Good Morning Jim,  
  
The program quickly assembled a response to your questions on the NPDES ICR, which is found in the explanation and attached table (see bottom of this document) from Alejandro Escobar below. Please let me know if you have any further questions on this.  
  
Spencer W. Clark  
Office of Environmental Information  
U.S. Environmental Protection Agency  
EPA West 6416X, (202) 566-0729  
----- Forwarded by Spencer Clark/DC/USEPA/US on 12/11/2012 08:10 AM -----  
  
From: Amelia Letnes/DC/USEPA/US  
To: Spencer Clark/DC/USEPA/US@EPA  
Date: 12/11/2012 08:05 AM  
Subject: Fw: ICR 2040-0004 NPDES Program Renewal

Here is the response from our contractor on how the calculations were done. He also included the chart that Jim requested.   
  
Amelia Letnes  
State and Regional Branch, Water Permits Division, OWM  
Mail Code: 4203M  
(202) 564-5627  
----- Forwarded by Amelia Letnes/DC/USEPA/US on 12/11/2012 08:04 AM -----  
  
From: "Escobar, Alejandro" <[Alejandro.Escobar@tetratech.com](mailto:Alejandro.Escobar@tetratech.com)>  
To: Amelia Letnes/DC/USEPA/US@EPA  
Date: 12/10/2012 09:45 PM  
Subject: RE: ICR 2040-0004 NPDES Program Renewal

Amelia,  
  
I can see how this is confusing. There are two key things that explain the issue with the construction numbers, and Jim is absolutely on the right track :  
  
1. There is a 65% decrease in the number of construction starts as Jim identified.  
2. For this ICR we have actual numbers for construction sites split between small and large based on updated data, whereas last time we used a basic assumption that 63% of sites were large and 37% of sites were small.   
  
So for large sites Jim is right that the line items associated with this decrease category have gone down by 75-80%. But for small sites the burden has only decrease by 47%. These two combined would show an approximate 65% reduction across the construction sector. We did not call attention to the small construction sites change because in Appendix D we were concerned with showing any change >50% (which in hindsight was probably not very smart)  
  
I have attached a table that show any decrease >50K hours. It is only 22 line items from the ICR but they account for almost 9 million hours (8,978,701 hours).  
  
I hope this helps clarify the issue. Please let me know if you need the data diced or sliced in a different way.   
  
Alejandro  
  
  
Alejandro Escobar | Environmental Engineer  
Direct: 703.385.6000 x461 | Fax: 703.385.6007 | Skype: alejandro\_escobar | Mobile New Zealand: ++64 021 08366202  
[alejandro.escobar@tetratech.com](mailto:alejandro.escobar@tetratech.com)  
  
Tetra Tech  |  Complex World, Clear Solutions  
10306 Eaton Place, Suite 340 | Fairfax, VA 22030-2201 | [www.tetratech.com](http://www.tetratech.com)  
  
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Π !!Think green, keep it on the screen!!  
  
  
  
-----Original Message-----  
From: [Letnes.Amelia@epamail.epa.gov](mailto:Letnes.Amelia@epamail.epa.gov) [<mailto:Letnes.Amelia@epamail.epa.gov>]   
Sent: Tuesday, December 11, 2012 11:54 AM  
To: Escobar, Alejandro  
Subject: Fw: ICR 2040-0004 NPDES Program Renewal  
  
  
Apparently Jim is back. Can you take a look at this?  
  
Amelia Letnes  
State and Regional Branch, Water Permits Division, OWM Mail Code: 4203M  
(202) 564-5627   
  
  
-----Forwarded by Amelia Letnes/DC/USEPA/US on 12/10/2012 05:52PM -----  
  
=======================  
To: Amelia Letnes/DC/USEPA/US@EPA  
From: Spencer Clark/DC/USEPA/US@EPA  
Date: 12/10/2012 04:42PM  
Cc: Katherine Telleen/DC/USEPA/US@EPA  
Subject: Fw: ICR 2040-0004 NPDES Program Renewal =======================  
Hi Amelia,  
  
I just got this question from Jim Laity, who's looking over ICR 229. Could you please look at this and provide a response in the next day or two?   
  
Thanks,  
  
Spencer W. Clark  
Office of Environmental Information  
U.S. Environmental Protection Agency  
EPA West 6416X, (202) 566-0729  
  
-----Forwarded by Spencer Clark/DC/USEPA/US on 12/10/2012 04:41PM -----  
To: Spencer Clark/DC/USEPA/US@EPA  
From: "Laity, Jim" <[James\_A.\_Laity@omb.eop.gov](mailto:James_A._Laity@omb.eop.gov)>  
Date: 12/10/2012 04:25PM  
Cc: Rick Westlund/DC/USEPA/US@EPA  
Subject: ICR 2040-0004 NPDES Program Renewal  
  
