**Appendix D – Analysis of Changes**

The table below presents all line items from the ICR with a greater than 50 percent change (positive or negative) from the currently approved ICR (i.e., OMB’s inventory). It also includes an explanation of the reason for the change and the quality assurance actions to verify the validity of these changes.

| **Reference Code** | **Activity Description** | **Respondent Type** | **Total Hours / Year (Renewal)** | **Total Hours / Year (OMB)** | **% Change** | **Reason for Change** |
| --- | --- | --- | --- | --- | --- | --- |
| 2.16 | Great Lakes Antidegradation Demonstration | Nonmunicipal - BCCs | 140 | 351 | -60% | Burden for the activity was divided by two because some of the burden is accounted for in the Water Quality Standards ICR. |
| 2.17 | Great Lakes Antidegradation Demonstration | Nonmunicipal - non-BCCs | 93 | 234 | -60% |
| 4.65 | Other Noncompliance Reports | CAFOs | 0 | 790 | -100% | Burden moved to the Animal Sector ICR |
| 4.66 | Other noncompliance Reports (CAFO Permittees) | NPDES States | 0 | 306 | -100% |
| 1.23 | Permit Consolidation | Industry | 0 | 4 | -100% | EPA anticipates that 0 facilities will file Permit Consolidation Requests each year  |
| 1.24 | Permit Consolidation | NPDES States, Facilities | 0 | 1 | -100% |
| 7.2 | Request for NPDES Partial Program Approval | NPDES States | 0 | 693 | -100% | EPA anticipates that no states that currently are not authorized to implement the NPDES program will seek partial program authorization during the life of this ICR.  |
| 6.3 | Section 308(a) Letters | General Stormwater Permittees Industrial | 3,208 | 1,712 | 87% | EPA estimates that 1,200 permittees will be required to respond to a section 308(a) letter. These are allocated based on the number of permits and the type of permits. The change in stormwater permittees affects the allocation of these letters. |
| 6.4 | Section 308(a) Letters | MS4s (Phase I and II) | 248 | 120 | 107% |
| 7.1 | Request for NPDES Program Approval | NPDES States | 0 | 693 | -100% | EPA expects that no states will request full program authorization during the life of this ICR.  |
|  |  |  |  |  |  |  |
| 2.83 | Development of SWPPP | Large construction sites (>5 acres) in NPDES States | 1,260,277 | 5,262,057 | -76% | EPA generated a new estimate of construction sites based on data collected for the development of the final Construction Effluent Limitation Guidelines. The Agency revised its estimate of the number of large and small construction sites covered by this ICR downward from 243,076 to 84,472 sites annually (Continued through |
| 2.84 | Development of SWPPP | Large construction sites (>5 acres) EPA Perm Auth no ESA | 41,059 | 187,314 | -78% |
| 2.85 | Development of SWPPP | Large construction sites (>5 acres) EPA Perm Auth informal ESA | 25,516 | 116,444 | -78% |
| 2.86 | Development of SWPPP | Large construction sites (>5 acres) EPA Perm Auth formal ESA | 1,856 | 8,445 | -78% |
| 3.98 | Routine site inspection | Large construction sites (>5 acres) in NPDES States | 450,099 | 1,879,306 | -76% |
| 3.99 | Routine site inspection | Large construction sites (>5 acres) EPA Perm Auth no ESA | 14,664 | 66,898 | -78% |
| 3.1 | Routine site inspection | Large construction sites (>5 acres) EPA Perm Auth informal ESA | 9,113 | 41,587 | -78% |
