

SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY

**Cooperative Agreements and Superfund State Contracts for Superfund Response Actions  
(Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

Cooperative Agreements and Superfund State Contracts for Superfund Response Actions (Renewal). OMB Control Number 2050-0179, EPA ICR Number 1487.10.

**1(b) Short Characterization/Abstract**

This is a request for an updated Information Collection Request (ICR). The title of this submission is: “Cooperative Agreements and Superfund State Contracts for Superfund Response Actions.” This ICR authorizes the collection of information under EPA’s Superfund Rule at 40 CFR Part 35, Subpart O, that establishes the administrative requirements for CERCLA-funded cooperative agreements for State, political subdivisions, and Federally-recognized Indian Tribes and Tribal Consortia response actions. The regulation includes only those provisions mandated by CERCLA, required by OMB circulars, or added by EPA to ensure sound and effective financial assistance management under this regulation. The information is collected from applicants and/or recipients of EPA assistance and is used to make awards, pay recipients, and collect information on how Federal funds are being utilized. EPA requires this information to meet its Federal stewardship responsibilities. Recipient responses are required to obtain a benefit (Federal funds) under 40 CFR Part 31, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments” and under 40 CFR Part 35, “State and Local Assistance.”

It is estimated that the information collection will involve 261 new respondents and 307 amendments to existing agreements with recipients impose a burden of 4,189 hours and \$128,466.67. Previous Information Collection burdens were approved under OMB control number 2050-0179. The prior ICR was approved without any terms of clearance.

**2. Need for and Use of the Collection**

**2(a) Need/Authority for the Collection**

This ICR is necessary due to the information collection and reporting requirements in the Superfund rule 40 CFR Part 35, Subpart O, “Cooperative Agreements and Superfund State Contracts for Superfund Response Actions.” Due to the statutory cost recovery requirements in

CERCLA and the need to carefully track all costs, Superfund recipients must comply with administrative requirements sufficient to meet these provisions of the law. The regulation sets forth the pre-award, post-award, and closeout cooperative agreement requirements which are conditions for receiving/managing a Superfund Cooperative Agreement (CA) or a Superfund State Contract (SSC). This information is needed by EPA project officers, grant specialists, and finance officials to manage/oversee the funding activities and cleanup activities at Superfund sites. EPA also uses the information to update the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) which tracks progress made at Superfund sites, and to update IFMS, EPA's database for tracking financial management.

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

The information collected is used by EPA to manage and administer cooperative agreements and Superfund State Contracts for Superfund response actions. The pre-award information is used to qualify cooperative agreement applicants and award cooperative agreements. The post-award information is used to meet the statutory and regulatory requirements and monitor recipient performance. The closeout information is used to meet reporting and record keeping requirements necessary for cost recovery purposes and for closing out awards. The information is necessary to ensure fiscal control and accountability for Superfund money to deter waste, fraud, and abuse.

40 CFR Part 35, Subpart O, also supplements EPA's general assistance regulation, 40 CFR Part 31, "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments." Part 31, which implements the requirements of OMB Circular A-102, became effective for awards made on or after October 1, 1988. The Part 31 rule (common rule) established uniformity among Federal agencies that award Federal grants and cooperative agreements to States, political subdivisions thereof, and Federally-recognized Indian Tribes and Tribal Consortia. Many of the information collection requirements for Superfund cooperative agreements were approved under the OMB Paperwork Clearance #2030-0020 associated with 40 CFR Part 31 prior to this ICR.

Due to statutory cost recovery requirements, and the need to carefully track costs by site and activity, Superfund recipients must comply with all administrative requirements to satisfy the provisions of the law. There are additional requirements in this regulation, which supplements Part 31, and are necessary for effective cost recovery from potentially responsible parties. States may be able to follow their own rules for certain aspects of the program, such as in procurement, if their administrative requirements and financial management capabilities are sufficient.

