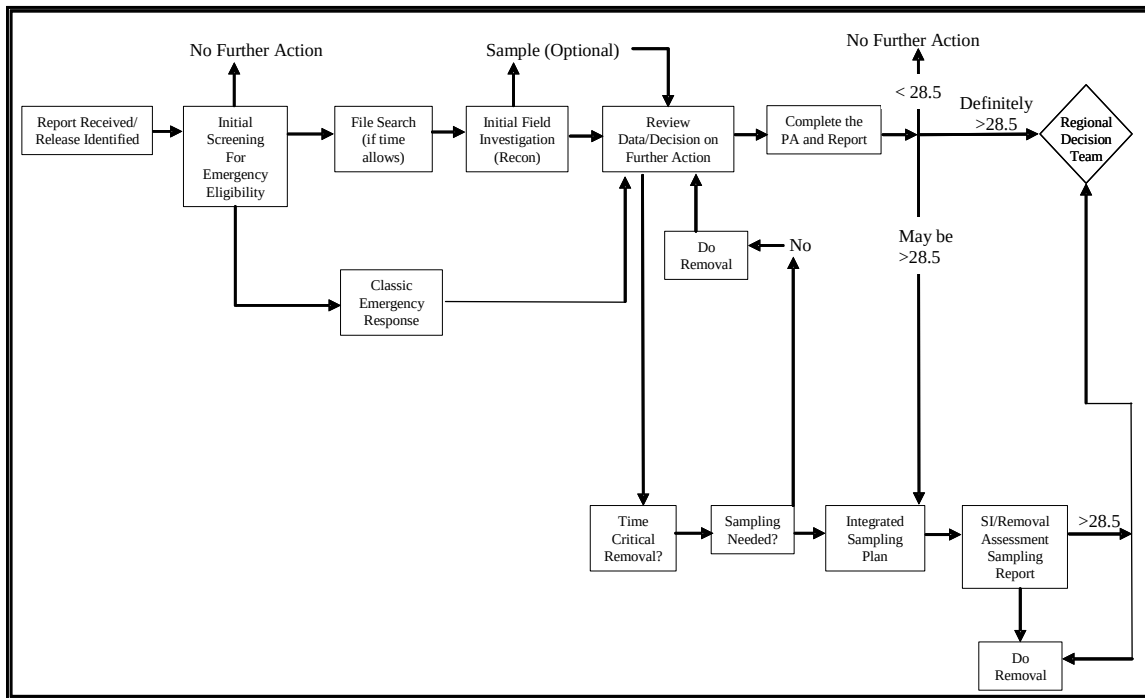
In order to expedite the data management effort and minimize the burden, EPA developed “Quickscore” software for use as an automated site scoring tool under the revised HRS. Quickscore includes a user’s manual, help screens, HRS score sheet calculation package, and a computerized option for site score generation.

In addition, EPA has sought to minimize the burden of data collection requirements by making substantial resources available to the respondents through the use of EPA contractors. EPA will continue to provide training to States and Tribes on a yearly basis through a national training program. To facilitate the HRS scoring effort, EPA has, wherever possible, included tables to minimize the level of effort necessary for data collection.

EPA’s assessment process allows for the integration of traditional site assessment activities to facilitate continuous assessment for high-priority sites until all the necessary data are collected. Combining some phases of the site assessment process will often reduce the level of effort expended on the duplication of similar data-gathering activities. Exhibit 4 presents EPA’s Integrated Assessment process. This integrated approach provides:

- Prompt risk reduction through early action (removal or cleanup activities);
- Continuous process for assessing site-specific conditions and the need for action;
- Appropriate cleanup of long-term environmental problems;
- Cross-program coordination of response planning;
- Early initiation of enforcement activities; and
- Early public notification and participation.

Exhibit 4: EPA's Integrated Assessment Process



The Site Reassessment represents the gathering and evaluation of new information on a site previously assessed under the Federal Superfund Program to determine whether further Superfund attention is needed. The scope of work for a Site Reassessment activity is flexible, but will usually represent a component of a traditional site assessment action. As such, it serves as a supplement to previous assessment work, and not as a replacement for traditional assessment activities (e.g., PA, SI).

All data collection activities require the maintenance of file information. The final report for each phase of the site assessment process is only part of the documentation of a site. All relevant site information collected or generated during the investigations should be securely stored and accurately tracked for future reference. This information is critical for the preparation of any final HRS packages and for future site disposition. Each agency performing site assessments or involved in the decision-making process of a site should maintain a file of site data.

5(c) Small Entity Flexibility

Except in circumstances where a small business is a potentially responsible party (PRP) or may provide some original information about a specific site, small businesses are not burdened by the collection of data for this program.

