

**SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST NUMBER 2050-0139
“REPORTING AND RECORD KEEPING REQUIREMENTS UNDER
EPA’S WASTEWISE PROGRAM”**

June 3, 2011

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

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

This Information Collection Request (ICR) is entitled “EPA’s WasteWise Program,” EPA ICR No. 1698.09, OMB Control No. 2050-0139.

1(b) **Short Characterization**

This submission is intended to request renewal of an ICR for EPA’s WasteWise Program, as described in this document. EPA’s existing ICR was approved in 2008, with Terms of Clearance, for a three year period. The existing ICR expires on June 30, 2011. EPA’s efforts to comply with the Terms of Clearance are discussed below.

Overview

The WasteWise program is an EPA partnership program that encourages companies, non-profit organizations, state/local/tribal/federal governments, schools, colleges, and universities to engage in waste reduction activities. WasteWise activities focus on waste prevention, recycling collection, and purchasing or manufacturing recycled-content products. The program was developed and is managed by EPA’s Office of Resource Conservation and Recovery (ORCR), Resource Conservation and Sustainability Division (RCSD).

WasteWise began in 1994 and since then has helped more than 3,000 organizations, including small, medium, and large businesses; local, state, and federal governments; and other public and private sector organizations plan, develop, and implement cutting-edge waste reduction programs and measure their results. It was one of the first programs developed to specifically focus on waste prevention and recycling as a way to bring about waste reduction and provide environmental benefits, while at the same time reducing overall costs. The program provides one-on-one technical assistance, tools, and resources to assist member organizations in designing waste reduction programs that are flexible, yet tailored to their individual needs. WasteWise offers a program-specific on-line web-based data management and reporting system to track and report partner progress in the program. It also uses EPA’s Waste Reduction Model (WaRM) to quantify the environmental benefits of partner actions in the program. Mentoring opportunities are also available to allow like-sector organizations the benefit of implementing waste reduction program elements that are proven to work.

The WasteWise program is viewed nationally, as well as internationally, as a model program to help organizations bring about waste reduction in a cost-effective manner. Many states promote the use of WasteWise to help organizations in their state achieve greater waste reduction. Over the years, several international government agencies have consulted with EPA and tailored their national partnership programs after the WasteWise model. It has become apparent over the years that the WasteWise program provides a cadre of resources and technical assistance that are unique in promoting waste reduction and obtaining measurable results.

In return for their participation in the program, active WasteWise Partners and Endorsers receive:

- A well-developed approach to program design, implementation, and documentation of results that can be implemented within a variety of organizations;
- Recognition opportunities through annual awards and being featured on the WasteWise Web site and other WasteWise publications;

- Opportunities to network with individuals implementing waste reduction activities in a variety of industry sectors;
- Access to an online data management and reporting system to facilitate internal tracking and allow for better waste management;
- Helpline, program representative, and list server services that assist with the identification of waste reduction opportunities, setting measurable goals, and researching technical questions;
- Access to a library and Web site of technical assistance resources to assist in achieving waste reduction goals; and
- A climate benefits profile which provides a summary of the amount of equivalent greenhouse gas (ghg) reductions that results from a partner's waste prevention and recycling efforts.

During 2011, EPA transitioned its municipal solid waste management focus to promote sustainable materials management (SMM). SMM is a life-cycle approach to resource conservation and waste prevention and management. Its purpose is to eliminate waste throughout the life of materials use – from extraction through intended use, ultimately reducing the amount of materials used; wastes generated; and associated environmental impacts. EPA plans to target specific waste streams and sectors in transitioning to its SMM focus and the WasteWise tools; technical assistance; and data management and reporting system will be an integral part of this overall effort. Data collected as part of the SMM initiatives will be obtained through the existing WasteWise data management system. Data collection forms will be provided to OMB for approval and will include cost burden estimates. Section 7 of this ICR provides more details of how EPA plans to use key WasteWise program elements as a tool for promoting SMM.

WasteWise Partners

Partner participation begins when an organization submits an online **Partner Registration Form** (Attachment E) that provides general information. Partners submit a **Partnership Agreement Form** committing them to identify specific goals, make continuous improvements, and report data in order to remain an active Partner in the program (Attachment O). Organizations that fulfill their partnership commitments are considered active partners and receive benefits including access to the online data management system, name in the Partner listing on the WasteWise Web site, and ability to use the WasteWise logo. Organizations that do not meet their commitments have their access to the online data management system revoked, name removed from the Partner listing on the WasteWise Web site, and are not allowed to use the WasteWise logo.

Partners can establish reporting protocols as a single entity or include multiple reporting sites within their organization. Partners are allowed up to two months to provide baseline data and self-identified goals in the areas of waste prevention; recycling; buy-recycled and/or manufacturing products with recycled content via the **Partner Annual Assessment Form** (Attachments F-J). Partners can add additional users to their online account by submitting a **New Contact Form** (Attachment K). The first year of membership is the only time during which partners are asked to submit baseline data. Partners use the same annual assessment form to submit annual data for every year that they are active in the WasteWise Program. By comparing the baseline data to subsequent annual data, EPA is able to determine a partner's waste reduction achievements over time.

The WasteWise program currently has 568 active partners (as of April 1, 2011). EPA expects WasteWise membership to increase by 76 active partners during each year of this ICR. While there is no cost to join as a WasteWise Partner, the information collection activities are estimated on average to cost each partner organization approximately

\$2,706 the first year they are in the program and \$2,631 each subsequent year. However, EPA also expects that for many of the organizations, these costs will be off-set to realize substantial cost savings through implementation of their waste reduction initiatives reported under WasteWise. In fact, information provided to the Agency shows that savings of hundreds of thousands, or even millions, of dollars is common for a large corporation, while even for small companies, significant savings can be realized.

WasteWise Endorsers

WasteWise also includes another component called the WasteWise Endorser Program. Various organizations, including non-profit organizations, and federal, state, and local governments, become WasteWise Endorsers and commit to recruiting their members and other constituents to become WasteWise Partners. Many WasteWise Endorsers go on to provide ongoing promotional and/or technical waste reduction information.

Joining the WasteWise Endorser Program involves submitting the online **Endorser Registration Form** (Attachment L), which provides general contact information, the number of business members the organization has, the primary business sectors represented, and the activities that the endorser will conduct. This form and all information submitted are housed in Re-TRAC (see below). Endorsers can add additional users to their online account by submitting a **New Contact Form** (Attachment K). A new requirement for the Endorser Program starting in 2011, will be for Endorsers to submit an **Endorser Agreement Form** (Attachment P) which commits them to identify specific goals and actions they plan to take in the following year. WasteWise will also require Endorsers to submit an **Endorser Annual Assessment Form** (Attachment M) by March 31 each year, reporting their promotional, outreach, and other endorser-related efforts (first submissions will be March 31, 2012). Organizations that fulfill their Endorser commitments are considered active Endorsers and receive benefits including access to the online data management system, name in the Endorser listing on the WasteWise Web site, and ability to use the WasteWise logo. Organizations that do not meet their commitments have their access to the online data management system revoked, name removed from the Endorser listing on the WasteWise Web site, and are not allowed to use the WasteWise logo.

EPA will track the information from the Endorser forms to establish participation in the program, understand the activities being undertaken by each endorser, and identify opportunities to assist them in their efforts (e.g., providing materials and/or a speaker). Some WasteWise Partners may also choose to enroll in the program as Endorsers. In these instances, the organization must submit separate registration forms, agreement forms, and all related reporting forms required for both Partners and Endorsers.

The WasteWise Endorser Program currently has 86 active endorsers (as of April 1, 2011). EPA expects membership in the WasteWise Endorser Program to increase by 11 active endorsers during each year of this ICR. While there is no cost to join as a WasteWise Endorser, the information collection activities are estimated on average to cost each endorser organization approximately \$593 in their first year in the program and \$375 each subsequent year. While Endorsers are unlikely to realize cost savings from their WasteWise activities, Partners that join the program as a result of WasteWise Endorser activities are expected to realize substantial cost savings.

The WasteWise Program also allows Endorsers who have members to create a WasteWise Affiliate Network. Through the affiliate network, Endorsers can use WasteWise to track their members' progress in their organization's waste reduction initiatives. Affiliate organizations' members join WasteWise as Partners and the Endorser

is then given access to the member organizations reported data. This allows the Endorser to better organize its members' waste reductions efforts.

