

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 2002.06
“CROSS-MEDIA ELECTRONIC REPORTING RULE”**

February 26, 2015

Office of Environmental Information
U.S. Environmental Protection Agency
Washington, D.C. 20460

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) TITLE AND NUMBER OF THE INFORMATION COLLECTION

This Information Collection Request (ICR) is entitled “Cross-Media Electronic Reporting Rule (Renewal)” EPA ICR Number 2002.06, OMB Control Number 2025-0003.

1(b) CHARACTERIZATION OF THE INFORMATION COLLECTION

The U.S. Environmental Protection Agency (EPA) allows regulated entities to report electronically to EPA by allowing the use of electronic document receiving systems to receive electronic documents in satisfaction of certain document submission requirements in EPA’s regulations.¹ The Cross-Media Electronic Reporting Rule (CROMERR) also allows state, tribal, and local governments to seek EPA approval, as provided under 40 Code of Federal Regulations (CFR) 3.1000, to accept electronic documents to satisfy reporting requirements under authorized or delegated environmental programs that they administer. In seeking EPA approval, these state, tribal, and local governments must upgrade existing electronic document receiving systems or develop new electronic document receiving systems to satisfy the criteria laid out at 40 CFR 3.2000. Regulated entities that use an electronic signature device in submitting electronic documents to the EPA or a state, tribal, or local government receiving system must comply with identity proofing requirements, as applicable. In the remainder of this document, we refer to state, tribal, and local governments as “States/Locals” because, at the current time, EPA is not aware of any tribal governments that have electronic document receiving systems or are planning to develop such systems during the next three years.

CROMERR does not require any regulated entity to report electronically to EPA or States/Locals. CROMERR establishes requirements for utilizing electronic reporting as an alternative to paper-based reporting. It does not require States/Locals to implement electronic reporting; rather, it establishes the framework for implementing the electronic reporting alternative for Federal laws that they administer. In this regard, regulated entities are affected only as follows:

- Entities that report electronically to EPA have to register with EPA’s electronic document receiving system (e.g., log on to the EPA Web site and enter requested information), comply with the identity proofing provisions, and then commence electronic reporting. In this document, we refer to these entities as “direct reporters.”
- States/Locals must upgrade existing electronic document receiving systems or develop new electronic document receiving systems to meet 40 CFR 3.2000 requirements. These States/Locals must apply for EPA program modification approval under 40 CFR 3.1000. They also must implement the identity proofing requirements at 40 CFR 3.2000(b)(5).

¹ In this document, EPA is using the term “electronic reporting” in a sense that excludes submission of a report via magnetic media, (i.e., via diskette, compact disc, or tape). EPA is also excluding transmission via hard copy facsimile. Likewise, EPA’s use of the term “electronic document” throughout this document refers exclusively to documents that are transmitted via a telecommunications network, excluding hard copy facsimile.

- Entities that report electronically to States/Locals must comply with the identity proofing requirements at 40 CFR 3.2000(b)(5). In this document, we refer to these entities as “indirect reporters.”
- Entities that opt to implement the local registration authority (LRA) alternative for identity proofing must identify an individual who will collect subscriber agreements from each individual that intends to use an electronic signature device in reporting electronically to a State/Local electronic document receiving system. In this document, we refer to these entities as “indirect reporting firms.”
- The LRA must collect and store subscriber agreements from individuals in his/her indirect reporting firm. The LRA also must prepare an agreement collection certification and submit a certification of receipt and secure storage to the corresponding State/Local agency.

Sections 1 through 5 of this document describe the information collection requirements covered in this ICR (e.g., in regard to need and use of the information collected). Section 6 estimates the annual burden to respondents. This ICR does not address the burden savings to respondents in reporting electronically under EPA programs. EPA’s programs will amend their program-specific ICRs to address these impacts.