## **3. Nonduplication, Consultations, and Other Collection Criteria**

### **3(a) Nonduplication**

All information collected is used to continue administering cooperative agreements and Superfund State Contracts for Superfund response actions. This data is not available from other sources, as it is specifically related to the requirements of 40 CFR part 35, subpart O, and the award, management, and closeout of cooperative agreements and Superfund State Contracts within this program.

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

On June 17, 2009 (74 FR 28693), EPA sought comments on this ICR pursuant to 5 CFR 1320.8(d). EPA received no comments.

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

This is a request for renewal of an information collection request, and in addition to the initial Federal Register notice, the following organizations were contacted to provide additional input towards the calculation of burden imposed by this ICR:

Bureau of Waste Site Cleanup  
Massachusetts Department of Environmental Protection  
One Winter St.  
Boston, MA 02108  
Ph: 617-292-5697

Site Remediation and Solid Waste Program  
Division of Remedial Management & Response  
New Jersey Department of Environmental Protection  
CN 413  
Trenton, NJ 08625

Office of Remediation Programs  
Virginia Department of Environmental Quality  
P.O. Box 10009  
629 E. Main St., 10th Floor  
Richmond, VA 23240-0009

Tennessee Department of Environment and Conservation  
401 Church Street  
Nashville, TN 37243

Division of Remediation Management  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276

Springfield, IL 62794-9276

Waste Management Division  
Oklahoma Department of Environmental Quality  
707 N. Robinson Street  
P.O. Box 1677 (Mailing Address)  
Oklahoma City, OK 73101-1677

CERCLA Branch Manager  
Utah Department of Environmental Quality  
168 North 1950 West  
Salt Lake City, UT 84116

Cleanup / Portland Harbor  
Northwest Region  
Oregon Department of Environmental Quality  
2020 SW Fourth Ave., Suite 400  
Portland, OR 97201

One of the organizations, Tennessee Department of Environment and Conservation, contacted responded. That respondent commented on the burdens presented in the burden table, and stated there were no significant changes.

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

There is no fixed schedule for the collection of this information. It is required on an as needed basis as stated in the rule at 40 CFR Part 35, Subpart O, "Cooperative Agreements and Superfund State Contracts for Superfund Response Actions." Therefore, there is no possibility that the information can be collected less frequently than required by the regulation.

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

The information collection is consistent with the guidelines set forth in 5 CFR 1320.5 of the Paperwork Reduction Act Guidelines.

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

No sensitive information is expected to be collected under this ICR. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

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

None of the information being collected will contain sensitive questions or require collecting sensitive information.

## **4. The Respondents and the Information Requested**

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

The respondents to the recordkeeping and reporting requirements are:

	<b>SIC Codes</b>	<b>NAICS Codes</b>
Other General Government Support	9119	921190
American Indian and Alaska Native Tribal Governments	8641	921150

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

#### **(i) Data Items (Including recordkeeping requirements)**

Information requested – Information relating to the following cooperative agreement types and Superfund State Contracts will be collected to ensure sound and effective financial assistance management and to help EPA meet its Federal stewardship responsibilities under this program:

- Pre-Remedial Cooperative Agreements;
- Remedial Response Cooperative Agreements;
- Enforcement Cooperative Agreements;
- Removal Cooperative Agreements;
- Core Program Cooperative Agreements;
- Support Agency Cooperative Agreements;
- Superfund State Contract;
- Conclusion of Superfund State Contracts;
- Consolidated Funding Cooperative Agreements;
- Conclusion of the Cooperative Agreement; and
- Records Retention.

This information will also be used to update and maintain the IFMS database.

#### **(ii) Respondent Activities**



Respondents will:

- Prepare and submit cooperative agreements application materials including work plans;
- Conduct research and gather data as needed;
- Prepare and submit quarterly/or bi-annual/or annual reports that contain: (1) An explanation of work accomplished during the reporting period, delays, or other problems, if any, and a description of the corrective measures that are planned. For Pre-remedial Cooperative Agreements, the report must include a list of the site-specific products completed and the estimated number of technical hours spent to complete each product. (2) A comparison of the percentage of the project completed to the project schedule, and an explanation of significant discrepancies. (3) A comparison of the estimated funds spent to date to planned expenditures and an explanation of significant discrepancies. For remedial, enforcement, and removal reports, the comparison must be on a per task basis. (4) An estimate of the time and funds needed to complete the work required in the Cooperative Agreement, a comparison of that estimate to the time and funds remaining, and a justification for any increase.
- Prepare other standardized non-construction assurances referenced and covered under 40 CFR Part 31 and OMB Circular A-102;
- Perform required recordkeeping activities;
- Respond to EPA requests for additional information; and
- Perform other activities as necessary as required by 40 CFR Part 35, Subpart O.