WasteWise Re-TRAC

In 2008, EPA began developing a customized portal in Re-TRAC, an existing waste management database, for the WasteWise program after identifying a need to streamline data collection, efficiently report on the program, and provide additional support for the Waste Wise Partners. The system has been completed and since 2010, EPA has collected and stored WasteWise Partner and Endorser information in the online data management and reporting system. EPA uses the information collected under the WasteWise program to track the activities of individual organizations participating in the program, recognize partner accomplishments, and identify effective waste reduction strategies to share with the other organizations. Approved paper information collection forms were translated into a user-friendly online format. For example, the online system walks WasteWise Partners through the Partner Annual Assessment Form page-by-page until all of the data is entered. Also, users are able to select from convenient drop-down menus that are populated with the most commonly observed data and "other" options as needed (e.g. most commonly recycled materials). Users can access Re-TRAC at no charge at their convenience, save information and return to it later, and add additional contacts using the **New Contact Form**.

In addition to collecting information from WasteWise Partners and Endorsers, Re-TRAC also provides members with internal tracking and customized reporting functions. EPA headquarters and regional offices have various reporting functions as well for improved program management.

1(c) Existing Terms of Clearance

EPA received ICR renewal approval for the WasteWise Program on June 24, 2008 (ICR reference Number 2007007-2050-001). This approval expires on June 30, 2011. A copy of this approval is included as Attachment A. Under the ICR's Terms of Clearance, EPA was required to evaluate the Program and develop a statistical methodology that could quantify the Program's impact on partner behavior using randomized control trials (RCTs), subject the methodology to peer review, incorporate peer review comments, and include the methodology with this ICR renewal. Specifically the Terms required the methodology to address the following issues: appropriate baseline; appropriate entity boundaries for reporting; conditions for self-selection bias; and low response rates from the partners and low item response rates from the partners. EPA was also asked to provide the following information: overall response rates from the participants; item non-response rates for each question in Section II of the approved Registration Form and Sections II through IV in the approved Assessment Form; descriptive statistics (including, but not limited to, mean, median, and mode) of the responses for each question in Section II of the approved Registration Form and Sections II through IV in the approved Assessment Form.

1(d) EPA Actions to Comply with Terms of Clearance

After the 2008 ICR approval, EPA conducted two research projects in an effort to evaluate the use of RCTs and other econometric approaches for the WasteWise Program. The results of these efforts are discussed below.

(i) *WasteWise Program Evaluation*

EPA's Office of Policy (OP) and the Office of Resource Conservation and Recovery (ORCR) commissioned a study of the WasteWise Program under OP's Program Evaluation Competition. The findings were published in July of 2010. The evaluation examined the WasteWise Program in the context of OMB's Terms of Clearance requiring the development and submission of a peer-reviewed econometric-based methodology for assessing the Program's impact on partner behavior. In general, the Evaluation found that RCTs and other econometric approaches are unlikely to be either practical or robust for partnership programs, due to data limitations and the complexity of the program interventions that make it difficult to isolate a control group. Specifically, the Program Evaluation found that:

- RCTs and other statistical methodologies that compare participants to non-participants do not appear to be feasible or theoretically valid approaches for estimating the benefits of partnership programs. These methods are problematic due to the extensive resources required and confounding impact of program designs that emphasize dissemination of information to non-participants;
- The literature suggests that links exist between certain external factors and the decision by firms to enter partnerships programs, but the specific impact of these factors is difficult to predict. Input from partners in literature reviews, evaluations, and case studies suggest that partnership programs may in some cases be complementary with existing strategies. In these cases, the programs may not be the root cause of new behaviors in organizations, but may help advance or broaden the adoption of new behaviors in non-linear ways. This further complicates efforts to isolate "program" impacts, even when it appears that program participation has provided significant value; and
- Limited available data and the limited applicability of RCT methods suggest that robust trend analysis considering behavioral changes over time among participants may be the most tractable methods for estimating program impacts.

The full results of this evaluation are included as Attachment B.

(ii) *Discussion Paper on Attribution*

EPA obtained the services of Resources for the Future (RFF) to analyze the challenges and options of attributing benefits to partnership programs. The result of that effort was a discussion paper entitled, *Attributing Benefits to Voluntary Program's in EPA's Office of Resource Conservation and Recovery* (March 2011).

Like the WasteWise Program Evaluation, the RFF study concluded that specific features of partnership programs make it difficult, and often impractical, to use full scale statistical analysis (like RCTs) to assess the direct influence of programs on partner behavior. Specifically, the paper identifies the following obstacles as reasons why quantifying direct causality can be difficult: sample bias; breadth of confounding factors; non-uniform interventions and outcomes; ambiguous intervention events; and spillover effects.

The discussion paper and all results are included as Attachment C.

(iii) Response Rates and Descriptive Statistics

The 2008 Terms of Clearance also required EPA to submit various response rate statistics for the three year duration of the ICR. Specifically, the Terms of Clearance requested:

- Overall response rate from WasteWise participants;
- Non-response rates for specific questions in the Registration and Annual Assessment forms; and
- Descriptive statistics (including, but not limited to mean, median, and mode) of the responses to specific questions in the Registration and Annual Assessment Forms.

EPA has compiled and evaluated all partner reporting activities and reported data from 2008 through 2010. EPA has included this statistical information in Attachment D.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

As stated by Congress (42 U.S.C. #13101-13103. 1990) and EPA (*The Solid Waste Dilemma: An Agenda for Action*. 1989 530-SW-89-019. pp. 16-21), 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. The Agency has developed a hierarchy asserting that waste should be prevented or reduced at the source whenever feasible and waste that cannot be prevented should be recycled where possible. The Resource Conservation and Recovery Act (RCRA) directs EPA to "...promote the protection of human health and the environment and to conserve valuable materials and energy resources ..." (42 section 6902(a)) and "...promote the demonstration, construction, and application of solid waste management, resource recovery, and resource conservation systems which preserve and enhance the quality of air, water, and land resources ..." (42 section 6902(a)(10)). In addition, "The Congress finds that (1) significant savings could be realized by conserving materials in order to reduce the volume or quantity of material which ultimately becomes wastes: (2) solid waste contains valuable energy and material resources which can be recovered and used thereby conserving increasingly scarce and expensive fossil fuels and virgin materials; ..." (Section 4001(a)). The WasteWise program and associated information collection activities will assist EPA in meeting the aforementioned objectives of RCRA by facilitating the prevention and recycling of wastes by participating organizations.

EPA collects initial information in the **Partner Registration Form** to formally establish participation in the WasteWise program. Partners also submit a **Partner Agreement Form** committing to take certain actions to remain in the program. These forms obtain general information on new WasteWise partners; identify the facilities committed to implementing the WasteWise initiatives relating to waste prevention, recycling, and buy/manufacture recycled-content products; and gain insight on new partners' areas of interests/priorities.

EPA also needs to collect annual information in the **Partner Annual Assessment Form** to better understand and assist each partner's waste reduction efforts and progress and to identify effective waste reduction strategies to share with others. Furthermore, as mentioned earlier, by compiling partners' baseline waste reduction data, WasteWise will

be able to more accurately determine the progress made by its partners in their waste reduction efforts.

The New **Contact Form** is used by a Partner or Endorser when granting a new user (within their organization) access to the online data management and reporting system.

For the WasteWise Endorser Program, EPA needs to collect initial information in the **Endorser Registration Form** to establish participation in the Endorser Program and to obtain general contact and membership information, as applicable. EPA also plans to collect information in the **Endorser Annual Assessment Form** on recruitment and ongoing activities to remain apprised of Endorser activities that bring new partners into the WasteWise program (see Sections 4(b)(v) and 5(a)(v)).

2(b) Practical Utility/Users of the Data

The information collected by the WasteWise program is not required for regulatory purposes by ORCR or other EPA offices. These data are reported by individual WasteWise members as a condition to remain active in the program. The data represent members' progress they make towards waste reduction goals, including waste prevention, recycling collection, and buying or manufacturing recycled-content products activities. EPA does not conduct facility audits of WasteWise members; however, a quality assurance process is in place to review member data for accuracy. Details of this process are discussed in Section 5(a)(ii). EPA provides tools, technical assistance, and mentoring opportunities to assist members in planning, developing, and implementing their waste reduction program efforts. Often this assistance allows members to set higher waste reduction goals and achieve greater results than originally anticipated.