CROMERR establishes requirements applicable to electronic reporting and receiving systems, as specified. Many of the activities to be conducted by direct reporters will be determined by the instructions associated with EPA’s electronic document receiving system. Specifically, EPA has developed an Agency-wide receiving system, the Central Data Exchange (CDX), which guides direct reporters through the registration and reporting procedures. In developing this ICR, EPA referred to the regulatory text, as well as CDX, in describing direct reporters’ activities and associated burden.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED AND AUTHORITY FOR THE COLLECTION

EPA established the CROMERR requirements to ensure compliance with the Government Paperwork Elimination Act (GPEA).² GPEA requires that Federal agencies be prepared, by October 21, 2003, to allow persons who are required to maintain, submit, or disclose information, the option of doing so electronically, when practicable, as a substitute for paper; and to use electronic authentication (electronic signature) methods to verify the identity of the sender and the integrity of electronic content. GPEA specifically provides that electronic records, and their related electronic signatures, are not to be denied legal effect, validity, or enforceability merely because they are in electronic form.

(1) Registering with EPA Electronic Document Receiving System

Regulated entities must initially register with the EPA electronic document receiving system to establish a user account. EPA needs the registration information to identify the registrant, contact information, and registrant's organization. Registrants also select a password and user name during registration. This information is needed to ensure that only the registrant has access to his/her account.

(2) Compliance with Identity Proofing Requirements

The identity proofing provisions in 40 CFR 3.2000(b)(5) are needed to strengthen the non-repudiation provisions of CROMERR. The electronic signature agreement, required in Section 3.2000(b)(5)(v), establishes that the signatory was informed of their obligation to keep the signature device from compromise, by ensuring that it is not made available to anyone else. These provisions are intended to ensure that the Federal laws regarding the falsification of information submitted to the government still apply to any and all electronic transactions, and that fraudulent electronic submissions will be prosecuted to the fullest extent of the law. In establishing clear requirements for electronic reporting systems, CROMERR helps to minimize fraud by assuring that the responsible individuals can be readily identified.

(3) Approval of State/Local Electronic Document Receiving System Applications

EPA needs information submitted by States/Locals in their program modification applications to evaluate the States/Locals' upgraded or new electronic document receiving systems to ensure they satisfy the criteria at 40 CFR 3.2000.

EPA also needs the information to evaluate whether the State/Local's modified program has been satisfactorily revised or modified in regard to their electronic document receiving system. In particular, the application must include a certification that the State/Local has sufficient legal authority provided by lawfully enacted or promulgated statutes or regulations to implement the electronic reporting component of its authorized program covered by the application; and to enforce the affected programs using electronic documents collected under

² Title XVII of Pub. L. 105 277.

these programs. The certification must be signed by the governmental official who is legally competent to certify with respect to legal authority on behalf of their government. In the case of a state, this official must be the Attorney General or designee. In the case of a tribe or local government, this official must be the chief administrative official or officer or designee. As a legal matter, EPA's position is that Attorneys General or their designees are the only officials capable of certifying with respect to their states' legal authority. Where there are substantial administrative obstacles involving the Attorney General in such certifications, EPA urges the State Attorney General to provide for a legally competent designee who is available to participate in the submission of the state's application.

2(b) PRACTICAL UTILITY AND USERS OF THE DATA

(1) Registering with EPA Electronic Document Receiving System

Regulated entities must initially register with the EPA electronic document receiving system to establish a user account and create a password. EPA uses the information to identify the registrant (e.g., by name and/or organization), establish the account, and contact the registrant if needed. Regulated entities use the password to access their account and to protect it from unauthorized use.

(2) Compliance with Identity Proofing Requirements

EPA, States/Locals, and LRAs use the identity proofing information from registrants to determine each registrant's identity and relationship to their regulated entity. The information may be used in an EPA or State/Local enforcement action to rebut a signatory's attempt to repudiate their electronic signature and/or other elements of the document that was signed.

When EPA or State/Local agency receives a subscriber agreement, certification of receipt and secure storage, or other identity-proofing information, the agency will review, process, and file the submittal. EPA or State/Local agency would then provide the registrant with access to the electronic document receiving system (e.g., open its account) so that it may begin using the electronic signature device in reporting electronically.

