

**TABLE A-1. AVERAGE ANNUAL COST TO THE FEDERAL GOVERNMENT**

Activity	Average Annual Burden Hours (from Table A-3)	Hourly Cost	Average Annual Cost
Technical Review of revised application & reapplication	3,660	\$74.70 <sup>a</sup>	\$273,402
Evaluate revised applications/reapplications for compliance with 301(h) criteria/prepare 301(h) decisions	2,981	\$35.73 <sup>b</sup>	\$106,511
Evaluate monitoring and toxic control program adequacy	2,220	\$35.73 <sup>b</sup>	\$79,321
Review State determinations and State certifications and coordinate with State	187	\$35.73 <sup>b</sup>	\$6,682
<b>TOTAL</b>	<b>9,048</b>		<b>\$465,915</b>

alt is assumed that the majority of reapplications and additional information submissions are reviewed by a contractor. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$67,787 or \$77,955/year. Thus, based on 2,080 working hours/year, the average salary of a contractor is \$37.35/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$74.70. (Hourly rate based on 2014 DC-B salary rate table.)

<sup>a</sup>It is assumed that the salary level of the typical government employee working on the 301(h) program is a GS-9, Step 10 salary, or \$67,787/year. Based on 2,080 working hours/year, the average hourly salary of a Federal employee is \$32.48/hour. Assuming 10 percent overhead costs, the labor cost for Federal employees is \$35.73/hour. (Hourly rate based on 2014 DC-B salary rate table.)

NOTE: Numbers may not add due to rounding.

**TABLE A-2. COST TO POTW AND STATE  
RESPONDENTS**

Activity	Average Annual Burden Hours	Hourly Cost	Average Annual Cost
<b>COST TO POTW RESPONDENTS</b>			
Application Revision	2,559	\$74.70 <sup>a</sup>	\$191,157
Reapplication	3,409	\$74.70 <sup>a</sup>	\$254,652
Monitoring Program	23,056	\$19.95 <sup>b</sup>	\$459,967
Toxics Control Program	19,040	\$19.95 <sup>b</sup>	\$379,848
<b>TOTAL</b>	<b>48,064</b>		<b>\$1,285,624</b>
<b>COST TO STATE RESPONDENTS</b>			
Determination	1,200	27.49 <sup>c</sup>	\$32,988
Certification	400	27.49 <sup>c</sup>	\$10,996
<b>TOTAL</b>	<b>1,600</b>		<b>\$43,984</b>
<b>TOTAL POTW AND STATE RESPONDENTS</b>	<b>49,664</b>		<b>\$1,329,608</b>

<sup>a</sup>It is assumed that much of the reapplication and additional information is prepared by a contractor with specialized expertise and equipment. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$67,787, or \$77,955/year. Thus, based on 2,080 working hours/year, the average hourly salary of a contractor is \$37.35/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$74.70/hour. (Hourly rate based on 2014 DC-B salary rate table.)

<sup>b</sup>It is assumed that the salary level of a typical local government employee working on the 301(h) program is a GS-5, Step 4, or \$37,859. Based on 2,080 working hours/year, the average hourly salary of a local employee is \$18.14/hour. Assuming 10 percent overhead costs, the labor cost for local government employees is \$19.95/hour. (Hourly rate based on 2014 DC-B salary rate table.)

<sup>c</sup>It is assumed that the salary level of a typical State government employee working on the 301(h) program is a GS-9, Step 1, or \$52,146/year. Based on 2,080 working hours/year, the average hourly salary of a State government employee is \$24.99/hour. Assuming 10 percent overhead costs, the labor cost for State government employees is \$27.49/hour. (Hourly rate based on 2014 DC-B salary rate table.)