Specifically, EPA uses the information collected in the **Partner Registration Form** to track organization status, prepare reports and mailing lists, and determine the focus of future WasteWise outreach efforts (based on partners' identified priorities). Additional contacts for any organization can be added using the **New Contact Form**.

EPA uses the information collected in the **Partner Annual Assessment Form** to record the participant's activities and progress in the WasteWise data management and reporting system; identify, develop, and disseminate case studies and other materials on key waste reduction practices; identify areas where additional technical assistance or information would be useful for individual Partners or more generally for program participants (e.g., high recycling figures for corrugated containers might indicate an opportunity for transport packaging reductions); recognize organizations with significant waste reduction accomplishments; evaluate opportunities for improving the WasteWise program, and measure the program's progress as well as progress towards sustainable materials management goals. Information on Partner results may be published in an annual report, however, this report has not been published since 2008.

EPA uses the general information collected in the **Endorser Registration Form** to track organization status and prepare reports and mailing lists. EPA will use the information collected in the **Endorser Annual Assessment Form** to learn about promotional activities and share successful strategies with other Endorsers, and offer assistance for these activities, such as providing materials for mailings or speakers for conferences (see Sections 4(b)(v) and 5(a)(v)).

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

The information obtained under this ICR is not duplicative nor is it currently collected by EPA or any other federal agency. Other non-federal organizations sponsor partnership programs that promote recycling collection or buying recycled products, but they do not offer a comprehensive waste reduction program that emphasizes the cost saving and environmental benefits of waste reduction. ORCR continues to work with these non-federal organizations to ensure that efforts are not duplicative.

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 February 23, 2011 (76 FR 10022). The public comment period ended on April 25, 2011. EPA received no comments on this ICR in response to the *Federal Register* notice.

3(c) Consultations

Since the last ICR approval, EPA has implemented an online data management and reporting system for use by Partners and Endorsers. Prior to launching this new system, EPA consulted with long-standing WasteWise members to beta-test the online system. WasteWise staff also conducted personal interviews with specific program members to discuss the utility of the registration forms, annual assessment forms, and other online features. Interviews were conducted with the following WasteWise members:

Name	Organization	E-Mail Address
Kirby Kraft	Anheuser-Bush	kirby.kraft@anheuser-busch.com
Bruce Norton	Constellation Energy	bruce.a.norton@constellation.com
John Bradburn	General Motors	john.bradburn@gm.com
Tom Costantino	PSEG	thomas.costantino@pseg.com
Charlie Vidich	USPS	charles.vidich@usps.gov
Don Curran	Virco Mfg	doncurran@virco.com
Vicki Bushnell	Kitsap County, WA	vbushnel@co.kitsap.wa.us
Kathleen Tobin	Verizon	kathleen.tobin@verizon.com
Kinley Deller	King County, WA	kinley.deller@kingcounty.gov

WasteWise also conducted webinars to allow members to test the system. We created test accounts so members could input data and trial the system. We evaluated time, functionality of the system, utility, ease of use, and maneuverability within the system. The feedback received allowed us to make key enhancements to the automated system in an effort to improve access and facilitate data entry. In addition, EPA headquarters consulted with regional offices to identify types of reports needed to improve partner support and outreach. WasteWise then built the necessary capabilities within the online system to satisfy their needs.

Once EPA launched the new online system, we held a series of webinars for existing and potential WasteWise members. From these webinars, additional enhancements were made. EPA has taken great care to make the transition to our online automated system as seamless and workable as possible for our members.

According to unsolicited feedback that we have received from Partners, the new online data management and reporting system has had a positive effect on the program. Many participating partners use the online system for internal tracking and reporting purposes, and appreciate the ability to sort their data and run customized reports. Of particular benefit is the system's ability to allow Partners and Endorsers to enter data for individual reporting locations within their organization.

3(d) Effects of Less Frequent Collection

The **Partner Registration Form** and **Endorser Registration Form** are one-time submissions for organizations wishing to participate in the WasteWise program. The **New Contact Form** is used to add additional users to an existing Partner or Endorser account

Within two months of registering, Partners submit the online **Partner Annual Assessment Form** with waste reduction baseline data and goals. This is also a one-time submission. Once baseline data is collected, Partners submit annual waste reduction data using the **Partner Annual Assessment Form** by March 31 of each year for the preceding calendar year, for as long as they remain active in the program.

Endorsers will submit the **Endorser Annual Assessment Form** by March 31 of each year for the preceding calendar year, detailing their annual recruitment and promotional activities for as long as they remain active in the program.

WasteWise believes that the frequency of data collection is appropriate and mirrors existing organization's internal annual reporting. Less frequent collection of annual assessment reports would hinder any WasteWise efforts to:

- Analyze program data to develop timely and successful strategies for engaging with members to achieve greater waste reductions;
- Review Partner activities in order to publicly recognize significant waste reduction activities; and
- Generate relevant and timely case studies and success stories that are helpful to members.

3(e) General Guidelines

All of the collection activities described within this ICR fall within OMB's General Guidelines.

3(f) Confidentiality

No information collected by EPA under the WasteWise program comprises confidential business information.

3(g) Sensitive Questions

No questions asked by EPA under the WasteWise program are of a sensitive nature.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents

The WasteWise program targets a broad audience, including small, medium, and large size businesses, nonprofit organizations, schools, colleges, universities, and federal, state, local, and tribal governments.

The WasteWise Endorser Program targets trade associations, membership organizations, and federal, state, local, and tribal organizations in this supporting statement.

4(b) Information Requested

When a member organization joins the WasteWise program as a Partner or Endorser, they register via the online **Partner Registration Form** or **Endorser Registration Form**. New partners are required to provide WasteWise with baseline waste reduction data within two months of registration using the **Partner Annual Assessment Form**. By March 31 of each year, all existing members and new members that joined the program before August 1 of the preceding year must report on the progress made toward achieving their goals using the online **Partner Annual Assessment Form** or **Endorser Annual Assessment Form**. Partners can add additional users to their online account by submitting a **New Contact Form**.

(i) *Partner Registration Form*

Program participants complete and submit to EPA a standard online **Partner Registration Form** that provides the following information:

Data items:

- Organization name, parent organization name (if applicable), and industry sector;
- Organization contact information including address, and website;
- Names and location of participating facilities;
- Aggregate number of employees at all participating facilities;
- How the member heard about the WasteWise program;
- Organization's primary contact's name; title; address, phone, fax and alternate number; and email address;
- Goals and activities; and
- Affiliate Networks, if any.

Respondent activities:

- Review the WasteWise materials and requirements;
- Select a primary contact person for the WasteWise program;
- Gather current waste management data to develop a baseline of waste reduction activities;
- Create a password for access to Re-TRAC;
- Accept participation requirements detailed in the **Partnership Agreement** included on the **Partner Registration Form**; and

- As part of the registration process, partners are required to submit baseline data. This data is submitted using the **Partner Annual Assessment Form** as detailed below.

(ii) Partner Annual Assessment Form

WasteWise Partners are required to submit baseline data one time via the online Annual Assessment Form and within 60 days of registering with the Program. WasteWise Partners are required to submit annual program results. **Partner Annual Assessment Forms** are due by March 31 of each year for data from the preceding calendar year data. The online **Partner Annual Assessment Form** contains both qualitative information and quantitative data.

Data items:

- **Municipal Solid Waste Disposed**
 - Weight of waste disposed via landfill and/or incineration (pounds and/or tons); and
 - Activity description and/or goals for upcoming year.
- **Waste Prevention and Recycling**
 - Type of material;
 - Weight of waste prevented and/or material recycled (pounds and/or tons); and
 - Activity description and/or goals for upcoming year.
- **Buying or Manufacturing Recycled-Content Products**
 - Type of product purchased or manufactured;
 - Current and previous recycled content percentages;
 - Amount purchased or manufactured (pounds and/or tons); and
 - Comments and/or goals.
- **Cost Savings and/or Revenue**
 - Dates for cost savings and/or revenue;
 - Total waste prevention revenue generated;
 - Total recycling revenue generated;
 - Total avoided purchasing costs due to waste prevention; and
 - Total avoided disposal costs due to recycling and waste prevention.
- **Comments**
 - A partner may provide additional information on its waste reduction activities (e.g., external promotion of WasteWise, employee education, etc.) or comments about the WasteWise program.

