

Appendix A: Respondents and Agency Activities Table

Table A1. Respondents Activities table (permittees)

Activity Description	Respondent Type	Total Hours per response	capital / startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents	Frequency of Reporting	Number of Responses / respondent / yr	Number of Responses Year	Total Hours / Year	Total Labor Cost	Type of Activity OMB (Reporting / Recordkeeping / 3rd party disclosure)	Type of Activity (EPA classification)	Obligation of Response OMB (mandatory, voluntary)	Affected Public (OMB)
NOI preparation & submittal	operators - PGP Table 1-1	2	\$0	\$0	\$0	9,125	1,825	once every 5 yrs	1	1,825	3,650	\$299,300	Reporting	1. Application/NOI	mandatory	Business, other for-profit, government
NOI preparation & submittal	operators under PGP - informal ESA	6	\$0	\$0	\$0	37	7	once every 5 yrs	1	7	44	\$3,641	Reporting	1. Application/NOI	mandatory	Business, other for-profit, government
NOI preparation & submittal	operators under PGP - formal ESA	20	\$0	\$0	\$0	18	4	once every 5 yrs	1	4	73	\$5,986	Reporting	1. Application/NOI	mandatory	Business, other for-profit, government
NOT Preparation & submittal	operators - PGP Table 1-1 (all)	0.5	\$0	\$0	\$0	456	91	once	1	91	46	\$5,156	Reporting	1. Application/NOI	mandatory	Business, other for-profit, government
Develop PDMP	operators - NOI filers (large)	40	\$0	\$0	\$0	4,836	967	once every 5 yrs	1	967	38,690	\$2,073,784	Reporting	2. Plan Development	mandatory	Business, other for-profit, government
Update PDMP	operators - NOI filers (large)	2	\$0	\$0	\$0	4,836	1,209	ongoing	1	1,209	2,418	\$123,324	Reporting	2. Plan Development	mandatory	Business, other for-profit, government
Monitoring (large site)	operators - NOI filers (large)	0.25	\$0	\$0	\$0	4,836	4,836	ongoing	16	77,380	19,345	\$986,595	Reporting	3. Monitoring	mandatory	Business, other for-profit, government
Monitoring (small site)	operators - NOI filers (small)	0.25	\$0	\$0	\$0	4,289	4,289	ongoing	4	17,155	4,289	\$218,726	Reporting	3. Monitoring	mandatory	Business, other for-profit, government
Monitoring	other operators	0.25	\$0	\$0	\$0	355,875	355,875	ongoing	1	355,875	88,969	\$4,537,406	Reporting	3. Monitoring	mandatory	Business, other for-profit, government
Annual Report preparation & submittal	operators - NOI filers (large & ESA)	8	\$0	\$0	\$0	4,892	4,892	yearly	1	4,892	39,132	\$1,995,732	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Adverse Incident Documentation	all operators	2	\$0	\$0	\$0	365,000	37	occasionally/As Needed	1	37	73	\$3,723	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Adverse Incident verbal notification	all operators	2	\$0	\$0	\$0	365,000	37	occasionally/As Needed	1	37	73	\$3,723	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Adverse Incident to Threatened or Endangered Species	all operators	2	\$0	\$0	\$0	365,000	4	occasionally/As Needed	1	4	7	\$372	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Spill, Leak verbal notification	all operators	0	\$0	\$0	\$0	365,000	365	occasionally/As Needed	1	365	0	\$0	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Spill, Leaks Documentation	all operators	1	\$0	\$0	\$0	365,000	365	occasionally/As Needed	1	365	365	\$18,615	recordkeeping	5. Recordkeeping	mandatory	Business, other for-profit, government
Corrective Action Documentation	all operators	5	\$0	\$0	\$0	365,000	365	occasionally/As Needed	1	365	1,825	\$93,075	recordkeeping	5. Recordkeeping	mandatory	Business, other for-profit, government
Permittee Report of Planned Facility Changes	all operators	4	\$0	\$0	\$0	365,000	365	occasionally/As Needed	1	365	1,460	\$74,460	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Permittee Report of anticipated noncompliance	all operators	5	\$0	\$0	\$0	365,000	365	occasionally/As Needed	1	365	1,825	\$93,075	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Permittee Report of Inaccurate Previous Information	all operators	2	\$0	\$0	\$0	365,000	183	occasionally/As Needed	1	183	366	\$18,666	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Noncompliance Reports	all operators	5	\$0	\$0	\$0	365,000	183	occasionally/As Needed	1	183	915	\$46,665	Reporting	4. Reporting	mandatory	Business, other for-profit, government
Recordkeeping (basic)	all operators	1	\$0	\$0	\$0	365,000	365,000	ongoing	1	365,000	365,000	\$14,965,000	recordkeeping	5. Recordkeeping	mandatory	Business, other for-profit, government
Recordkeeping	operators - non-NOI filers	0.5	\$0	\$0	\$0	355,875	355,875	ongoing	1	355,875	177,938	\$9,074,813	recordkeeping	5. Recordkeeping	mandatory	Business, other for-profit, government
Full Recordkeeping	operators - NOI filers (large)	1	\$0	\$0	\$0	4,836	4,836	ongoing	16	77,380	77,380	\$3,946,380	recordkeeping	5. Recordkeeping	mandatory	Business, other for-profit, government
Recordkeeping (PDEW)	operators - NOI filers (small)	1	\$0	\$0	\$0	4,289	4,289	ongoing	4	17,155	17,155	\$9,195,080	recordkeeping	5. Recordkeeping	mandatory	Business, other for-profit, government
TOTAL									1,277,083	841,037	\$47,783,297					

1. Total hours per response are from the EA or ICR for NPDES Program except for the Update PDMP.

2. Total number of respondents: assumed 2.5% of 365,000 respondents are required to submit NOIs; assumed 0.1% of 36,500 respondent will need to address ESA informally and 0.05% formally; assumed 5% of the respondents required to submit NOIs will file NOT; assumed 47% of the respondents required to submit NOIs are small entities and 53% are large entities; assumed respondent with ESA issue will submit annual reports.