## **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

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

EPA will collect the requested information using standardized reports and record keeping appropriate to support cost recovery. The grants information is entered into IGMS, the Agency's database for tracking the status of grant/cooperative agreement actions. Financial information is entered into IFMS, the Agency's database for tracking financial management.

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

EPA will conduct activities in connection with the acquisition, analysis, storage, and utilization of the requested cooperative agreement and Superfund State Contract-related information and financial data. This information and financial data are reviewed in accordance with the requirements of 40 CFR Part 35, Subpart O.

Superfund recipients must retain records for 10 years following the submission of the final Financial Status Report, and must retain those records longer if an enforcement action is ongoing. This ensures that response action information will be available to support EPA litigation efforts to recover Superfund costs from responsible parties. The Agency also conducts periodic on-site reviews to ensure recipient compliance with applicable requirements.

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

There are no small businesses affected by this information collection. Small Governmental Jurisdictions are affected, but the burden is minimal, and steps have been taken to reduce the burden imposed by this information collection. As 40 CFR Part 35, Subpart O is a fully-funded regulation, all burden imposed by the regulation is required in order for recipients to obtain and manage financial awards.

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

The collection schedule for this information relating to cooperative agreements and Superfund State Contracts is variable depending on such factors as: date of applications, magnitude of efforts, and project periods, etc.

## **6. Estimating the Burden and Cost of the Collection**

Table 1, “Total Respondent Burden,” documents the computation of individual burdens for providing the information required for the application and administration of each type of cooperative agreement and each Superfund State Contract included in this ICR. The individual burden is expressed under a heading believed to be consistent with the concept of burden under the Paperwork Reduction Act. Responses to this information collection are mandatory, as they are required to properly manage and administer the funds awarded under cooperative agreements and Superfund State Contracts.

The 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.

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

A “unit” burden is the burden incurred by a respondent for performing a cooperative agreement specific activity. States incur burdens under an estimated 568 cooperative agreement and Superfund State Contract activities per year for reporting, certifications, schedules, notifications, assurances, and record keeping activities. The estimated burden is incurred by activities under the following types of Cooperative Agreements/Superfund State Contracts and other requirements:

- Pre-Remedial Cooperative Agreements;
- Remedial Response Cooperative Agreements;
- Enforcement Cooperative Agreements;
- Removal Cooperative Agreements;
- Core Program Cooperative Agreements;
- Support Agency Cooperative Agreements;



- Superfund State Contract;
- Conclusion of Superfund State Contracts;
- Consolidated Funding Cooperative Agreements;
- Conclusion of the Cooperative Agreements; and
- Records Retention.

The estimated average burden associated with each Cooperative Agreement/Superfund State Contract/Other requirement is discussed below and summarized in Table 1, “Total Respondent Burden.”

The estimated burden associated with Pre-Remedial Cooperative Agreements represents the number of hours that are spent in identification of environmental results, research, data collection, analysis, negotiation, preparation, and post-award monitoring of the Pre-Remedial Cooperative Agreement. EPA estimates that approximately 43 (12 new respondent CAs and 31 amended respondent CAs) Pre-Remedial Cooperative Agreements involving States, Tribes, or political subdivisions, will be in place each year. EPA estimates that an average of 9 hours are necessary to prepare all the plans, compliance documents, lists and schedules required in the application for this type of Cooperative Agreement within Subpart O.