5(d) Collection Schedule

The site assessment process is intended to be a flexible method for determining priorities among releases or threatened releases of hazardous substances for the purpose of determining if further investigation is necessary. Site assessment information collection does not occur on a regularly scheduled basis. The frequency of collection is driven by the schedule established in Section 116(b) of CERCLA. Section 116(b) requires an HRS evaluation (if warranted) within four years of the site's entry into CERCLIS.¹⁴ For sites brought to EPA's attention via a citizen's

¹⁴ Section 116 of CERCLA as amended by SARA can be found at http://www.access.gpo.gov/uscode/title42/chapter103_subchapteri_.html.

petition, Section 105(d) of CERCLA requires completion of a PA, or an explanation of why a PA is not appropriate, within one year after receiving the petition.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA estimates an annual average of 60 States and Tribes will conduct the site assessment activities described in this ICR. The annual burden for respondents is a function of the number of State- and Tribal-lead activities performed each year. The estimated total annual burden for State and Tribal authorities to conduct these activities is approximately 148,873 hours. This estimate was calculated by multiplying the estimated average annual number of State- and Tribal-lead activities projected from FY 2008 through FY 2011 by the average hours needed to perform each activity. Exhibit 5 provides detailed information on the estimated annual respondent burden (calculated as a weighted average based on information provided by EPA regions).

Exhibit 5: Annual Respondent Burden

Respondent Activities	Estimated Hours Per Activity ¹	Estimated Annual Number of State/Tribal Activities ¹	Total Annual National Hours by Activity
Pre-CERCLIS Screening	99.08	342	33,885
Preliminary Assessment (PA)	200.34	111	22,238
Site Inspection (SI)	596.40	75	44,730
Integrated Assessment (IA)	565.14	7	3,956
Expanded Site Inspection (ESI)	702.56	30	21,077
Site Reassessment	214.25	84	17,997
HRS Package	712.86	7	4,990
TOTAL		656	148,873

¹ Weighted average based on activity hours provided by the EPA Regions

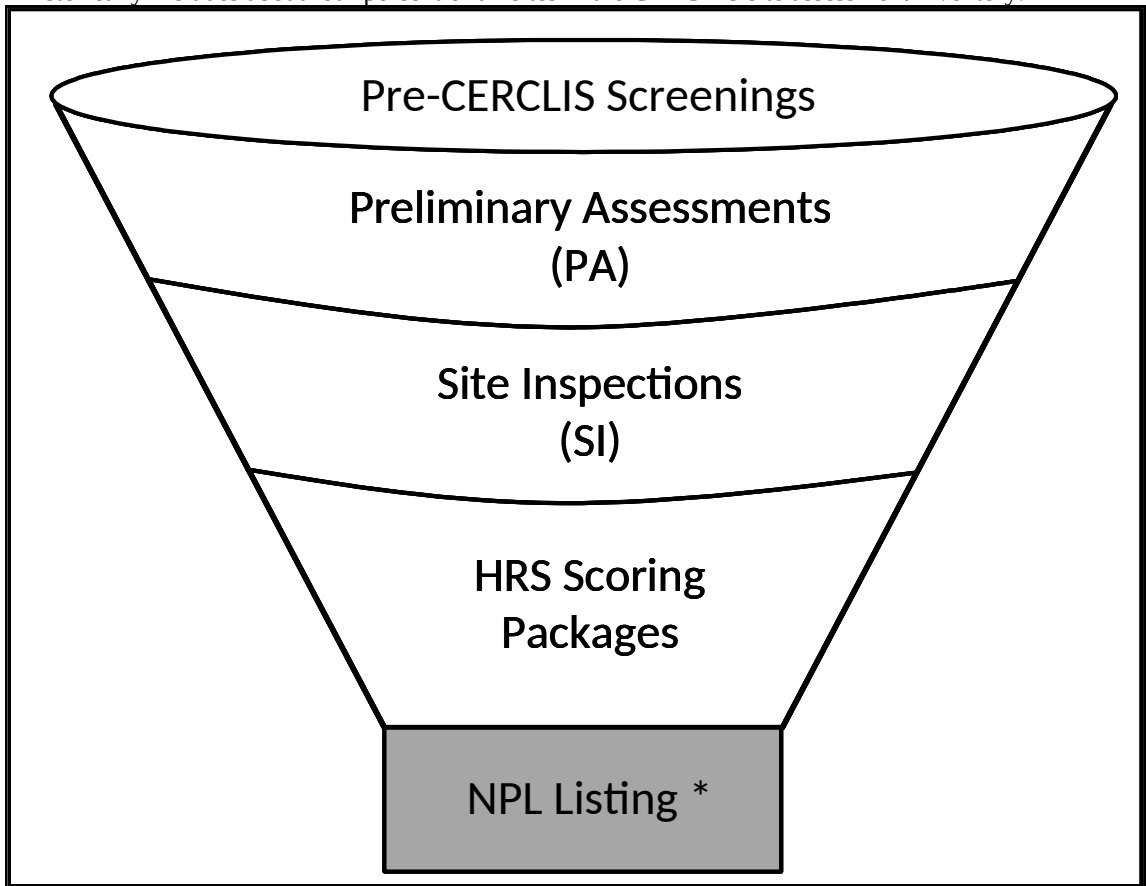
To reduce the burden on respondents, EPA has streamlined the process of screening sites to ensure that sites are assessed as efficiently and inexpensively as conditions allow. Sites not requiring Federal action are screened out of the process early, thus avoiding lengthy and more expensive evaluations. For example, only about four percent of the sites in the site assessment process have been listed on the NPL.¹⁵