| 3.101 | Routine site inspection | Large construction sites (>5 acres) EPA Perm Auth formal ESA | 663 | 3,016 | -78% |
| 4.319 | Permittee Report of Planned Facility Changes | Construction Stormwater General Permittees | 1,640 | 4,772 | -66% |
| 4.320 | Permittee Report of Planned Facility Changes | NPDES States, Construction Stormwater General Permittees | 8,200 | 23,860 | -66% |
| 4.321 | Permittee Report of Anticipated Noncompliance | Construction Stormwater General Permittees | 410 | 1,195 | -66% |
| 4.322 | Permittee Report of Anticipated Noncompliance | NPDES States, Construction Stormwater General Permittees | 780 | 2,260 | -66% |
| 4.323 | Facility and Permit Transfer Report | Construction Stormwater General Permittees | 246 | 717 | -66% |
| 4.324 | Facility and Permit Transfer Report | NPDES States, Construction Stormwater General Permittees | 312 | 904 | -66% |
| 4.325 | Permittee Report of Inaccurate Previous Information | Construction Stormwater General Permittees | 82 | 238 | -66% |
| 4.326 | Permittee Report of Inaccurate Previous Information | NPDES States, Construction Stormwater General Permittees | 156 | 448 | -65% |
| 4.327 | Unanticipated Bypass / Upset Reports (Verbal Reports) | Construction Stormwater General Permittees | 410 | 1,195 | -66% |
| 4.328 | Unanticipated Bypass / Upset Report (Verbal Notification) | NPDES States, Construction Stormwater General Permittees | 78 | 225 | -65% |
| 4.329 | Unanticipated Bypass / Upset Report (Immediate Action) | NPDES States, Construction Stormwater General Permittees | 39 | 113 | -65% |
| 4.330 | Unanticipated Bypass / Upset Reports (Written Reports) | Construction Stormwater General Permittees | 124 | 358 | -65% |
| 4.331 | Unanticipated Bypass / Upset Report (Written Report) | NPDES States, Construction Stormwater General Permittees | 118 | 338 | -65% |
| 4.332 | Maximum Daily Violation Reports (Verbal Reports) | Construction Stormwater General Permittees | 234 | 675 | -65% |
| 4.333 | Maximum Daily Violation Report (Verbal Notification) | NPDES States, Construction Stormwater General Permittees | 78 | 225 | -65% |
| 4.334 | Maximum Daily Violation Report (Immediate Action) | NPDES States, Construction Stormwater General Permittees | 39 | 113 | -65% |
| 4.335 | Maximum Daily Violation Reports (Written Reports) | Construction Stormwater General Permittees | 78 | 226 | -66% |
| 4.336 | Maximum Daily Violation Report (Written Report) | NPDES States, Construction Stormwater General Permittees | 78 | 226 | -66% |
| 4.337 | Other Noncompliance Reports | Construction Stormwater General Permittees | 4,105 | 11,930 | -66% |
| 4.338 | Other Noncompliance Reports (NPDES Permittee Reports) | NPDES States, Construction Stormwater General Permittees | 1,556 | 4,504 | -66% |
| 5.44 | Recordkeeping | Large construction sites (>5 acres) in NPDES States | 13,849 | 57,825 | -76% |
| 5.45 | Recordkeeping | Large construction sites (>5 acres) EPA Perm Auth no ESA | 451 | 2,058 | -78% |
| 5.46 | Recordkeeping | Large construction sites (>5 acres) EPA Perm Auth informal ESA | 280 | 1,280 | -78% |
| 5.47 | Recordkeeping | Large construction sites (>5 acres) EPA Perm Auth formal ESA | 20 | 93 | -78% |
| 5.48 | Recordkeeping of Inspections | Stormwater General Permittees, Construction | 328,294 | 954,316 | -66% |
| 6.34 | Inspection & Investigation of NPDES permittees - Stormwater General (large Construction) - RI | NPDES States | 13,848 | 57,824 | -76% |
