

SUPPORTING STATEMENT

1. Identification of the Information Collection

1(a) Title: Brownfields Program – Accomplishment Reporting (Revision)
(OMB Control Number 2050-0192; EPA ICR No. 2104.05)

1(b) This is a request to revise an existing Information Collection Request (ICR). This ICR covers the collection of information from those organizations that receive cooperative agreements from EPA under the authority of subtitle A and expand the collection to those eligible entities that receive cooperative agreements from EPA under the authority of subtitle C of the “Small Business Liability Relief and Brownfields Revitalization Act” (Public Law 107-118, January 2002). Subtitle A of the Act amends the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, and authorizes EPA to award cooperative agreements to States, tribes, local governments, and other eligible entities to support the assessment and cleanup of brownfields properties and subtitle C authorizes a noncompetitive \$50 million program to establish and enhance state and tribal response programs. With this ICR, EPA’s Office of Brownfields and Land Revitalization (OBLR) seeks authorization to collect information from cooperative agreement recipients (recipients) using several standard forms that will streamline the data collection effort and improve the quality of information collected. The information collected under this ICR supplements the minimum reporting and record keeping requirements that recipients are subject to under 40 CFR Part 30, “Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-profit Organizations” and 40 CFR Part 31, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments.” EPA estimates that all respondents who voluntarily respond to this information collection by electing to participate in the Brownfields program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

1(c) Revision

For the last renewal, ICR 2104.04, the old forms were mistakenly attached in the posting. The purpose of this revision is to post the revised forms that were mistakenly left out of the last ICR renewal.

Per OMB's request, the burden tables were modified to separate the burden of private (non-profits) individuals and government entities reporting to EPA. Through the recalculation, the total burden cost increased by a negligible amount due to rounding.

For this revision of the ICR, EPA made changes to streamline some questions on the Property Profile Form. Additionally, questions were added to the Job Training reporting form. On the Property Profile Form, EPA listed additional common contaminants and affected media options to the drop down menu in Table B: Contaminants and Affected Media. EPA received feedback from respondents to add pesticides under the list of contaminants and indoor air and building materials under the list of affected media since those responses are already commonly reported to ACRES in an open text field. On the Job Training reporting form, EPA added questions to obtain more information about the training recipients benefiting from our funding. EPA is seeking to

collect this additional information to gain a better understanding about who is benefiting from Job Training cooperative agreement funds and to improve the program to better serve its target audience.

2. Need for/Use of the Collection

On January 11, 2002, the President signed into law the Small Business Liability Relief and Brownfields Revitalization Act (the “Brownfields Amendments”), which authorizes EPA to award several types of cooperative agreements to eligible entities. Under subtitle A of the Brownfields Amendments, States, tribes, local governments, and other eligible entities can receive cooperative agreements to:

- (1) inventory, characterize, assess, and conduct planning and community involvement related to brownfields sites;
- (2) carry out cleanup activities at brownfields sites;
- (3) capitalize revolving loan funds and provide sub-grants for cleanup activities; and
- (4) support the creation and implementation of environmental job training and placement programs.

Under subtitle C of the Brownfields Amendments, States and tribes can receive cooperative agreements to:

- (1) establish or enhance a State response program that meets the four elements;
- (2) establish or enhance a public record;
- (3) develop legislation, regulations, procedures, or guidance that would establish or enhance the legal structure of the State program;
- (4) capitalize a revolving loan fund;
- (5) purchase environmental insurance; and
- (6) carry out site-specific environmental assessment and cleanup activities.

In the Brownfields Amendments, a brownfields site means real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. For funding purposes, EPA uses the term “brownfields property(ies)” synonymously with the term “brownfields site(s).”

While the Agency collects basic cooperative agreement information as part of its Federal stewardship responsibilities to manage and oversee recipient activities and expenditures (see 40 CFR Parts 30 and 31), OBLR needs additional information from recipients to be reported in a

consistent manner in order to evaluate the effectiveness of the program and to report on program activities and accomplishments to Congress and other program stakeholders. Specifically, OBLR has used and will continue to use the information collected from recipients to oversee the activities carried out using cooperative agreement funds, to evaluate program implementation and effectiveness, and to meet the Agency’s responsibilities under the Government Performance and Results Act to report on OBLR’s accomplishments. The information collection activities covered by this renewed ICR are intended to: (1) continue to improve the alignment of reporting requirements with programmatic performance measures; and (2) simplify and standardize reporting requirements to reduce uncertainty and burden imposed on recipients. Without the information collection, OBLR would have limited access to information needed to effectively assess the relationship between those activities funded by EPA’s Brownfields cooperative agreements and the intent of Congress with the passage of the Brownfields Amendments.