(3) Approval of State/Local Electronic Document Receiving System Applications

EPA uses the information submitted by States/Locals in their program modification applications to evaluate the States/Locals' upgraded or new electronic document receiving systems against the criteria at 40 CFR 3.2000(b)(1)-(5). For example, EPA will review the application to determine if the systems are able to generate data as needed, and in a timely manner, including copy of record for each electronic document received, sufficient to prove that the electronic document was not altered without detection during transmission or at any time after receipt.

EPA also reviews the application to ensure that the State/Local has taken all necessary steps to modify its regulations and statutes, as needed, so that it has authority to implement electronic reporting and enforce the affected programs using electronic documents collected under its programs. This includes, among other things, an evaluation of the Attorney General's certification under 40 CFR 3.1000(b)(1)(i).

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) NONDUPLICATION

CROMERR establishes uniform, Agency-wide criteria for electronic document receiving systems, thereby minimizing the potential for duplication or redundancy across EPA or State/Local programs. In addition, electronic reporting is voluntary, and will likely be used by facilities only if cost-effective and non-duplicative with their other compliance activities. CROMERR does not alter the reporting requirements under existing regulations and statutes, and does not affect whether a document must be created, submitted, or retained under the existing provisions 40 CFR.

3(b) PUBLIC NOTICE

In compliance with the Paperwork Reduction Act of 1995 (PRA), EPA issued a public notice in the *Federal Register* on November 4, 2014 (79 FR 65391). The notice indicated that EPA was planning to submit an ICR, “Cross-Media Electronic Reporting Rule” (EPA ICR No. 2002.06, OMB Control No. 2025–0003), to the Office of Management and Budget (OMB) for review and approval in accordance with the PRA. The notice also requested comments on the information collection and burden estimates covered in the ICR. The public comment period extended through January 5, 2015. EPA did not receive any written comments on the ICR in response to the *Federal Register* notice.

3(c) CONSULTATIONS

Most of the underlying assumptions in this ICR (e.g., hour and cost burden estimates) are based on EPA consultations with industry and States/Locals during the development of CROMERR and renewal of previous CROMERR ICRs. In developing this current ICR, EPA carefully reviewed all of the ICR’s data and assumptions and determined that a few should be strengthened based on additional consultations.

Table 1 identifies the organizations contacted.

Table 1
Organizations EPA Contacted during the Development of this ICR (February 2015)

Organization	Contact Name	Phone Number
Industry (i.e., Direct/Indirect Reporters)		
3M	Linda Murray	(651) 733-3461
Maersk Line, Limited	Larry Bowling	(757) 531-7799
OVS	Ken Wessels	(503) 437-1414
Shields Bag and Printing Company	Derek LaFramboise	(509) 248-7500

Organization	Contact Name	Phone Number
State/Local Agencies		
Arkansas Department of Environmental Quality	Letty Hardee	(501) 682-0672
New York Department of Environmental Conservation	Robert Wither	(518) 402-8154
Ohio Environmental Protection Agency	Adele Vogelgesang	(614) 728-1747

The following paragraphs summarize the feedback obtained on the burden associated with various information collection activities.