| 1.124 | NOI preparation & submittal | Large construction sites (>5 acres) in NPDES States | 51,935 | 216,843 | -76% |
| 1.125 | NOI preparation & submittal | Large construction sites (>5 acres) EPA Perm Auth no ESA | 1,692 | 7,719 | -78% |
| 1.126 | NOI preparation & submittal | Large construction sites (>5 acres) EPA Perm Auth informal ESA | 4,206 | 19,194 | -78% |
| 1.127 | NOI preparation & submittal | Large construction sites (>5 acres) EPA Perm Auth formal ESA | 1,020 | 4,640 | -78% |
| 1.128 | NOI Processing & review | NPDES States, Large construction sites (>5 acres)  | 34,623 | 144,562 | -76% |
| 1.133 | Prepare and submit a NOT | Large construction sites (>5 acres) | 18,252 | 76,569 | -76% |
| 1.134 | NOT processing | NPDES States, Large Construction | 8,656 | 36,141 | -76% |
| 3.102 | Monitoring | Construction Sites  | 35,031 | 10,135 | 246% | Formula correction from previous ICR.  |
| 4.137 | Permittee Report of Inaccurate Previous Information | Minor Municipal | 378 | 208 | 82% | Formula correction from previous ICR.  |
| 4.138 | Permittee Report of Inaccurate Previous Information | NPDES States, Minor Municipal | 744 | 408 | 82% |
| 6.20 | Inspection & Investigation of NPDES permittees - PCI | NPDES States | 0 | 21,408 | -100% | This burden has been transferred to the Pretreatment ICR (OMB Control No. 2040-0009). |
| 1.104 | Form 1 | Individual Stormwater Permits, New | 258 | 166 | 55% | More new individual NPDES stormwater permits were issued in the last 3-years than in the 3 years prior to the last ICR Update. (86 vs. 55) |
| 1.105 | Form 1 | NPDES States, New Facilities Individual Stormwater Facilities | 42 | 27 | 56% |
| 5.38 | Recordkeeping (Develop recordkeeping system; enter data; train personnel; and file information) | Individual Stormwater Permits New | 129 | 83 | 55% |
| 1.50 | Form 2S | PrOTWs, Sludge Only | 572 | 378 | 52% | Number of Sludge Only Nonmunicipal permits in ICIS is proportionally larger than the number of permits reported in PCS. More states are under ICIS now. |
| 5.13 | Recordkeeping (Develop recordkeeping system; enter data; train personnel; and file information) | Nonmunicipal, Sludge Only | 99 | 65 | 52% |
| 4.15 | Permittee Report of Inaccurate Previous Information | Minor Nonmunicipal | 1,126 | 710 | 59% | Significant reduction in the number of Existing Minor NPDES Permits based on EPA's direction to account for data entry errors in ICIS.  |
| 4.16 | Permittee Report of Inaccurate Previous Information | NPDES States, Minor Nonmunicipal | 2,212 | 1,392 | 59% |
| 7.5 | Request for NPDES Program Modification - Update Legal Authority in Other Areas | NPDES States | 3,083 | 333 | 825% | The Agency anticipates that all authorized states will revise their programs to update their legal authorities in response to the multiple rulemakings anticipated in the NPDES program.  |
| 4.106 | Permittee Report of Anticipated Noncompliance | NPDES States, Nonmunicipal Sludge | 0 | 10 | -100% | The previous ICR had one permittee responding to this activity. Mathematical restriction to prevent less than full permittees (i.e., rounding) to be counted and the combination of updating the number of permits and the allocation of permits to authorized vs. non-authorized states based on the number of permits and not population. |
| 4.108 | Facility and Permit Transfer Report | NPDES States, Nonmunicipal Sludge | 0 | 4 | -100% |