3. Non-duplication, Consultations, and Other Collection Criteria

3(a). Non-duplication – There is no other known source for the information that EPA seeks under this ICR. Moreover, this ICR supplements, and does not duplicate, the information that EPA collects as part of its reporting and record keeping provisions under the Agency’s general assistance regulations at 40 CFR Part 30, “Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-profit Organizations,” and 40 CFR Part 31, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments.” EPA’s regulations at 40 CFR Part 31, which implements the requirements of OMB Circular A-102, became effective for awards made on or after October 1, 1988. The Part 31 rule (common rule) established uniformity among Federal agencies that award Federal grants and cooperative agreements to States, political subdivisions thereof, and Federally-recognized Indian Tribal Governments. **Exhibit 1** identifies the tasks and burdens of recipients that are covered under other OMB-approved ICRs. This ICR addresses the burden imposed on recipients and EPA associated with the reporting requirements that are unique to cooperative agreements awarded by EPA under authority of subtitles A and C of the Brownfields Amendments.

Exhibit 1: Grant Burdens Covered Under Other Agency ICRs

Task/Burden	Authority	Agency Approved ICR
Preliminary Grant Proposal	40 CFR Parts 30 and 31	OMB 2030-0020
Final Grant Proposal	40 CFR Parts 30 and 31	OMB 2030-0020
Budget Sheets	40 CFR Parts 30 and 31	OMB 2030-0020
Quarterly Progress Reports	40 CFR Parts 30 and 31	OMB 2030-0020
Notification of Significant Developments	40 CFR Parts 30 and 31	OMB 2030-0020
Procurement Reports	40 CFR Parts 30 and 31	OMB 2030-0020
Financial Reports	40 CFR Parts 30 and 31	OMB 2030-0020
Project Records	40 CFR Parts 30 and 31	OMB 2030-0020

3(b). Public Notice Required Prior to ICR Submission to OMB. The first notification of the Agency's request for the renewal of this ICR was published in the Federal Register. Concurrent with the submission of this ICR to OMB, EPA is publishing a second Federal Register notice seeking public comments on this ICR.

The revised forms and Public Notice were published in the Federal Register on 9/19/2012 under EPA-HQ-SFUND-2012-0104.

The 1st Federal Register Notice was posted under 77 FR 58127.

The revised Property Profile Form, Job Training Reporting Form Instructions, Job Training Reporting Form, and Property Profile Form Instructions were posted and did not receive any comments.

3(c). Consultations – EPA has more than 15 years of experience managing Brownfields cooperative agreement programs that awarded more than 2,900 cooperative agreements to State, local, and tribal governments to address brownfields properties. For these Brownfields cooperative agreements, EPA staff has worked closely with the recipients to help them participate in the program and address their brownfields properties. As such, EPA has a detailed understanding of the activities that recipients undertake and the burden they incur for voluntarily participating in EPA's cooperative agreement programs. In addition, during the preparation of the initial ICR in 2003 and the reporting forms that are included, EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft forms included in this ICR. Recipient responses form the basis of EPA's initial calculations of the burden hours and costs.

For the first renewal of this ICR in 2006 the ICR was expanded to include reporting from subtitle C recipients. To do so, EPA consulted with several State and Tribal representatives when working on modifications to the Property Profile Form. State personnel involved included: Barbara Coler, State of California; Andrew Shivas, State of Tennessee; Mark Walker, State of Colorado; Amy Yersavich, Ohio; and Catherine Sharp, State of Oklahoma. Tribal personnel included Susan Morang, Cherokee Nation.

For the second renewal of the ICR in 2009, EPA added additional fields to the Property Profile Form. EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft new fields for the Property Profile Form included in this renewal ICR.

For the third renewal of the ICR, EPA made no changes to the Property Profile Form and Job Training reporting form. EPA contacted nine RLF recipients and six Job Training recipients and asked them to evaluate the burden of completing the forms attached to this ICR. Recipient responses form the basis of EPA's calculations of the burden hours and costs.

