SUPPORTING STATEMENT

**INFORMATION COLLECTION FOR THE
GREAT LAKES ACCOUNTABILITY SYSTEM**

**U.S. ENVIRONMENTAL PROTECTION AGENCY
GREAT LAKES NATIONAL PROGRAM OFFICE**

March 2010

TABLE OF CONTENTS

APPENDIX A: COMMENTS ON THE PUBLIC NOTICE FOR THE PROPOSED INFORMATION
COLLECTION FOR THE GREAT LAKES ACCOUNTABILITY SYSTEM AND EPA'S RESPONSE

APPENDIX B: COMPLETED QUESTIONNAIRES FOR THE INFORMATION COLLECTION FOR
THE GREAT LAKES ACCOUNTABILITY SYSTEM
        -   Racine, Wisconsin
        -   New York State Department of Environmental Conservation
        -   Michigan Department of Environmental Quality
        -   Alliance for the Great Lakes
        -   Pennsylvania Sea Grant
        -   Keweenaw Bay Indian Community

APPENDIX C: SUMMARY TABLES – RESPONDENT COST AND BURDEN CALCULATIONS

APPENDIX D: JANUARY 5, 2010 FEDERAL REGISTER NOTICE ANNOUNCING 60 DAY
PUBLIC COMMENT PERIOD ON THE GREAT LAKES ACCOUNTABILITY SYSTEM

LIST OF TABLES

PART A OF THE SUPPORTING STATEMENT

1.   Identification of the Information Collection

   1(a)   Title of the Information Collection

   Great Lakes Accountability System (EPA ICR Number 2379.01, OMB Control Number 2005 NEW)

   1(b)   Short Characterization/Abstract

   This new request for an information collection is needed to assist with the administration of the Great Lakes Restoration Initiative (GLRI). The GLRI is a new $475 million multi-year program to restore the Great Lakes that was included in the Department of the Interior, Environment, and Related Agencies Appropriations Act, 2010 (Public Law 111-88).   It will be guided by a 5 year action plan that sets goals, criteria for measuring progress and clear standards of accountability. GLRI funding will be distributed by the Environmental Protection Agency (EPA) through both its own programs and those of other federal agencies. A substantial portion of the funding will be administered to non-federal partners through grants, cooperative agreements and contracts.

   The Conference Report accompanying Public Law 111-88, House Report 111-316 (H. R. 111-316), requested EPA to develop a process that, "Ensures monitoring and reporting on the progress of the Great Lakes Restoration Initiative…." EPA's Great Lakes National Program Office (GLNPO) developed the Great Lakes Accountability System (GLAS) as the primary mechanism for collecting information to monitor and report on GLRI progress.

   The GLAS is a web-based reporting system that is available at https://restore.glnpo.net:8080/login.htm. GLRI funding recipients will be required to enter information into GLAS on the nature of the activity, responsible organization, organizational point-of-contact, resource levels, geographic location and major milestones of progress toward GLRI goals. The information will be organized around focus areas to align activities with the GLRI Action Plan goals and measures. The information contained in the GLAS will be available to the public after undergoing EPA review to verify its accuracy .

   The GLAS will provide transparency on GLRI activities and funds and form the basis for reports to the President and Congress on the GLRI. The information in GLAS will be updated quarterly. Timely and accurate reporting will be critical.

   GLNPO estimates the total annual respondent cost and burden to be $1,274,150.40 (as of March 29, 2010). The annual federal cost to administer this information collection is estimated to be $36,181.25 (as of March 29, 2010), which results in a total annual cost of $1,310,331.65. An overview of the cost and burden hours is provided below:

   - Respondents/Affected Entities: Great Lakes Restoration Initiative Funding Recipients
   - Estimated total number of potential non-federal respondents: 594 (463 state, local and tribal governments, 131 non-government organizations).
   - Estimated number of projects per non-federal respondent: 1
   - Number of federal respondents: 15
   - Estimated number of projects per federal respondent: 3.3 (50 projects spread across 15 federal agencies)

• Frequency of response per project: Quarterly

Estimated total annual burden hours: 21,613 hours (33 hours per project for state, local, and tribal governments, 41.1 hours per project for non-government organizations and 19 hours per project for federal agencies).