Exhibit 6 provides an illustration of the site assessment screening process. The process is portrayed as a funnel to show how the number of respondent activities performed generally decreases as sites progress down the funnel and are screened out of the process. Depending upon how far a particular site progresses through the site assessment process, the burden per site may range on average from 99 hours (average for conducting pre-CERCLIS screening and no other work) to 2,311 hours (cumulative average for conducting pre-CERCLIS screening, PA, SI, ESI, and HRS package work).

¹⁵ Figure provided by EPA Headquarters.

Exhibit 6: Site Assessment Screening Process

*Historically includes about four percent of all sites in the CERCLIS site assessment inventory.



6(b) Estimating Respondent Costs

The costs incurred by State and Tribal respondents for conducting site assessment activities equals the estimated average cost per activity (including laboratory costs) multiplied by the number of State/Tribal lead activities. In addition to activity-specific costs, the States and Tribes incur infrastructure costs associated with developing and maintaining a State or Tribal site assessment program. These infrastructure costs include such items as training, developing standard operating procedures, administrative support, and computers and automated data processing (ADP) support.

The total estimated annual respondent cost is \$11,740,260, however both activity-specific costs and infrastructure costs are reimbursed by the EPA, thus the effective respondent cost is \$0.

Exhibit 7 provides detailed information on the estimated annual respondent burden and costs as calculated based on projected FY 2008 through FY 2010 activity data. Depending upon how far a particular site progresses through the site assessment process, the respondent cost per site may range from \$5,226 (average for conducting pre-CERCLIS screening and no other work) to \$152,848 (cumulative average for conducting pre-CERCLIS screening, PA, SI, ESI and HRS package work).

Exhibit 7: Annual Respondent Burden and Costs

Respondent Activities	Estimated Cost per Activity ¹	Estimated Annual Number of State/Tribal Activities ¹	Total Annual National Cost by Activity
Pre-CERCLIS Screening	\$5,226	342	\$1,787,385
Preliminary Assessment (PA)	\$8,938	111	\$992,084
Site Inspection (SI)	\$36,214	75	\$2,716,035
Integrated Assessment (IA)	\$25,043	7	\$175,300
Expanded Site Inspection (ESI)	\$52,521	30	\$1,575,635
Site Reassessment	\$14,072	84	\$1,182,066
HRS Package	\$49,949	7	\$349,642
State/Tribal Infrastructure			\$2,962,113
SUBTOTAL		656	\$11,740,260
Less Federal Reimbursement			-\$11,740,260
TOTAL		656	\$0

¹ Weighted average based on activity costs provided by the EPA Regions

6(c) Estimating Agency Burden and Costs

The EPA Regional offices review and manage sites assessed under Superfund by States and Tribes, and provide oversight for State and Tribal site assessment cooperative agreements. Based on average annual projections from FY 2008 through FY 2010, the estimated average annual burden to the EPA for reviewing and managing site assessment activities conducted by States and Tribes under Superfund is 49,669 hours at an estimated cost of \$4,529,813. Reimbursement of state costs brings the total Agency cost to \$16,270,073. Exhibit 8 provides detailed information on the estimated annual Agency burden and costs as calculated based on projected FY 2008 through FY 2010 activity data. Based on the 2007 GS pay schedule, EPA estimates an average hourly Regional labor cost of \$57, excluding the impact of benefits, to review and manage the work covered under this ICR. To derive hourly estimates, EPA divided annual compensation estimates by 2,080 which is the number of hours in the Federal work year. EPA uses a multiplication factor of 1.6 to derive hourly estimates inclusive of benefits. Taking into account benefits, the average hourly rate is \$91.20 (\$57 x 1.6).