WasteWise expects that the information needed for the **Partner Annual Assessment Form** is kept as a common business practice by companies implementing waste reduction programs. Therefore, recordkeeping activities associated with reporting are not included in this ICR.

Respondent activities:

- Conduct a waste assessment or account for annual waste reduction efforts;
- Review waste management records to assess progress during the reporting year;
- Set new self-identified waste reduction goals;
- Complete and submit the online **Annual Assessment Form**;
- Respond to EPA questions about reported data; and
- As noted above (under **Partner Registration Form**), partners use the **Annual Assessment Form** to submit baseline data online and within 60 days of registering for the program.

(iii) Endorser Registration Form

Endorsers complete and submit an online **Endorser Registration Form** that provides basic information and describes recruitment and promotional activities.

Data items:

- Organization name;
- Name, title, address, phone number, fax number, and email address of the endorser's principal contact person;
- Approximate number of business members in the organization;
- List of primary business sectors represented by the organization (e.g., NAICS codes);
- Description of proposed recruitment campaign to encourage the organization's members (e.g., local businesses) to become WasteWise Partners; and
- Description of proposed ongoing activities to promote WasteWise and/or provide information to organization members on waste reduction strategies.

Respondent activities:

- Review the WasteWise Endorser Program information;
- Identify ongoing promotional and support activities;
- Select a primary contact person for the WasteWise Endorser Program; and
- Complete and submit the online **Endorser Registration Form**.

(iv) Endorser Annual Assessment Form

In 2011, WasteWise plans to develop a form that will allow Endorsers to track and report their annual achievements. Endorsers will be required to complete and submit the **Endorser Annual Assessment Form** by March 31 of each year for the preceding year's activities (first submission will be March 31, 2012). The online **Endorser Annual Assessment Form** will contain information on the Endorsers' annual recruitment and promotional activities, as well as new goals for the following year.

Data items:

- **Promotional Activities**
 - Description of activities conducted to promote waste reduction and WasteWise; and
 - Frequency of promotional efforts.
- **Promotional Results**
 - Number of organizations and/or people reached with promotional efforts;
 - New organizations joining WasteWise following promotional efforts; and
 - Number of WasteWise Partners that the Endorser provided with tracking and reporting assistance.
- **Comments**
 - The Endorser may provide any additional information on its recruitment and promotional activities and promotional goals for the upcoming year.

Endorsers can use the online data management and reporting system as the sole method to record, track, and report their endorsement activities. Therefore, no separate “recordkeeping” activities will be required. As a result, activities associated with separate recordkeeping, beyond data entry into the system, are not included in this ICR.

Respondent activities:

- Review recruitment and promotional activities to assess progress during the reporting year;
- Set new recruiting and promotional goals; and
- Complete and submit the online **Endorser Annual Assessment Form**.

(v) New Contact Form

Partners and Endorsers may elect to have multiple users access the online data management and reporting system in order to facilitate reporting at different locations. The **New Contact Form** is used by members when granting a new user (within their organization) access to the online data management and reporting system. There are two versions of this form, one for individuals to request access for themselves to the WasteWise online data management and reporting system and one for account administrators to add additional users. The only difference between the two versions is that the account administrators have two additional fields to assign and/or restrict each user’s rights within the WasteWise online data management and reporting system. Burden estimates for this form are included in estimates provided for the **Partner Registration Form** and **Endorser Registration Form** since this is an extension of registration information.

Data items:

- Organization name, reporting location, and state;
- Contact’s name; title; address, phone, fax and alternate number; and email address;
- User access level: Primary or Reporting (For account administrators only); and

- User location access: Establish/Restrict a user's access to one or more locations (For account administrators only).

Respondent activities

- Create a password for access to Re-TRAC.

5. **THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

5(a) **Agency Activities**

Under the WasteWise program, EPA engages in various activities related to the following five forms:

(i) ***Partner Registration Form***

- Maintain **Partner Registration Forms** in the online data management and reporting system and public WasteWise website;
- Answer questions posed by potential participants regarding program membership;
- Review and approve new partner registration forms;
- Place welcome calls to new partners; and
- Email welcome letters to new partners containing participation information and links to program resources.

(ii) ***Partner Annual Assessment Form***

- Maintain the online data management and reporting system containing annual assessment data entered by members. This online system is also a tool to assist partners in measuring and tracking waste reduction progress;
- Provide tools to assist partners with measuring, tracking, and reporting progress. These tools range from resources posted to the program website, a staffed helpline, and periodic webinars;
- Email partners to remind them to submit data by due dates:
 - New partners must submit baseline waste reduction data and goals within two months of registering for the program;
 - Existing Partners must submit waste reduction data and new goals by March 31 of each year for the proceeding calendar year; and
- Answer questions regarding the **Partner Annual Assessment Form**, and once received, review it for consistency and completeness, making follow-up inquiries as needed.
 - **Reported Data Quality.** The WasteWise program employs a quality assurance process that involves reviewing the data submitted by each Partner and determining whether the reported results appear consistent with the volumes reported by the Partner in previous years for similar activities. If newly submitted data appear to be the exact same as data submitted in previous years or appear to be cumulative rather than simply for the current reporting year period, the Partner is contacted to clarify the reported

results. For reported amounts above 1,000,000 pounds, Partners are contacted to confirm the order of magnitude and to prevent any errors of interpretation. In addition, data are reviewed to ensure that only acceptable WasteWise materials and activities are included in the amounts reported. Once this thorough review is complete, the data is verified. Only data verified through the quality assurance process is included in official program data.

- Develop Climate Change profiles, for each Partner, which provides annual summaries of verified data and related greenhouse gas impacts using EPA's WaRM.

(iii) *Endorser Registration Form*

- Maintain **Endorser Registration Forms** on the public WasteWise website;
- Answer questions posed by potential Endorsers regarding membership in the program;
- Review and approve new **Endorser Registration Forms**;
- Place a welcome call to new Endorsers; and
- Email welcome letters to new Endorsers containing participation information and links to program resources.

(iv) *Endorser Annual Assessment Form*

As noted above, this is a newly developed form. WasteWise anticipates undertaking the following activities in association with this form:

- Maintain the online data management and reporting system containing annual assessment data entered by members. This web based system is also a tool to assist Endorsers in measuring and tracking promotional and recruiting activities;
- Provide tools to assist Endorsers with their promotional and recruitment efforts. These tools range from resources posted to the program website, a staffed helpline, and periodic webinars;
- Email Endorsers to remind them to submit data by due dates:
 - Endorsers must submit the previous year's promotional and recruiting data and new goals by March 31 of each year for the proceeding calendar;
- Answer any questions regarding the **Endorser Annual Assessment Form** and once received, review it for consistency and completeness, making follow-up inquiries, as needed;
 - **Reported Data Quality.** The WasteWise program reviews the data submitted by each Endorser and determines whether the information reported appears consistent with the activities and goals reported in previous years. If newly submitted data appear to be the exact same as submitted in previous years or appears to be cumulative rather than simply for the current reporting year period, the Endorser is contacted to clarify the reported results. In addition, reported information is reviewed to ensure that only acceptable WasteWise activities are included. Once this thorough review is complete, the data is verified. Only verified data is included in official program data.

(v) *New Contact Form*

- Maintain New Contact Form in the online data management and reporting system;
- Email contacts on the form that they have access to the online data management and reporting system; and
- When requested, provide newly activated contacts with assistance in accessing the online system.

5(b) Collection Methodology and Management

EPA relies on its online forms and database to collect, store, and evaluate the data submitted by Partners. EPA reviews each submission to ensure the collected information is reasonable and complete. The data are used to identify prominent waste reduction strategies, develop and publish case studies of significant accomplishments, and steer the program's priorities for the upcoming year. In addition, members can use the online data management and reporting system to benchmark data and evaluate trends.

The data collected under this ICR is reported by individual WasteWise members as a condition to remain active in the program. The data represent members' quantified progress that they made towards waste reduction goals (in areas such as waste prevention, recycling collection, and buying or manufacturing recycled-content products). EPA does not conduct facility audits of WasteWise members; however, a quality assurance process is in place to review reported data for accuracy and adherence to goals as described in Section 5(a)(ii).

WasteWise uses the collected data to record participant's activities and progress made in waste prevention and recycling, identify technical assistance needs for each participant, and develop case studies and mentoring opportunities that can be used by participants to enhance their waste reduction programs.