2. Need for and use of the Collection

2(a) Need/Authority for the Collection

Collecting information from more than 10 non-federal partners is needed to effectively provide transparency and accountability for the GLRI. H.R.111-316 calls for EPA to, "Ensure monitoring and reporting on the progress of the Great Lakes Restoration Initiative, using scientific research to revise restoration priorities as needed, and adapt and modify activities beginning in fiscal year 2011."

Consistent with this direction, GLRI funding recipients will be required to submit information about activities and report progress against measures in the GLRI Action Plan. The GLAS is the primary mechanism for collecting information on GLRI activities.

2(b) Practical Utility/Users of the Data

The primary users of the data are EPA, other government agencies, non-profit organizations, universities and the public. The information in GLAS will be used to catalog the resources and actions that are implemented under the GLRI and to track progress. It will serve as the basis for reports to the President and Congress. The public will be able to view activities across the basin, with details such as how much funding the activity has received and which organizations are involved. The GLAS is a key component of the GLRI.

3. Non duplication, Consultations, and Other Collection Criteria

3(a) Non duplication

GLNPO conducted research into other EPA programs and other federal agency programs, and state agency/department or non-governmental organizations to determine whether any organization had information pertinent to the GLRI Action Plan. Within EPA, it was confirmed that only the GLNPO had the pertinent information. No information similar to that requested for the GLAS was identified in the state, local and tribal government agencies and non-governmental organizations.

Pursuant to this research, GLNPO concluded that activity and funding information required in the GLAS is specific and unique to the GLRI's goals of protection and habitat restoration. The GLAS is the only reporting system used to quarterly collect comprehensive information about activities and funding levels.

Several federal agencies have their own restoration project databases into which some GLRI project information will be entered.   To minimize burden and avoid duplication, efforts are

---

underway to develop a mechanism for importing relevant data fields from these systems into GLAS.

3(b)   Public Notice Required Prior to ICR submission to OMB

GLNPO solicited public comments on this ICR in the Federal Register (Volume 75, page 362, published January 5, 2010). As of the close of the comment period, on March 9, 2010, EPA received one set of public comments on this ICR. The comments and GLNPO's responses are contained in Appendix A.

3(c)   Consultations

GLNPO invited seven non-federal organizations to participate in consultations to estimate their annual cost and burden for using the GLAS. The consultations are in keeping with ICR guidance to consult with no-more than nine non-federal organizations. GLNPO provided the

participating organizations with accountability system demonstrations. GLNPO prepared and distributed a questionnaire for respondents to complete with burden estimates for labor costs associated with reporting activities, capital/startup costs, and operations and maintenance costs. GLNPO also conducted phone consultations to review responses and clarify as needed. Table 1 provides a list of organizations asked to participate in consultations. Not all chose to participate.

Table 1. Consultation Participants by Type of Organization

Name	Phone Number	Affiliation
State, Local, and Tribal Government Agencies		
Julie Kinzelman	(262) 636-9501	City of Racine, Wisconsin, Health Department
Rick Hobrla	(517) 335-4173	Michigan Department of Natural Resources and Environment
Chris O'Connor	(518) 402-9140	New York Department of Environmental Conservation
Mark Kwitowski	(814) 870-1593	City of Erie, Pennsylvania
Todd Warner	(906) 524-5757 ext. 13	Keweenaw Bay Indian Community
Private / Non-Governmental Organizations		
Michelle Liebetreu	(857) 399-6219	Alliance for the Great Lakes
Dave Skellie	(814) 217-9014	Pennsylvania Sea Grant

GLNPO has received completed questionnaires from six respondents.