Exhibit 8: Annual Agency Burden and Cost

Respondent Activity	Estimated Hours per Activity ¹	Estimated Cost per Activity	Estimated No. Activities	Total Hours by Activity	Total Costs by Activity
Review/Manage Pre-CERCLIS Screening	23	\$2,098	106	7,805	\$711,816
Review/Manage Preliminary Assessment	58	\$5,290	94	6,469	\$589,973
Review/Manage Site Inspection	274	\$24,989	61	20,556	\$1,874,707
Review/Manage Integrated Assessment	98	\$8,938	3	684	\$62,381
Review/Manage Expanded Site Inspection	138	\$12,586	38	4,138	\$377,386
Review/Manage Site Reassessment	92	\$8,390	76	7,767	\$708,350
Review/Manage HRS Package	321	\$29,275	25	2,250	\$205,200
SUBTOTAL			656	49,669	\$4,529,813
Reimbursement of State Costs					\$11,740,260
TOTAL			656	49,669	\$16,270,073

¹ Weighted average based on activity hours provided by the EPA Regions

Approximately 61 regional EPA staff review and manage the Superfund site assessment work carried out by states and tribes. In addition to reviewing site assessment reports submitted by states and tribes, EPA staff conduct site management, oversight and quality assurance activities. Oversight activities include: reporting and recordkeeping activities such as establishing and maintaining a master database; answering respondent questions; auditing and reviewing data submissions; recording and entering data submissions; analyzing requests for confidentiality and providing confidentiality protection; reformatting and distributing data; and storing data.

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

EPA estimates that an annual average of 60 States (including U.S. Territories) and Tribes will perform the site assessment activities described in this ICR. The estimated annual burden to these respondents for performing these activities is approximately 148,873 hours at a cost of approximately \$11,740,260. One hundred percent of the respondent cost (\$11,740,260) is reimbursed by the EPA through cooperative agreements. On average, EPA estimates each respondent will complete and submit approximately 11 assessment reports per year.

6(e) Bottom Line Burden Hours and Costs

Total annual average estimated respondent burden hours and costs are shown in Exhibit 9 below. Exhibit 9 combines information in Exhibit 5 (respondent hours burden) and Exhibit 7 (respondent cost burden) into a single table. Total Agency burden hours and costs are shown in Exhibit 8 above.

Exhibit 9: Total Estimated Respondent Burden and Cost Summary

Respondent Activity	Estimated Hours per Activity	Estimated Cost per Activity	Estimated No. Activities	Total Hours by Activity	Total Costs by Activity
Review/Manage Pre-CERCLIS Screening	99.08	\$5,226	342	33,885	\$1,787,385
Review/Manage Preliminary Assessment	200.34	\$8,938	111	22,238	\$992,084
Review/Manage Site Inspection	596.4	\$36,214	75	44,730	\$2,716,035
Review/Manage Integrated Assessment	565.14	\$25,043	7	3,956	\$175,300
Review/Manage Expanded Site Inspection	702.56	\$52,521	30	21,077	\$1,575,635
Review/Manage Site Reassessment	214.25	\$14,072	84	17,997	\$1,182,066
Review/Manage HRS Package	712.86	\$49,949	7	4,990	\$349,642
State/Tribal Infrastructure					\$2,962,113
SUBTOTAL			656	148,873	\$11,740,260
Less Federal Reimbursement					-\$11,740,260
TOTAL			656	148,873	\$0

6(f) Reasons for Change in Burden

The estimated respondent burden presented in this ICR represents an adjustment from the burden estimates of the previous ICR. Respondent burden is estimated to decline by 1,412 hours and by \$1,840,115. This decrease is primarily due to a 28 percent decline in the number of total activities to be performed by respondents combined with a 21 percent decline in State/Tribal infrastructure costs. The total hour burden will decline by only one percent as respondents are expected to perform a greater number of the more labor intensive ESI and HRS package activities.

6(g) Burden Statement

Depending on the number and type of activities performed, average burden per Response is estimated as 226.9 hours. Burden ranges from 99 to 2,311 hours per site. The number of hours required to assess a particular site depends on how far a site progresses through the site assessment process. Sites where only a pre-CERCLIS screening is performed will on average require approximately 99 hours (average for conducting pre-CERCLIS

screening and no other work), while sites that progress to NPL listing may require approximately 2,311 hours (cumulative average for conducting pre-CERCLIS screening, PA, SI, ESI and HRS package work). This burden estimate includes reporting activities and minimal recordkeeping activities.

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-SFUND-2007-0888, which is available online viewing at www.regulations.gov, or in person viewing at the Superfund Docket in the EPA Docket enter (EPA/DC) EPA West, Room 3334, 1301 Constitution Ave., NW, 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 at 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 Number EPA-HQ-SFUND-2007-0888 and OMB Control Number 2050-0095 in any correspondence.

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