The estimated burden associated with Remedial Response Cooperative Agreements represents the number of hours that are spent in identification of environmental results, research, plan preparation, data collection, analysis, negotiation in preparing the materials required for, and post-award monitoring of Remedial Response Cooperative Agreements. EPA estimates that approximately 48 (15 new respondent CAs and 33 amended respondent CAs) Remedial Response Cooperative Agreements, which involve States, Tribes, and political subdivisions, will be in place each year. EPA estimates that an average of 18 hours is necessary to prepare all the materials required in an application for this type of Cooperative Agreement. Those materials include: a project narrative, which includes much more site-specific information than a project narrative for a Pre-Remedial Cooperative Agreement; compliance documents and certifications; CERCLA assurances; and notifications. The majority of the burden under this Cooperative Agreement is associated with the preparation of the schedule of deliverables. Though the format of that schedule is fairly standard, the planning and negotiation involved can be time consuming.

The estimated burden associated with Enforcement Cooperative Agreements represents the number of hours that are spent in identification of environmental results, research, plan and certification documentation preparation, such as the quality assurance plan, data collection, analysis in the preparation of materials involved in acquiring and operating within an Enforcement cooperative agreement. EPA estimates that an average of 12 (4 new respondent CAs and 8 amended respondent CAs) Enforcement Cooperative Agreements will be in place each year. EPA also estimates that 30 hours are needed to fulfill the requirements imposed by this type of Cooperative Agreement. Those requirements include: creating the site description; creating the site specific statement of work; producing the statement designating lead site project manager; creating the site specific health and safety plan; producing the quality assurance plan; developing the schedule of deliverables; and producing a copy of the applicable state, local, or tribal statutes.

The majority of the burden is imposed by the creation of the site specific statement of work, the quality assurance plan, and the schedule of deliverables.

The estimated burden associated with Removal Response Cooperative Agreements represents the number of hours that are spent in identification of environmental results, research, plan preparation, data collection, analysis, negotiation in preparing the materials required for, and post-award monitoring of, a Removal Response Cooperative Agreement. EPA estimates that approximately 4 (2 new respondent CAs and 2 amended respondent CAs) Removal Response Cooperative Agreements, which involve States, Tribes, and political subdivisions, will be in place each year. EPA estimates that an average of 29 hours is necessary to prepare all the materials required for this type of Cooperative Agreement. Those required materials include: a site description; a site specific statement of work; a statement designating lead site project manager; a site specific community relations plan; a site specific health and safety plan; a quality assurance plan; a schedule of deliverables. Program experience has shown that the majority of the burden imposed under the requirements for this type of Cooperative Agreement can be attributed to the development of the schedule of deliverables and the quality assurance plan.

The estimated burden associated with Core Program Cooperative Agreements represents the number of hours that are spent in identification of environmental results, research, data collection, analysis, negotiation in preparing the materials required for, and post-award monitoring of a Core Program Cooperative Agreement. EPA estimates that 45 (16 new respondent CAs and 29 amended respondent CAs) Core Program Cooperative Agreements, which involve States, Tribes, and political subdivisions, will be in place each year. Superfund program experience indicates that, on average, about 9 hours are needed to fulfill the requirements imposed by this type of Cooperative Agreement. Those requirements include preparing a statement of work, and a background statement. Those two requirements are responsible for the majority of burden attributed to Core Program Cooperative Agreements.

The estimated burden associated with Support Agency Cooperative Agreements represents the number of hours that are spent in identification of environmental results, research, data collection, analysis, negotiation in preparing the materials required for, and post-award monitoring of a Support Agency Cooperative Agreement. EPA estimates that approximately 58 (17 new respondent CAs and 41 amended respondent CAs) Support Agency Cooperative Agreements, which involve States, Tribes, and political subdivisions, will be in place each year. EPA estimates that an average of 8 hours are needed to prepare all the materials required for this type of Cooperative Agreement. The majority of the burden imposed by a Support Agency Cooperative Agreement can attributed to the development of the required statement of work.