(1) Direct/Indirect Reporters

(a) Identity Proofing Activities

- **Prepare and submit a non-electronic (paper) subscriber agreement.** EPA received mixed feedback about the ICR's original burden for preparing and submitting a non-electronic (paper) subscriber agreement (i.e., 15 minutes or 0.25 hour per subscriber agreement) from the employee registrants contacted. One registrant indicated that the ICR's original burden estimate was a realistic industry average, while two registrants disagreed with the burden estimate. (One registrant did not provide feedback on this information collection activity.) The registrants contacted suggested a revised burden estimate of 30 minutes or 0.50 hour. Based on the consultation information, the average burden for preparing and submitting a non-electronic (paper) subscriber agreement was estimated to be 25 minutes or 0.42 hour per subscriber agreement.
- **Prepare and submit an electronic, reuse (consolidated), or third-party subscriber agreement.** EPA received mixed feedback about the ICR's original burden for preparing and submitting an electronic, reuse (consolidated), or third-party subscriber agreement (i.e., 10 minutes or 0.17 hour per subscriber agreement) from the employee registrants contacted. One registrant indicated that the ICR's original burden estimate was a realistic industry average, while two registrants disagreed with the burden estimate. (One registrant did not provide feedback on this information collection activity.) The registrants contacted suggested a revised burden estimate of 20 minutes or 0.33 hour. Based on the consultation information, the average burden for preparing and submitting an electronic, reuse (consolidated), or third-party subscriber agreement was estimated to be 17 minutes or 0.28 hour per subscriber agreement.
- **File subscriber agreement.** EPA was informed that, generally, the ICR's original burden for filing a subscriber agreement (i.e., 5 minutes or 0.08 hour per subscriber agreement) was a realistic industry average. However, one of the four registrants contacted suggested a revised burden estimate of 15 minutes or 0.25 hour. Based on the consultation information, the average burden for filing a subscriber agreement was estimated to be 7 minutes or 0.12 hour per subscriber agreement.

- **Report compromised or surrendered electronic signature device and prepare/submit new subscriber agreement.** EPA was informed that, generally, the ICR's original burden for reporting a compromised or surrendered electronic signature device and preparing/submitting a new subscriber agreement (i.e., 5 minutes or 0.08 hour per subscriber agreement) was a realistic industry average. However, one of the four registrants contacted suggested a revised burden estimate of 20 minutes or 0.33 hour. (One registrant did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for reporting a compromised or surrendered electronic signature device and preparing/submitting a new subscriber agreement was estimated to be 10 minutes or 0.17 hour per subscriber agreement.
- **Contact the Help Desk for technical support.** EPA received mixed feedback about the ICR's original burden for contacting the Help Desk for technical support (i.e., 3.6 minutes or 0.06 hour per subscriber agreement) from the employee registrants contacted. One registrant indicated that the ICR's original burden estimate was a realistic industry average, while two registrants disagreed with the burden estimate. (One registrant did not provide feedback on this information collection activity.) The registrants contacted suggested a revised burden estimate that ranged from 7.5 minutes to 10 minutes, or 0.13 hour to 0.17 hour. Based on the consultation information, the average burden for contacting the Help Desk for technical support was estimated to be 7 minutes or 0.12 hour per subscriber agreement.
- **Prepare subscriber agreement and send to LRA.** EPA received mixed feedback about the ICR's original burden for preparing a subscriber agreement and sending it to the LRA (i.e., 20 minutes or 0.33 hour per subscriber agreement) from the employee registrants contacted. One registrant indicated that the ICR's original burden estimate was a realistic industry average, while one registrant disagreed with the burden estimate. (Two registrants did not provide feedback on this information collection activity.) The registrants contacted suggested a revised burden estimate of 30 minutes or 0.50 hour. Based on the consultation information, the average burden for preparing a subscriber agreement and sending it to the LRA was estimated to be 25 minutes or 0.42 hour per subscriber agreement.
- **Report breach of security or compromised/surrendered electronic signature device to LRA.** EPA received mixed feedback about the ICR's original burden for reporting a breach of security or a compromised/surrendered electronic signature device (i.e., 5 minutes or 0.08 hour per report) from the employee registrants contacted. One registrant indicated that the ICR's original burden estimate was a realistic industry average, while one registrant disagreed with the burden estimate. (Two registrants did not provide feedback on this information collection activity.) The registrants contacted suggested a revised burden estimate of 15 minutes or 0.25 hour. Based on the consultation information, the average burden for reporting a breach of security or a compromised/surrendered electronic signature device was estimated to be 10 minutes or 0.17 hour per report.

