

**SUPPORTING STATEMENT FOR  
INFORMATION COLLECTION REQUEST NUMBER 2076.03  
“EPA'S NATIONAL PARTNERSHIP FOR ENVIRONMENTAL PRIORITIES”**

**Submitted May 2009/Updated September 2009**

## CONTENTS

|      |  |       |
|------|--|-------|
| 1.   | IDENTIFICATION OF THE INFORMATION COLLECTION REQUEST                       |       |
| 1(a) | <u>Title and Number of the Information Collection Request</u> .....        | 3     |
| 1(b) | <u>Short Characterization</u> .....  | 3     |
| 2.   | NEED FOR AND USE OF THE COLLECTION   |       |
| 2(a) | <u>Need and Authority for the Collection</u> .....                         | 4     |
| 2(b) | <u>Practical Utility/Users of the Data</u> .....                           | 5     |
| 3.   | NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA               |       |
| 3(a) | <u>Non-duplication</u> .....   | 6     |
| 3(b) | <u>Public Notice Required Prior to ICR Submission to OMB</u> .....         | 6     |
| 3(c) | <u>Consultations</u> .....   | 6     |
| 3(d) | <u>Effects of Less Frequent Collection</u> .....                           | 6     |
| 3(e) | <u>General Guidelines</u> .....  | 7     |
| 3(f) | <u>Confidentiality</u> .....   | 7     |
| 3(g) | <u>Sensitive Questions</u> .....   | 7     |
| 4.   | THE RESPONDENTS AND THE INFORMATION REQUESTED                              |       |
| 4(a) | <u>Respondents and NAICS Codes</u> .....                                   | 7     |
| 4(b) | <u>Information Requested</u> .....   | 8     |
| 5.   | AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT      |       |
| 5(a) | <u>Agency Activities</u> .....   | 13    |
| 5(b) | <u>Collection Methodology and Management</u> .....                         | 14    |
| 5(c) | <u>Small Entity Flexibility</u> .....                                      | 14    |
| 5(d) | <u>Collection Schedule</u> .....   | 14    |
| 6.   | ESTIMATING THE BURDEN AND COST OF COLLECTION                               |       |
| 6(a) | <u>Estimating Respondent Burden</u> .....                                  | 14    |
| 6(b) | <u>Estimating Respondent Costs</u> .....                                   | 14    |
| 6(c) | <u>Estimating Agency Burden and Costs</u> .....                            | 15    |
| 6(d) | <u>Estimating the Respondent Universe and Total Burden and Costs</u> ..... | 15    |
| 6(e) | <u>Bottom Line Burden Hours and Costs</u> .....                            | 17    |
| 6(f) | <u>Reasons for Change in Burden</u> .....                                  | 17    |
| 6(g) | <u>Burden Statement</u> .....  | 17    |
|      | Burden Exhibits.....   | 19-21 |

## 1. IDENTIFICATION OF THE INFORMATION COLLECTION REQUEST

### 1(a) Title and Number of the Information Collection Request

This Information Collection Request (ICR) is entitled “EPA’s National Partnership for Environmental Priorities (Renewal)”, EPA ICR number 2076.03, OMB Control number 2050-0190.

### 1(b) Short Characterization

The U.S. Environmental Protection Agency (EPA) has established a national program, called the National Partnership for Environmental Priorities (NPEP), to encourage improved chemical management through source reduction, use of environmentally preferable alternatives, and recycling. NPEP targets a list of potentially hazardous chemicals known as priority chemicals (Attachment A). An organization’s decision to participate in the program is completely voluntary. The primary purpose of the program is to serve as a “clearing house” of information on the availability of technical assistance, project ideas, and production-related success stories. By distributing this information, EPA hopes to stimulate additional chemical management activities and to present innovative technologies and production success stories to prospective partners. EPA uses three forms to collect information from partners. These forms can be prepared and submitted by hard copy or electronically.

Prospective participants joining NPEP can take an “Enrollment” track or a “Champion” track. On the Enrollment track, participation begins when an **Enrollment Form** (see Attachment B) is submitted to, and received and accepted by EPA. The form asks for basic site identification information as well as information on the perspective partner’s chemical management goal(s) under the program. This form also serves as an “Additional NPEP Goals Form” for partners interested in submitting additional partnership goals.

On the Champion track, participation begins when a **Champion Enrollment Form** (see Attachment C) is submitted to, and received and accepted by EPA. The form asks for basic site identification information as well as information on the perspective partner’s goals under the program to promote reductions in Priority Chemicals and other Chemicals of National Concern.

Once partners achieve the goals established on the enrollment form, partners may complete and submit a **Success Story** (see Attachment D). The **Success Story** also serves as the application for the NPEP Achievement Award. These Success Stories are made available on EPA’s National Partnership for Environmental Priorities program website. Each success story describes a partner’s chemical management techniques, implementation problems, lessons learned, benefits, and relevant implications. The Success Stories assist EPA in better understanding chemical management approaches and technologies. The information also helps EPA in sharing lessons learned and effective strategies among potential partners, in order to promote continued and effective chemical management efforts. Sharing effective chemical reduction strategies with

others is a fundamental objective of the partnership program. EPA estimates that each partner will submit at least one of these forms over three years. These forms will enable EPA to establish a partner's progress and the overall success of the program. They will also allow EPA to recognize partner accomplishments in a formal manner, if appropriate (e.g., at a recognition ceremony or by congratulatory letter). These success stories, available electronically on the Success Stories web page, help current and prospective partners search for project ideas.