| 4.110 | Permittee Report of Inaccurate Previous Information | NPDES States, Nonmunicipal Sludge | 0 | 4 | -100% |
| 4.193 | Facility and Permit Transfer Report | NPDES States, Municipal Sludge | 0 | 4 | -100% |
| 3.57 | DMR Sampling | Minor Municipal Dischargers, Bimonthly Reporting | 2,650 | 580 | 357% | The total number of Minor (Municipal) Dischargers that report Bimonthly has increased. Reporting frequency fields in ICIS are easier to interpret than those in PCS. More States are now under ICIS. |
| 3.63 | DMR Sampling Analysis | Minor Municipal Dischargers, Bimonthly Reporting | 5,630 | 1,232 | 357% |
| 4.147 | DMR Reporting | Minor Municipal Dischargers, Bimonthly Reporting | 1,152 | 252 | 357% |
| 4.148 | DMR Administration | NPDES States, Minor Municipal Dischargers, Bimonthly Reporting | 149 | 34 | 343% |
|  |  |  |  |  |  |  |
| 3.3 | DMR Sampling | Minor Nonmunicipal Dischargers, Bimonthly Reporting | 9,853 | 4,885 | 102% | The total number of Minor (nonmunicipal) Dischargers that report Bimonthly has increased. Reporting frequency fields in ICIS are easier to interpret than those in PCS. More States are now under ICIS. |
| 3.1 | DMR Sampling Analysis | Minor Nonmunicipal Dischargers, Bimonthly Reporting | 20,938 | 10,381 | 102% |
| 4.25 | DMR Reporting | Minor Nonmunicipal Dischargers, Bimonthly Reporting | 4,284 | 2,124 | 102% |
| 4.26 | DMR Administration | NPDES States, Minor Nonmunicipal Dischargers, Bimonthly Reporting | 562 | 278 | 102% |
| 3.81 | DMR Sampling | General Non-stormwater Permittees (State) - Semi-Annually | 977 | 0 | N/A | Total Number of Non-Stormwater General Permittees decreased by EPA. (Jackie Clark) Additionally, the percent of Non-stormwater General Permittees not required to report has increased, and there is a move from monthly and quarterly sampling to semiannual and annual. |
| 3.82 | DMR Sampling | General Non-stormwater Permittees (State) - Quarterly | 47,538 | 109,944 | -57% |
| 3.83 | DMR Sampling | General Non-stormwater Permittees (State) - Bimonthly | 49,194 | 23,720 | 107% |
| 3.87 | DMR Sampling Analysis | General Non-stormwater Permittees (State) - Semi-Annually | 651 | 0 | N/A |
| 3.88 | DMR Sampling Analysis | General Non-stormwater Permittees (State) - Quarterly | 31,692 | 73,296 | -57% |
| 3.89 | DMR Sampling Analysis | General Non-stormwater Permittees (State) - Bimonthly | 32,796 | 15,813 | 107% |
| 4.225 | DMR Reporting | General Non-stormwater Permittees (State) - Semi-Annually | 868 | 0 | N/A |
| 4.226 | DMR Reporting | General Non-stormwater Permittees (State) - Quarterly | 42,256 | 97,728 | -57% |
| 4.227 | DMR Reporting | General Non-stormwater Permittees (State) - Bimonthly | 43,728 | 21,084 | 107% |
| 3.47 | DMR Sampling | Sludge Only, Class I Mgmt Facilities (Industrial) | 2,440 | 536 | 355% | Uncertainty attached to sludge permits (i.e., unknown sludge class) has decreased in the number reported in ICIS from the numbers reported in PCS. This increases the number of Class I facilities and reduces the number of Non-Class I facilities. |
| 3.51 | DMR Sampling Analysis | Sludge Only, Class I Mgmt Facilities (Industrial) | 7,319 | 1,607 | 355% |
| 3.69 | DMR Sampling | Sludge Only, Class I Mgmt Facilities (Municipal Biosolids) | 10,784 | 1,927 | 460% |
| 3.70 | DMR Sampling | Sludge Only, Non-Class I Mgmt Facilities (Municipal Biosolids) | 31 | 5,916 | -100% |