**TABLE A-3. FEDERAL GOVERNMENT BURDEN**

Activity	Burden Hours/Activity		Number of Permits to be Processed Annually <sup>a</sup>						Federal Burden Hours/Activity for 3 Years of ICR			Average Annual Burden <sup>b</sup>
	S	L	FY 2014		FY 2015		FY 2016		S	L	TOTAL	
Technical review of revised application and reapplication	360	1650	1	2	1	2	1	2	1,080	9,900	10,980	3,660
Evaluate revised applications and reapplications for compliance with 301(h) criteria	208	1040	4	2	4	2	5	2	2,704	6,240	8,944	2,981
Evaluate monitoring and toxic control program adequacy	60	100	22	9	22	9	22	9	3,960	2,700	6,660	2,220
Review State determinations and State certifications and coordinate with the State	20	20	5	4	5	4	6	4	320	240	560	187
<b>TOTAL</b>									<b>8,064</b>	<b>19,080</b>	<b>27,144</b>	<b>9,048</b>

NOTE: S = small, L = large

<sup>a</sup>Incorporates EPA's estimate of how many permittees are expected to revise applications and apply for reissuance. These numbers are consistent with those used on Tables A-6, A-7, A-8, and A-10.<sup>b</sup>Calculated by dividing total by 3.

**TABLE A-4. ANNUAL, TOTAL AND AVERAGE BURDENS FOR EACH OF THE SIX INFORMATION ACTIVITIES**

Activity/Unit Burden	Burden Hours	FY 2014		FY 2015		FY 2016		TOTAL		Average	
		Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All
<b>Application Revision (POTW)</b>											
Sm Facility Hr.	255	1	255	1	255	1	255	3	765	1	255
Lg. Facility Hr.	1,152	2	2,304	2	2,304	2	2,304	6	6,912	2	2,304
<b>SUBTOTAL</b>		<b>3</b>	<b>2,559</b>	<b>3</b>	<b>2,559</b>	<b>3</b>	<b>2,559</b>	<b>9</b>	<b>7,677</b>	<b>3</b>	<b>2,559</b>
<b>Reapplication (POTW)</b>											
Sm Facility Hr.	255	4	1,020	4	1,020	5	1,275	13	3,315	4	1,105
Lg. Facility Hr.	1,152	2	2,304	2	2,304	2	2,304	6	6,912	2	2,304
<b>SUBTOTAL</b>		<b>6</b>	<b>3,324</b>	<b>6</b>	<b>3,324</b>	<b>7</b>	<b>3,579</b>	<b>19</b>	<b>10,227</b>	<b>6</b>	<b>3,409</b>
<b>Monitoring (POTW)</b>											
Sm Facility Hr.	328	22	7,216	22	7,216	22	7,216	66	21,648	22	7,216
Lg. Facility Hr.	1,760	9	15,840	9	15,840	9	15,840	27	47,520	9	15,840
<b>SUBTOTAL</b>		<b>31</b>	<b>23,056</b>	<b>31</b>	<b>23,056</b>	<b>31</b>	<b>23,056</b>	<b>93</b>	<b>69,168</b>	<b>31</b>	<b>23,056</b>
<b>Toxics Control</b>											
Sm Facility Hr.	80	22	1,760	22	1,760	22	1,760	66	5,280	22	1,760
Lg. Facility Hr.	1,920	9	17,280	9	17,280	9	17,280	27	51,840	9	17,280
<b>SUBTOTAL</b>		<b>31</b>	<b>19,040</b>	<b>31</b>	<b>19,040</b>	<b>31</b>	<b>19,040</b>	<b>93</b>	<b>57,120</b>	<b>31</b>	<b>19,040</b>
<b>TOTAL (POTWs)</b>											
Sm Facility Hr.		22	10,251	22	10,251	22	10,506	66	31,008	22	10,336
Lg Facility Hr.		9	37,728	9	37,728	9	37,728	27	113,184	9	37,728
<b>TOTAL (All POTWs)<sup>a</sup></b>		<b>31</b>	<b>47,979</b>	<b>31</b>	<b>47,979</b>	<b>31</b>	<b>48,234</b>	<b>93</b>	<b>144,192</b>	<b>31</b>	<b>48,064</b>
<b>Determination (States)</b>											
Sm Facility Hr.	90	5	450	5	450	6	540	16	1,440	5	480
Lg Facility Hr.	180	4	720	4	720	4	720	12	2,160	4	720
<b>SUBTOTAL</b>		<b>9</b>	<b>1,170</b>	<b>9</b>	<b>1,170</b>	<b>10</b>	<b>1,260</b>	<b>28</b>	<b>3,600</b>	<b>9</b>	<b>1,200</b>
<b>Certification (States)</b>											
Sm Facility Hr.	30	5	150	5	150	6	180	16	480	5	160
Lg Facility Hr.	60	4	240	4	240	4	240	12	720	4	240
<b>SUBTOTAL</b>		<b>9</b>	<b>390</b>	<b>9</b>	<b>390</b>	<b>10</b>	<b>420</b>	<b>28</b>	<b>1,200</b>	<b>9</b>	<b>400</b>
<b>Total (States)<sup>b</sup></b>		<b>7</b>	<b>1,560</b>	<b>7</b>	<b>1,560</b>	<b>7</b>	<b>1,680</b>	<b>7</b>	<b>4,800</b>	<b>7</b>	<b>1,600</b>
<b>GRAND TOTAL(States + POTWs)</b>		<b>38</b>	<b>49,539</b>	<b>38</b>	<b>49,539</b>	<b>38</b>	<b>49,914</b>	<b>38</b>	<b>148,992</b>	<b>38</b>	<b>49,664</b>

