#### ICR SUPPORTING STATEMENT

#### 1. IDENTIFICATION OF THE INFORMATION COLLECTION

#### 1(a) Title of Information Collection

State Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCP) Annual Reporting Form (Reinstatement), also known as the 507 Programs, Annual Reporting Form.

#### 1(b) Short Characterization (Abstract)

Type of collection

This will be an annual collection of program information on the activities and accomplishments of the 507 programs' three program components (i.e., small business ombudsman, small business assistance program, and compliance advisory panel).

Who is collecting?

This information will be collected annually from the states and territories by the EPA Small Business Ombudsman (SBO).

What is being collected?

Information will be collected on the following. Program Contacts: those small businesses that have requested assistance, trade associations, public and private service groups that are concerned about environmental issues. Budget: the annual budget of the state programs. Staffing: how many full time equivalents work in the programs to assist small business. Outreach: the types and numbers of participants that attend outreach activities. Technical Assistance: permit assistance, site visits, assistance through phone calls received and requests through the mail and e-mail media.

• Why?

The information will be collected, evaluated, summarized, and periodically reported as specified under Section 507 of the Clean Air Act (CAA) as amended in 1990. Information collected will show trends in program advancement, budget changes and numbers of small businesses assisted. This information is important to congress and others to help them see what is being accomplished by the state programs and the progress toward improved environmental performance by the small business community.

• Who will use the information?

This information will be used by the EPA SBO to evaluate the progress of state implementation of Section 507; by Congress in consideration of incorporating similar small business assistance programs into other environmental legislative actions as they come up for amendments or re-authorization; by states, both externally and internally to highlight their programs; by national small business trade associations as the original promoters of this concept to not only see how well state programs are functioning, but also as an advocate before the Congress for other such programs in environmental

legislation; and by other Federal agencies, primarily the Small Business Administration, in evaluating the effectiveness of this type of assistance effort.

How will the information be collected and stored?

Information will be collected via the Internet using an e-mailed survey form. The EPA SBO will send the form to the respondents and they will return the completed form to that office. The information will be stored in a spread sheet that will be made available to programs upon request. The Small Business Ombudsman will evaluate, review, summarize, and compile the information for preparation of the 507 Program Report.

• What will this cost?

The information collection involves 53 respondents [50 states, two territories (Puerto Rico and the Virgin Islands), and the District of Columbia]. The total respondent cost is estimated to be \$96,311.60.

#### 2. NEED AND USE OF THE COLLECTION

# 2(a) Need/Authority for the Collection

This collection of information is pursuant to Section 507, Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) (a), (d), and (e) of the Clean Air Act as amended in 1990, Public Law 101-549, November 15, 1990. This Act directs EPA to monitor the 507 programs and to provide a periodic 507 Program Report. This responsibility has been delegated to EPA's SBO.

#### 2(b) Practical Utility/Users of the Data

The EPA SBO will report the results of the collection, including an objective summary of conclusions and recommendations relative to funding or other environmental legislative consideration. This information will also be provided to Congressional staffs and committees interested in environmental matters and small business assistance activities at the state and local levels. In addition, this information will be provided to small business trade associations for their further use in promoting the utility and viability of assistance programs, to EPA Headquarters and Regional Offices, to other federal agencies such as the Small Business Administration, to all state small business ombudsmen and small business assistance program directors, and to state governors and other interested state environmental officials.

Both state and federal officials have used the information not only to evaluate how well the programs are functioning, but also in planning how to render more effective, less costly, and more timely assistance. The constantly evolving nature of these programs means that information of this type should be made available to decision-makers, whether they are at the federal, state, or local levels.

The Agency has shared the information with the parties listed above. The 507 programs have found this information valuable in learning of other program's strengths and innovations. This information promotes additional sharing of ideas and maximizes resources across programs. The EPA SBO also has served as a resource on specific programs by providing relevant data and narratives to policy makers at the federal and state levels upon request. The SBO relies on this information as a vital tool in program development and in making recommendations to other offices within the Agency.

While data and analysis have been provided during these thirteen years of reporting, the practical utility may have been limited by its level of detail. To improve the usefulness of the data, the information requested from the 507 programs and the format of the 507 Program Report was streamlined.