(b) **Local Registration Authority Activities**

- ***Develop a process or plan to implement the requirement, designate the LRA, and submit LRA application to agency.*** EPA was informed by the employee registrants contacted that the ICR's original burden for developing a process or plan to implement the requirement, designate the LRA, and submit an LRA application to an agency (i.e., 13 hours per reporting firm) was a realistic industry average. (Two registrants did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for developing a process or plan to implement the requirement, designate the LRA, and submit an LRA application to an agency was not revised and thus, remained at 13 hours per reporting firm.
- ***Register LRA with the electronic document receiving system.*** EPA was informed by the employee registrants contacted that the ICR's original burden for registering the LRA with the electronic document receiving system (i.e., 10 minutes or 0.17 hour per reporting firm) was a realistic industry average. (Two registrants did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for registering the LRA with the electronic document receiving system was not revised and thus, remained at 10 minutes or 0.17 hour per reporting firm.
- ***Re-designate LRA, due to turnover, and send application materials.*** EPA was informed by the employee registrants contacted that the ICR's original burden for re-designating an LRA, due to turnover, and sending application materials (i.e., 1 hour per reporting firm) was a realistic industry average. (Two registrants did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for re-designating an LRA, due to turnover, and sending application materials was not revised and thus, remained at 1 hour per reporting firm.
- ***Collect and securely store subscriber agreements.*** EPA was informed by the employee registrants contacted that the ICR's original burden for an LRA to collect and securely store subscriber agreements (i.e., 10 minutes or 0.17 hour per subscriber agreement) was a realistic industry average. (Two registrants did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for collecting and securely storing subscriber agreements was not revised and thus, remained at 10 minutes or 0.17 hour per subscriber agreement.
- ***Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage.*** EPA was informed by the employee registrants contacted that the ICR's original burden for preparing an agreement collection certification after securely storing subscriber agreements, and submitting the certification of receipt and secure storage (i.e., 10 minutes or 0.17 hour per certification) was a realistic industry average. (Two registrants did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for preparing an agreement collection certification after securely storing subscriber agreements, and submitting the certification of receipt and secure storage was not revised and thus, remained at 10 minutes or 0.17 hour per certification.

(c) **On-Going Management Activities**

- **Identify and resolve problems.** EPA was informed that, generally, the ICR's original burden for identifying and resolving problems (i.e., 1 hour per employee registrant) was a realistic industry average. However, one of the four registrants contacted suggested a revised burden estimate of 3 hours. (One registrant did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for identifying and resolving problems was estimated to be 1.67 hours per employee registrant.

(2) **State/Local Agencies**

(a) **Identity Proofing Activities**

- **Receive, process, review, approve and file a subscriber agreement.** EPA was informed by two of the three state agencies contacted that the ICR's original burden for receiving, processing, reviewing, approving and filing a subscriber agreement (i.e., 10 minutes or 0.17 hour per subscriber agreement) was a realistic national average. (One state agency did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for receiving, processing, reviewing, approving and filing a subscriber agreement was not revised and thus, remained at 10 minutes or 0.17 hour per subscriber agreement.

(b) **Local Registration Authority Activities**

- **Receive, process, review, and approve certification of receipt and secure storage.** EPA was informed by one of the three state agencies contacted that the ICR's original burden for receiving, processing, reviewing, and approving a certification of receipt and secure storage (i.e., 10 minutes or 0.17 hour per certification) was a realistic national average. (The remaining two state agencies did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for receiving, processing, reviewing, and approving a certification of receipt and secure storage was not revised and thus, remained at 10 minutes or 0.17 hour per certification.
- **Receive notification of breach of security or compromised/surrendered electronic signature device, and take action.** EPA was informed by one of the three state agencies contacted that the ICR's original burden for receiving a notification of breach of security or compromised/surrendered electronic signature device, and taking action (i.e., 1 hour per notification) was a realistic national average. (The remaining two state agencies did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for receiving a notification of breach of security or compromised/surrendered electronic signature device, and taking action was not revised and thus, remained at 1 hour per notification.