EPA has maintained a question in the Enrollment Form asking if potential partners have a Quality Assurance/Quality Control (QA/QC) plan for data, and on the Success Story outline we ask them to attach their QA/QC plan for any data they submit. EPA does not expect partners to generate a QA/QC plan for data associated with this voluntary program; rather, we assume that they have an existing plan for the generation of any data, and that they will follow such a plan for data generated for their Success Stories.

Based on review of program Success Stories and anecdotal information, EPA expects that companies would enroll only if their benefits under the program outweigh the costs. Although EPA expects partners to experience a minor burden resulting from the paperwork requirements of the program, many organizations realize substantial cost savings (typically more than enough to offset their paperwork costs) through implementation of their chemical reduction initiatives.

This ICR describes the information collection procedures under EPA's National Partnership for Environmental Priorities. In Sections 1 through 5 of this ICR, EPA describes the forms and procedures in detail (e.g., the need, use, and data elements of the forms). In Section 6, EPA estimates the total annual hour and cost burden to respondents and EPA associated with these activities.

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

### **2(a) Need and Authority for the Collection**

Section 1003 of the Resource Conservation and Recovery Act states, as one of the statute's objectives, "minimizing the generation of hazardous waste and the land disposal of hazardous waste by encouraging process substitution, materials recovery, properly conducted recycling and reuse..." (42 U.S.C. 321).

The Pollution Prevention Act of 1990 directs the EPA Administrator to "facilitate the adoption of source reduction techniques by businesses ..., foster the exchange of information regarding source reduction techniques ..., and [foster] the provision of technical assistance to businesses" (42 U.S.C. 13101). The National Partnership for Environmental Priorities and associated information collection activities assist EPA in meeting the above stated goals by facilitating pollution prevention, improved chemical management, and recycling of chemicals by participating partner organizations. Additionally, stated by Congress (42 U.S.C. 13101) and EPA (*The Solid Waste Dilemma: An Agenda for Action*), there are significant opportunities for businesses to reduce or prevent pollution at the source through cost-effective changes in production, operation,

and raw material use. EPA has developed a hierarchy asserting that Priority Chemicals should be prevented or reduced at the source whenever feasible; if these chemicals cannot be prevented, they should be recycled where possible.

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

The information collected by the partnership program is not designed or intended to support regulatory decision-making by the Office of Resource Conservation and Recovery (ORCR) or other EPA offices.

EPA uses the information collected in the **Enrollment Form** to:

- Formally establish each partner's participation in the program;
- Obtain general information on new partners, including their chemical management goal(s);
- Initiate contact with the primary person in charge of the member's chemical reduction/recycling initiatives, and assist each partner's efforts;
- Establish future Agency targets; and
- Evaluate progress toward GPRA goals.

EPA uses the information collected in the **Champion Enrollment Form** to:

- Formally establish a partner's participation as a program Champion;
- Obtain general information on new partners, including their goals to promote chemical management; and
- Initiate contact with the primary person in charge of the member's program promotion initiatives, and assist each partner's efforts;

EPA uses each **Success Story** to:

- Identify and track a partner's accomplishments in relation to the goal(s) established under the program;
- Learn about the partner's chemical management techniques and strategies, particularly as they relate to successes and problems and the specific circumstances of a partner's chemical management challenges, accomplishments, and relevant implications (e.g., techniques, problems and lessons learned);
- Share this information with the general public;
- Modify and improve EPA's programs for encouraging improved chemical management;
- Recognize a partner's accomplishments in a formal manner (e.g., by congratulatory letter);
- Determine EPA's progress toward established GPRA goals.

### 3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

#### 3(a) Non-duplication

The information on chemical management efforts to be obtained under this ICR is not collected elsewhere by EPA or any other federal agency. Other non-federal organizations sponsor voluntary programs that promote source reduction, recycling, or the purchase of recycled products, but do not offer a comprehensive chemical management program that emphasizes the cost savings and other benefits of improved chemical management.

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

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on January 23, 2009 (74 FR 4189). The comment period ended on March 24, 2009. EPA received no comments to that notice.

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

In evaluating the partnership program forms, ORCR staff conducted personal interviews with less than nine program partners to discuss techniques for measuring chemical management. Among other things, EPA gained understanding of the program benefits, as well as the potential burden to member organizations under the reporting procedures. Interviews were conducted with the following eight partners:

| <b>Name of Contact Person</b> | <b>Phone Number</b> | <b>Company Name</b> |
|-------------------------------|---------------------|---------------------|
| Bruce Mullin                  | (775) 657-4596      | City of Reno, NV    |
| David Westman                 | (212) 460-6588      | Consolidated Edison |
| Doug Dennis                   | (615) 760-6294      | Embraer             |
| Laura Miller                  | (302) 451-2662      | GE Energy           |
| James Groome                  | (201) 825-0300      | Okonite Cable       |
| David Potts                   | (856) 224-1638      | PSE&G               |
| Michelle Eaglin               | (225) 242-5590      | Rubicon             |
| Fred Goodson                  | (504) 465-7609      | Shell Oil           |

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

Each form under the program is submitted on a *one-time* basis. Submission of additional goals and success stories are fully optional and need not be submitted unless desired by the partner. Hence, EPA has minimized the frequency of information collection to the greatest extent practicable.

### **3(e) General Guidelines**

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, EPA's Information Collection Review Handbook, and other applicable OMB guidance.