Data are also used to report the overall results of members involved in the program. Any time data is aggregated and/or disseminated, EPA follows the existing Terms of Clearance and qualifies its results to ensure attribution (i.e., program's impact on Partner achievements) is not implied. EPA will work with OMB to develop a methodology to better characterize the program's influence on Partner behavior and results. Once a methodology is developed, EPA would like to disseminate and use the program results from WasteWise with attribution.

5(c) Small Entity Flexibility

Some of the participants in the WasteWise program will be small entities. EPA designed its online reporting forms to be highly flexible and dependent on activities in order to minimize respondent burden, while obtaining sufficient and accurate information. Organizations can also choose the number of facilities to include in the program and choose their own goals based on resources. In addition, the burden associated with the WasteWise program is greatly reduced for small entities in particular because the program offers direct one-on-one mentoring and a helpline that provides support especially valuable for small organizations allowing them to fully participate in the program.

5(d) Collection Schedule

Organizations may join the WasteWise program by submitting the online **Partner Registration Form** at any time. New Partners submit baseline waste reduction data and goals via the online **Partner Annual Assessment Form** within two months of joining the program. All existing Partners' online **Partner Annual Assessment Forms** are due to EPA by March 31 of every year for the proceeding calendar year that the partner participates in the program.

Trade associations and other membership-based organizations may join the program by submitting the online **Endorser Registration Forms** at any time. All existing Endorsers' online **Endorser Annual Assessment Forms** will be due to EPA by March 31 of every year for the proceeding calendar year that the Endorser participates in the program.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Tables 4-6 present the burden hours, costs per respondent, and total for all respondents during each of the three years covered under this ICR. WasteWise members are divided into three sectors representing: Private, State/Local, and Federal.

The **Partner Registration Form** contains basic questions, and thus the burden is expected to be minimal. The overall burden, as shown in the tables, is estimated to be one hour per participant. This burden level is an estimate based on 17 years of WasteWise program experience. The burden estimate for the **Partner Registration Form** is for completing and submitting the form only.

Completing the **Partner Annual Assessment Form** entails assessment, reporting, and recordkeeping activities. The overall annual labor burden for Partners is expected to average 34.5 hours per participant; this estimate is based on 17 years of WasteWise program experience. Burden hours for the **Partner Annual Assessment Form** are for conducting a waste assessment, collecting data, entering data into the online data management and reporting system, and reporting activities.

In the first year of membership, new Partners are estimated to spend 35.5 hours (one hour on the **Partner Registration Form** and 34.5 hours on the **Partner Annual Assessment Form**, i.e. providing baseline data) on the information collection activities. It is estimated that Partners spend 34.5 hours (on the **Partner Annual Assessment Form**) for subsequent years in the program. Estimates for submitting information associated with the **New Contact Form** are included in the burden estimates for the **Partner Registration Form** and **Endorser Registration Form** since this information is an extension of registration.

The **Endorser Registration Form** asks for basic information and requests brief descriptions of promotional activities, and thus the burden is expected to be minimal. The overall burden, as shown in Tables 4-6, is estimated to be three hours per participant; this estimate is based on 17 years of WasteWise program experience. All burden hours for the **Endorser Registration Form** are for reporting only.

Completing the **Endorser Annual Assessment Form** entails assessment, reporting, and recordkeeping activities. The overall annual labor burden for Endorsers is expected to average five hours per participant. Burden hours for the **Endorser Annual Assessment Form** are for accounting for annual efforts, assessing progress, entering data into the online data management and reporting system, and reporting activities.

6(b) Estimating Respondent Costs

Currently, WasteWise has 568 active Partners and 86 active Endorsers. WasteWise anticipates receiving 343 new **Partner Registration Forms** and 54 new **Endorser Registration Forms** each year under this ICR. Of these new registrants, WasteWise anticipates 76 Partners and 11 Endorsers will fulfill their membership requirements and submit **Annual Assessment Forms** each year. The membership breakdown by sector over the next three years is shown in the following table.

Table 1. WasteWise Membership

WasteWise Partners (by category)				
	Federal	State/Local	Private	Total
Current	21	45	502	568
Year 1	24	51	569	644
Year 2	27	57	636	720
Year 3	30	63	703	796
WasteWise Endorsers (by category)				
	Federal	State/Local	Private	Total
Current	2	12	72	86
Year 1	2	14	81	97
Year 2	2	16	90	108
Year 3	2	18	99	119

EPA used the May 2009 Occupational Employment Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor to estimate average hourly private respondent labor. This survey provides unloaded labor rates for a number of job categories in various sectors. EPA believes (based on 17 years of program experience) that responses will require time from one manager and one technical staff person. For managers, EPA used labor category 11-9199 (Managers, All Others) which has an average unloaded labor rate of \$47.67/hour. For technical staff, EPA used labor category 19-2041 (Environmental Scientists) which has an unloaded labor rate of \$32.38/hour. These hourly rates were multiplied by a standard private sector overhead calculation factor of 2.3 to obtain the loaded labor rates for private sector respondents shown in Table 2. All rates have been rounded up to the nearest dollar. No capital or operations and management costs are incurred by respondents under this ICR.

Table 2. Hourly Labor Rates – Private Sector

Labor Category	Hourly Rate Plus Overhead
Management	\$110
Technical	\$74

For federal, state, and local respondents, EPA used the General Schedule Salary Tables for 2011 issued by the Office of Personnel Management (OPM) to estimate hourly labor rates. EPA believes (based on program experience) that responses will require time from one manager (GS 14, Step 3) and one technical staff person (GS 11, Step 10). To estimate national labor rates for each of these job categories, EPA summed the unloaded hourly rates of all 36 locality tables and averaged the rates for GS 14, Step 3 and GS 11, Step 10. Based on these calculations, the average unloaded rates for GS 14, Step 3 is \$51.86 and for GS 11, Step 10 is \$37.53. EPA multiplied these basic hourly rates by the standard government overhead factor of 1.6 to obtain the loaded labor rates shown in Table 3. All figures have been rounded up to the next full dollar.

Table 3. Local, State, and Federal Labor Rates

Labor Category	Rate Plus Overhead (\$/hour)
Management	\$84
Technical	\$61

Table 4. Annual Estimated Respondent Burden and Cost – Private Sector Respondents

Partner Respondents										
	Individual Respondent Burden Hours & Cost for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity			Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Management	Technical	Total Hours							
Partner Registration Form (includes New Contact Form)										
Review Form	0.25	0.50	0.75	\$65	227	\$19,479	227	\$19,479	227	\$19,479
Complete/Transmit Form	0.00	0.25	0.25	\$19	76	\$5,587	76	\$5,587	76	\$5,587
SUBTOTAL	0.25	0.75	1.00	\$83	302	\$25,066	302	\$25,066	302	\$25,066
Annual Assessment Form										
Collect records and conduct a waste assessment OR account for annual efforts	7.00	14.00	21.00	\$1,806	11,949	\$1,027,614	13,356	\$1,148,616	14,763	\$1,269,618
Review records to assess progress	0.25	0.25	0.50	\$46	285	\$26,174	318	\$29,256	352	\$32,338
Set Goals	2.50	7.50	10.00	\$830	5,690	\$472,270	6,360	\$527,880	7,030	\$583,490
Complete/Transmit Form	0.25	1.75	2.00	\$157	1,138	\$89,333	1,272	\$99,852	1,406	\$110,371
Respond to EPA Questions	0.25	0.75	1.00	\$83	569	\$47,227	636	\$52,788	703	\$58,349
SUBTOTAL	10.25	24.25	34.50	\$2,922	19,631	\$1,662,618	21,942	\$1,858,392	24,254	\$2,054,166
Costs to Partners										
Total Cost to All Partners					19,933	\$1,687,684	22,244	\$1,883,458	24,556	\$2,079,232
Endorser Respondents										
	Individual Respondent Burden Hours & Cost for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity			Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Management	Technical	Total Hours							
Endorser Registration Form (includes New Contact Form)										
Review Form	0.25	0.50	0.75	\$65	34	\$2,903	34	\$2,903	34	\$2,903
Determine Activities	0.25	1.50	1.75	\$139	79	6,233	79	\$6,233	79	\$6,233
Complete/Transmit Form	0.00	0.50	0.50	\$37	23	1,665	23	\$1,665	23	\$1,665
SUBTOTAL	0.50	2.50	3.00	\$240	135	10,800	135	\$10,800	135	\$10,800
Endorser Annual Assessment Form										
Account for annual efforts	0.50	1.50	2.00	\$166	162	\$13,446	180	\$14,940	198	\$16,434
Review records to assess progress	0.25	0.25	0.50	\$46	41	\$3,726	45	\$4,140	50	\$4,554
Set Goals	0.25	1.00	1.25	\$102	101	\$8,222	113	\$9,135	124	\$10,049
Complete/Transmit Form	0.00	0.50	0.50	\$37	41	\$2,997	45	\$3,330	50	\$3,663
Respond to EPA Questions	0.25	0.50	0.75	\$65	61	\$5,225	68	\$5,805	74	\$6,386
SUBTOTAL	1.25	3.75	5.00	\$415	405	\$33,615	450	\$37,350	495	\$41,085
Costs to Endorsers										
Total Cost to All Endorsers					540	\$44,415	585	\$48,150	630	\$51,885
Assumptions										
Management rate: \$110/hr										
Technical rate: \$74/hr										
New partners: 302/yr										
Reporting partners: Y1=569, Y2=636, Y3=703										
New Endorsers: 45/yr										
Reporting Endorsers: Y1=81, Y2=90, Y3=99										