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

#### 3(a) Non-duplication

Information is being requested from and about programs mandated under Section 507 of the CAA of 1990, therefore, this information is unique to this collection. Typically, the information is not available from other sources.

During extensive review by the 507 programs, they expressed that reporting of this nature in no way duplicates internal state reporting requirements. Further, neither the EPA Regional Offices nor Headquarters requires or has ever requested information of this nature.

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

On September 25, 2007, (72 FR 54444), EPA sought comments on this ICR pursuant to 5 CFR 1320.8(d). EPA received no comments during the comment period. An additional 30-day comment period will be opened when this ICR is sent to OMB.

#### **3(c)** Consultations

As previously stated, this information collection review has had the in-depth involvement of many responsible state offices. Further, every year at the SBO/SBEAP National Conference, both in prior years and the upcoming year, possible improvements in the process and the reporting from this survey are discussed.

In preparing this ICR and in revising the Reporting Form, the EPA SBO convened a work group consisting of nine representatives from the 507 programs. This committee began conference calls in November 2006 to form a work group that would meet as needed to complete the survey form. Committee members are:

•	Phyllis Copeland SC SBO	803-896-8932
	Richard Rasmussen VA SBEAP	804-698-4394
	Kenya Stump KY SBEAP	800-562-2327
•	Cathy Colglaizer KS SBO	800-357-6087
	Terry Polen WVA SBO	304-926-0440 ext 1381
	Troy Johnson MN SBEAP	651-296-7767

· Teresa Shiflett 404-362-4854 GA SBEAP

Representatives from the EPA included:

Angela Suber 202-566-2827 Acting EPA SBO

Annette Hill 404-562-8287 EPA Small Business Liaison, Region IV

Dave Byro 215-814-5563 Small Business Liaison, EPA Region III

Comments from all parties were very constructive. Key suggestions included:

- Create consistent definitions for all programs reporting.
- Identify and report on core program elements that succinctly portray the overall status and health of the 507 programs.
- Standardize the counting method for the number of businesses helped or assisted. Programs currently use various approaches for recording data.
- Ensure that the counting of web page hits and sessions are consistent to present a truer picture of businesses and the public using the computer to retrieve information.

Following these conference calls, the Reporting Form was revised based on Committee directives. The revised form was sent to committee members via e-mail. Their subsequent comments and suggestions were compiled and distributed by e-mail

Comments and suggestions on the revised form include:

- Use the word "activities" (or some other descriptive word) instead of "businesses" when
  referring to assistance data. A small business could receive assistance in several ways -mailings, telephone calls, seminars, or permit assistance. By using the word "activities,"
  duplication and misrepresentation are avoided.
- Count all types of assistance by each occurrence, not by business. A program could do a
  site visit, make several phone calls, meet with a business, etc. that could have resulted
  from a newspaper article or workshop. This could mean many assists and hours of work
  while technically helping only one business.
- Ensure that the comments that were received which further complicate the Reporting Form much more than was discussed in earlier conference calls are refined with definitions written to reduce misunderstandings.
- Suggest that States differentiate between total contacts for outreach activities (e.g., seminars, publications, web site hits) and total businesses assisted for technical assistance (e.g., onsite visits, permit application meetings).
- Avoid detailed information on direct and indirect assistances, business sector served, etc. This may be useful at the state level, but not necessary for federal reporting.

- Focus on simplification of the reporting process and the resulting 507 Program Report.
- Expressed concern that proposed information to be reported won't provide as many useful metrics and measurable outcomes. Defining goals and measuring outcomes was discussed at length over several conference calls. The state programs involved in the work group felt that the states have not been trained on outcome measures, and is many cases are not funded to provide follow up or survey activities.

The committee also addressed the issue of annual reporting burden and came to the following consensus: the average monthly recordkeeping burden (per program) would be three hours per month, or 36 hours annually, plus four hours for annual reporting. Total reporting burden would be 40 hours per state. This work is expected to be performed by experienced professional technical staff.

Following the conference calls, the Reporting Form was again revised and e-mailed to the committee for final approval, which it received.

#### 3(d) Effects of Less Frequent Collection

The submission of this information on less or more than an annual basis will not meet the useful intent under the Section 507 of the CAA. Annual reporting assures uniformity and consistency. All the states use their annual submissions to the EPA SBO for a report to higher management within the state.