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

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which defines EPA's general policy on public disclosure of information, contain provisions for confidentiality. However, EPA does not anticipate that businesses will assert a claim of confidentiality under the program. If such a claim were asserted, EPA must and will treat the information in accordance with the regulations cited above. EPA also will assure that this information collection complies with the Privacy Act of 1974 and OMB Circular 108.

### **3(g) Sensitive Questions**

No questions of a sensitive nature are asked in the Enrollment Form, the Champion Enrollment Form, or the Success Story Form.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents and NAICS Codes**

Following are the North American Industrial Classification System (NAICS) codes associated with companies eligible for enrollment in the program; however, EPA does not expect that companies from all industry sectors in the list will necessarily sign up during the three-year period covered by this ICR.

| <b>NAICS Title</b>                          | <b>NAICS Code</b> |
|---|-------------------|
| Agriculture, Forestry, Fishing, and Hunting | 11                |
| Mining                                      | 21                |
| Construction                                | 23                |
| Manufacturing                               | 31-33             |
| Wholesale Trade                             | 42                |
| Retail Trade                                | 44-45             |
| Transportation and Warehousing              | 48-49             |
| Information, Finance, and Insurance         | 51-53             |
| Professional, Scientific, and Technical     | 54                |

| NAICS Title                            | NAICS Code |
|--|------------|
| Services                               |            |
| Waste Management and Remedial Services | 56         |
| Health Care and Social Assistance      | 62         |
| Arts, Entertainment, and Recreation    | 71         |
| Accommodation and Food Services        | 81         |
| Public Administration                  | 92         |

#### 4(b) **Information Requested**

This section discusses the forms and associated Respondent activities under EPA's National Partnership for Environmental Priorities.

#### **Enrollment Form**

Prospective companies complete and submit to EPA a one-time, one-page **Enrollment Form** that provides basic organizational information, as well as their chemical management goal(s) for a selected chemical(s) in their processes, products, or waste stream. Companies can use supplemental sheets of the **Enrollment Form** if they want to set goals for additional chemicals. They also can update/modify their goals after initial submittal if they so desire.

##### (i) Data items

An **Enrollment Form** consists of the following elements:

- General Identifying Information:
  - Organization name;
  - Facility name and address, including city/state/zip;
  - Parent company;
  - Principal contact and contact's title/phone/email;
  - Authorizing official and official's title/phone/email;
  - Facility's RCRA ID Number if one has been assigned;
  - Date; and
  - How they found out about NPEP
- Information on one or more chemicals in a partner's processes, products, or waste streams that is targeted for reduction, including:
  - Whether the chemical will be reduced by;
    - Source reduction,
    - Recycling, or



- Materials management,
    - Chemical name and/or CASRN; and
    - NAICS Code or Sector.
- Description of the proposed project, including:
  - Narrative description;
  - Amount of the expected chemical reduction;
  - Project time-frame; and
  - If there is a Quality Assurance/Quality Control for data.

(ii) Respondent activities

Each partner is expected to conduct the following activities in completing the **Enrollment Form**:

- Review the partnership information and related materials (available in hard copy or at [www.epa.gov/npep](http://www.epa.gov/npep)); and
- Complete and submit the **Enrollment Form**.

A partner may, at its discretion, update its chemical management goal(s) as the project proceeds. To do so, the partner may submit an Enrollment Form with the updated information to EPA, or notify EPA electronically of desired changes.

### **Champion Enrollment Form**

Prospective Champions complete and submit to EPA a one-time, one-page **Champion Enrollment Form** that provides basic organizational information and an outline of activities they will undertake to satisfy the NPEP Champion requirements. Organizations can use supplemental sheets of the **Champion Enrollment Form** if they want to set additional goals. They also can update/modify their goals after initial submittal if they so desire.

(i) Data items

A **Champion Enrollment Form** consists of the following elements:

- General Identifying Information:
  - Organization name;
  - Facility name and address, including city/state/zip;
  - Chemical name and/or CASRN
  - Industrial sector/NAICS code;
  - Parent company;
  - Principal contact and contact's title/phone/email;
  - Authorizing official and official's title/phone/email;

- Facility's RCRA ID Number if one has been assigned;
  - Date; and
  - How they found out about NPEP
- Information on how they will satisfy requirements in Champion Goal 1, including how they will initiate a campaign to recruit new NPEP partners:
  - Narrative description of Goal 1 project; and
  - How they will measure Goal 1 success.
- Information on how they will satisfy requirements in Champion Goal 2, including selecting from one of the following:
  - Our corporate website;
    - Link to EPA's website and/or,
    - Maintain info about NPEP on website,
  - Feature NPEP in publications;
  - Provide technical assistance;
  - Create outreach materials promoting NPEP;
  - Other (please describe);
  - Distribute NPEP outreach materials;
    - At conferences,
    - At events, or
    - On website,
  - Include NPEP in presentations;
    - At conferences,
    - At corporate events,
  - Narrative description of Goal 2 project;
  - How they will measure Goal 2 success.

## Success Story

A partner prepares and submits a **Success Story** when the stated goal(s) in the **Enrollment Form** is achieved. EPA estimates that all existing partners will submit at least one of these forms to receive recognition for their chemical management efforts. Achievements in improved chemical management will be highlighted on the NPEP website. EPA provides a template for the partners to follow when preparing their **Success Story**. Success Stories describe the chemical management efforts, techniques used, problems, and other relevant issues. Partners may use supplemental sheets if they want to report additional chemicals. If partners have a Quality Assurance/Quality Control Plan for any data submitted, they are asked to attach it to their Success Story. Partners may also submit a Success Stories form to document interim progress they have achieved toward their improved chemical management goal(s).