For this revision, EPA contacted nine RLF recipients and six Job Training recipients and asked them to evaluate the burden of completing the forms attached to this ICR. The nine RLF

recipients contacted were Larry Norris, State of Alabama, Erin Hazelton, State of Ohio, Fonda Apostolopolou, State of Colorado, Laura Clark, Cuyahoga County, Diana Sasser, City of Sacramento, Paula Boase, Downriver Community Conference, Mike McCluskey, State of New Hampshire, Chuck Morgan, Southern Maine RPC, and Ross Muir, State of New Mexico. The six Job Training recipients are Miguel Partap, Enterprise Center of Chattanooga, Alexander Nicholas, RichmondBUILD, Mollie Dowling, OAI Chicago Southland, John Mello, Civic Works Maryland for Baltimore, Warren Adams-Leavitt, Metropolitan Energy Center, and Sontina Greene, City of Durham. Recipient responses form the basis of EPA's calculations of the burden hours and costs.

3(d). Effects of Less Frequent Collection – The information collection schedule is consistent with the Agency's reporting schedule for general assistance agreements. Less frequent collection may not enable EPA to oversee and manage Brownfields cooperative agreements effectively and would lessen OBLR's ability to report up-to-date and accurate information on program activities and accomplishments. In consideration of the burden imposed on recipients, EPA has adopted less frequent reporting for the Property Profile Form in which recipients are required to update and submit the form as notable activities or changes occur at a particular property. EPA anticipates that recipients of subtitle A assessment, cleanup, and revolving loan fund cooperative agreements will submit an updated Property Profile Form to EPA, twice but not more than four times over the life of the cooperative agreement. For subtitle C State and tribal response program cooperative agreements, EPA anticipates that recipients will submit a Property Profile Form to EPA twice a year in line with the bi-annual reporting guidelines.

3(e). General Guidelines – The information collection is consistent with the guidelines set forth in 5 CFR 1320.6 of the Paperwork Reduction Act Guidelines.

3(f). Confidentiality – No confidentiality is provided and no sensitive information is collected under this ICR.

3(g). Sensitive Questions – Sensitive questions are not associated with the information collection activities performed under Public Law 107-118.

4. Respondents and Information Requested

4(a). Respondents – Respondents under this ICR are those entities who voluntarily elect to participate in the Brownfields cooperative agreement programs and receive funding from EPA under the authority of subtitle A and/or C of the Brownfields Amendments. Specifically, respondents to this information collection include: general purpose units of local government (NAICS Code: 92411); land clearance authorities or other quasi-governmental entities that operate under the supervision and control of, or as an agent of, a general purpose unit of local government (NAICS Code: 92411); government entities created by State legislature (NAICS Code: 92411); regional councils or groups of general purpose units of local government (NAICS Code: 92411); redevelopment agencies that are chartered or otherwise sanctioned by the State (NAICS Code: 92411); States (NAICS Code: 92411); Indian Tribes other than in Alaska (NAICS Code: 92115); Alaska Native Regional Corporations, Alaska Native Village Corporations, and

Metlakatla Indian Communities (NAICS Code:92115); and non-profit organizations¹ (NAICS Code: 81331²).

4(b). Information Requested – The information requested by EPA under this ICR includes information from recipients specific to the activities undertaken and the accomplishments that result using Brownfields funds. The information to be collected by EPA will vary by the type of cooperative agreement awarded to the respondent. Brownfields Job Training recipients are required to complete on a quarterly basis the Brownfields Job Training Reporting Form. The Job Training Reporting Form seeks basic information on how funds were used to support Job Training programs and the accomplishments stemming from those programs. For example, Job Training recipients will report the number of participants who have completed the training, whether participants obtained employment, and the average hourly wages of participants who obtained employment.

For Brownfields area-wide planning , assessment, cleanup, revolving loan fund cooperative agreements, and property-specific activities of the State Response Program Cooperative Agreements, EPA requires subtitle A and C award recipients to prepare an initial Brownfields Property Profile Form for each property the cooperative agreement intends to address. The Property Profile Form complements the information collected as part of the progress reports required by the general assistance regulations, and requests basic information about each brownfields property covered by the cooperative agreement, such as property name, location, parcel number, and size. EPA requires recipients to update the Property Profile Form as notable activities or changes occur on the property, but no more frequently than quarterly for subtitle A recipients and no more than twice a year for subtitle C recipients. For example, as an assessment of the property is completed, recipients are required to complete the portion of the Property Profile Form that applies to assessments, and provide basic information to EPA on the type of assessment, date of completion, and results or findings of the assessment. Other sections of the Property Profile Form collect basic information on cleanups and any redevelopment activities that occur on the property, including estimates of the number of jobs that result.