3. Annual number of respondents: total divide by 5 for NOI, NOT, PDMP (5-year permit cycle); update plans - assumed 25%; adverse incident - assumed 0.01%; adverse incident to TES - assumed 0.001%; report of anticipated noncompliance & inaccurate previous info - assumed 0.05%; others - assumed 0.1%

4. Total Labor rate: used same rate as those in the EA - average managerial rate \$113, technical rate \$51, clerical rate \$41. NOI (50% managerial, 50% technical); NOT (all managerial); PDMP (2hr managerial, 36hr technical, 2hr clerical); PDEW (0.5hr managerial, 9hr technical, 0.5hr clerical); other activities (technical rate or clerical rate)

Appendix A: Respondents and Agency Activities Table

Table A2. Respondents Activities table (States)

Activity Description	Respondent Type	Total Hours per response	capital / startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents	Frequency of Reporting	Number of Responses / respondent /yr	Number of Responses Year	Total Hours / Year	Total Labor Cost	Type of Activity OMB (Reporting / Recordkeeping / 3rd party disclosure)	Type of Activity (EPA classification)	Obligation of Response OMB (mandatory, voluntary)	Affected Public (OMB)
NOI processing & review	States	0.5	\$0	\$0	\$0	45	45	every 5 yrs	36.5	1,643	821	\$31,208	Reporting	1. Application/NOI	mandatory	States
NOT processing & review	States	0.25	\$0	\$0	\$0	45	45	ongoing	1.825	82	21	\$780	Reporting	1. Application/NOI	mandatory	States
Annual Report processing & review	States	1	\$0	\$0	\$0	45	45	yearly	97.609	4,392	4,392	\$166,911	Reporting	4. Reporting	mandatory	States
Adverse Incident report review	States	2	\$0	\$0	\$0	45	45	occasionally/As Needed	0.73	33	66	\$2,497	Reporting	4. Reporting	mandatory	States
Permittee Report of Planned Facility Changes	States	0.5	\$0	\$0	\$0	45	45	occasionally/As Needed	7.3	329	164	\$6,242	Reporting	4. Reporting	mandatory	States
Permittee Report of anticipated noncompliance	States	2	\$0	\$0	\$0	45	45	occasionally/As Needed	7.3	329	657	\$24,966	Reporting	4. Reporting	mandatory	States
Permittee Report of Inaccurate Previous Information	States	1	\$0	\$0	\$0	45	45	occasionally/As Needed	3.66	165	165	\$6,259	Reporting	4. Reporting	mandatory	States
Noncompliance Reports	States	2	\$0	\$0	\$0	45	45	occasionally/As Needed	3.66	165	329	\$12,517	Reporting	4. Reporting	mandatory	States
TOTAL									7,136	6,615	\$251,379					

Table A3. Agency Activities Table

Activity Description	Respondent Type	Total Hours per response	capital / startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents	Frequency of Reporting	Number of Responses / respondent /yr	Number of Responses Year	Total Hours / Year	Total Labor Cost	Type of Activity OMB (Reporting / Recordkeeping / 3rd party disclosure)	Type of Activity (EPA classification)	Obligation of Response OMB (mandatory, voluntary)	Affected Public (OMB)
NOI processing & review	EPA	0.5						once every 5 yrs		183	91	\$3,737	Reporting	1. Application/NOI	mandatory	EPA
NOI processing & review (informal)	Services	0.5						occasionally/As Needed		7	4	\$152	Reporting	1. Application/NOI	mandatory	Services
NOI processing & review (formal)	Services	5						occasionally/As Needed		4	18	\$747	Reporting	1. Application/NOI	mandatory	Services
NOT processing & review	EPA	0.25						ongoing		9	2	\$93	Reporting	1. Application/NOI	mandatory	EPA
Annual Report processing & review	EPA	1						yearly		500	500	\$20,483	Reporting	4. Reporting	mandatory	EPA
Adverse Incident report review	EPA	2						occasionally/As Needed		4	7	\$299	Reporting	4. Reporting	mandatory	EPA
Adverse Incident to Threatened or Endangered Species	Services	2						occasionally/As Needed		4	7	\$299	Reporting	4. Reporting	mandatory	Services
Permittee Report of Planned Facility Changes	EPA	0.5						occasionally/As Needed		37	18	\$747	Reporting	4. Reporting	mandatory	EPA
Permittee Report of anticipated noncompliance	EPA	2						occasionally/As Needed		37	73	\$2,989	Reporting	4. Reporting	mandatory	EPA
Permittee Report of Inaccurate Previous Information	EPA	1						occasionally/As Needed		18	18	\$749	Reporting	4. Reporting	mandatory	EPA
Noncompliance Reports	EPA	2						occasionally/As Needed		18	37	\$1,499	Reporting	4. Reporting	mandatory	EPA
TOTAL									820	776	\$31,795					

1. Total hours per response are from the ICR for NPDES Program.
 2. Number of responses/yr - EPA is 10% of permittee's total number of responses/yr
 3. Labor Rate for Federal is \$40.95 and for State is \$38.