The Success Story consists of the following elements:

- General Identifying Information:
  - Organization name;
  - Facility name and address, including city/state/zip;
  - Industrial sector/NAICS;
  - Parent company;
  - Principal contact and contact's title/phone/email;
  - Authorizing official and official's title/phone/email;
  - Facility's RCRA ID Number if one has been assigned;
  - Date; and
  - Enrollment Date
- Organization background:
  - How large is organization;
  - How long have they been in operation;
  - What is produced and product use;
  - Description of customer base;
  - Production processes;
  - Volumes produced; and
  - What other environmental partnership programs they participate in
- Partnership Goals:
  - What chemical or suite of chemicals were chosen for reduction;
  - Why was this (these) chemical(s) chosen; What source reduction, recycling, materials recovery and/or energy recovery goal(s) did you set?
  - What source reduction, recycling, materials recovery, and/or energy recovery alternatives did you consider?
- Source Reduction/Recycling/Material Management Alternative
  - Source Reduction or materials management;
    - Equipment or technology modifications;

- Reformulation or redesign of products;
  - Improvements in inventory control;
  - Process or procedure modifications;
  - Substitution of less toxic raw materials;
  - Improvements in maintenance/housekeeping practices; or
  - Other (*please describe*).
- Recycling/Recovery:
  - Direct use/reuse in a process to make a product;
  - Processing the waste to recover or regenerate a usable product;
  - Using/reusing waste as a substitute for a commercial product;
  - Other (*please describe*).
- What method did you use to achieve your goal?
- What prior successes, if any, helped you achieve this goal?
- Hurdles faced;
  - Material substitution issues.
  - Product quality issues.
  - Process change issues.
  - Equipment issues.
  - Financial issues.
  - Customer issues.
  - Senior management commitment and support issues.
  - Training and/or departmental coordination issues.
  - Other (please describe).
- Results;
  - Describe and quantify any changes in product content, energy use, and/or environmental releases that resulted from accomplishing your goal;
  - Describe cost savings and/or increases, including changes in capital, production, operations and maintenance, raw material purchases, waste management, and worker health and safety costs.;
  - What was the payback period for this project;
  - Describe any changes in company policy, management and/or worker involvement, and/or customer satisfaction that resulted directly or indirectly from this achievement.
- Lessons Learned;
  - What lessons learned from this project would you like to share with others;
  - What lessons learned extend to other operations or projects in your organization?

(ii) Respondent activities

A partner submitting the **Success Story** is expected to perform the following activities:

- Review documentation on chemical management efforts and accomplishments during the project period; and
- Complete and submit the template provided by EPA.

## 5. **AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### 5(a) **Agency Activities**

This section discusses the forms and associated EPA activities under the National Partnership for Environmental Priorities.

#### **Enrollment Form**

- Email outreach material to potential participants.
- Contact and share information and project ideas with interested partners.
- Record and enter information into a database and post online.

#### **Champion Enrollment Form**

- Email outreach material to potential participants.
- Contact and share information and project ideas with interested partners.
- Record and enter information into a database and post online.

#### **Success Story**

- Develop and maintain tracking information.
- Record and enter information into the database.
- Conduct QA/QC on data entry.
- Develop and publish an annual summary of overall program progress.
- Develop and publish a summary of success stories of highly successful programs.

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

In collecting and analyzing the information associated with this ICR, EPA uses a telephone system, personal computers, and database software. EPA ensures the accuracy and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the three forms into a database and summarizes the data. The data is used to identify prominent chemical management strategies and to develop and publish an annual summary of overall partner progress and stories of highly successful chemical management activities. EPA currently offers all forms in hard copy and electronically.

## **5(c) Small Entity Flexibility**

EPA expects that some of the participants in the partnership program will be small entities. EPA has designed its reporting forms to minimize respondent burden while obtaining sufficient and accurate information. The partnership program was designed to be highly flexible. Organizations can choose the number of facilities to include in the program and set their own goals based on individual organization resources. In addition, the partnership is voluntary. As such, companies will participate in the program only if they expect it to be cost-effective for them.

## **5(d) Collection Schedule**

Organizations can submit an **Enrollment Form** to join the partnership program at any time. The **Success Story** is submitted when the partner achieves steps toward its chemical management goal(s) or after the final chemical management goal(s) are achieved.

# **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

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

EPA estimates respondent hourly burden for all of the information collection requirements covered in this ICR in Exhibits 1 and 3. The burden estimates for each activity presented in Exhibit 1 include the burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents.

## **6(b) Estimating Respondent Costs**

Exhibits 1 and 3 estimate the annual costs to respondents based on the cost of labor and related costs, as discussed below.

### **(1) Labor Costs**

EPA estimates an average hourly respondent labor cost (including overhead) of \$200.22 for legal staff, \$112.31 for managerial staff, \$59.11 for technical staff, and \$31.86 for clerical staff. To arrive at these estimates, EPA consulted the *May 2008 Occupational Employment*

*Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor*; this survey summarizes the unloaded factor of 2.3 for non-legal staff and 3.0 for legal staff to derive their loaded hourly rates. Using the burden hours discussed in Section 6(a) and the wage rates outlined in this section, Exhibit 1 illustrates the labor costs associated with all the information collection requirements covered in this ICR.