| 3.73 | DMR Sampling Analysis | Sludge Only, Class I Mgmt Facilities (Municipal Biosolids) | 32,353 | 5,780 | 460% |
| 3.74 | DMR Sampling Analysis | Sludge Only, Non-Class I Mgmt Facilities (Municipal Biosolids) | 52 | 9,861 | -100% |
| 4.111 | DMR Reporting | Sludge Only, Class I Mgmt Facilities (Industrial) | 1,626 | 357 | 355% |
| 4.112 | DMR Administration | NPDES States Sludge Only, Class I Mgmt Facilities (Industrial) | 82 | 25 | 224% |
| 4.114 | DMR Administration | NPDES States Sludge Only, Non-Class I Mgmt Facilities (Industrial) | 15 | 31 | -51% |
| 4.196 | DMR Reporting | Sludge Only, Class I Mgmt Facilities (Municipal Biosolids) | 7,190 | 1,284 | 460% |
| 4.197 | DMR Administration | NPDES States Sludge Only, Class I Mgmt Facilities (Municipal Biosolids) | 364 | 90 | 303% |
| 4.198 | DMR Reporting | Sludge Only, Non-Class I Mgmt Facilities (Municipal Biosolids) | 2 | 394 | -100% |
| 4.199 | DMR Administration | NPDES States Sludge Only, Non-Class I Mgmt Facilities (Municipal Biosolids) | 1 | 277 | -100% |
| 5.14 | DMR Recordkeeping | Sludge Only, Class I Mgmt Facilities (Industrial) | 138 | 30 | 355% |
| 5.26 | DMR Recordkeeping | Sludge Only, Class I Mgmt Facilities (Municipal Biosolids) | 611 | 109 | 460% |
| 5.27 | DMR Recordkeeping | Sludge Only, Non-Class I Mgmt Facilities (Municipal Biosolids) | 0 | 34 | -100% |
| 5.31 | DMR Recordkeeping Only | Sludge Only, Non-Class I Mgmt Facilities (Municipal Biosolids) | 14 | 2,662 | -100% |
| 1.140 | NOI Filing | Tank Ships  | 731 | 402 | 82% | Vessels Universe updated based on information in the Economic and Benefits Analysis of the 2013 Vessel General Permit (VGP), September 2011. One time reporting activities already completed by most permitted vessels. NOI  |
| 1.143 | NOI Filing | Passenger Vessels | 66 | 248 | -73% |
| 3.105 | Routine Inspections | Tank Ships  | 2,014 | 1,011 | 99% |
| 3.106 | Routine Inspections | Commercial Fishing  | 1,168 | 4,813 | -76% |
| 3.108 | Routine Inspections | Passenger Vessels | 918 | 2,270 | -60% |
| 3.114 | Annual Inspections | Tank Ships  | 6,739 | 3,661 | 84% |
| 3.115 | Annual Inspections | Commercial Fishing  | 1,184 | 4,813 | -75% |
| 3.117 | Annual Inspections | Passenger Vessels | 990 | 2,321 | -57% |
| 4.339 | One Time Reporting | Cruise Ships  | 2 | 18 | -90% |
| 4.340 | One Time Reporting | Freight Ships  | 290 | 613 | -53% |
| 4.342 | One Time Reporting | Commercial Fishing  | 0 | 963 | -100% |
| 4.343 | One Time Reporting | Freight Barges  | 820 | 3,171 | -74% |
| 4.344 | One Time Reporting | Passenger Vessels | 0 | 466 | -100% |
| 4.346 | One Time Reporting | Utility Vessels  | 23 | 642 | -96% |
| 4.347 | One Time Reporting | Tank Barges  | 229 | 488 | -53% |
| 5.51 | Recordkeeping Activities | Tank Ships  | 2,020 | 1,074 | 88% |
| 5.52 | Recordkeeping Activities | Commercial Fishing  | 1,175 | 4,813 | -76% |
| 5.54 | Recordkeeping Activities | Passenger Vessels | 949 | 2,292 | -59% |
| 2.30 | Documenting Nine Minimum Control Measures - O&M | POTWs - Small | 0 | 17 | -100.0% | All CSO permits or enforcement orders have fulfill the obligation of Phase I technology-based CSO control requirements (Nine Minimum Controls) |
| 2.31 | Documenting Nine Minimum Control Measures - O&M | POTWs - Medium | 0 | 13 | -100.0% |
| 2.32 | Documenting Nine Minimum Control Measures - O&M | POTWs - Large | 0 | 27 | -100.0% |
