

## MEMORANDUM

**Date:** April 4, 2008

**Subj:** Request for OMB Approval of Survey to Capture Office of Enforcement & Compliance Assurance (OECA) GPRA Measurement Outcomes

**From:** Hans Scheifele  
Compliance Assistance and Sector Programs Division  
Office of Compliance  
US EPA Headquarters

**Thru:** Richard Westlund  
Collection Strategies Division  
Office of Environmental Information

**To:** Cortney Higgins  
Office of Information and Regulatory Affairs  
Office of Management and Budget

As a condition of Office of Management and Budget (OMB) approval for the generic clearance Information Collection Request (ICR), Assessment of Compliance Assistance Projects, OMB control number 2020-0015 (1860.03), expiration date September 30, 2008, EPA agreed to submit each specific questionnaire covered by this clearance to OMB for review.

The Environmental Protection Agency is seeking approval under this generic clearance ICR through Fiscal Year 2008 from the OMB. This survey request is to measure Regional and Headquarters successes in providing Compliance Assistance (CA) by measuring the effectiveness of the Region's compliance assistance outcomes achieved from direct compliance assistance provided to regulated entities. The three outcome measures include (1) the number of respondents reporting an increased understanding, (2) the number reporting a change in environmental practices, and (3) the number reporting a reduction in pollution. Through this time period, we estimate we will reach approximately 5,220 multi-sector recipients.

Information will be collected from facility visits, facility re-visits, workshops/training, on-going facility specific work, and response to inquiry activities. The method of survey delivery will be primarily through mailed surveys, email surveys and phone conversations several months after, but within the same fiscal year, the direct assistance was provided to determine if actual changes were made. Results will be recorded in the Compliance Assistance Module of the Integrated Compliance Information System (ICIS).

The affected audience for this ICR includes members of the regulated community and, to a lesser extent, state and local regulators and compliance assistance providers that receive EPA compliance assistance tools or services. We estimate we will reach approximately 5,220 multi-sector recipients.

If you have any questions, please contact Hans Scheifele, EPA Headquarters at 202-564-1459.

## REQUEST FOR APPROVAL OF INFORMATION COLLECTION ACTIVITY

April 4, 2008

EPA HEADQUARTERS  
OFFICE OF COMPLIANCE  
Hans Scheifele, 202-564-1459

### Background

Under The Annual Commitment System (ACS) Regions are required to report to the Office of Compliance (OC) on outcomes achieved from direct compliance assistance provided to regulated entities for the national priorities. Beginning in Fiscal Year 2006, the Regions must report the percent of regulated entities that (1) increased understanding, (2) changed environmental management practices, and (3) reduced, treated or eliminated pollution as a result of EPA assistance. Measures two and three are reported for GPRA purposes.

The Regions collect compliance assistance outcome data from many programs and numerous sector initiatives. Therefore, this survey will be used by Regional staff contacting sector recipients from various media and programs. The affected audience for this Information Collection Request (ICR) includes members of the regulated community and, to a lesser extent, state and local regulators and compliance assistance providers that receive EPA compliance assistance tools or services. We estimate reaching approximately 5,220 recipients through Fiscal Year 2008.

### I. Survey Purpose and Description

We propose to use the six (6) generic survey questions already approved by Office of Management and Budget (OMB) under ICR #1860.03 OMB Control # 2020-0015.

Measurement will be collected from facility visits, facility re-visits, on-going facility specific work, response to inquiry, workshops, training courses, and presentations. Regulated entities receiving this direct assistance will be contacted several months after the event, but during the same Fiscal Year, to review if knowledge of environmental requirements and best management practices was increased and acted on. The burden estimate below includes follow up phone calls to surveys if deemed appropriate.

The proposed survey below does not involve fact-finding for the purposes of regulatory development or enforcement.

### III. Survey Methodology and Use of Results

The Regions will normally notify the regulated entity at the time of compliance assistance delivery that EPA plans to follow up with them to assess the quality of the assistance. At this time regional staff will indicate the assessment method to be used (e.g., phone, letter, email). The method of survey delivery will primarily be through mailed surveys, emailed surveys or phone conversations conducted several months after the direct assistance to determine if actual changes were made.

Results will be recorded in the Compliance Assistance Module of the Integrated Compliance Information System (ICIS) and reported to regional managers for certification to Office of Compliance at mid-year and end-of-year. The results will also be aggregated at the end of the Fiscal Year and reported for GPRA purposes.