**(2) Capital Costs**

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements covered in this ICR.

**(3) Operations and Maintenance (O&M) Costs**

O&M costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as "the recurring dollar amount of cost associated with O&M or purchasing services." For this ICR, O&M costs cover mailing costs (\$0.48 for a letter, envelope, and postage).

**6(c) Estimating Agency Hour and Cost Burden**

EPA estimates EPA hour and cost burden associated with all of the requirements covered in this ICR in Exhibit 2. Based on the "General Schedule (GS) Salary Table 2009," EPA estimates an average hourly labor rate of \$75.25 for legal staff (GS-15, Step 1), \$68.24 for managerial staff (GS-14, Step 3), \$49.38 for technical staff (GS-11, Step 10), and \$22.78 for clerical staff (GS-5, Step 4). To derive these hourly estimates, EPA multiplied the basic hourly rates by the standard government overhead factor of 1.6.

**6(d) Estimating the Respondent Universe and Total Hour and Cost Burden**

**(1) Respondent Universe**

Table 1 presents the number of companies expected to participate in the program over the three-year period of this ICR. EPA currently has 223 enrolled partners. For purposes of the ICR's burden calculations, EPA has averaged the number of new and existing partners over the three-year period, and factored in an apparent acceleration in enrollment over the last twelve months, to conclude that there will be, on average, 100 new partners per year for each of the three years of this ICR. We anticipate that this will result in a total enrollment 523 partners by the end ICR year three. EPA derived these universe estimates based on consultations with less than ten prospective partners. (See Section 3(c) of this ICR for additional information on the consultations.)

**Table 1  
Number of Respondents Expected to Participate in the**

**National Partnership for Environmental Priorities Program over the Three-Year Period of the ICR**

| <b>Type of Respondent</b>       | <b>Year 1</b> | <b>Year 2</b> | <b>Year 3</b> | <b>Average</b> |
|---------------------------------|---------------|---------------|---------------|----------------|
| Existing (at beginning of year) | 223           | 323           | 423           | 323            |
| New (during year)               | 100           | 100           | 100           | 100            |
| Existing (at end of year)       | 323           | 423           | 523           | 423            |

In the following paragraphs, EPA uses these universe estimates in its respondent hour and cost burden calculations.

**(2) Annual Respondent Hour and Cost Burden**

Based on the universe data presented in Table 1, EPA estimates respondent burden associated with all of the requirements covered in this ICR in Exhibits 1 and 3. A discussion of the assumptions used in developing these burden estimates follows.

**(a) Enrollment Form**

Organizations wanting to become partners of the National Partnership for Environmental Priorities program are required to complete and submit to EPA an **Enrollment Form**. EPA estimates that, on average, 50 new organizations wanting to become partners of the program will have to conduct this activity each year.

EPA further estimates that fifteen existing partners will notify EPA to modify their chemical management goals each year.

**(b) Champion Enrollment Form**

Prospective Champions are asked to complete and submit to EPA a **Champion Enrollment Form**. EPA estimates that, on average, 50 new organizations wanting to become partners of the program will have to conduct this activity each year.

EPA further estimates that fifteen existing Champion partners will notify EPA to modify their chemical management goals each year.

**(c) Success Story**

Partners will complete and submit to EPA a **Success Story** once they achieve steps toward meeting their chemical management goal(s). EPA estimates that approximately 20 percent of all the partners in the program during the three-year period of this ICR will submit at least one success story over the 3 years (i.e. 90 stories total, averaging 30 per year).



## **6(e) Bottom Line Hour and Cost Burden**

### **(1) Respondent Tally**

Exhibit 3 shows the aggregate annual hour and cost burden to respondents. As shown in the exhibit, EPA estimates the annual respondent burden to be 2,358 hours and \$188,758.

### **(2) Agency Tally**

As is shown in Exhibit 2, the annual Agency hour and cost burden associated with all the requirements covered in this ICR is estimated to be 213 hours and \$11,008.

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

There is an increase of 1,716 hours from what is currently approved. The increase in estimates of hourly burden is based on increases in program enrollment and an expansion in program scope with the addition of the “Champion” component. For this renewal, EPA was able to canvas partners (see section 3(c) Consultations) to establish these burden estimates.

## **6(g) Burden Statement**

**Burden Statement:** The annual burden for the enrollment form is estimated to average 22 hours per response; the annual burden for the Champion Enrollment form is estimated to average 22 hours per response; the annual burden for the success stories is expected to average 10 hours per response. 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 EPA '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-RCRA-2008-0914, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the RCRA Docket 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 RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at [www.regulations.gov](http://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-RCRA-2008-0914 and OMB Control Number 2050-0190 in any correspondence.