5. The Information Collected – Agency Activities, Collection, Methodology and Information Management

5(a). Agency Activities – EPA is responsible to Congress and other stakeholders to ensure that its resources are being used efficiently and effectively, to evaluate the progress of the recipients in meeting the goals of EPA’s Office of Brownfields and Land Revitalization, and to share the successes, lessons learned, and best practices among Brownfields recipients. EPA will collect the information using standardized forms that minimize the burden on respondents while ensuring consistent information that can be easily aggregated and accurately reported. EPA program staff will review the information collected to keep current on recipient activities, and will enter the information into the Agency’s Assessment, Cleanup, and Redevelopment Exchange System (ACRES). EPA uses ACRES to maintain information on all of its Brownfields

¹ For the purposes of the Brownfields grant program, EPA uses the definition of non-profit organization contained in Section 4(6) of the Federal Financial Assistance Management Improvement Act of 1999, Public Law 106-107.

²NAICS Codes as of 2002. Source: <http://www.census.gov/epcd/naics02/naicod02.htm>

cooperative agreements' property specific activities, develop reports to support management and program evaluation activities, and to report accomplishments achieved as part of the Agency's responsibilities under GPRA. For the additional Job Training questions, the additional information collected will help the agency respond to internal inquiries regarding who is benefiting from the training opportunities funded through Brownfield cooperative agreements.

5(b). Collection Methodology and Management – EPA will collect data under this ICR using a standard set of forms, instructions, and guidance that are designed to simplify and facilitate the reporting requirements for recipients. In fulfilling the requirements under the Government Paperwork Elimination Act (Public Law 105-277), EPA developed an electronic reporting process that will allow recipients to report their data electronically. This electronic reporting process is integrated with EPA's Enterprise Architecture to further streamline the Agency's data management and reporting responsibilities. EPA released the electronic reporting process in January 2007 and all Brownfields recipients starting from FY 2003 have been given access. EPA has modified its reporting guidance and provides training on the electronic reporting process. EPA has achieved positive returns in user acceptance of the electronic reporting process since its release and continues to anticipate that the electronic reporting process may reduce the burden placed on recipients during the next three years of this ICR. Through improvements to ACRES and greater recipient experience, it is estimated that the reporting burden will decrease.

5(c). Small Entity Flexibility – This information collection request is expected to affect small governmental jurisdictions, which are defined as governments of cities, counties, towns, townships, villages, school districts, or special districts with populations of less than 50,000. This definition may also include Indian Tribes, in keeping with the President's Federal Indian Policy. EPA has considered whether to establish different reporting requirements for small entities and has determined that: (1) different reporting requirements among recipients will result in inconsistent data that may lessen the Agency's ability to oversee and report on program activities and accomplishments; (2) the burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and (3) the Brownfields program is voluntary and respondents who elect to participate in this program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

5(d). Collection Schedule – The information to be collected under this ICR for subtitle A assessment, cleanup, and revolving loan fund recipients shall not occur more frequently than quarterly and no more than twice a year for subtitle C property specific activities. Brownfields Job Training recipients must complete and/or update their Brownfields Job Training Performance Form every quarter. For subtitle A assessment, cleanup, revolving loan fund cooperative agreements, and subtitle C property specific activities, recipients will be required to prepare an initial Property Profile Form for each property at which the cooperative agreement starts to address, and to update the Property Profile forms for only those properties in which notable activities or changes have occurred during the last reporting period.

6. Estimating the Burden and Cost of the Collection

6(a). Estimating respondent burden - A “unit” burden is the burden incurred by a respondent for performing a specific activity that is not covered by another ICR (such as 40 CFR Parts 30 and 31). The estimated burden is incurred by the following activities:

- Completion of the Brownfields Job Training Reporting Form;
- Initial completion of the Brownfields Property Profile Form; and
- Periodic updating of the Brownfields Property Profile Form to report progress on specific properties undergoing assessment, cleanup, or redevelopment.