<sup>a</sup>There are 31 POTWs in the 301(h) universe.<sup>b</sup>There are 7 States in the 301(h) universe.

**TABLE A-5. APPLICATION REVISION  
AND REAPPLICATION ACTIVITIES  
AND BURDEN HOURS FOR POTWS**

Activities	Burden Hours	
	Small	Large
Read Instructions	8	16
Plan Activities	8	16
Create Information	80	320
Gather Information	135	320
Complete Information	24	480
<b>TOTAL</b>	<b>255</b>	<b>1,152</b>

**TABLE A-6. ANNUAL POTW RESPONDENTS AND TOTAL ANNUAL BURDEN OF APPLICATION REVISION**

	FY 2014		FY 2015		FY 2016		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	1	2	1	2	1	2	3	6	3
Burden (burden from Table A-5 x number of respondents)	255	2,304	255	2,304	255	2,304	765	6,912	2,559

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the total small and large POTWs for 3 years by 3.

**TABLE A-7. ANNUAL POTW RESPONDENTS AND TOTAL ANNUAL BURDEN OF REAPPLICATION**

	FY 2014		FY 2015		FY 2016		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	4	2	4	2	5	2	13	6	6
Burden (burden from Table A-5 x number of respondents)	1,020	2,304	1,020	2,304	1,275	2,304	3,315	6,912	3,409

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the total small plus large POTWs for 3 years by 3.

**TABLE A-8. ANNUAL POTW RESPONDENTS AND TOTAL ANNUAL BURDEN OF MONITORING AND TOXICS CONTROL PROGRAM**

	Number of Respondents						Average Annual Number of Respondents	Burden Hours/Permittee		Annual Burden				Average Annual Burden <sup>a</sup>
	FY 2014		FY 2015		FY 2016			S	L	FY 2014	FY 2015	FY 2016	TOTAL	
	S	L	S	L	S	L								
Monitoring Program	22	9	22	9	22	9	31	328	1,760	23,056	23,056	23,056	69,168	23,056
Toxics Control Program	22	9	22	9	22	9	31	80	1,920	19,040	19,040	19,040	57,120	19,040

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the total annual burden of small plus large POTWs for 3 years by 3.