- **Receive application to designate LRA.** EPA was informed by one of the three state agencies contacted that the ICR's original burden for receiving an application to designate an LRA (i.e., 30 minutes or 0.50 hour per reporting firm) was a realistic national average. (The remaining two state agencies did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for receiving an application to designate an LRA was not revised and thus, remained at 30 minutes or 0.50 hour per reporting firm.

(c) On-Going Management Activities

- **Identify and resolve problems.** EPA was informed by two of the three state agencies contacted that the ICR's original burden for identifying and resolving problems (i.e., 1 hour per employee registrant) was a realistic national average. (One state agency did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for identifying and resolving problems was not revised and thus, remained at 1 hour per employee registrant.
- **Respond to information requests.** EPA was informed by two of the three state agencies contacted that the ICR's original burden for responding to information requests (i.e., 1.5 hours per employee registrant) was a realistic national average. (One state agency did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for responding to information requests was not revised and thus, remained at 1.5 hours per employee registrant.

(d) State/Local Electronic Document Receiving System Application Activities

- **Read the regulations.** EPA received mixed feedback about the ICR's original burden for reading the regulations (i.e., 1.5 hours per State/Local agency) from the state agencies contacted. One state agency indicated that the ICR's original burden estimate was a realistic industry average, while one state agency disagreed with the burden estimate. (One state agency's feedback on the burden estimate included other activities and thus, was excluded from the analysis for consistency purposes.) The state agencies contacted suggested a revised burden estimate of 1.5 hours. Based on the consultation information, the average burden for reading the regulations was estimated to be 2.26 hours per State/Local agency.
- **Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 and apply for EPA program modification approval under 40 CFR 3.1000 (state agency).** EPA was informed by two of the three state agencies contacted that the ICR's original burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval (i.e., 331 hours per state agency) was a realistic national average. (One state agency's feedback on the burden estimate seemed to include other activities and thus, was excluded from the analysis for consistency purposes.) Based on the consultation information, the average burden for upgrading an existing electronic document receiving system or

developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval was estimated to be 331 hours per state agency.

- ***Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000.*** EPA was informed by one of the three state agencies contacted that the ICR's original burden for submitting an amendment to the original application for EPA program modification approval under 40 CFR 3.1000 (i.e., 24 hours per State/Local agency) was a realistic national average. (The remaining two state agencies did not provide feedback on this information collection activity.) Based on the consultation information, the average burden for submitting an amendment to the original application for EPA program modification approval under 40 CFR 3.1000 was not revised and thus, remained at 24 hours per State/Local agency.
- ***Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000.*** EPA received mixed feedback about the ICR's original burden for submitting a notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (i.e., 45 minutes or 0.75 hour per State/Local agency) from the state agencies contacted. One state agency indicated that the ICR's original burden estimate was a realistic industry average, while one state agency disagreed with the burden estimate. (One state agency did not provide feedback on this information collection activity.) The state agencies contacted suggested a revised burden estimate of 22 hours. Based on the consultation information, the average burden for submitting a notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 was estimated to be 11.39 hours per State/Local agency.
- ***Cost for upgrading or developing electronic document receiving system (state agency).*** EPA was informed by one of the three state agencies contacted that the ICR's original cost estimate for upgrading or developing an electronic document receiving system (i.e., \$152,701 per state agency) was a realistic national average. However, the remaining two state agencies disagreed with the cost estimate. The state agencies contacted suggested revised cost estimates that ranged from \$300,000 to \$479,364.06. Based on the consultation information, the average cost for upgrading or developing an electronic document receiving system was estimated to be \$310,688 per state agency.

The above feedback is reflected in the burden assumptions of this ICR, as appropriate. Detailed information on EPA's assumptions regarding these and other activities are fully discussed in Section 6 of this document.

3(d) EFFECTS OF LESS FREQUENT COLLECTION

(1) Registering with EPA Electronic Document Receiving System

Facilities must initially register with the EPA electronic document receiving system to establish a user account. Registration information is collected at the time of registration (i.e., a one-time event) and updated if needed. Because it is a one-time activity, the information cannot be collected less frequently. If this information were not collected, EPA would not have a way to learn the identity of the registrant and establish its account.