The estimated burden associated with the contents of a Superfund State Contract represents the number of hours that are spent in identification of environmental results, research, data collection, analysis, negotiation, and preparation of the Superfund State Contract each year. EPA estimates that approximately 11 (4 new respondent CAs and 7 amended respondent CAs) Superfund State Contracts are in place each year. The Superfund grants program workgroup

estimates that about 24 hours are needed to meet the burden imposed by the requirements under a Superfund State Contract. Those requirements include: general authorities; purpose statement; site description; statement to follow guidance; statement of work; schedule of deliverables; SPOC; CERCLA assurances; list of Support Agency Cooperative Agreements; sanctions for failure to comply with the terms of the Superfund State Contract; site access; joint inspection of the remedy; exclusion of third party benefits; State review; and a list of responsible party activities.

The estimated burden associated with the Conclusion of a Superfund State Contract represents the number of hours that are spent in assembling and reconciling financial data, identifying any outstanding contractual issues, assembling relevant agreement data deliverables and other documentation, coordinating with USEPA personnel in the disposition of equipment and other acquisitions under the Superfund State Contract, determining final cost shares and preparing the site for the operation and maintenance. EPA estimates that approximately 35 (35 new respondents and 0 amended respondents) Superfund State Contracts are concluded each year. The Superfund Subpart O Workgroup estimates that an average of 7 hours is needed to meet the burden imposed by the requirements under a Superfund State Contract. Those requirements include: general authorities; purpose statement; site description; statement to follow guidance; statement of work; schedule of deliverables; SPOC; CERCLA assurances; list of Support Agency Cooperative Agreements; sanctions for failure to comply with the terms of the Superfund State Contract; site access; joint inspection of the remedy; exclusion of third party benefits; State review; and a list of responsible party activities.

The estimated burden associated with Consolidated Funding Cooperative Agreements represents the number of hours that are spent in identification of environmental results, research, data collection, analysis, negotiation, and preparation of Consolidated Funding Cooperative Agreements each year. EPA estimates that approximately 4 (1 new respondent CA and 3 amended respondent CAs) Consolidated Funding Cooperative Agreements are in place each year. EPA estimates that approximately 43 hours a year are necessary to meet the requirements of a Consolidated Funding Cooperative Agreement. This type of agreement is composed of a Pre-Remedial, Core Program, and Support Agency Cooperative Agreement.

The estimated burden associated with the Conclusion of a Cooperative Agreement represents the number of hours that are spent in assembling and reconciling financial data, identifying any outstanding contractual issues, assembling relevant data deliverables and other documentation, coordinating with USEPA personnel in the disposition of equipment and other acquisitions under the agreement, determining final cost shares and preparing the site for the operation and maintenance. EPA estimates that approximately 25 (25 new respondent CAs and 0 amended respondent CAs) Cooperative Agreements are concluded each year. The Superfund Subpart O Workgroup estimates an average of 11 hours are needed to meet the burden imposed by the requirements under a Cooperative Agreement. Those requirements include: general authorities; purpose statement; site description; statement to follow guidance; statement of work; schedule of deliverables; SPOC; CERCLA assurances; list of Support Agency Cooperative Agreements; sanctions for failure to comply with the terms of the Cooperative Agreement; site

access; joint inspection of the remedy; exclusion of third party benefits; State review; and a list of responsible party activities.

The estimated burden associated with the Records Retention requirements represents the number of hours that are spent each year beyond the 10-year (Superfund) retention requirement for record maintenance, storage, and any document requests that would be made throughout the year. All cooperative agreements must meet these Records Retention requirements, and incur the resulting burden. EPA estimates that approximately 284 (130 new respondent CAs and 154 amended respondent CAs) Cooperative Agreements will be in place each year. Superfund program experience indicates that an average of 3 hours will be required each year to meet the burden imposed by this regulation's Records Retention requirements.

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

### **(i) Estimating Labor Costs**

For all activities covered by this ICR, wage rates for State, Tribal, and political subdivision personnel are estimated to be comparable to those of Federal government personnel. These wage rates were estimated based upon corresponding Federal GS wage rates as of January 2009. The rates, as outlined below are multiplied by a 1.6 benefits multiplication factor to account for government overhead expenses.