The estimated burden for respondents is presented in Exhibit 2.

If any burdens were found to be imposed in the ICR by a rule that supersedes the Brownfields Amendments, those burdens, or a percentage of those burdens, were removed from the overall burden calculation in this ICR (see Exhibit 1).

6(b). Estimating respondent costs - To estimate the unit burden (hours) and hourly rate for the original information collection activity, EPA relied on its extensive experience working closely with Brownfields recipients, as well as in-depth interviews with nine current or former Revolving Loan Fund (RLF) recipients and six Job Training recipients specific to this ICR. Those interviewed were shown draft copies of all forms and accompanying instructions and guidance that would be used for reporting and asked to estimate: (1) the number of hours that would be required to perform each task; and (2) the labor mix required to perform each task (e.g., percentage of management, technical, clerical). The data gathered from these interviews were then analyzed to estimate the unit burden and labor mix.

For the renewal of this information collection request in 2012, EPA carried forward the same assumptions that were made for the original request.

For this revision, the forms and data collection minimally changed. To estimate the unit burden (hours) and hourly rate for the renewed information collection activity, EPA conducted in-depth interviews with nine current RLF recipients specific to this ICR. Those interviewed were shown draft copies of the new fields and accompanying instructions and guidance that would be used for reporting and asked to estimate: (1) the number of hours that would be required to perform each task; and (2) the labor mix required to perform each task (e.g., percentage of management, technical, clerical). The data gathered from these interviews were then analyzed to estimate the unit burden and labor mix.

Activity (non-profits)	Unit Burden (Hours)	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Average Number of Responses/ Year*	Total Burden Hours/ Year*	Total Cost/ Year (Dollars)*
Job Training Reporting Form (non-profits)	4	\$82.00	\$328.00	18	73	\$5,904
Initial Completion of Property Profile Form (Subtitle A) (non-profits)	1	\$98.12	\$98.12	55	55	\$5,397
Update of Property Profile Form (Subtitle A) (non-profits)	1.5	\$98.12	\$147.18	38	58	\$5,593
TOTAL				111	186	\$16,894
AVERAGE TOTAL COST PER BURDEN HOUR					\$90.83	
Total Annual Respondents: 43						

Activity (Governments)	Unit Burden (Hours)	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Average Number of Responses/ Year*	Total Burden Hours/ Year*	Total Cost/Year (Dollars)*
Job Training Reporting Form (Governments)	4	\$82.00	\$328.00	11	43	\$3,608
Initial completion of Property Profile Form (Subtitle A) (Governments)	1	\$98.12	\$98.12	952	952	\$93,410
Initial Completion of Property Profile Form (Subtitle C)	1	\$98.12	\$98.12	564	564	\$55,340
Update of Property Profile Form (Subtitle A) (Governments)	1.5	\$98.12	\$147.18	667	999	\$98,169
Update of Property Profile Form (Subtitle C)	1.5	\$98.12	\$147.18	282	423	\$41,505
TOTAL				2,476	2,981	\$292,032
AVERAGE TOTAL COST PER BURDEN HOUR					\$97.96	
Total Annual Respondents: 964						

Total Activity (Non-Profit + Government)	Unit Burden (Hours)	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Average Number of Responses/ Year*	Total Burden Hours/ Year*	Total Cost/Year (Dollars)*
Job Training Reporting Form (non-profits)	4	\$82.00	\$328.00	18	73	\$5,904
Job Training Reporting Form (Governments)	4	\$82.00	\$328.00	11	43	\$3,608
Initial Completion of Property Profile Form (Subtitle A) (non-profits)	1	\$98.12	\$98.12	55	55	\$5,397
Initial completion of Property Profile Form (Subtitle A) (Governments)	1	\$98.12	\$98.12	952	952	\$93,410
Initial Completion of Property Profile Form (Subtitle C)	1	\$98.12	\$98.12	564	564	\$55,340
Update of Property Profile Form (Subtitle A) (non-profits)	1.5	\$98.12	\$147.18	38	58	\$5,593
Update of Property Profile Form (Subtitle A) (Governments)	1.5	\$98.12	\$147.18	667	999	\$98,169

Update of Property Profile Form (Subtitle C)	1.5	\$98.12	\$147.18	282	423	\$41,505
TOTAL				2,587	3,167	\$308,926
AVERAGE TOTAL COST PER BURDEN HOUR					\$97.54	
Total Annual Respondents: 1,007						