Table 5. Annual Estimated Respondent Burden and Cost – State/Local Respondents

Partner Respondents										
	Individual Respondent Burden Hours & Cost for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity			Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Management	Technical	Total Hours							
Partner Registration Form (includes New Contact Form)										
Review Form	0.25	0.50	0.75	\$52	25	\$1,700	25	\$1,700	25	\$1,700
Complete/ Transmit Form	0.00	0.25	0.25	\$15	8	\$503	8	\$503	8	\$503
SUBTOTAL	0.25	0.75	1.00	\$67	33	\$2,203	33	\$2,203	33	\$2,203
Annual Assessment Form										
Collect records and conduct a waste assessment OR account for annual efforts	7.00	14.00	21.00	\$1,442	1,071	\$73,542	1,197	\$82,194	1,323	\$90,846
Review records to assess progress	0.25	0.25	0.50	\$36	26	\$1,849	29	\$2,066	32	\$2,284
Set Goals	2.50	7.50	10.00	\$668	510	\$34,043	570	\$38,048	630	\$42,053
Complete/ Transmit Form	0.25	1.75	2.00	\$128	102	\$6,515	114	\$7,282	126	\$8,048
Respond to EPA Questions	0.25	0.75	1.00	\$67	51	\$3,404	57	\$3,805	63	\$4,205
SUBTOTAL	10.25	24.25	34.50	\$2,340	1,760	\$119,353	1,967	\$133,394	2,174	\$147,436
Costs to Partners										
Total Cost to All Partners					1,793	\$121,556	2,000	\$135,597	2,207	\$149,639
Endorser Respondents										
	Individual Respondent Burden Hours & Cost for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity			Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Management	Technical	Total Hours							
Endorser Registration Form (includes New Contact Form)										
Review Form	0.25	0.50	0.75	\$52	6	\$412	6	\$412	6	\$412
Determine Activities	0.25	1.50	1.75	\$113	14	\$900	14	\$900	14	\$900
Complete/ Transmit Form	0.00	0.50	0.50	\$31	4	\$244	4	\$244	4	\$244
SUBTOTAL	0.50	2.50	3.00	\$195	24	\$1,556	24	\$1,556	24	\$1,556
Endorser Annual Assessment Form										
Account for annual efforts	0.50	1.50	2.00	\$134	28	\$1,869	32	\$2,136	36	\$2,403
Review records to assess progress	0.25	0.25	0.50	\$36	7	\$508	8	\$580	9	\$653
Set Goals	0.25	1.00	1.25	\$82	18	\$1,148	20	\$1,312	23	\$1,476
Complete/ Transmit Form	0.00	0.50	0.50	\$31	7	\$427	8	\$488	9	\$549
Respond to EPA Questions	0.25	0.50	0.75	\$52	11	\$721	12	\$824	14	\$927
SUBTOTAL	1.25	3.75	5.00	\$334	70	\$4,673	80	\$5,340	90	\$6,008
Costs to Endorsers										
Total Cost to All Endorsers					94	\$6,229	104	\$6,896	114	\$7,564
Assumptions										
Management Rate: \$84/hr										
Technical Rate: \$61/hr										
New Partners: 33/yr										
Reporting Partners: Y1=51, Y2=57, Y3=63										
New Endorsers: 8/yr										
Reporting Endorsers: Y1=14, Y2=16, Y3=18										

Table 6. Annual Estimated Respondent Burden and Cost – Federal Respondents

Partner Respondents										
	Individual Respondent Burden Hours & Cost for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity			Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Management	Technical	Total Hours							
Partner Registration Form (includes New Contact Form)										
Review Form	0.25	0.50	0.75	\$52	6	\$412	6	\$412	6	\$412
Complete/ Transmit Form	0.00	0.25	0.25	\$15	2	\$122	2	\$122	2	\$122
SUBTOTAL	0.25	0.75	1.00	\$67	8	\$534	8	\$534	8	\$534
Annual Assessment Form										
Collect records and conduct a waste assessment OR account for annual efforts	7.00	14.00	21.00	\$1,442	504	\$34,608	567	\$38,934	630	\$43,260
Review records to assess progress	0.25	0.25	0.50	\$36	12	\$870	14	\$979	15	\$1,088
Set Goals	2.50	7.50	10.00	\$668	240	\$16,020	270	\$18,023	300	\$20,025
Complete/ Transmit Form	0.25	1.75	2.00	\$128	48	\$3,066	54	\$3,449	60	\$3,833
Respond to EPA Questions	0.25	0.75	1.00	\$67	24	\$1,602	27	\$1,802	30	\$2,003
SUBTOTAL	10.25	24.25	34.50	\$2,340	828	\$56,166	932	\$63,187	1,035	\$70,208
Costs to Partners										
Total Cost to All Partners					836	\$56,700	940	\$63,721	1,043	\$70,742
Endorser Respondents										
	Individual Respondent Burden Hours & Cost for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity			Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Management	Technical	Total Hours							
Endorser Registration Form (includes New Contact Form)										
Review Form	0.25	0.50	0.75	\$52	1	\$52	1	\$52	1	\$52
Determine Activities	0.25	1.50	1.75	\$113	2	\$113	2	\$113	2	\$113
Complete/ Transmit Form	0.00	0.50	0.50	\$31	1	\$31	1	\$31	1	\$31
SUBTOTAL	0.50	2.50	3.00	\$195	3	\$195	3	\$195	3	\$195
Endorser Annual Assessment Form										
Account for annual efforts	0.50	1.50	2.00	\$134	4	\$267	4	\$267	4	\$267
Review records to assess progress	0.25	0.25	0.50	\$36	1	\$73	1	\$73	1	\$73
Set Goals	0.25	1.00	1.25	\$82	3	\$164	3	\$164	3	\$164
Complete/ Transmit Form	0.00	0.50	0.50	\$31	1	\$61	1	\$61	1	\$61
Respond to EPA Questions	0.25	0.50	0.75	\$52	2	\$103	2	\$103	2	\$103
SUBTOTAL	1.25	3.75	5.00	\$334	10	\$668	10	\$668	10	\$668
Costs to Endorsers										
Total Cost to All Endorsers					13	\$862	13	\$862	13	\$862
Assumptions										
Management Rate = \$84/hr										
Technical Rate = \$61/hr										
New Partners = 8/yr										
Reporting Partners: Y1=24, Y2=27, Y3=30										
New Endorsers = 1/yr										
Reporting Endorsers: Y1=2,										

Y2=2, Y3=2

6(c) Estimating Agency Burden and Costs

Table 8 (below) presents the estimated Agency burden hours and costs associated with the information collection activities under this ICR. Other direct costs (copying, printing, telephone, and mailing expenses) are also included. EPA based its burden estimates on 17 years of experience managing the WasteWise program and interacting with partners.