| 2.33 | Documenting Nine Minimum Control Measures - Max. Storage of System | POTWs - Small | 0 | 35 | -100.0% |
| 2.34 | Documenting Nine Minimum Control Measures - Max. Storage of System | POTWs - Medium | 0 | 27 | -100.0% |
| 2.35 | Documenting Nine Minimum Control Measures - Max. Storage of System | POTWs - Large | 0 | 53 | -100.0% |
| 2.36 | Documenting Nine Minimum Control Measures - Pretreatment | POTWs - Small | 0 | 17 | -100.0% |
| 2.37 | Documenting Nine Minimum Control Measures - Pretreatment | POTWs - Medium | 0 | 13 | -100.0% |
| 2.38 | Documenting Nine Minimum Control Measures - Pretreatment | POTWs - Large | 0 | 27 | -100.0% |
| 2.39 | Documenting Nine Minimum Control Measures - Max. Flow | POTWs - Small | 0 | 35 | -100.0% |
| 2.40 | Documenting Nine Minimum Control Measures - Max. Flow | POTWs - Medium | 0 | 27 | -100.0% |
| 2.41 | Documenting Nine Minimum Control Measures - Max. Flow | POTWs - Large | 0 | 53 | -100.0% |
| 2.42 | Documenting Nine Minimum Control Measures - Dry-weather Overflows | POTWs - Small | 0 | 78 | -100.0% |
| 2.43 | Documenting Nine Minimum Control Measures - Dry-weather Overflows | POTWs - Medium | 0 | 13 | -100.0% |
| 2.44 | Documenting Nine Minimum Control Measures - Dry-weather Overflows | POTWs - Large | 0 | 27 | -100.0% |
| 2.45 | Documenting Nine Minimum Control Measures - Control Solids | POTWs - Small | 0 | 17 | -100.0% |
| 2.46 | Documenting Nine Minimum Control Measures - Control Solids | POTWs - Medium | 0 | 13 | -100.0% |
| 2.47 | Documenting Nine Minimum Control Measures - Control Solids | POTWs - Large | 0 | 27 | -100.0% |
| 2.48 | Documenting Nine Minimum Control Measures - Pollution Prevention | POTWs - Small | 0 | 17 | -100.0% |
| 2.49 | Documenting Nine Minimum Control Measures - Pollution Prevention | POTWs - Medium | 0 | 13 | -100.0% |
| 2.50 | Documenting Nine Minimum Control Measures - Pollution Prevention | POTWs - Large | 0 | 27 | -100.0% |
| 2.51 | Documenting Nine Minimum Control Measures - Public Notification | POTWs - Small | 0 | 17 | -100.0% |
| 2.52 | Documenting Nine Minimum Control Measures - Public Notification | POTWs - Medium | 0 | 13 | -100.0% |
| 2.53 | Documenting Nine Minimum Control Measures - Public Notification | POTWs - Large | 0 | 27 | -100.0% |
| 2.54 | Documenting Nine Minimum Control Measures - Monitor | POTWs - Small | 0 | 69 | -100.0% |
| 2.55 | Documenting Nine Minimum Control Measures - Monitor | POTWs - Medium | 0 | 27 | -100.0% |
| 2.56 | Documenting Nine Minimum Control Measures - Monitor | POTWs - Large | 0 | 27 | -100.0% |
| 2.57 | Documenting Nine Minimum Control Measures - General Reporting | POTWs - Small | 0 | 35 | -100.0% |
| 2.58 | Documenting Nine Minimum Control Measures - General Reporting | POTWs - Medium | 0 | 27 | -100.0% |
| 2.59 | Documenting Nine Minimum Control Measures - General Reporting | POTWs - Large | 0 | 53 | -100.0% |
| 2.60 | Documenting Nine Minimum Control Measures - Recordkeeping | POTWs - Small | 0 | 35 | -100.0% |
| 2.61 | Documenting Nine Minimum Control Measures - Recordkeeping | POTWs - Medium | 0 | 27 | -100.0% |
| 2.62 | Documenting Nine Minimum Control Measures - Recordkeeping | POTWs - Large | 0 | 53 | -100.0% |
| 2.63 | Review NMC Documentation | NPDES States | 0 | 267 | -100.0% |
| 5.58 | CSO State Oversight - Recordkeeping | NPDES States | 0 | 7 | -100.0% |