Exhibit 2 - Annual Respondent Burden and Cost

* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

** Figures may not sum due to rounding.

The unit labor cost (dollars) for this burden estimate is a weighted hourly rate based upon the estimated labor mix and wage rates gathered from the U.S. Bureau of Labor Statistics (BLS). Across all tasks, data from consultations indicate that the average recipient will incur 13 percent of its burden with executive/managerial staff labor, 6 percent with professional specialty staff labor, 53 percent with technical labor, 10 percent with administrative support or clerical labor, and 17 percent with program participants and partners. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in December 2008³ for a weighted hourly rate of \$46.72 and an estimated fully loaded rate of \$98.12.

For this revision, EPA made minimal changes to the Job Training report form. To calculate the reporting burden, EPA conducted in-depth interviews with six Job Training recipients. Those interviewed were shown draft copies of the new fields and accompanying instructions and guidance that would be used for reporting and asked to estimate: (1) the number of hours that would be required to perform each task; and (2) the labor mix required to perform each task (e.g., percentage of management, technical, clerical). The data gathered from these interviews were then analyzed to estimate the unit burden and labor mix.

Job Training recipients will be required to report progress on a quarterly basis using EPA’s “Brownfields Job Training Reporting Form.” Recipients will be required to report progress on a quarterly basis, with each update requiring approximately 4 hours for a unit burden of \$328.00 for both non-profits and governmental entities. This estimate captures the recipients and the program participants time needed to provide data and the recipients time to gather data and submit the form. The majority of this burden stems from the activities associated with the collection of salary or wage information from Job Training program participants who are able to find employment.

Subtitle A area-wide planning, assessment, cleanup, and revolving loan fund recipients will be required to report progress with the “Brownfields Property Profile Form.” EPA anticipates that the initial completion of this form will require approximately 1 hour. Recipients will be required to update this form as milestones are achieved, though not more frequently than quarterly. It is estimated that each update will require approximately 1.5 for a unit burden of \$147.18 for both non-profits and governmental entities. It is estimated that each form will be updated an average of twice per year.

³ ⁴See Bureau of Labor Statistics publication entitled “Employer costs per hour worked for employee compensation and costs as a percent of total compensation: State and local government, by occupational group, March 2005 <http://stats.bls.gov/news.release/ecec.t04.htm#content>.

Area-wide planning, assessment, and cleanup cooperative agreements awarded under subtitle A of the Brownfields Amendments cover a period of performance of up to three years, and revolving loan fund cooperative agreements cover a period of performance up to 5 years. Based on the Agency's experience under its program, EPA estimates that at the end of two years, approximately 75 percent of cooperative agreements will receive a no-cost extension, approximately 20 percent of recipients will receive supplemental awards, and 5 percent of cooperative agreements will close out. Recipients that receive either a no-cost extension or a supplemental award will be required to continue to report on their activities using the forms authorized under this ICR. In addition, cooperative agreements that have closed out may undergo a five-year review conducted five years after close out. The five year review gathers data on the current status of properties that benefited from EPA funding while the cooperative agreement was active using the forms authorized under this ICR. This burden is included in the estimated number of responses per year and, therefore, the overall burden calculation estimated for this ICR.

Subtitle C recipients that conduct property specific activities will be required to report progress with the "Brownfields Property Profile Form." EPA anticipates that the initial completion of this form will require approximately 1 hour. Recipients will be required to update this form as milestones are achieved, though not more frequently than twice a year. It is estimated that each update will require approximately 1.5 hours for a unit burden of \$147.18. It is estimated that each form will be updated an average of twice per year.

All awards made under subtitle C of the Brownfields Amendments have at least a one year period of performance or can be a multi-year award depending on the State's financial need for continued funding. Based on the Agency's understanding of State response programs, EPA estimates that one-half of the State recipients have sophisticated response programs and can complete property specific activities within one year, therefore submitting a total of two responses. EPA further estimates that the remaining State, tribal, and US territories that receive funding take two years to complete property specific activities therefore submitting a total of four responses.

Start-up costs to meet the Brownfields reporting requirements are minimal and are a part of the customary and usual expenses incurred by recipients. There are no capital costs related to Brownfields reporting requirements. Therefore, total start-up and capital costs are zero. There are no operation and maintenance costs required.