Management	GS 13, step 1	\$54.14/hour
Technical	GS 11, step 1	\$37.98/hour
Clerical	GS 7, step 1	\$25.66/hour

These rates are from the Office of Personnel Management (OPM) "2009 General Schedule" which excludes locality rates of pay. These rates can be obtained from the OPM website, <http://www.opm.gov/flsa/oca/09tables/indexGS.asp>. It is further estimated that approximately 20% of the respondent activity is Managerial, 70% is Technical, and 10% is Clerical in nature. Based upon the above, the weighted average is \$39.99 per hour  $[(54.14*0.2)+(37.98*0.7)+(25.66*0.1)]$ .

### **(ii) Estimating Capital and Operation and Maintenance Costs**

The only type of costs associated with this information collection activity is labor costs. There is no estimated Capital/Startup and Operation and Maintenance Costs associated with this collection of information.

### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

The total capital/startup costs for this ICR are \$0.

The total operation and maintenance (O&M) costs for this ICR are \$0.

The total respondent costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to respondents over the next three years of the ICR is estimated to be \$0.

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

The only costs to the Agency are those costs associated with maintenance, analysis, and utilization of the collected information.

The average Agency cost for the collection and administration of the information required by this ICR is estimated to be \$181,174.45. This cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total hourly rate of \$45.52.

These rates are from the Office of Personnel Management (OPM) “2009 General Schedule” which excludes locality rates of pay. These rates can be obtained from the OPM website, <http://www.opm.gov/flsa/oca/09tables/indexGS.asp>. Details upon which this estimate is based appear in Table 2, “Total Agency Burden,” below.

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

Based on our research for this ICR, approximately 568 respondents will provide the information required under 40 CFR Part 35, Subpart O each year.

The number of Total Annual Responses is 568.

The total annual labor costs are \$128,466.67. Details regarding these estimates may be found in Table 1 (Total Respondent Burden).

Note that the total annual capital and O&M costs to the regulated entity are \$0. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The total annual burden is 4,189 hours.

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

The bottom line burden hours and cost tables for both the Agency and the respondents appear below. The annual respondent burden for this collection of information is estimated to average 7 hours per response.

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

The decrease in burden from the most recently approved ICR of \$21,220 and 884 hours reflects a decrease in the estimated number of respondents from the previous ICR.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 7 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 valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-SFUND-2004-0008, which is available for in person viewing at the Superfund Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is 202-566-1744, and the telephone number for the Superfund Docket is 202-566-0276. An electronic version of the public docket is available at [www.regulations.gov](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. Once in the system, select "search," then key in the Docket ID Number identified above.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1: Total Respondent Burden**

Activity		Average number of respondents per Year (Full) 2009	Unit Burden (Hours)	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Total Burden (Hours)	Total Cost (Dollars)
Pre-Remedial CA	New	12	10	\$39.99	\$399.90	120	\$4798.80
	Amendment	30.8	8.7	\$13.33	\$115.97	267.96	\$3,571.91
Remedial response CA	New	15.2	23	\$39.99	\$919.77	349.6	\$13980.51
	Amendment	33.4	13	\$13.33	\$173.29	434.2	\$5,787.89
Enforcement CA	New	4	46	\$39.99	\$1,839.54	184	\$7358.16
	Amendment	7.6	12.7	\$13.33	\$169.29	96.52	\$1,286.61
Removal response CA	New	1.6	45	\$39.99	\$1,799.55	72	\$2879.28
	Amendment	2	13	\$13.33	\$173.29	26	\$346.58
Core program CA	New	16	11	\$39.99	\$439.89	176	\$7038.24
	Amendment	29.4	6	\$13.33	\$73.80	176.4	\$2,169.72
Support agency CA	New	17	11	\$39.99	\$439.89	187	\$7478.13
	Amendment	40.8	5.7	\$13.33	\$75.98	232.56	\$3,100.02
Superfund State Contract	New	4	33	\$39.99	\$1,319.67	132	\$5278.68
	Amendment	6.6	14.3	\$13.33	\$190.62	94.38	\$1,258.09
Conclusion of Superfund State Contract	New	34.8	8	\$39.99	\$319.92	278.4	\$11133.22
	Amendment	0	5.3	\$13.33	\$70.65	0	\$0.00
Consolidated funding CA	New	0.6	77	\$39.99	\$3,079.23	46.2	\$1847.54
	Amendment	3	7.7	\$13.33	\$102.64	23.1	\$307.92
Conclusion of CA	New	25.2	16	\$39.99	\$639.84	403.2	\$16123.97
	Amendment	0	5.3	\$13.33	\$70.65	0	\$0.00
Records retention	New	130.4	6	\$39.99	\$239.94	782.4	\$31288.18
	Amendment	153.6	0.7	\$13.33	\$9.33	107.52	\$1,433.24
<b>TOTAL</b>							\$128,466.67
<b>TOTAL NUMBER OF RESPONDENTS</b>						*	568
<b>TOTAL BURDEN HOURS*</b>						*	<b>4,189.44</b>
<b>AVERAGE BURDEN HOURS PER RESPONDENT*</b>						*	<b>7.38</b>
<b>TOTAL COST</b>							<b>\$128,466.67</b>