EPA used the General Schedule Salary Tables for 2011 issued by the Office of Personnel Management (OPM) to estimate hourly labor rates for the Agency. The Agency expects most activities under this ICR to be performed by managerial staff (GS 14, Step 3) and technical staff (GS 11, Step 10). To estimate national labor rates for each of these job categories, EPA summed the unloaded hourly rates of all 36 locality tables and averaged the rates for GS 14, Step 3 and GS 11, Step 10. Based on these calculations, the average unloaded rates for GS 14, Step 3 is \$51.86 and for GS 11, Step 10 is \$37.53. EPA multiplied these basic hourly rates by the standard government overhead factor of 1.6 to obtain the loaded labor rates shown in Table 7. All figures have been rounded up to the next full dollar.

EPA still expects to have contractor support for various activities associated with the information collection under this ICR and has included contractor costs in the estimates. Contractor hourly rates, estimated based on the rates for the current contractor, ERG, are \$150.58 for managerial staff (Project Manager) and \$78.00 for technical staff (Program Analyst 2) so the average hourly rates are proportional to the percentage of contractor support on a given task.

Table 7. Agency Labor Rates

EPA/ Contractor Share	Mgmt. Rate	Technical Rate	Mgmt. %	Technical %	Average Rate
100% EPA	\$83	\$60	25%	75%	\$66
0% Contractor	\$0	\$0	0%	0%	\$0
Total					\$66
25% EPA	\$21	\$15	25%	75%	\$17
75% Contractor	\$113	\$59	25%	75%	\$73
Total					\$90
0% EPA	\$0	\$0	0%	0%	\$0
100% Contractor	\$151	\$78	25%	75%	\$96
Total					\$96

Table 8. Annual Estimated Agency Burden and Cost

	Avg. Hourly Rate	Year 1				Year 2				Year 3			
		Labor		Other Direct Costs	Total Costs	Labor		Other Direct Costs	Total Costs	Labor		Other Direct Costs	Total Costs
		Hours	Costs			Hours	Costs			Hours	Costs		
Partner Registration Form (includes New Contact Form)													
Maintain Online Form and Database	\$96	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$96	350	\$33,600	\$1,400	\$35,000	350	\$33,600	\$1,400	\$35,000	350	\$33,600	\$1,400	\$35,000
Subtotal		350	\$33,600	\$11,400	\$45,000	350	\$33,600	\$12,400	\$46,000	350	\$33,600	\$13,400	\$47,000
Partner Annual Assessment Form													
Maintain Online Form and Database	\$96	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$90	1,300	\$117,000	\$5,200	\$122,200	1,450	\$130,500	\$5,800	\$136,300	1,600	\$144,000	\$6,400	\$150,400
QA/QC Data	\$96	1,300	\$124,800	\$5,200	\$130,000	1,450	\$139,200	\$5,800	\$145,000	1,600	\$153,600	\$6,400	\$160,000
Subtotal		2600	\$241,800	\$20,400	\$262,200	2900	\$269,700	\$22,600	\$292,300	3200	\$297,600	\$24,800	\$322,400
Endorser Registration Form (includes New Contact Form)													
Maintain Online Form and Database	\$96	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$96	50	\$4,800	\$200	\$5,000	50	\$4,800	\$200	\$5,000	50	\$4,800	\$200	\$5,000
Subtotal		50	\$4,800	\$10,200	\$15,000	50	\$4,800	\$11,200	\$16,000	50	\$4,800	\$12,200	\$17,000
Endorser Annual Assessment Form													
Maintain Online Form and Database	\$96	0	\$0	\$10,000	\$10,000	0	\$0	\$11,000	\$11,000	0	\$0	\$12,000	\$12,000
Answer Questions	\$90	200	\$18,000	\$800	\$18,800	225	\$20,250	\$900	\$21,150	250	\$22,500	\$1,000	\$23,500
QA/QC Data	\$96	200	\$19,200	\$800	\$20,000	225	\$21,600	\$900	\$22,500	250	\$24,000	\$1,000	\$25,000
Subtotal		400	\$37,200	\$11,600	\$48,800	450	\$41,850	\$12,800	\$54,650	500	\$46,500	\$14,000	\$60,500
Cost to EPA													
Total Cost		3400	\$317,400	\$53,600	\$371,000	3750	\$349,950	\$59,000	\$408,950	4100	\$382,500	\$64,400	\$446,900

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

As of April 1, 2011, the WasteWise program had 568 active partners. EPA expects 343 organizations to submit the **Partner Registration Form** during each year for the period covered by this ICR. The **Partner Registration Form** is a one-time reporting requirement. Organizations must submit the **Partner Annual Assessment Form**, an annual reporting requirement containing quantitative information, to be considered an active WasteWise partner. As previously mentioned, WasteWise anticipates that 76 of the 343 new registrants each year will complete the **Partner Annual Assessment Form**. Thus, WasteWise estimates the following **Partner Annual Assessment Form** submittals: 644 in year 1, 717 in year 2, and 796 in year 3.

The WasteWise program currently has approximately 86 active Endorsers. The **Endorser Registration Form** is a one-time reporting event. EPA estimates that 54 organizations will submit the **Endorser Registration Form** each year. Endorsers must submit the **Endorser Annual Assessment Form**, an annual reporting requirement containing information on promotional and recruitment activities, to be considered an active WasteWise Endorser. EPA anticipates that 11 of the 54 new registrants will submit the **Endorser Annual Assessment Form**. Therefore, WasteWise estimates the following **Endorser Annual Assessment Form** submittals: 97 in year 1, 108 in year 2, and 119 in year 3. The **New Contact Form** represents supplemental registration information and the time to complete this form is included in the burden estimates for the **Partner Registration Form** and **Endorser Registration Form**.

6(e) Estimated Burden Hours and Costs

The estimated burden and costs to respondents are displayed in the Table 9 below. Note that the estimated number of respondents changes each year, depending on the information collection activity. There are variations in the estimated costs for each of the three years covered because the number of respondents increases each of these years.

Table 9. Estimated Burden and Costs to Respondents

Form	Number of Respondents	Burden Hours	Cost
Year 1			
Partner Registration	343	343	\$27,803
Partner Annual Assessment	644	22,218	\$1,838,137
Endorser Registration	54	156	\$12,551
Endorser Annual Assessment	97	485	\$38,956
<i>Year 1 Total</i>	<i>1,136</i>	<i>23,202</i>	<i>\$1,917,447</i>
Year 2			
Partner Registration	343	343	\$27,803
Partner Annual Assessment	717	24,736	\$2,054,973
Endorser Registration	54	156	\$12,551
Endorser Annual Assessment	108	540	\$43,358
<i>Year 2 Total</i>	<i>1,220</i>	<i>25,775</i>	<i>\$2,138,685</i>
Year 3			
Partner Registration	343	343	\$27,803
Partner Annual Assessment	796	27,462	\$2,271,462
Endorser Registration	54	156	\$12,551
Endorser Annual Assessment	119	595	\$47,761
<i>Year 3 Total</i>	<i>1,310</i>	<i>28,556</i>	<i>\$2,359,577</i>
3-Year Total	3,666	77,533	\$6,415,709
Annual Average	1,222	25,844	\$2,138,570

The estimated burden and costs to EPA also vary each year, according to the number of respondents. Table 10 indicates the Agency’s estimated burden and costs for each of the three years covered under this ICR.

Table 10. Estimated Burden and Costs to EPA

Year	Burden Hours	Cost
Year 1	3,400	\$371,000
Year 2	3,750	\$408,950
Year 3	4,100	\$446,900
3-Year Total	11,250	\$1,226,850
Annual Average	3,750	\$408,950

6(f) Reasons for Change in Burden

Since the last clearance, EPA has made the following changes to the WasteWise program that affect information collection activities:

- **Online Data Management and Reporting System.** WasteWise’s new online data management and reporting system reduced burden of WasteWise members and program administrators by automating tasks.
- **Changes in Wage Rates.** EPA changed the burden costs for private respondents to reflect the updated rates in the May 2009 Occupational Employment Statistics (OES) Survey from the Bureau of Labor Statistics, Department of Labor. EPA also changed the burden costs to state, local and federal respondents, as well as the Agency to reflect the 2011 GS rates. This only impacted burden costs; it did not impact burden hours.
- **Variation in Number of Participants.** For this ICR, the Agency updated the Partner numbers to reflect current WasteWise membership trends. EPA expects that 76 new active Partners will join AND report as active Partners during each year covered by this ICR. Additionally, EPA expects the WasteWise program to bring in 11 new active reporting Endorsers each year. Active members include Partners and Endorsers that register AND report.