6(c). Agency burden and costs - EPA incurs a burden in the process of requesting, reviewing and processing the information covered by this ICR. This burden includes:

- Reviewing and processing Brownfields Job Training Reporting Forms;
- Reviewing and processing initial Brownfields Property Profile Forms; and
- Reviewing and processing updates of Brownfields Property Profile Forms.

The estimated burden associated with EPA activities is presented in Exhibit 3.

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)	Total Unit Cost (Dollars)	Average Number of Responses/Year*	Total Burden Hours/Year*	Total Cost/Year (Dollars)*
Review and Process Job Training Reporting Form	1	\$50.19	\$50.19	29	29	\$1,456
Review and Process Initial Completion of Property Profile Form (Subtitle A)	1.5	\$49.66	\$74.49	1,007	1,511	\$75,015
Review and Process Initial Completion Property Profile Form (Subtitle C)	1.5	\$49.66	\$74.49	564	846	\$42,014
Review and Process Update to Property Profile Form (Subtitle A)	1	\$49.66	\$49.66	705	705	\$35,007
Review and Process Update to Property Profile Form (Subtitle C)	1	\$49.66	\$49.66	282	282	\$14,005
TOTAL				2,587	3,372	\$167,496
AVERAGE TOTAL COST PER BURDEN HOUR						\$49.67

Exhibit 3 - Annual Agency Burden and Cost

* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

** Figures may not sum due to rounding.

The burden imposed upon EPA was initially estimated by: (1) interviewing EPA Regional and Headquarters staff to gather individual estimates of the time required to perform each activity and the GS level of the staff performing those tasks; (2) averaging the time data to estimate the number of hours required for each burden element; (3) averaging the data on the percentage of time performed by particular staff GS levels; (4) developing a weighted hourly rate based upon percentage of staff labor at different GS levels devoted to each task; and (5) determining the product of the weighted hourly rate and the number of hours required per activity.

For the revision and expansion of this information collection request, EPA is using the estimates collected from RLF project officers and Job Training project officers.

The weighted hourly rate utilized in the Federal burden estimate is based upon the following composite:

GS Level	Percent	Hourly Wage Rate*
GS 4, Step 1	10%	\$11.75
GS 11, Step 1	10%	\$24.10
GS 13, Step 1	75%	\$34.34

GS 14, Step 1	5%	\$40.58
Weighted Rate		\$31.37

*Rates for 2011 General Schedule (http://www.opm.gov/oca/11tables/pdf/g_s_h.pdf)

6(d). Estimated Respondent Universe and Total Burden and Costs – The estimated annual average number of respondents per year for this information collection is 1007 respondents, with the average total number of responses per year estimated at 2,587. Of these 1,007 respondents, 43 are non-profits and 964 are state, local, or tribal governments. As presented in Exhibit 2, the total average annual burden to respondents is 3,167 hours per year at a cost of \$308,926.

6(e). Bottom-line burden hours and costs – Exhibits 2 and 3 provide the bottom-line burden hours and costs for respondents and EPA, respectively. The hours and costs presented in these exhibits represent the average annual burden resulting from this information collection; the total burden hours and costs for the three-year period covered under this ICR is estimated to be three times the total hours and costs provided in each exhibit.

6(f). Reasons for Change in Burden – OMB requested the separation of private and government burden in the table and, as a result, there was an increase of \$15 in the total cost to respondents. This small increase is due to rounding..The purpose of this revision is to present the correct, revised forms.

6(g). Burden Statement – The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1.2 hours per response. For non-profit respondents the estimate is 1.7 hours per response and for state/local/tribal government respondents the estimate is 1.2 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-SFUND-2012-0104 which is available for public viewing at the OSWER Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the OSWER

Docket is (202) 566-0276. Use EPA's electronic docket and comment system at www.regulations.gov, to submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the docket that are available electronically. Once in the system, select "docket search," then key in the docket ID number identified above. Please note that EPA's policy is that public comments, whether submitted electronically or in paper, will be made available for public viewing at www.regulations.gov as EPA receives them and without change, unless the comment contains copyrighted material, confidential business information (CBI), or other information whose public disclosure is restricted by statute. For further information about the electronic docket, go to www.regulations.gov. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-SFUND-2012-0104 and OMB Control Number 2050-0192 in any correspondence.