Exhibit 1

Reporting and Recordkeeping Requirements Under EPA's  
National Partnership for Environmental Priorities  
Estimated annual respondent hour and cost  
burden

| INFORMATION COLLECTION ACTIVITY            | Hours and Costs per Respondent |                           |                         |                        |                     |            |                           |        |       | Total Hours and Costs                 |                      |                           |                            |                         |                 |
|--|--------------------------------|---------------------------|-------------------------|------------------------|---------------------|------------|---------------------------|--------|-------|---------------------------------------|----------------------|---------------------------|----------------------------|-------------------------|-----------------|
|  | Legal<br>\$200.22/Hr           | Managerial<br>\$112.31/Hr | Technical<br>\$59.11/Hr | Clerical<br>\$31.86/Hr | Respondent<br>Hours | Labor Cost | Capital/ Startup<br>Costs | O&M    | Costs | Number of<br>Respondents/<br>Activity | Total Hours/<br>Year | Total Labor<br>Costs/Year | Total Capital<br>Cost/Year | Total O&M<br>Costs/Year | Total Cost/Year |
| <b>Enrollment Form</b>                     |                                |                           |                         |                        |                     |            |                           |        |       |                                       |                      |                           |                            |                         |                 |
| Review partnership package                 | 1.34                           | 1.16                      | 5.12                    | 0.00                   | 7.62                | \$700.00   | \$0.00                    | \$0.00 |       | 50                                    | 381                  | \$35,000                  | \$0                        | \$0                     | \$35,000        |
| Complete and submit Enrollment Form        | 0.00                           | 4.19                      | 7.94                    | 0.56                   | 12.69               | \$956.00   | \$0.00                    | \$0.48 |       | 50                                    | 635                  | \$47,800                  | \$0                        | \$24                    | \$47,824        |
| Prepare and submit modification if desired | 0.00                           | 0.31                      | 1.03                    | 0.06                   | 1.40                | \$97.00    | \$0.00                    | \$0.48 |       | 15                                    | 21                   | \$1,455                   | \$0                        | \$7                     | \$1,462         |
| <b>Subtotal</b>                            | 1.34                           | 5.66                      | 14.09                   | 0.62                   | 21.71               | \$1,753.00 | 0.00                      | \$0.96 |       | Varies                                | 1,037                | \$84,255                  | \$0                        | \$31                    | \$84,286        |
| <b>Champion Enrollment Form</b>            |                                |                           |                         |                        |                     |            |                           |        |       |                                       |                      |                           |                            |                         |                 |
| Review partnership package                 | 1.30                           | 1.20                      | 5.00                    | 0.00                   | 7.50                | \$689.00   | \$0.00                    | \$0.00 |       | 50                                    | 375                  | \$34,450                  | \$0                        | \$0                     | \$34,450        |
| Complete and submit Champion Form          | 0.00                           | 4.20                      | 8.00                    | 0.50                   | 12.70               | \$958.00   | \$0.00                    | \$0.48 |       | 50                                    | 635                  | \$47,900                  | \$0                        | \$24                    | \$47,924        |
| Prepare and submit modification if desired | 0.00                           | 0.25                      | 1.00                    | 0.00                   | 1.25                | \$87.00    | \$0.00                    | \$0.48 |       | 15                                    | 19                   | \$1,305                   | \$0                        | \$7                     | \$1,312         |
| <b>Subtotal</b>                            | 1.30                           | 5.65                      | 14.00                   | 0.50                   | 21.45               | \$1,734.00 | 0.00                      | \$0.96 |       | Varies                                | 1,029                | \$83,655                  | \$0                        | \$31                    | \$83,686        |
| Review Project and Results                 | 0.00                           | 0.06                      | 1.44                    | 0.00                   | 1.50                | \$92.00    | \$0.00                    | \$0.00 |       | 30                                    | 45                   | \$2,760                   | \$0                        | \$0                     | \$2,760         |
| Prepare and Submit Success Story           | 0.00                           | 2.31                      | 5.19                    | 0.38                   | 7.88                | \$577.00   | \$0.00                    | \$0.42 |       | 30                                    | 236                  | \$17,310                  | \$0                        | \$13                    | \$17,323        |
| Prepare and Submit Clarifications          | 0.00                           | 0.03                      | 0.31                    | 0.03                   | 0.37                | \$23.00    | \$0.00                    | \$0.42 |       | 30                                    | 11                   | \$690                     | \$0                        | \$13                    | \$703           |
| <b>Subtotal</b>                            | 0.00                           | 2.40                      | 6.94                    | 0.41                   | 9.75                | \$692.00   | \$0.00                    | \$0.84 |       | 30                                    | 293                  | \$20,760                  | \$0                        | \$26                    | \$20,786        |
| <b>TOTAL</b>                               |                                |                           |                         |                        |                     |            |                           |        |       | Varies                                | 2,358                | \$188,670                 | \$0                        | \$88                    | \$188,758       |

Totals may vary due to rounding.

