

**TABLE A-1. AVERAGE ANNUAL COST TO THE FEDERAL GOVERNMENT**

Activity	Average Annual Burden Hours (from Table A-3)	Hourly Cost	Average Annual Cost
Technical Review of revised application & reapplication	3,660	\$72.22 <sup>a</sup>	\$264,325
Evaluate revised applications/reapplications for compliance with 301(h) criteria/prepare 301(h) decisions	3,467	\$34.54 <sup>b</sup>	\$119,750
Evaluate monitoring and toxic control program adequacy	2,660	\$34.54 <sup>b</sup>	\$91,876
Review State determinations and State certifications and coordinate with State	207	\$34.54 <sup>b</sup>	\$7,150
<b>TOTAL</b>	<b>9,993</b>		<b>\$483,101</b>

<sup>a</sup>It is assumed that the majority of reapplications and additional information submissions are reviewed by a contractor. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$65,531 or \$75,361/year. Thus, based on 2,080 working hours/year, the average salary of a contractor is \$36.11/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$72.22. (Hourly rate based on 2009 DC-B salary rate table.)

<sup>b</sup>It is assumed that the salary level of the typical government employee working on the 301(h) program is a GS-9, Step 10 salary, or \$65,531/year. Based on 2,080 working hours/year, the average hourly salary of a Federal employee is \$31.40/hour. Assuming 10 percent overhead costs, the labor cost for Federal employees is \$34.54/hour. (Hourly rate based on 2009 DC-B salary rate table.)

NOTE: Numbers may not add due to rounding.

**TABLE A-2. COST TO POTW AND STATE RESPONDENTS**

Activity	Average Annual Burden Hours	Hourly Cost	Average Annual Cost
<b>COST TO POTW RESPONDENTS</b>			
Application Revision	2,559	\$72.22 <sup>a</sup>	\$184,811
Reapplication	3,963	\$72.22 <sup>a</sup>	\$286,208
Monitoring Program	27,888	\$19.29 <sup>b</sup>	\$537,960
Toxics Control Program	23,200	\$19.29 <sup>b</sup>	\$447,528
<b>TOTAL</b>	<b>57,610</b>		<b>\$1,456,507</b>
<b>COST TO STATE RESPONDENTS</b>			
Determination	1,320	26.57 <sup>c</sup>	\$35,072
Certification	440	26.57 <sup>c</sup>	\$11,691
<b>TOTAL</b>	<b>1,760</b>		<b>\$46,763</b>
<b>TOTAL POTW AND STATE RESPONDENTS</b>	<b>59,370</b>		<b>\$1,503,270</b>

<sup>a</sup>It is assumed that much of the reapplication and additional information is prepared by a contractor with specialized expertise and equipment. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$65,531, or \$75,361/year. Thus, based on 2,080 working hours/year, the average hourly salary of a contractor is \$36.11/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$72.22/hour. (Hourly rate based on 2009 DC-B salary rate table.)

<sup>b</sup>It is assumed that the salary level of a typical local government employee working on the 301(h) program is a GS-5, Step 4, or \$36,596. Based on 2,080 working hours/year, the average hourly salary of a local employee is \$17.54/hour. Assuming 10 percent overhead costs, the labor cost for local government employees is \$19.29/hour. (Hourly rate based on 2009 DC-B salary rate table.)

<sup>c</sup>It is assumed that the salary level of a typical State government employee working on the 301(h) program is a GS-9, Step 1, or \$50,408/year. Based on 2,080 working hours/year, the average hourly salary of a State government employee is \$24.15/hour. Assuming 10 percent overhead costs, the labor cost for State government employees is \$26.57/hour. (Hourly rate based on 2009 DC-B salary rate table.)