In addition, GLNPO conducted a demonstration of the GLAS for Wisconsin Department of Natural Resources staff on March 4, 2010 and for representatives of the organizations listed below at a Great Lakes Habitat/Species Workgroup on March 17, 2010:

U.S. Fish and Wildlife Service
U.S. Army Corps of Engineers
National Oceanic and Atmospheric Administration
Natural Resources Conservation Service
Great Lakes Fishery Commission
Great Lakes Commission

Wisconsin Department of Natural Resources
Ducks Unlimited
Council of Great Lakes Governors
Wisconsin Wetlands Association
Environmental Consulting and Technology, Inc.

GLNPO based the federal burden estimate on EPA's experience because it is the agency most familiar with the system.

Table 2. Federal Consultation Participants

Name	Phone Number	Affiliation
Rita Cestaric	(312) 886-6815	U.S. Environmental Protection Agency, GLNPO
Ken Klewin	(312) 886-4794	U.S. Environmental Protection Agency, GLNPO

3(d)   Effects of Less Frequent Collection

If the information is not collected, it will be impossible to provide accountability on the expenditure of Federal funds under the GLRI or to evaluate progress. Quarterly submissions of information are required to provide timely information to ensure Federal monies are properly used and report progress.

3(e)   General Guidelines

This information collection is consistent with all of OMB's general guidelines.

- Respondents are asked to report quarterly.

- Respondents are provided more than 30 days to respond to the data call.

- Respondents are not required to submit more than one copy of original documents.

- This information collection does not use a statistical survey.

- Respondents do not receive a pledge of confidentiality in regard to the information collection. No information is confidential or personal; all is considered public.

- Respondents are not asked to submit proprietary or confidential information.

3(f)   Confidentiality

Information in the GLAS is not of a confidential nature.

3(g)   Sensitive Questions

None of the requested information is considered to be of a sensitive nature.

4. The Respondents and the Information Requested

4(a)   Respondents/NAICS Codes

The respondents for this ICR are the recipients of GLRI funding, which includes federal, state, and local agencies (NAICS 924110 and 924120), non-governmental organizations (e.g.,

environment, conservation, and wildlife organizations in NAICS 813312), and other program partners.

4(b)   Information Requested

1. Information from GLRI funding recipients will be collected through the web-based GLAS.

(i)   Data items, including record keeping requirements

GLRI funding recipients provide information about the activities they undertake to restore and protect the Great Lakes. Once logged in to the GLAS, the funding recipients enter data about their activities, which are grouped by focus and program areas. GLNPO does not impose additional recordkeeping requirements on any respondent. States and other entities may impose their own recordkeeping requirement that is separate from the GLAS. Specific data items entered into the GLAS include:

Project reporting elements
- Focus area – A broad programmatic area in the Action Plan to organize restoration activities. The focus areas are predefined in GLAS. Mandatory field.
- Program area – Specific thematic program areas organized as a subset of the focus areas. Program areas are predefined in GLAS. Mandatory field.
- Project type - A function such as monitoring or restoration that supports a program area. Project types are predefined in GLAS. Mandatory field.
-
Project and funding reporting elements
- Project title – Mandatory field
- Project description – Mandatory field.
- Quality Assurance Plan required and date of approval– Check yes or no. If yes, provide date of approval. Mandatory field.
- Lead organization/contact information – Basic details necessary to identify and contact project managers. The lead organizations are predefined in GLAS. Mandatory field.
- Collaborating organizations – A list of other organizations providing resources for the project. The lead organizations are predefined in GLAS. Optional field.
- GLRI funding amount/funding year -   Specifies total GLRI dollars and the fiscal year in which the funding was provided. The funding year is predefined in GLAS. Mandatory field.
- Other funding amount/funding source – Non-GLRI dollars allocated for the project and the source of the funds. Optional field.
- FTEs – The total number of full time equivalents per quarter that are funded with GLRI funds. Mandatory field.
- Project status/date- An identifier such as current or completed that identifies the status of the project as of a specific date. The project status and date are predefined fields in GLAS. Mandatory field.
- Pertinent GLRI performance measures - A quantitative summary metric for evaluating progress. Performance measures are predefined in GLAS. Mandatory field.