#### 3(e) General Guidelines

OMB's general guidelines for information collections have been followed in gathering information from the states. The EPA SBO requests information readily available during the conduct of the state's program. The state records are those normally retained for good records management and reporting.

- Respondents are requested to report annually.
- Respondents typically have 60-90 days to prepare a written response to the collection of information request.
- Respondents are asked to complete and submit their Reporting Form and email it to the EPA SBO.
- Respondents are not required to retain their records for more than 3 years. The EPA SBO
  has not imposed any recordkeeping requirements, although the individual states may have
  their own recordkeeping policies.
- Respondents are not required to participate in a statistical survey that is not designed to produce data that can be generalized to the universe of the study.
- Respondents do not have to use any statistical data classification.
- Respondents do not receive a pledge of confidentiality in regard to the information collection. All information is considered public.

 Respondents are not asked to submit any proprietary, trade secret, or other confidential information.

#### **3(f)** Confidentiality

Information in the Annual Report is aggregated and is not of a confidential nature. None of the information collected by this action results in or requests sensitive information of any nature from the states.

# 4. THE RESPONDENTS AND THE INFORMATION REQUESTED

#### 4(a) Respondents/SIC Codes

Respondents will be *one* of the following state offices: environmental agency (SIC 9511), commerce or economic development department (SIC 9611), governor's office (SIC 9111), or ombudsman's office (SIC 9511). These departments/agencies typically are responsible for the conduct of the State 507 Programs.

### 4(b) Information Requested

The draft reporting form is included in this section on pages 9 through 13.

#### (I) Data Items

States will report on the data items shown in the following table. Each item is designated as a record keeping item or a reporting item; activities that are customary and usual business practices (CBP) also are indicated, as required in the following section. The

EPA SBO imposes no record keeping requirements on any respondent. Each state may have its own requirement for retention of records.

DATA ITEM	RECORD KEEPING	REPORTING	СВР
Program Information			
Name of State, Territory, or Local Agency		X	X
Reporting Form Contact		X	X
Budget			
Combined SBO/SBEAP/CAP Budget		X	X
Staffing		X	X
SBO/SBEAP FTEs		X	X
Status of CAP		X	X
Outreach and Technical Assistance			
Air-only or Multimedia Assistance		X	X
Data on Offered Services/Activities	X		X
Significant Accomplishments, Awards, Program Highlights		X	X

#### (ii) Respondent Activities (see partial explanatory model below)

The respondents will engage in the following activities to assemble, submit, and store the data items listed in the previous section. These activities reflect the items of burden mandated by the 1995 Paperwork Reduction Act.

*Review Instructions* -- Instructions are straight forward, and the Form will remain the same from year to year.

Acquire, Install, and Utilize Technology and Systems -- Information requested in this ICR is typical of information gathered as part of good business practices. No special technology or systems would be required for this collection. E-mail and Internet access (the latter needed to complete the Form) have become standard tools.

Adjust the Existing Ways to Comply with Any Previously Applicable Instructions and Requirements -- As stated above, the Reporting Form will remain the same from year to year. Modifications to the Form from previous requirements have been greatly reduced and simplify reporting requirements.

*Search Data Sources* -- Gathering and updating information is now an annual task, since states have been reporting on the activities of their programs since 1995. Data items requested in the Form are already collected as customary business practices.

Complete and Review the Collection of Information -- Programs will provide data and one narrative to complete their submissions. All information should be readily available. States must select their best examples that will typify their operations and accomplishments for their programs. Recording and reviewing the required information should be straightforward and procedural. Completion and review of the Reporting Form is anticipated to be a cooperative effort among the key program staff.

*Transmit or Otherwise Disclose the Information* -- The Reporting Form will be provided to the respondents via email. Each respondent will then complete the information and return it to the SBO using the same method. This approach will enable the SBO to efficiently compile the information from the individual programs and prepare a Periodic 507 Program Report.

*Store, File, and Maintain* -- The EPA SBO does not mandate any requirement on file storage and retention. Each state may set its own requirements on the length of time and the manner in which they store and retain their files.