**TABLE A-9. BURDEN FOR STATE DETERMINATIONS AND 401(A)(1) CERTIFICATIONS**

Activity	Burden (Hours/Activity)			
	State Determination		401 Certification	
	Small <sup>a</sup>	Large <sup>a</sup>	Small	Large
Identify Applicable Requirements	8	8	4	4
Analyze Material	69	155	17	43
Review Accuracy	8	10	4	6
Report Information	5	7	5	7
<b>TOTAL</b>	<b>90</b>	<b>180</b>	<b>30</b>	<b>60</b>

<sup>a</sup>Burden for application revisions and reapplications.

**TABLE A-10. ANNUAL RESPONDENTS AND TOTAL ANNUAL BURDEN OF STATE DETERMINATIONS**

	FY 2014 <sup>a</sup>		FY 2015		FY 2016		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents	5	4	5	4	6	4	28	9
Burden <sup>b</sup>	450	720	450	720	540	720	3,600	1,200

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the number of respondents and the total burden for 3 years by 3. There are 7 states in the 301(h) universe.

<sup>b</sup>Calculated by multiplying burden estimates in Table A-9 by the corresponding number of respondents in each information submission category.

**TABLE A-11. ANNUAL RESPONDENTS AND TOTAL ANNUAL BURDEN OF STATE 401(a)(1) CERTIFICATION**

	FY 2014		FY 2015		FY 2016		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents <sup>b</sup>	5	4	5	4	6	4	28	9
Burden <sup>c</sup>	150	240	150	240	180	240	1200	400

Note: S = small, L = large

<sup>a</sup>Calculated by dividing total burden hours and number of respondents for the 3 years by 3. There are 7 states in the 301(h) universe.

<sup>b</sup>Number derived by assuming 28 permit reapplications and application revisions over 3 years of the ICR; 16 small and 12 large; and will result in the final approval and preparation of a draft permit, thus requiring State certification. It is assumed that the application review process takes approximately one year.

<sup>c</sup>Calculated by multiplying burden estimates in Table A-9 by number of respondents.

**TABLE A-12. SUMMARY TABLE<sup>a</sup>**

Respondent/Activity	Number of Respondents/Responses	Hours per Response <sup>b</sup>	Average Annual Burden
<b>POTWs</b>			
Application Revision	3	853	2,559
Reapplication	6	568	3,409
Monitoring Program	31	744	23,056
Toxics Control Program	31	614	19,040
<b>TOTAL: POTWs</b>	<b>31</b>		<b>48,064</b>
<b>STATES</b>			
Determinations	9	133	1,200
Certifications	9	44	400
<b>TOTAL: STATES</b>	<b>7</b>		<b>1,600</b>
<b>TOTAL: POTWs AND STATES</b>	<b>38</b>		<b>49,664</b>

<sup>a</sup>Average of 3 years divided by 3.

<sup>b</sup> Hours per response were calculated by dividing the average annual burden by the number of respondents. Values have been rounded to the nearest hour.

**TABLE A-13. EXPLANATION OF CHANGE IN BURDEN**

Activity	Burden from Previous ICR		Difference	Reason for Change
Application Revision	2,559	2,559	0	
Reapplication	3,963	3,409	-554	Fewer respondents <sup>a</sup>
Monitoring Program	27,888	23,056	-4,832	Fewer respondents <sup>a</sup>
Toxics Control Program	23,200	19,040	-4,160	Fewer respondents <sup>a</sup>
State Determination	1,320	1,200	-120	Fewer respondents <sup>ab</sup>
State Certification	440	400	-40	Fewer respondents <sup>ab</sup>
<b>TOTAL</b>	<b>59,370</b>	<b>49,664</b>	<b>-9,706</b>	<b>Fewer respondents<sup>ab</sup></b>

<sup>a</sup>301(h) universe has decreased since the previous ICR

<sup>b</sup>Number of States in 301(h)