**TABLE A-3. FEDERAL GOVERNMENT BURDEN**

Activity	Burden Hours/Activity		Number of Permits to be Processed Annually <sup>a</sup>						Federal Burden Hours/Activity for 3 Years of ICR			Average Annual Burden <sup>b</sup>
	S	L	FY 2009		FY 2010		FY 2011		S	L	TOTAL	
Technical review of revised application and reapplication	360	1650	1	2	1	2	1	2	1,080	9,900	10,980	3,660
Evaluate revised applications and reapplications for compliance with 301(h) criteria	208	1040	5	3	5	2	5	2	3,120	7,280	10,400	3,467
Evaluate monitoring and toxic control program adequacy	60	100	26	11	26	11	26	11	4,680	3,300	7,980	2,660
Review State determinations and State certifications and coordinate with the State	20	20	6	5	6	4	6	4	360	260	620	207
<b>TOTAL</b>									9,240	20,740	29,980	9,993

NOTE: S = small, L = large

<sup>a</sup>Incorporates EPA's estimate of how many permittees are expected to revise applications and apply for reissuance. These numbers are consistent with those used on Tables A-6, A-7, A-8, and A-10.<sup>b</sup>Calculated by dividing total by 3.

**TABLE A-4. ANNUAL, TOTAL AND AVERAGE BURDENS FOR EACH OF THE SIX INFORMATION ACTIVITIES**

Activity/Unit Burden	Burden Hours	FY 2009		FY 2010		FY 2011		TOTAL		Average	
		Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All
<b>Application Revision (POTW)</b>											
Sm Facility Hr.	255	1	255	1	255	1	255	3	765	1	255
Lg. Facility Hr.	1,152	2	2,304	2	2,304	2	2,304	6	6,912	2	2,304
<b>SUBTOTAL</b>		<b>3</b>	<b>2,559</b>	<b>3</b>	<b>2,559</b>	<b>3</b>	<b>2,559</b>	<b>9</b>	<b>7,677</b>	<b>3</b>	<b>2,559</b>
<b>Reapplication (POTW)</b>											
Sm Facility Hr.	255	5	1,275	5	1,275	5	1,275	15	3,825	5	1,275
Lg. Facility Hr.	1,152	3	3,456	2	2,304	2	2,304	7	8,064	2	2,688
<b>SUBTOTAL</b>		<b>8</b>	<b>4,731</b>	<b>7</b>	<b>3,579</b>	<b>7</b>	<b>3,579</b>	<b>22</b>	<b>11,889</b>	<b>7</b>	<b>3,963</b>
<b>Monitoring (POTW)</b>											
Sm Facility Hr.	328	26	8,528	26	8,528	26	8,528	78	25,584	26	8,528
Lg. Facility Hr.	1,760	11	19,360	11	19,360	11	19,360	33	58,080	11	19,360
<b>SUBTOTAL</b>		<b>37</b>	<b>27,888</b>	<b>37</b>	<b>27,888</b>	<b>37</b>	<b>27,888</b>	<b>111</b>	<b>83,664</b>	<b>37</b>	<b>27,888</b>
<b>Toxics Control</b>											
Sm Facility Hr.	80	26	2,080	26	2,080	26	2,080	78	6,240	26	2,080
Lg. Facility Hr.	1,920	11	21,120	11	21,120	11	21,120	33	63,360	11	21,120
<b>SUBTOTAL</b>		<b>37</b>	<b>23,200</b>	<b>37</b>	<b>23,200</b>	<b>37</b>	<b>23,200</b>	<b>111</b>	<b>69,600</b>	<b>37</b>	<b>23,200</b>
<b>TOTAL (POTWs)</b>											
Sm Facility Hr.		26	12,138	26	12,138	26	12,138	78	36,414	26	12,138
Lg Facility Hr.		11	46,240	11	45,088	11	45,088	33	136,416	11	45,472
<b>TOTAL (All POTWs)<sup>a</sup></b>		<b>37</b>	<b>58,378</b>	<b>37</b>	<b>57,226</b>	<b>37</b>	<b>57,226</b>	<b>111</b>	<b>172,830</b>	<b>37</b>	<b>57,610</b>
<b>Determination (States)</b>											
Sm Facility Hr.	90	6	540	6	540	6	540	18	1,620	6	540
Lg Facility Hr.	180	5	900	4	720	4	720	13	2,340	4	780
<b>SUBTOTAL</b>		<b>11</b>	<b>1,440</b>	<b>10</b>	<b>1,260</b>	<b>10</b>	<b>1,260</b>	<b>31</b>	<b>3,960</b>	<b>10</b>	<b>1,320</b>
<b>Certification (States)</b>											
Sm Facility Hr.	30	6	180	6	180	6	180	18	540	6	180
Lg Facility Hr.	60	5	300	4	240	4	240	13	780	4	260
<b>SUBTOTAL</b>		<b>11</b>	<b>480</b>	<b>10</b>	<b>420</b>	<b>10</b>	<b>420</b>	<b>31</b>	<b>1,320</b>	<b>10</b>	<b>440</b>
<b>Total (States)<sup>b</sup></b>		<b>8</b>	<b>1,920</b>	<b>8</b>	<b>1,680</b>	<b>8</b>	<b>1,680</b>	<b>8</b>	<b>5,280</b>	<b>8</b>	<b>1,760</b>
<b>GRAND TOTAL(States + POTWs)</b>		<b>45</b>	<b>60,298</b>	<b>45</b>	<b>58,906</b>	<b>45</b>	<b>58,906</b>	<b>45</b>	<b>178,110</b>	<b>45</b>	<b>59,370</b>