# STATE SMALL BUSINESS STATIONARY SOURCE TECHNICAL AND ENVIRONMENTAL COMPLIANCE ASSISTANCE PROGRAM (SBTCP)

# ANNUAL REPORTING FORM FOR THE PERIOD 1/01 TO 12/31 (Each Calendar Year)

OMB NO.:	
EXPIRATION DATE://	

\*\*\* Completed forms are due by March 31 of each year \*\*\*

This is the Annual Reporting Form for the State Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBEAPs) under the Clean Air Act (CAA) as amended in 1990. We are collecting objective information on each SBEAP. This report is not an evaluation of your program.

#### INSTRUCTIONS FOR COMPLETING THIS FORM

- 1. **STOP!** Save (using the save function from the File menu) this document to your hard drive using the name of your State or Territory as the document title before continuing.
- 2. Please complete the electronic version of the Form. Do not answer questions by referring to attached documents or a previous SBTCP report.
- 3. You should have already collected the requested information. If a question asks for data you do not have, please briefly explain in the narrative section of this document why it is not available. For future reports, you may need to revise the statistics that you track.
- 4. Each answer block (with the noted exceptions) must be answered completely. If part of the question does not apply, indicate "not applicable", "N/A", "0", or another appropriate answer.
- 5. In the narrative section at the end of the Form you may cut and paste text from another file, however you will not be able to spell check the text after pasting. It is recommended that you check spelling and grammar prior to pasting into this document.
- 6. Once your form is complete please file a copy for future reference and e-mail a copy of the document to Angela Suber at <a href="mailto:suber.angela@epa.gov">suber.angela@epa.gov</a>.
- 7. See the "Definitions" on the following page to assist you in what to count in your report.
- 8. Contact Angela Suber at 202 566-2827 if you have any questions, or e-mail suber.angela@epa.gov.

#### SUGGESTIONS FOR COMPLETING THIS FORM

- Gathering information for this report is definitely a team effort! Enlist the help of key contacts from the SBO, the SBEAP, and the CAP, and ask them to complete applicable sections.
- Assign responsibility to one person for completing and submitting this Form (most likely the SBO).

 Refer to last year's 507 Program Report and the information you provided on your Reporting Form when completing this year's Reporting Form.

**<u>Definitions:</u>** The following definitions are a guide for gathering information for the Annual Report they are not all-inclusive, however should be used to determine how to count total assistance and total outreach activities.

- 1) On Site Visit: a one-on-one meeting at the business work site to answer questions about environmental issues, to assist with self audit activities, or present information about environmental programs. Not an inspection. Each time a site visit is made to the same site, it counts as an additional visit for total assistance provided. Note: if the site visit turns into a permit assistance visit, you may count as a site visit and a permit assist.
- 2) **Phone calls Made/Received:** phone calls made to business, trade associations, federal offices, or the general public that answer questions about environmental issues, or are in the course of researching an environmental question. Phone calls received, either "hotline" or standard office phone that relate to assistance in understanding environmental regulations or questions about environmental issues combined with phone calls made will give you the total number.
- 3) **E-Mails Received/Made:** e-mail activities in relationship to compliance assistance.
- 4) **Workshops/Seminars:** the number of total workshops and seminars that were attended or provided to anyone for any reason by SBO/SBEAP Staff in the State. Include a count of all attendees.
- 5) **Permit Assistance:** any type of assistance provided to a business in relationship to permit or compliance requirements, reviews, written permits, answering questions about permits, or directing business owner or managers to the correct office or web site for additional assistance.
- 6) **Walk-ins:** any visit to the SBO/SBEAP's office for meetings or one-on-one assistance.
- 7) <u>Publication/direct mail/newsletters (Compliance Assistance Tools):</u> number of publications that were mailed directly to a business or the general public. The total number for assists will equal the total distribution of documents. Not total published documents.
- 8) Other types of Assistance and Activities: events like Public Service Announcements, Radio Talk Shows, news print, special events, state fairs, presentations for the public, speaking engagements that can not be defined as to total number of businesses reached, may be counted. This is an estimated audience reached as part of the total effort of your office. Estimated numbers should be as accurate as possible.
- 9) <u>Computer Web-sites Hits:</u> Hits are contacts made by outside organizations or the general public to obtain information about your environmental assistance program, regulations, or guidance through access to your web site.