Exhibit 2

Requirements Regarding EPA's Waste Minimization Program

Estimated Annual Agency Hour and Cost Burden

| INFORMATION COLLECTION ACTIVITY                | Agency Hours and Costs |                          |                         |                        |              |            |                          |              | Total Hours and Costs                 |                      |                           |                            |                         |                 |
|--|------------------------|--------------------------|-------------------------|------------------------|--------------|------------|--------------------------|--------------|---------------------------------------|----------------------|---------------------------|----------------------------|-------------------------|-----------------|
|  | Legal<br>\$75.25/Hr    | Managerial<br>\$68.24/Hr | Technical<br>\$49.38/Hr | Clerical<br>\$22.78/Hr | Agency Hours | Labor Cost | Capital Startup<br>Costs | O&M<br>Costs | Number of<br>Respondents/<br>Activity | Total Hours/<br>Year | Total Labor<br>Costs/Year | Total Capital<br>Cost/Year | Total O&M<br>Costs/Year | Total Cost/Year |
| <b>Enrollment Form</b>                         |                        |                          |                         |                        |              |            |                          |              |                                       |                      |                           |                            |                         |                 |
| Mail out member packets                        | 0.00                   | 0.00                     | 0.25                    | 0.00                   | 0.25         | \$12.00    | \$0.00                   | \$0.48       | 50                                    | 13                   | \$600                     | \$0                        | \$24                    | \$624           |
| Share information with interested partners     | 0.00                   | 0.25                     | 0.50                    | 0.00                   | 0.75         | \$42.00    | \$0.00                   | \$0.00       | 50                                    | 38                   | \$2,100                   | \$0                        | \$0                     | \$2,100         |
| Record/enter information from forms            | 0.00                   | 0.00                     | 0.50                    | 0.00                   | 0.50         | \$25.00    | \$0.00                   | \$0.00       | 50                                    | 25                   | \$1,250                   | \$0                        | \$0                     | \$1,250         |
| <b>Subtotal</b>                                | varies                 | varies                   | varies                  | varies                 | varies       | varies     | varies                   | varies       | varies                                | 76                   | \$3,950                   | \$0                        | \$24                    | \$3,974         |
| <b>Champion Enrollment Form</b>                |                        |                          |                         |                        |              |            |                          |              |                                       |                      |                           |                            |                         |                 |
| Mail out member packets                        | 0.00                   | 0.00                     | 0.25                    | 0.00                   | 0.25         | \$12.00    | \$0.00                   | \$0.48       | 50                                    | 13                   | \$600                     | \$0                        | \$24                    | \$624           |
| Share information with interested partners     | 0.00                   | 0.25                     | 0.50                    | 0.00                   | 0.75         | \$42.00    | \$0.00                   | \$0.00       | 50                                    | 38                   | \$2,100                   | \$0                        | \$0                     | \$2,100         |
| Record/enter information from forms            | 0.00                   | 0.00                     | 0.50                    | 0.00                   | 0.50         | \$25.00    | \$0.00                   | \$0.00       | 50                                    | 25                   | \$1,250                   | \$0                        | \$0                     | \$1,250         |
| <b>Subtotal</b>                                | varies                 | varies                   | varies                  | varies                 | varies       | varies     | varies                   | varies       | varies                                | 76                   | \$3,950                   | \$0                        | \$24                    | \$3,974         |
| <b>Success Stories</b>                         |                        |                          |                         |                        |              |            |                          |              |                                       |                      |                           |                            |                         |                 |
| Record and enter information into the database | 0.00                   | 0.00                     | 0.00                    | 0.25                   | 0.25         | \$6.00     | \$0.00                   | \$0.00       | 30                                    | 8                    | \$180                     | \$0                        | \$0                     | \$180           |
| Maintain tracking system                       | 0.00                   | 0.00                     | 0.25                    | 0.00                   | 0.25         | \$12.00    | \$0.00                   | \$0.00       | 30                                    | 8                    | \$360                     | \$0                        | \$0                     | \$360           |
| QA/QC of data                                  | 0.00                   | 0.50                     | 1.00                    | 0.00                   | 1.50         | \$84.00    | \$0.00                   | \$0.00       | 30                                    | 45                   | \$2,520                   | \$0                        | \$0                     | \$2,520         |
| <b>Subtotal</b>                                | varies                 | varies                   | varies                  | varies                 | varies       | varies     | varies                   | varies       | varies                                | 61                   | \$3,060                   | \$0                        | \$0                     | \$3,060         |
| <b>TOTAL</b>                                   |                        |                          |                         |                        |              |            |                          |              | <b>varies</b>                         | <b>213</b>           | <b>\$10,960</b>           | <b>\$0</b>                 | <b>\$24</b>             | <b>\$11,008</b> |