6(g) Burden Statement

The reporting burden for information collection requirements associated with completing the **Partner Registration Form** and **New Contact Form** are estimated to be one hour per respondent. The burden estimate includes time to review WasteWise program information and requirements and to complete and submit the form(s).

The reporting burden for information collection requirements associated with completing the **Partner Annual Assessment Form** is estimated to be 34.5 hours per respondent. This burden estimate includes time to conduct a waste assessment, set up a tracking system, determine goals, collect and review records, complete and submit the form, and respond to questions from EPA regarding data clarification.

The reporting burden for information collection requirements associated with completing the **Endorser Registration Form** and **New Contact Form** are estimated to be three hours per respondent. This burden estimate includes time to review WasteWise Endorser program information and requirements, to determine recruitment and promotional activities, and to complete and submit the form.

The reporting burden for information collection requirements associated with completing the **Endorser Annual Assessment Form** is estimated to be five hours per respondent. This burden estimate includes time to collect and review records, determine goals, complete and submit the form, and respond to questions from EPA regarding data clarification.

Burden means the total time, effort, and financial resources expended by persons to generate, maintain, retain, 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 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 No. EPA-HQ-RCRA-2010-0832, which is available for online viewing at www.regulations.gov, or in person viewing at the RCRA 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 RCRA Docket is (202) 566-0270.

Use www.regulations.gov to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document.

7. POTENTIAL FUTURE WASTEWISE INITIATIVES

7(a) **WasteWise Challenges – Targeting Selective Materials and Sectors**

In his September 2009 Strategy for American Innovation, President Obama called on federal agencies to increase their ability to promote innovation by using tools, such as challenges to solve tough problems. In response, WasteWise will issue Challenges to its Partners to give them the opportunity to target selected materials for waste prevention and recycling. WasteWise may also challenge certain sectors, such as federal, state, or local governments; colleges and universities; etc., to increase waste prevention and recycling in general or target certain materials generated in high volume by those sectors. These WasteWise Challenges will raise awareness of the opportunities to reduce the amount of these materials generated and increase their recovery, recruit organizations to join and participate in WasteWise, and encourage existing Partners to pursue additional waste reduction activities. The use of these Challenges will be a key component of EPA's efforts to promote Sustainable Materials Management (SMM).

During the duration of this ICR, EPA anticipates issuing a number of WasteWise Challenges that would impact the number of Partners that may join the program and/or

the number of organizations (Partners and Non-Partners) submitting data to the program. We anticipate issuing one or more Challenges over the next three years, targeting the following materials/sectors: electronics; packaging; colleges and universities; federal/state/local governments; and food wastes. We hope to initiate two Challenges in the first year of this ICR that will serve as models for subsequent Challenges. One of these challenges will use the standard WasteWise forms. The other will use equivalent forms which are included in Attachment N. Subsequent Challenges will follow the form of these two initial Challenges and data collection needs will be similar. However, if additional data information or form changes are needed, we will amend the ICR. Since these Challenges and their burden are not included in the burden estimates provided earlier in this document, the annual estimated burden for a typical Challenge is shown in Table 11.

7(b) Requirements for Organizations Participating in Challenges

To participate in a Challenge, organizations may sign-up via the WasteWise **Partner Registration Form** or a **Challenge Registration Form** which would be a substantively equivalent form with alternative formatting. Following standard WasteWise requirements, Challenge participants will report results of Challenge-related efforts via the **Partner Annual Assessment Form** or a **Challenge Assessment Form**, which would be a substantively equivalent form with alternative formatting. EPA will provide the alternative **Challenge Registration and Assessment Forms** to reduce the burden on participating organizations and streamline data collection of Challenge related activities. Attachment N includes samples of how the alternative online Challenge forms may be presented to participants. These formats will allow the online database system to sort data submitted under the particular Challenge in a more efficient manner, depending on the complexity of the Challenge issued. For the purposes of this ICR, EPA assumes, conservatively, that all participants would also formally join WasteWise as part of any Challenge issued, so that this estimate is likely to overestimate, but will not underestimate, this burden on participants.

Based on all of the aforementioned assumptions, Challenge participants would be expected to:

- review a narrative description of the Challenge details;
- register, if they so choose, for the Challenge using the standard **Partner Registration Form** or a substantively equivalent alternative form;
- submit baseline data using the standard **Partner Annual Assessment Form** or a substantively equivalent alternative form;
- report accomplishments using the standard **Partner Annual Assessment Form** or a substantively equivalent alternative form.

7(c) Estimating Burden and Costs for Organizations Participating in Challenges

At this time, plans for the WasteWise Challenges are still being developed, so the estimated burdens in this section are conservative and are likely to overestimate the burden in order to adequately account for future activity in these areas. Based on historical review and previous WasteWise Challenges, EPA estimates that approximately 50 organizations will participate in each Challenge. The estimated cost burden on participants for a single Challenge is shown in Table 11. EPA used the highest cost labor mix, that of the private sector, in developing the estimates since we are unable, at this time, to identify the exact number of participants in each Challenge by sector.

Table 11. Annual Estimated Burden for Challenge Respondents for a Single Challenge

Challenge Respondents										
	Individual Respondent Burden Hours & Cost for All Years				Year 1 Costs		Year 2 Costs		Year 3 Costs	
	Hours per Respondent per Activity			Cost per Activity	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
	Management	Technical	Total Hours							
Challenge Registration Form (includes new contact form)										
Review Challenge details	0.25	0.50	0.75	\$65	15	\$1,290	11	\$968	11	\$968
Complete/ Transmit Form	0.00	0.25	0.25	\$19	5	\$370	4	\$278	4	\$278
SUBTOTAL	0.25	0.75	1.00	\$83	20	\$1,660	15	\$1,245	15	\$1,245
Challenge Assessment Form										
Collect records and conduct a waste assessment OR account for annual efforts	1.75	3.50	5.25	\$452	105	\$9,030	184	\$15,803	263	\$22,575
Review records to assess progress	0.25	0.25	0.50	\$46	10	\$920	18	\$1,610	25	\$2,300
Set Goals	0.50	1.75	2.25	\$185	45	\$3,690	79	\$6,458	113	\$9,225
Complete/ Transmit Form	0.25	1.00	1.25	\$102	25	\$2,030	44	\$3,553	63	\$5,075
Respond to EPA Questions	0.25	0.75	1.00	\$83	20	\$1,660	35	\$2,905	50	\$4,150
SUBTOTAL	3.00	7.25	10.25	\$867	205	\$17,330	359	\$30,328	513	\$43,325
Costs to Partners										
Total Cost to All Partners					225	\$18,990	374	\$31,573	528	\$44,570
Assumptions										
Management rate: \$110/hr										
Technical rate: \$74/hr										
New Challenge participants: 15/yr										
Challenge participant totals: Y1=20, Y2=35, Y3=50										

7(d) Estimating Agency Burden and Costs for Challenges

Table 12 (below) presents the estimated Agency burden hours and costs associated with administering WasteWise Challenges. Other direct costs (copying, printing, telephone, and mailing expenses) are also included. EPA based its burden estimates on 17 years of experience managing the WasteWise program and interacting with partners. EPA's burden estimate uses the highest cost scenario of running a Challenge by assuming that each Challenge will require separate and unique Challenge Registration and Annual Assessment Forms and that the Agency will need to provide technical assistance and QA/QC of reported data for each Challenge participant. EPA used the same rates and assumptions for hourly rates as in the calculation of Agency burden in Section 6(c).

Table 12: Annual Estimated Agency Burden and Cost for a Single Challenge

	Avg. Hourly Rate	Labor		Other Direct Costs	Total Costs
		Hours	Costs		
Challenge Registration Form					
Maintain Online Form and Database	\$96	0	\$0	\$0*	\$0*
Answer Questions	\$96	25	\$2,400	\$100	\$2,500
Subtotal		25	\$2,400	\$100	\$2,500
Challenge Assessment Form					
Maintain Online Form and Database	\$96	0	\$0		
Answer Questions	\$90	50	\$4,500	\$200	\$4,700
QA/QC Data	\$96	50	\$4,800	\$200	\$5,000
Subtotal		100	\$9,300	\$400	\$9,700
Cost to EPA					
Total Cost		150	\$11,700	\$500	\$12,200

**There are no additional costs for maintaining the online form or database for the Challenge beyond the standard costs of the program's online database hosting and maintenance included in section 6(c).*