# **PROGRAM INFORMATION**

Provide the name of th	e State or Territ	tory for wh	ich this r	eport is being submitted.	
		REPO	RTING F	ORM CONTACT	_
Name					
Title					
Agency/Organization					
Address					
City, State, Zip					
Telephone Number	( ) -	X			
FAX Number	( ) -				
E-mail address					
by fiscal year, please in  2008 Budget Total	s \$	udget that i	is in effec	t as of 12/31)	
Sources	☐Title V Fees	□105 Fur	nds	□Other	
Budget Change	☐ Increase	☐ Decre	ase	☐ No Change	
STAFFING  How many employees, measured as full-time equivalents (FTEs), support the SBO/SBEAP?					
Total FTEs					
SBO Staff #	SBEAP S	taff#			
What is status of your	Compliance Adv	visory Pane	el (CAP)?		
S	tatus		Check if applicable		
Do you have a CAP?			☐ Yes ☐ No # Positions Vacant		
Active (holding meetings or conference calls)			☐ Yes ☐ No ☐ N/A		

OUTREACH AND TECHNICAL ASSISTANCE

Please provide the requested data for each type of activity during the year.					
Method of Assistance Provided	# of Events	<b>Total Assists</b>			
1) Site Visits					
2) Phone calls Made and Received					
3) E-mails Made and Received					
4) Permit Assistance					
5) Walk-ins					
6)Mailings/Newsletters/Publications Distributed to a Business or Public					
7) Workshops and Seminars					
Total Assistance Provided					
Please provide information on Outro	each Activities for the calendar	r year.			
Other Types of Assistance Provide	ed # of Events	Estimated Audience			
8) Public Service Announcements					
9) Radio Talk Shows					
9) Radio Talk Shows 10) Other Special Events					
,					
10) Other Special Events					
10) Other Special Events 11)					
10) Other Special Events 11) 12)					
10) Other Special Events 11) 12) 13)					

Does your program offer air-only or multimedia assistance?

 $\square$  Multimedia

 $\square$  Air only

Web Site Activity: How many times did people access your web site to get information on your environmental assistance program?

Your Web Site Address	Number of Web Site Pages	Total Number of Hits

Please include information about your program that you would like to he such as significant accomplishments, awards, actions taken to multimedia, changes in annual budget or FTE's, etc. Positive outcomes a studies are especially appreciated!	nove to

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

#### 5(a) Agency Activities

The electronic Reporting Form will be available to states and territories near the beginning of each calendar year. Respondents will have at least 60 days to respond to the request for information. The EPA's Small Business Ombudsman will answer questions from the respondents regarding the Reporting Form.

The EPA SBO will collect, assemble, analyze, and store the information provided by the 507 programs. The SBD will use this information to prepare the 507 Program Report. The EPA SBO will publish a Periodic 507 Program Report, which will contain summary information, a perspective on the materials provided, selected highlights, conclusions, and recommendations. All state submittals will be included in the appendices.

The EPA SBO will maintain copies of state submittals and the Annual Report electronically.

#### 5(b) Collection Methodology and Management

Prior to the submission of this ICR, potential revisions to the Reporting Form received extensive review by representatives from the 507 programs. The Reporting Form was revised following the guidance provided by a convened work group of state representatives, via conference calls.

Once the representatives had finalized the survey, the survey was forwarded out to all state programs for comment. The Workgroup integrated the comments received into the final draft.

For each reporting year, each 507 program will receive the electronic Reporting Form via email, along with instructions for gathering data and completing the report. Annual updating will be significantly streamlined in light of the automated nature of compiling the information.

Data quality will be checked upon receipt of each state's Reporting Form, during analysis, and in final review of the report. Information and data will be processed using spreadsheet software. Data will be entered manually.

Data is publicly accessible through the Periodic 507 Program Report, which is available on the EPA SBO's home page.

#### 5(c) Small Entity Flexibility

The completion of the Reporting Form does not require any input or action by any small entity.

#### 5(d) Collection Schedule

This is an annual (calendar year) collection of information on the states' activities, accomplishments, and data outputs under Section 507 of the CAA. A typical reporting schedule would look as follows:

- Electronic Reporting Form is made available to states: January
- States complete Reporting Form: January-March
- State agency submits reporting form to EPA SBO: March 31
- EPA SBO Transfers Data to Spread sheet and conducts Analysis: May
- Data is made available to state programs: July
- EPA SBO prepares the periodic 507 Program Report and obtains final EPA approvals: Typically on a bi-annual basis
- EPA SBO submits Periodic 507 Program Report: August of Reporting Year and posts the document on the internet.