Exhibit 2

Requirements Regarding EPA's Waste Minimization Program

Estimated Annual Agency Hour and Cost Burden

| INFORMATION COLLECTION ACTIVITY                | Agency Hours and Costs |                          |                         |                        |              |            |                          |              | Total Hours and Costs                 |                      |                           |                            |                         |                 |
|--|------------------------|--------------------------|-------------------------|------------------------|--------------|------------|--------------------------|--------------|---------------------------------------|----------------------|---------------------------|----------------------------|-------------------------|-----------------|
|  | Legal<br>\$75.25/Hr    | Managerial<br>\$68.24/Hr | Technical<br>\$49.38/Hr | Clerical<br>\$22.78/Hr | Agency Hours | Labor Cost | Capital Startup<br>Costs | O&M<br>Costs | Number of<br>Respondents/<br>Activity | Total Hours/<br>Year | Total Labor<br>Costs/Year | Total Capital<br>Cost/Year | Total O&M<br>Costs/Year | Total Cost/Year |
| <b>Enrollment Form</b>                         |                        |                          |                         |                        |              |            |                          |              |                                       |                      |                           |                            |                         |                 |
| Mail out member packets                        | 0.00                   | 0.00                     | 0.25                    | 0.00                   | 0.25         | \$12.00    | \$0.00                   | \$0.48       | 50                                    | 13                   | \$600                     | \$0                        | \$24                    | \$624           |
| Share information with interested partners     | 0.00                   | 0.25                     | 0.50                    | 0.00                   | 0.75         | \$42.00    | \$0.00                   | \$0.00       | 50                                    | 38                   | \$2,100                   | \$0                        | \$0                     | \$2,100         |
| Record/enter information from forms            | 0.00                   | 0.00                     | 0.50                    | 0.00                   | 0.50         | \$25.00    | \$0.00                   | \$0.00       | 50                                    | 25                   | \$1,250                   | \$0                        | \$0                     | \$1,250         |
| <b>Subtotal</b>                                | varies                 | varies                   | varies                  | varies                 | varies       | varies     | varies                   | varies       | varies                                | 76                   | \$3,950                   | \$0                        | \$24                    | \$3,974         |
| <b>Champion Enrollment Form</b>                |                        |                          |                         |                        |              |            |                          |              |                                       |                      |                           |                            |                         |                 |
| Mail out member packets                        | 0.00                   | 0.00                     | 0.25                    | 0.00                   | 0.25         | \$12.00    | \$0.00                   | \$0.48       | 50                                    | 13                   | \$600                     | \$0                        | \$24                    | \$624           |
| Share information with interested partners     | 0.00                   | 0.25                     | 0.50                    | 0.00                   | 0.75         | \$42.00    | \$0.00                   | \$0.00       | 50                                    | 38                   | \$2,100                   | \$0                        | \$0                     | \$2,100         |
| Record/enter information from forms            | 0.00                   | 0.00                     | 0.50                    | 0.00                   | 0.50         | \$25.00    | \$0.00                   | \$0.00       | 50                                    | 25                   | \$1,250                   | \$0                        | \$0                     | \$1,250         |
| <b>Subtotal</b>                                | varies                 | varies                   | varies                  | varies                 | varies       | varies     | varies                   | varies       | varies                                | 76                   | \$3,950                   | \$0                        | \$24                    | \$3,974         |
| <b>Success Stories</b>                         |                        |                          |                         |                        |              |            |                          |              |                                       |                      |                           |                            |                         |                 |
| Record and enter information into the database | 0.00                   | 0.00                     | 0.00                    | 0.25                   | 0.25         | \$6.00     | \$0.00                   | \$0.00       | 30                                    | 8                    | \$180                     | \$0                        | \$0                     | \$180           |
| Maintain tracking system                       | 0.00                   | 0.00                     | 0.25                    | 0.00                   | 0.25         | \$12.00    | \$0.00                   | \$0.00       | 30                                    | 8                    | \$360                     | \$0                        | \$0                     | \$360           |
| QA/QC of data                                  | 0.00                   | 0.50                     | 1.00                    | 0.00                   | 1.50         | \$84.00    | \$0.00                   | \$0.00       | 30                                    | 45                   | \$2,520                   | \$0                        | \$0                     | \$2,520         |
| <b>Subtotal</b>                                | varies                 | varies                   | varies                  | varies                 | varies       | varies     | varies                   | varies       | varies                                | 61                   | \$3,060                   | \$0                        | \$0                     | \$3,060         |
| <b>TOTAL</b>                                   |                        |                          |                         |                        |              |            |                          |              | <b>varies</b>                         | <b>213</b>           | <b>\$10,960</b>           | <b>\$0</b>                 | <b>\$24</b>             | <b>\$11,008</b> |

**Exhibit 3**

**Reporting and Recordkeeping Requirements Under EPA's  
National Partnership for Environmental Priorities**

**Total Annual Respondent Hour and Cost Burden**

| INFORMATION COLLECTION ACTIVITY | Total Hours  | Total Labor<br>Costs | Total Capital<br>Cost | Total O&M<br>Costs | Total Costs      |
|---------------------------------|--------------|----------------------|-----------------------|--------------------|------------------|
| Enrollment Form                 | 1,057        | \$64,266             | \$0                   | \$51               | \$64,266         |
| Champion Enrollment Form        | 1,029        | \$63,655             | \$0                   | \$51               | \$63,680         |
| Success Stories                 | 293          | \$20,760             | \$0                   | \$26               | \$20,786         |
| <b>TOTAL</b>                    | <b>2,358</b> | <b>\$188,670</b>     | <b>\$0</b>            | <b>\$88</b>        | <b>\$188,758</b> |

**Exhibit 4**

**Requirements Regarding EPA's Waste Minimization Program**

**Total Annual Agency Hour and Cost Burden**

| INFORMATION COLLECTION ACTIVITY | Total Hours | Total Labor<br>Costs | Total Capital<br>Cost | Total O&M<br>Costs | Total Costs     |
|---------------------------------|-------------|----------------------|-----------------------|--------------------|-----------------|
| Enrollment Form                 | 76          | \$3,950              | \$0                   | \$24               | \$3,974         |
| Champion Enrollment Form        | 76          | \$3,950              | \$0                   | \$24               | \$3,974         |
| Case Studies                    | 61          | \$3,060              | \$0                   | \$0                | \$3,060         |
| <b>TOTAL</b>                    | <b>213</b>  | <b>\$10,960</b>      | <b>\$0</b>            | <b>\$48</b>        | <b>\$11,008</b> |

Exhibit 4

Requirements Regarding EPA's Waste Minimization Program

Total Annual Agency Hour and Cost Burden

| INFORMATION COLLECTION ACTIVITY | Total Hours | Total Labor Costs | Total Capital Cost | Total O&M Costs | Total Costs     |
|---------------------------------|-------------|-------------------|--------------------|-----------------|-----------------|
| Enrollment Form                 | 76          | \$3,950           | \$0                | \$24            | \$3,974         |
| Champion Enrollment Form        | 76          | \$3,950           | \$0                | \$24            | \$3,974         |
| Case Studies                    | 61          | \$3,060           | \$0                | \$0             | \$3,060         |
| <b>TOTAL</b>                    | <b>213</b>  | <b>\$10,960</b>   | <b>\$0</b>         | <b>\$48</b>     | <b>\$11,008</b> |