Location
- Street address, city state and zip code for the funding recipient- Mandatory field.
- Congressional district of funding recipient – This field is predefined in GLAS. Mandatory field.

- Watershed or 8-digit hydrologic unit code for the project – This field is predefined in GLAS. Mandatory field.
- Area of Concern (AOC) – This field in predefined in GLAS. Mandatory field if the project is located in an AOC.
- State, latitude/longitude, Congressional district – Project location information. Optional field.

Links to the GLRI Action Plan
- GLRI long term goal, interim measure and measure of progress – Relevant GLRI Action Plan goals and measures for the project. At a minimum, information must be entered into one of these fields for each project. These fields are predefined in GLAS.

Milestones
- Schedule, description and status – A short description, schedule and status for key project events. Mandatory field.

(ii)   Respondent Activities

GLRI grant recipients conduct the following activities to assemble, submit, and store the data items identified above (Table 3). These activities reflect the items of burden mandated by the 1995 Paperwork Reduction Act.

Table 3. List of Respondent Activities

Activity	Record Keeping	Reporting	GLNPO[1]
Preparing to Use the System. *EPA provides detailed instructions for entering data online and through training workshops. Gathering and reviewing the data to be entered, and organizing it by GLRIAP goal is a typical activity as part of common business practices.*		X	X
Obtaining Access. *No special technology or systems are required for this collection as the GLAS is Web-based. Internet access is a standard business tool. EPA establishes user IDs and passwords for each reporting organization.*		X	X
Entering Records. *GLRI grant recipients will review pre-populated system elements, and review data entered by their project partners to ensure no duplicative data. Records about new activities will be entered as appropriate.*		X	
Reviewing and Verifying Records. *Reviewing and verifying the accuracy of the data entered into the system is typical of standard business practice.*		X	X
Feedback and Evaluation. *Users of the GLAS are encouraged to provide feedback on the system*.		X	

1. Common Business Practice

5. The Information Collected–Agency Activities, Collection Methodology, and Information Management

5(a)   Agency Activities

Activities undertaken by GLNPO on a quarterly basis for this information collection include:

- Update reporting guidance and system instructions
- Notify system users of data call
- Conduct training
- Update Web site
- Solicit and compile feedback from users
- Respond to user comments and questions.

5(b)   Collection Methodology and Management

GLNPO will use the Web-based GLAS available at http://restore.glnpo.net:8080/glas.login.htm to collect data from the GLRI grant recipients. Each reporting organization will be assigned a user ID and password. EPA has established security measures to protect data that have been entered, including maintaining the data on a secure server on a secure network, confirming the data with each reporting organization, and making only summarized information available to the public.

In preparation for the quarterly data call, EPA/GLNPO will provide detailed guidance about the database to the GLRI fund recipients (e.g., organize training/workshops, facilitate hands-on demonstrations as necessary). GLNPO will also verify the accuracy of the data entered into the system during and after the data call. Quarterly updating by the GLRI fund recipients will be streamlined in light of the automated nature of compiling the information. To improve the efficiency of entering data, a cloning button is available during data entry that allows users to make a copy of the data for the next fiscal year (i.e., clone the 2010 data to create and modify a record for 2011).

5(c)   Collection Schedule

The information collection is based on a quarterly collection of data on the activities of the GLRI grant recipients. Table 4 shows a typical quarterly or 3-month collection schedule.

Table 4. Collection Schedule

DATE	ACTIVITY
Month 1	Outreach to GLRI fund recipients Conduct workshops / feedback sessions
Month 1	Data call sent to GLRI funding recipients
Month 2	Data entry complete
Month 3	Accuracy check by GLNPO

6. Estimating the Burden and Cost of the Collection

The consultations to determine the annual cost and burden estimates for using the GLAS are complete. The final estimates are detailed in the subsections that follow.