# 6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

#### **6(a)** Estimating Respondent Burden

Burden hour estimates are based on the results of a pretest of the original survey information and report preparation cycle; the estimates were refined based on a pretest of the revised survey information that was prepared for this ICR renewal. The revised Reporting Form was discussed in detail with state ombudsmen or small business assistance program directors from ten of the 53 Section 507 reporting state programs (i.e., comprising the 50 states, the District of Columbia, the Virgin Islands, and Puerto Rico). They formulated a general consensus of how long it would take to complete the reporting form and who would likely be responsible from each state to complete the task.

The information requested was confirmed to be normal program activity information the 507 programs collect on an ongoing basis. Where a few state environmental agencies have delegated or contracted management of their technical assistance program, this information is part of the project management responsibilities. This requested reporting information typically would be compiled by experienced professional or technical staff.

On average, the requested information can be compiled readily and maintained by the state within 40 hours (assuming the state organization continuously maintains their records in a reasonably

efficient manner) using experienced professional or technical staff. The 40-hour forecast includes 36 hours for record keeping and 4 hours for reporting the required information.

Respondent information will be compiled electronically and summarized and analyzed by the EPA SBO. An estimated 222 EPA hours will be required to complete the 507 Program Report.

#### 6(b) Estimating the Respondent Burden

Labor rates were derived from the Bureau of Labor Statistics, Employment Cost Trends, Table 4: State and Local Government by Occupational and Industry Group (<a href="http://data.bls.gov/cgi-bin/print.pl/news.release/ecec.t04.htm">http://data.bls.gov/cgi-bin/print.pl/news.release/ecec.t04.htm</a>).

Please refer to Worksheet 1.

#### 6(c) Estimating Agency Burden and Cost

Based on the US Office of Personnel Management 2008 General Schedule Locality Pay Tables, January 2008 (http://www.opm.gov/oca/04tables/GShrly/html/washingt.htm), EPA estimates an average hourly regional labor cost of \$71.39 for GS-15, Step 10 staff; \$61.06 for GS-14, Step 10 staff; and \$39.00 for GS-12, Step 6 staff. EPA then multiplied hourly rates by the standard government benefits multiplication factor of 1.6 and added the hourly labor cost to arrive at the fully burdened rate. Refer to Worksheet 2A.

Total Agency cost may be found in Worksheet 2C.

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

(I) Respondent Burden

Refer to Worksheet 1.

(ii) Agency Burden

Refer to Worksheets 2A and 2B.

#### **6(e)** Bottom Line Burden Hours and Cost Tables

Please see Worksheets 1, 2A, 2B, and 2C.

Fifty-three states and territories will complete the Reporting form annually during the period covered by this ICR. No significant variation (more than 25 percent) in the annual reporting/record keeping burden over the life of this ICR is expected for the agency or the respondents.

#### 6(f) Reasons for Change in Burden

There is no change in burden.

#### 6(g) Burden Statement

Public reporting burden for this collection is estimated to average 4 hours plus 36 hours of record keeping per state responder. This includes the time for reviewing instructions, gathering information, searching data sources, completing and reviewing the collection of information, transmitting the information, and maintaining the information.

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 purpose of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjusting the existing ways to comply with any previous applicable instructions and requirements; train personnel to respond to 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 number 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-OA-2007-0706, which is available for online viewing at www.regulations.gov, or in person viewing at the [insert your Program Office docket name] in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, 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 Office of Environmental Information (OEI) Docket is (202) 566-1752. 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-OA-2007-0706 and OMB Control Number 2080-0068 in any correspondence.