\*Amendment respondents are assumed to have only 1/3 of the burden imposed as Full respondents, since the process of amending is not as extensive as it is for a new application for a CA

**Table 2: Total Agency Burden**

Activity		Average number of respondents per Year (Full) 2009	Unit Burden (Hours)	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Total Burden (Hours)	Total Cost (Dollars)
Pre-Remedial CA	New	12	26	\$45.52	\$1183.52	312	\$14202.24
	Amendment	30.8	8.7	\$15.17	\$131.98	267.96	\$4,064.95
Remedial response CA	New	15.2	39	\$45.52	\$1775.28	592.8	\$26984.26
	Amendment	33.4	13	\$15.17	\$197.21	434.2	\$6586.81
Enforcement CA	New	4	38	\$45.52	\$1729.76	152	\$6919.04
	Amendment	7.6	12.7	\$15.17	\$192.66	96.52	\$1,464.21
Removal response CA	New	1.6	39	\$45.52	\$1775.28	62.4	\$2840.45
	Amendment	2	13	\$15.17	\$197.21	26	\$394.42
Core program CA	New	16	18	\$45.52	\$819.36	288	\$13109.76
	Amendment	29.4	6	\$15.17	\$91.02	176.4	\$2,675.99
Support agency CA	New	17	17	\$45.52	\$773.84	289	\$13155.28
	Amendment	40.8	5.7	\$15.17	\$86.47	232.56	\$3,527.94
Superfund State Contract	New	4	43	\$45.52	\$1957.36	172	\$7829.44
	Amendment	6.6	14.3	\$15.17	\$216.93	94.38	\$1,431.74
Conclusion of Superfund State Contract	New	34.8	16	\$45.52	\$728.32	556.8	\$25345.54
	Amendment	0	5.3	\$15.17	\$80.40	0	\$0.00
Consolidated funding CA	New	0.6	23	\$45.52	\$1046.96	13.8	\$628.17
	Amendment	3	7.7	\$15.17	\$116.81	23.1	\$350.43
Conclusion of CA	New	25.2	16	\$45.52	\$728.32	403.2	\$18353.66
	Amendment	0	5.3	\$15.17	\$80.40	0	\$0.00
Records retention	New	130.4	5	\$45.52	\$227.6	652	\$29679.04
	Amendment	153.6	0.7	\$15.17	\$10.62	107.52	\$1,631.08
<b>TOTAL</b>							\$181,174.45
<b>TOTAL NUMBER OF RESPONDENTS</b>						*	568
<b>TOTAL BURDEN HOURS*</b>						*	<b>4,952.64</b>
<b>AVERAGE BURDEN HOURS PER RESPONDENT*</b>						*	<b>8.72</b>
<b>TOTAL COST</b>							<b>\$181,174.45</b>

\*Amendment respondents are assumed to have only 1/3 of the burden imposed as Full respondents, since the process of amending is not as extensive as it is for a new application for a CA.