6(a)   Estimating Respondent Burden

Burden hour estimates are based on the responses to the consultation questionnaires and follow-up discussions where needed with respondents. Respondents provided annual burden estimates on a per project basis. Each project will require the initial entry and quarterly

updates. The respondents include state, local and tribal governments and non-governmental organizations identified in Section 3(c). Additionally, federal burden is included based on EPA estimates, as identified in Section 3(c). Annual estimates for each type of respondent are provided in Table 5. For the Fiscal Year (FY) 2010, EPA estimates 458 projects conducted by non-federal entities to be awarded GLRI funding in FY2010. Assuming continued project funding under the GLRI, EPA estimates that 288 new awards will be made to non-federal entities in years two and three. Using these assumptions and assuming that one project is entered or updated by a single respondent, EPA estimates that 458 projects will need quarterly updates during year one, 746 projects will need updating during year two and 576 projects will need to be updated during year three **(assumes 458 projects completed will be completed and not require updates in year three)**. Annualizing over three years (458, 458 + 288, 288 + 288), there will be 594 non-federal respondents and quarterly updates per year.

For FY 2010, GLNPO estimates that 14 federal agencies will be awarded GLRI funding for between 40 - 50 new projects. Assuming continued project funding under the GLRI, EPA estimates that between 20 – 25 new awards will be made to federal entities in years two and three.   Using these assumptions, GLNPO estimates that 50 federal projects will need quarterly updates during years one, two and three **(assumes 50 projects will be completed and not require updates in year three)**. Annualizing over three years (50, 25 + 25, 25 + 25), there will be 14 federal respondents and 50 quarterly updates per year.

Table 5. Estimated Annual Burden Per Project

Respondent Type	Annual Burden Per Project
State, Local, and Tribal Government Agencies	33 hours
Non-Governmental Organizations	41.1 hours
Federal Agencies	19 hours

6(b)   Estimating Respondent Costs

(i)   Estimating Labor Costs

Table 6 presents the annual respondent burden/cost estimate for state, local, and tribal government respondents. Labor rates were derived from information published by the Bureau of Labor and Statistics (BLS) for May 2008 (the most recent available data) and include a benefits multiplier of 1.5. BLS labor rates used in the calculations have the following Standard Occupational Categories: 11-0000 (Management Occupations), 19-0000 (Life, Physical, and Social Science Occupations), and, 43-0000 (Office and Administrative Support Occupations). GLNPO escalated wages and benefits from May 2008 values to December 2009 values using the Employment Cost Index for total compensation of state and local government employees. The index value for the second quarter of 2008 is 109.9 and the index value for the fourth quarter of 2009 is 114.1. The resulting escalation factor is 1.038. Labor rates were also increased by 17 percent to account for overhead. For each labor category, the labor rate is the average of a calculated rate for state employees and a calculated rate for local government agency staff.

Table 6. Estimated Annual Burden/Cost Per Project for State, Local, and Tribal Government Agencies

Information Collect Activity	Annual Hours Per Project			Annual Labor Cost Per Project	Annual Capital or Startup Costs Per Project	Annual O&M Cost Per Project	Annual Hours and Costs Per Project	
	Managerial ($65.37/ hour)	Technical ($48.27/ hour)	Clerical ($30.83/ hour)				Annual Hours Per Project	Annual Costs Per Year
Preparing to Use the System	8.6	7.5	0	$924.19	$0.00	$0.00	16.1	$924.19
Obtaining Access	0.4	0.8	0	$64.76	$0.00	$0.00	1.2	$64.76
Entering Records	5.9	4.60	0	$607.71	$0.00	$0.00	10.50	$607.71
Reviewing and Verifying Records	1	2.80	0	$200.52	$0.00	$0.00	3.80	$200.52
Feedback and Evaluation	0.9	0.50	0	$82.97	$0.00	$0.00	1.40	$82.97
Total	**16.8**	**16.2**	**0**	**$1,880.14**	**$0.00**	**$0.00**	**33**	**$1,880.14**