<sup>a</sup>There are 37 POTWs in the 301(h) universe.<sup>b</sup>There are 8 States in the 301(h) universe.

**TABLE A-5. APPLICATION REVISION  
AND REAPPLICATION ACTIVITIES  
AND BURDEN HOURS FOR POTWS**

Activities	Burden Hours	
	Small	Large
Read Instructions	8	16
Plan Activities	8	16
Create Information	80	320
Gather Information	135	320
Complete Information	24	480
<b>TOTAL</b>	<b>255</b>	<b>1,152</b>

**TABLE A-6. ANNUAL POTW RESPONDENTS AND TOTAL ANNUAL BURDEN OF APPLICATION REVISION**

	FY 2009		FY 2010		FY 2011		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	1	2	1	2	1	2	3	6	3
Burden (burden from Table A-5 x number of respondents)	255	2,304	255	2,304	255	2,304	765	6,912	2,559

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the total small and large POTWs for 3 years by 3.

**TABLE A-7. ANNUAL POTW RESPONDENTS AND TOTAL ANNUAL BURDEN OF REAPPLICATION**

	FY 2009		FY 2010		FY 2011		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	5	3	5	2	5	2	15	7	7
Burden (burden from Table A-5 x number of respondents)	1,275	3,456	1,275	2,304	1,275	2,304	3,825	8,064	3,963

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the total small plus large POTWs for 3 years by 3.

**TABLE A-8. ANNUAL POTW RESPONDENTS AND TOTAL ANNUAL BURDEN OF MONITORING AND TOXICS CONTROL PROGRAM**

	Number of Respondents						Average Annual Number of Respondents	Burden Hours/Permittee		Annual Burden				Average Annual Burden <sup>a</sup>
	FY 2009		FY 2010		FY 2011			S	L	FY 2009	FY 2010	FY 2011	TOTAL	
	S	L	S	L	S	L								
Monitoring Program	26	11	26	11	26	11	37	328	1,760	27,888	27,888	27,888	83,664	27,888
Toxics Control Program	26	11	26	11	26	11	37	80	1,920	23,200	23,200	23,200	69,600	23,200

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the total annual burden of small plus large POTWs for 3 years by 3.