Spencer: Projected burden decreases by 9.6 million hours, almost all of it for revised estimates. This is based primarily on a changed estimate of new construction starts each year, from 243,076 to 84,472 sites, which accounts for 8.0 million hours, or about 84% of the total burden change. This is a 65% decrease in this general category. However, the main burden line items associated with this decrease category have gone down by 75-80%. Please provide an explanation.<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />  
  
Appendix D provides a list of line items that have changed by more than 50%--most of these are very small in absolute numbers. It would be more helpful to see a list of the largest burden changes that collectively account for 95% plus of the total change (9 million hours +), regardless of the percentage change in the line item itself. I don’t want staff to go to a lot of trouble on this, but if they could whip up a simple table showing the big ticket items that would be helpful. -- jim  
  
*(See attached file: Extra Table for Jim (12112012).docx)*

**Extra Table – Analysis of Changes**

The table below presents all line items from the ICR with a greater than 50,000 hours in reduction from the currently approved ICR (i.e., OMB’s inventory). It also includes an explanation of the reason for the change.

| **Reference Code** | **Activity Description** | **Respondent Type** | **Total Hours / Year (Renewal)** | **Total Hours / Year (OMB)** | **Change** | **Reason for Change** |
| --- | --- | --- | --- | --- | --- | --- |
| 1.124 | NOI preparation & submittal | Large construction sites (>5 acres) in NPDES States | 51,935 | 216,843 | -164,909 | 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 |
| 1.128 | NOI Processing & review | NPDES States, Large construction sites (>5 acres) | 34,623 | 144,562 | -109,939 |
| 1.129 | Prepare and submit a permit application or NOI | Small construction sites (1-5 acres) | 168,613 | 316,132 | -147,519 |
| 1.133 | Prepare and submit a NOT | Large construction sites (>5 acres) | 18,252 | 76,569 | -58,318 |
| 2.82 | Development of SWPPP | Small construction sites (1-5 acres) | 1,034,462 | 1,939,511 | -905,049 |
| 2.83 | Development of SWPPP | Large construction sites (>5 acres) in NPDES States | 1,260,277 | 5,262,057 | -4,001,780 |
| 2.84 | Development of SWPPP | Large construction sites (>5 acres) EPA Perm Auth no ESA | 41,059 | 187,314 | -146,255 |
| 2.85 | Development of SWPPP | Large construction sites (>5 acres) EPA Perm Auth informal ESA | 25,516 | 116,444 | -90,927 |
| 3.97 | Routine site inspection | Small construction sites (1-5 acres) | 91,142 | 170,882 | -79,740 |
| 3.98 | Routine site inspection | Large construction sites (>5 acres) in NPDES States | 450,099 | 1,879,306 | -1,429,207 |
| 3.99 | Routine site inspection | Large construction sites (>5 acres) EPA Perm Auth no ESA | 14,664 | 66,898 | -52,234 |
| 5.48 | Recordkeeping of Inspections | Stormwater General Permittees, Construction | 328,294 | 954,316 | -626,022 |
| 3.8 | DMR Sampling Analysis | Major Dischargers, Nonmunicipal | 1,710,240 | 1,825,320 | -115,080 | The total number of Major Dischargers has decrease. This is most likely the results of data quality checks as states move their information from PCT to ICIS. More States are now under ICIS. |
| 3.2 | DMR Sampling | Minor Nonmunicipal Dischargers, Monthly Reporting | 662,179 | 810,226 | -148,046 | The total number of Minor (nonmunicipal) Dischargers that report monthly has decreased (Bimonthly has increased). Reporting frequency fields in ICIS are easier to interpret than those in PCS. More States are now under ICIS. |
| 3.9 | DMR Sampling Analysis | Minor Nonmunicipal Dischargers, Monthly Reporting | 1,407,131 | 1,721,729 | -314,599 |
| 3.62 | DMR Sampling Analysis | Minor Municipal Dischargers, Monthly Reporting | 770,544 | 872,595 | -102,051 |
| 4.23 | DMR Reporting | Minor Nonmunicipal Dischargers, Monthly Reporting | 287,904 | 352,272 | -64,368 |
| 3.11 | DMR Sampling Analysis | Minor Nonmunicipal Dischargers, Quarterly Reporting | 300,523 | 351,196 | -50,674 | The total number of Minor (nonmunicipal) Dischargers that report quarterly has decreased (Bimonthly has increased). Reporting frequency fields in ICIS are easier to interpret than those in PCS. More States are now under ICIS. |
| 3.82 | DMR Sampling | General Non-stormwater Permittees (State) - Quarterly | 47,538 | 109,944 | -62,406 | 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. |
| 4.226 | DMR Reporting | General Non-stormwater Permittees (State) - Quarterly | 42,256 | 97,728 | -55,472 |
| 3.95 | DMR Sampling | MS4s, Phase I | 257,520 | 419,933 | -162,413 | Updated sources of information show a decrease in the number of estimated Phase I MS4s permits. |
| 3.96 | DMR Sampling Analysis | MS4s, Phase I | 145,389 | 237,083 | -91,694 |