Sources: Hour burden estimates are averages across consultees. Wage rates are based on BLS mean wages for State agencies (http://www.bls.gov/oes/2008/may/naics4_999200.htm), Local government agencies, (http://www.bls.gov/oes/2008/may/naics4_999300.htm), and. BLS 2010 Employment Cost Index, Series ID CIS30100000000001 (state and local government) (customized tables at: http://www.bls.gov/ncs/ect/#data; accessed 3/3/2010).
Note: numbers may not add up across all rows and columns due to rounding.

Table 7 presents the annual respondent burden/cost estimate for non-governmental organizations. State/local/tribal government labor rates used in Table 6 are used for non-governmental labor rates in this table. Since non government wage rates tend to be slightly lower than state/local/tribal government wage rates, the use of the state/local/tribal government wage rates in these calculations provides conservative estimates.

March 29, 2010

Table 7. Estimated Annual Burden/Cost Per Project for Non-governmental Organizations

Information Collect Activity	Annual Hours Per Project			Annual Labor Cost Per Project	Annual Capital or Startup Cost Per Project	Annual O&M Cost Per Project	Annual Hours and Costs Per Project	
	Managerial ($65.37/ hour)	Technical ($48.27/ hour)	Clerical ($30.83/ hour)				Annual Total Hours Per Project	Annual Total Cost Per Project
Preparing to Use the System	25	3	0	$1,779.08	$0.00	$0.00	28	$1,779.08
Obtaining Access	0.5	0.3	0	$47.17	$0.00	$0.00	0.8	$47.17
Entering Records	6.5	1.3	0	$487.66	$0.00	$0.00	7.8	$487.66
Reviewing and Verifying Records	4	0	0	$261.49	$0.00	$0.00	4	$261.49
Feedback and Evaluation	0.5	0	0	$32.69	$0.00	$0.00	0.5	$32.69
Total	**36.5**	**4.6**	**0**	**$2,608.08**	**$0.00**	**$0.00**	**41.1**	**$2,608.08**

Sources: Hour burden estimates are averages across consultees. Wage rates are based on BLS mean wages for State agencies (http://www.bls.gov/oes/2008/may/naics4_999200.htm), Local government agencies, (http://www.bls.gov/oes/2008/may/naics4_999300.htm), and. BLS 2010 Employment Cost Index, Series ID CIS30100000000001 (state and local government) (customized tables at: http://www.bls.gov/ncs/ect/#data; accessed 3/3/2010).
Note: numbers may not add up across all rows and columns due to rounding.

Table 8 presents the annual respondent burden/cost estimate for federal respondents. The federal labor rates were derived from information published by the U.S. Office of Personal Management and include a benefits multiplier of 1.6.

Table 8. Estimated Annual Burden/Cost Per Project for Federal Agencies

Information Collect Activity	Annual Hours Per Project		Annual Labor Cost Per Project	Annual Capital or Startup Costs Per Project	Annual O&M Cost Per Project	Annual Total Hours and Costs Per Project	
	GS14 ($73.58/ hour)	GS13 ($62.27/ hour)				Annual Total Hours Per Project	Annual Total Costs Per Project
Preparing to Use the System	1.00	1.00	$135.86	$0.00	$0.00	2	$135.86
Obtaining Access	0.5	0.5	$67.93	$0.00	$0.00	1	$67.93
Entering Records	1.00	8.00	$571.76	$0.00	$0.00	9	$571.76
Reviewing and Verifying Records	2.00	4.00	$396.26	$0.00	$0.00	6	$396.26
Feedback and Evaluation	0.5	0.5	$67.93	$0.00	$0.00	1	$67.93
Total	**5.00**	**14.00**	**$1239.73**	**$0.00**	**$0.00**	**19**	**$1239.73**

Source: http://www.opm.gov/oca/10tables/html/gs_h.asp (step 5); rates include a benefits multiplier of 1.6

March 29, 2010

(ii) Estimating Capital and Operations and Maintenance Costs

Respondents will not incur capital or operations and maintenance costs for this information collection.

