

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.

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change	
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%		

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	
3.63	DMR Sampling Analysis	Minor Municipal Dischargers, Bimonthly Reporting	5,630	1,232	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.
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%	

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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
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%		

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
3.70	DMR Sampling	Sludge Only, Non-Class I Mgmt Facilities (Municipal Biosolids)	31	5,916	-100%	and reduces the number of Non-Class I facilities.
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%	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	
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%	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	% Change	Reason for Change
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%	