When data derived from these surveys is aggregated and shared publicly or used for GPRA purposes the following disclaimer will always be used:

"These performance measures are not calculated from a representative sample of the regulated entity universe. The percentages are based on the number of regulated entities that answer affirmatively to these questions on our voluntary surveys. The percentages do not account for the number of regulated entities who chose not answer these questions or the majority of entities who chose not to answer the survey."

#### IV. Respondents Burden

To minimize the respondent burden, the simple and clear six (6) generic survey questions approved by Office of Management and Budget (OMB) will be used.

- a) How many respondents do you anticipate will respond to the survey?

**5,220**

- b) How long will it take to complete the survey?

**10 minutes**

- c) Calculate the cost per hour for the respondent. The ICR calculates \$68.63/hour

Total Burden Hours:

**$5,220 \times 10 \text{ min.} / 60 \text{ min.} = 870 \text{ hours}$**

Total Respondents Cost:

**$870 \times \$68.63 = \$59,708.10$**

#### V. Agency Burden

Time it will take staff to review the responses and conduct analysis. The ICR calculates \$41.25/hour.

Total Agency Burden (EPA staff time in hours multiplied by cost per hour):

**$870 \times \$41.25 = \$35,887.50$**

**Annual Workshop/Training, Facility Visit, Facility Re-visit, ongoing facility specific work and Response to Inquiry FY 2008 Survey**

1. What regulatory actions did you take as a result of the compliance assistance activity?
  - a. File a notification
  - b. Obtain a permit or certification
  - c. Provide data to EPA, state, or local regulator
  - d. Submit reports to EPA, state, or local regulator
  - e. Comply with an environmental requirement
  - f. No regulatory actions will be taken
  - g. Other, specify \_\_\_\_\_
  
2. What process changes at your facility did you make as a result of the compliance assistance activity?
  - a. Change the storage or handling of a waste or emission
  - b. Change a process or practice
  - c. Purchase new process equipment
  - d. Implement material or waste recycling system
  - e. Install pollution control equipment (e.g., scrubbers, control technique)
  - f. Install a waste treatment system
  - g. Switch to renewable energy
  - h. No process changes will be taken
  - i. Other, specify \_\_\_\_\_
  
3. What management changes at your facility did you take as a result of the compliance assistance activity?
  - a. Conduct a self audit
  - b. Institute an environmental management policy, system or procedure
  - c. Institute training or other communication to improve awareness and/or practices
  - d. Identify pollution prevention opportunity
  - e. No management action will be taken
  - f. Other, specify \_\_\_\_\_
  
4. Who (if anyone) have you contacted for further assistance as a result of the compliance assistance activity?
  - a. A vendor
  - b. A state or local regulatory agency
  - c. A non-regulatory local source for additional compliance assistance

- d. No contacts will be made
- e. Other, specify \_\_\_\_\_

5. Please identify any reductions or the elimination of a pollutant(s) that resulted from the actions taken as a result of the CA activity.

- reduced or eliminated waste (solid/hazardous)
- reduced or eliminated air emissions (air, fugitive)
- reduced or eliminated pollutant emissions (wastewater)
- other, specify \_\_\_\_\_
- none
- don't know.

6. Have you realized a cost savings from actions taken as a result of the compliance assistance activity?

- Yes
- No

The contact information below is OPTIONAL. We will contact you if we need clarification on the survey. Your contact information will not be included in any aggregated reports.

Respondent Name: \_\_\_\_\_

Facility Name: \_\_\_\_\_

Facility Address: \_\_\_\_\_

Contact Phone Number: \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

Thank you very much for your time and support in helping us better serve environmental assistance to the regulated community.

Questions on the survey, please contact Hans Scheifele at 202-564-1459 or [scheifele.hans@epa.gov](mailto:scheifele.hans@epa.gov).

**Thank you for your input!**

Public reporting burden for this collection is estimated to average 10 minutes per response, including time for reviewing instructions, gathering information, and completing and reviewing the information. Send comments on the Agency's need for this information, the accuracy of the provided burden estimate, and any suggestions for reducing the burden, including the use of automated collection techniques, to the Director, Office of Environmental Information, Collection Strategies Division, United States Environmental Protection Agency (mail Code 2822), 1200 Pennsylvania Ave, NW Washington, D.C. 20460; and to the Office of Information & Regulatory Affairs, Office of Management & Budget, 725 17<sup>th</sup> Street, NW, Washington D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR 1860.03 and the OMB control number 2020-0015 in any correspondence. Do not send completed survey to the Washington, D.C address. Approval Expires 9/30/08.