6(c)   Estimating Agency Burden and Cost

As shown in Table 9, the estimated annual cost to the federal government for administering this collection of information is $36,181.25.

Table 9. Estimated Annual Federal Administrative Burden/Cost

	Hours / Year					Total Hours and Costs	
	GS14	GS13	GS12	Labor	O&M	Total	
Information Collect	**$73.58/**	**$62.27/**	**$52.37/**	**Cost/**	**Cost/**	**Hours/**	**Total Costs/**
Activity	**hour**	**hour**	**hour**	**Year**	**Year**	**Year**	**Year**
Update Reporting Guidance and System Instructions	24	0	0	$1,766.02	$0.00	24	$1,766.02
Notify System Users of Data Call	24	0	0	$1,766.02	$0.00	24	$1,766.02
Conduct Training	40	0	0	$2,943.36	$0.00	40	$2,943.36
Update Web Site	0	12	16	$1,585.15	$0.00	28	$1,585.15
Solicit and Compile Feedback from Users	16	0	0	$1,177.34	$0.00	16	$1,177.34
Respond to User Comments and Questions	40	0	0	$2,943.36	$0.00	40	$2,943.36
Contractor support					$24,000.00		$24,000.00
Total Administrative Burden	144	12	16	$12,181.25	$24,000.00	172	$36,181.25

Source: http://www.opm.gov/oca/10tables/html/gs_h.asp (step 5); rates include a benefits multiplier of 1.6

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

GLNPO estimates that 358 state, local, and tribal government agencies, 100 non-governmental organizations, and 13 federal agencies are likely to report to the GLAS annually. The total burden and costs are summarized in Table 10.

Table 10. Estimated Annual Burden Cost*

Respondent Type	Annual Total Hours Per Project	Annual Total Cost Per Project	Average Number of Projects/ Year	Total Annual Hours	Total Annual Cost
State, Local, and Tribal Government Agencies	33	$1880.14	463	15,279	$870,506.01
Non-governmental Organizations	41.1	$2608.08	131	5,384	$341,657.99
Federal Agencies	19	$1239.73	50	950	$61,986.40
Total	Varies	Varies	644	21,613	$1,274,150.40

Note: Respondents will not incur capital or operations and maintenance costs for this information collection

6(e) Bottom Line Burden Hours and Cost Tables

As of March 9, 2010, the total annual cost for this information collection is estimated to be $1,310,331.65. The bottom line burden hours and costs for each respondent group, federal administrative hours, and operations and maintenance costs are listed in Table 11.

Table 11. Bottom Line Burden Hours and Costs

Line Item	Annual Hours	Annual Cost	Average Number of Projects Per Year	Total Burden Hours Per Year	Total Cost Per Year
State, Local, and Tribal Government Agency Responses	33	$1880.14	463	15,279	$870,506.01
Non-governmental Organization Responses	41.1	$2608.08	131	5,384	$341,657.99
Federal Agency Responses	19	$1239.73	50	950	$61,986.40
Total Respondent Cost	Varies	Varies	644	21,613	$1,274,148.50
Total Respondent Burden hours					
Federal Administrative Hours	0.27[1]	$18.91[1]			$12,181.25
Federal Operations and Maintenance (Contractor Support)					$24,000
Total			644		$1,310,331.65

1. Average labor hours and labor cost in Table 8 Per Project.

(iii) Variations in the Annual Bottom Line

GLNPO does not anticipate significant variations in the annual bottom line.

6(g)   Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 33 hours per project for state, local, and tribal government agencies, 41.1 hours per project for non-governmental organizations, and 19 hours per project for federal agencies. Burden is defined as 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 estimate 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 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, 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 OMB Control Number 2005-NEW in any correspondence.