

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@tetrattech.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

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!!Think green, keep it on the screen!!

-----Original Message-----

From: 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 -----

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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>
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	25,516	116,444	-90,927	

Reference Code	Activity Description	Respondent Type	Total Hours / Year (Renewal)	Total Hours / Year (OMB)	Change	Reason for Change
		informal ESA				
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,	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.

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