# WORKSHEET 1: ANNUAL RESPONDENT BURDEN/COST ESTIMATE

Collection Activity	Burden Hours Prof/Tech \$45.43 /hr	Response Hours Per Year	Total Labor Costs Per Year	Capita l Costs	O & M Costs	Number of Respond	Total Hours Per Year (all respond.)	Total Cost Per Year
Review instructions	1	1	45.43	0	0	53	53	\$2,407.79
Acquire, install, and utilize technology and systems	0	0	0	0	0	53	0	0
Adjust existing ways to comply with previously applicable instructions and requirements	1	1	45.43	0	0	53	53	\$2,407.79
Gather information	32	32	1,453.76	0	0	53	1,696	\$77,049.28
Search data sources	2	2	90.86	0	0	53	106	\$4,815.58
Complete and review the collection of information	2	2	90.86	0	0	53	106	\$4,815.58
Transmit or otherwise disclose the information	1	1	45.43	0	0	53	53	\$2,407.79
Store, file, or maintain the information	1	1	45.43	0	0	53	53	\$2,407.79
TOTALS	40	40	1,817.20	0	0	53	2,120	\$96,311.60

ANNUAL ACTIVITY	TALLY		TOTALS
Annual Recordkeeping Burden	Total Recordkeeping Hours Number of Respondents	36 53	36 x 53 = 1,908 hours
Annual Reporting Burden	Total Reporting Hours Number of Respondents	4 53	4 x 53 =212 hours
Annual Burden	Total Hours	40	40 x 53 = 2,120 hours
	Number of Respondents	53	
Annual Cost	Total Cost  Number of Respondents	\$1,817.20 53	\$1,817.20 x 53 = \$96,311.60

# WORKSHEET 2A: ANNUAL AGENCY BURDEN/COST ESTIMATE

Collection Activity	Agend	cy Burden Ho	ours		Total Labor	Capital Costs (\$)	O & M Costs (\$)	Total Cost Per
	GS15 \$114.22/hr	GS14 \$97.70/hr	GS12 \$62.40/hr	e Hours Per Year	Costs Per Year			Year
Review/update survey instrument*	2	2	8	12	\$923.04	0	0	\$923.04
Maintain a master informational data base	0	4	30	34	\$2262.80	0	0	\$2262.80
Answer respondent questions	4	10	30	44	\$3305.88	0	0	\$3305.88
Review informational and data submissions for accuracy and completeness	0	10	40	50	\$3473.00	0	0	\$3473.00
Prepare 507 Program Report	8	8	12	28	\$2444.16	0	0	\$2444.16
Agency review and approval process	8	24	20	52	\$4506.56	0	0	\$4506.56
Submit 507 Program Report and Distribute	8	20	20	48	\$4115.76	0	0	\$4115.76
TOTALS	30	78	160	268	\$21,031.20	0	0	\$21,031.20

<sup>\*</sup>Does not include the cost of renewing the ICR every three years

# WORKSHEET 2B: ANNUAL CONTRACTOR BURDEN/COST ESTIMATE

Collection activity	Contract Burden Hours		Response hours per year	Total Labor Costs Per year (\$)	Other costs	Total Costs Per year
	PL-4 \$82.40/hr	PL-2 \$46.35/hr				
Review/update survey instrument	8	24	32	\$1,771.60	\$0.00	\$1,771.60
Review Informational and data submissions for accuracy and completeness	8	48	56	\$2,884.00	\$0.00	\$2,884.00
Process and compile submissions	8	32	40	\$2,142.40	\$0.00	\$2,142.40
Analyze and summarize data and other information from submissions	24	80	104	\$5,685.60	\$0.00	\$5,685.60
Prepare 507 Program Report	16	96	112	\$5,768.00	\$0.00	\$5,768.00
Agency review process	8	24	32	\$1,771.60	\$0.00	\$1,771.60
TOTALS	72	304	376	\$20,023.20	\$0.00	\$20,023.20

# WORKSHEET 2C: AGENCY AND CONTRACTOR SUMMARIES

ANNUAL AGENCY ACTIVITY	TOTALS
Annual Agency Burden	268 Hours
Annual Agency Labor Cost	\$21,031.20
Annual Agency O&M Cost	\$0
Total Agency Cost	\$21,031.20
ANNUAL CONTRACTOR ACTIVITY	TOTALS
Annual Contractor Burden	376 Hours
Annual Contractor Labor Cost	\$20,023.20
Annual Contractor O&M Cost	0
Total Contractor Cost	\$20,023.20
SUMMARY	TOTALS
Total Agency Cost	\$21,031.20
Total Contractor Cost	\$20,023.20
Total Annual Cost	\$41,054.40