**TABLE A-9. BURDEN FOR STATE DETERMINATIONS AND 401(A)(1) CERTIFICATIONS**

Activity	Burden (Hours/Activity)			
	State Determination		401 Certification	
	Small <sup>a</sup>	Large <sup>a</sup>	Small	Large
Identify Applicable Requirements	8	8	4	4
Analyze Material	69	155	17	43
Review Accuracy	8	10	4	6
Report Information	<u>5</u>	<u>7</u>	<u>5</u>	<u>7</u>
<b>TOTAL</b>	<b>90</b>	<b>180</b>	<b>30</b>	<b>60</b>

<sup>a</sup>Burden for application revisions and reapplications.

**TABLE A-10. ANNUAL RESPONDENTS AND TOTAL ANNUAL BURDEN OF STATE DETERMINATIONS**

	FY 2009 <sup>a</sup>		FY 2010		FY 2011		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents	6	5	6	4	6	4	31	10
Burden <sup>b</sup>	540	900	540	720	540	720	3,960	1,320

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the number of respondents and the total burden for 3 years by 3. There are 8 states in the 301(h) universe.

<sup>b</sup>Calculated by multiplying burden estimates in Table A-9 by the corresponding number of respondents in each information submission category.

**TABLE A-11. ANNUAL RESPONDENTS AND TOTAL ANNUAL BURDEN OF STATE 401(a)(1) CERTIFICATION**

	FY 2009		FY 2010		FY 2011		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents <sup>b</sup>	6	5	6	4	6	4	31	10
Burden <sup>c</sup>	180	300	180	240	180	240	1320	440

Note: S = small, L = large

<sup>a</sup>Calculated by dividing total burden hours and number of respondents for the 3 years by 3. There are 8 states in the 301(h) universe.

<sup>b</sup>Number derived by assuming 31 permit reapplications and application revisions over 3 years of the ICR; 18 small and 13 large; and will result in the final approval and preparation of a draft permit, thus requiring State certification. It is assumed that the application review process takes approximately one year.

<sup>c</sup>Calculated by multiplying burden estimates in Table A-9 by number of respondents.

**TABLE A-12. SUMMARY TABLE<sup>a</sup>**

Respondent/Activity	Number of Respondents/Responses	Hours per Response <sup>b</sup>	Average Annual Burden
<b>POTWs</b>			
Application Revision	3	853	2,559
Reapplication	7	566	3,963
Monitoring Program	37	754	27,888
Toxics Control Program	37	627	23,200
<b>TOTAL: POTWs</b>	<b>37</b>		<b>57,610</b>
<b>STATES</b>			
Determinations	10	132	1,320
Certifications	10	44	440
<b>TOTAL: STATES</b>	<b>8</b>		<b>1,760</b>
<b>TOTAL: POTWs AND STATES</b>	<b>45</b>		<b>59,370</b>

<sup>a</sup>Average of 3 years divided by 3.

<sup>b</sup> Hours per response were calculated by dividing the average annual burden by the number of respondents. Values have been rounded to the nearest hour.

**TABLE A-13. EXPLANATION OF CHANGE IN BURDEN**

Activity	Burden from Previous ICR		Difference	Reason for Change
Application Revision	2,559	2,559	0	
Reapplication	4,218	3,963	-255	Fewer respondents <sup>a</sup>
Monitoring Program	29,200	27,888	-1,312	Fewer respondents <sup>a</sup>
Toxics Control Program	23,520	23,200	-320	Fewer respondents <sup>a</sup>
State Determination	1,410	1,320	-90	Fewer respondents <sup>ab</sup>
State Certification	470	440	-30	Fewer respondents <sup>ab</sup>
<b>TOTAL</b>	<b>61,377</b>	<b>59,370</b>	<b>-2,007</b>	<b>Fewer respondents<sup>ab</sup></b>

<sup>a</sup>301(h) universe has decreased since the previous ICR

<sup>b</sup>Number of States in 301(h)