(2) Compliance with Identity Proofing Requirements

Facilities must comply with the identity proofing provisions of CDX and 40 CFR 3.2000(b)(5), as applicable. These provisions provide that, in the case of priority reports for which an electronic signature device was used to create an electronic signature, a determination of identity must be made before the electronic document is received. It is critical that registrants submit the identity proofing paperwork in advance of their priority reports so that the Agency can establish a link between each registrant and its electronic signature device to hold them accountable for their submittals. Facilities also must report any compromise or surrender of its electronic signature device to EPA or State/Local.

LRAs must report any breach of storage of its subscriber agreements. These are as-needed submittals. If these reports were not collected, EPA and States/Locals would not have a way to learn about the signature compromise/surrender or storage breaches. Hence, they would not be in a position to take follow up action as needed (e.g., to temporarily prevent access to an account whose signature device has been compromised). This could result in the unauthorized use an electronic signature device.

(3) Approval of State/Local Electronic Document Receiving System Applications

CROMERR sets forth timeframes for EPA receipt, review, and approval of State/Local program modification applications to implement electronic document receiving systems. States/Locals that did not have an electronic document receiving system in use or substantially developed on or before October 13, 2005 must apply to EPA for program modification approval before receiving electronic documents (40 CFR 3.10000(a)(2)). If this frequency were not specified, EPA would not have assurance that States/Locals are developing and using electronic document receiving systems that comply with CROMERR's provisions at 40 CFR 3.2000.

3(e) GENERAL GUIDELINES

This ICR adheres to the guidelines stated in the PRA, OMB's implementing regulations, applicable OMB guidance, and EPA's ICR Handbook.

EPA notes that subscriber agreements must be kept on file until five years after deactivation of the associated electronic signature device. A five-year retention period is necessary to ensure that such records are available in case of an EPA or State/Local enforcement

action. EPA recognizes that a registrant may use an electronic signature device in signing a range of enforcement-sensitive reports. Certain reports may have relevance to an enforcement action long after it is submitted to EPA or State/Local. Because of this, EPA needed to establish a sufficiently long retention period for the subscriber agreements so that they would be available for such enforcement actions.

3(f) CONFIDENTIALITY

If a confidentiality claim were asserted, EPA would treat the information in accordance with the confidentiality regulations at 40 CFR Part 2, Subpart B. EPA also would ensure that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

3(g) SENSITIVE QUESTIONS

Persons registering with CDX are asked to provide knowledge-based information (e.g., date of birth) to ensure the security of their password, user name, and other information supplied. If the person loses his/her password or user name, or otherwise needs to confirm his/her identity to EPA, EPA could use the knowledge-based information to confirm his/her identity.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) RESPONDENTS AND NAICS CODES

The information collection requirements covered in this ICR will likely have broad applicability across industries. Refer to Appendix A for a list of the North American Industry Classification System (NAICS) codes associated with industries most likely affected by these requirements.

4(b) INFORMATION REQUESTED

Following is a description of the data items and activities associated with the information collection requirements covered in this ICR. Refer to Section 1(b) for the types of respondents examined in this subsection.

(1) Registering with EPA Electronic Document Receiving System

Facilities must register their employees with CDX before reporting electronically to EPA. The employees must update their registration information if it changes.

(i) Data Items:

- An on-line registration application:
 - Registrant name.
 - Organization name.
 - Address.
 - Knowledge-based information (e.g., user-supplied secret question-and-answer pair).

(ii) Respondent Activities:

Facility employees must perform the following activities:

- Log on to receiving system site and enter requested information.
- Update the information, as needed.

(2) Compliance with Identity Proofing Requirements

Direct reporters, indirect reporters, indirect reporting firms, and LRAs must comply with the identity proofing provisions of CDX and CROMERR, as applicable. In addition, States/Locals that accept electronic documents to satisfy reporting requirements under authorized or delegated environmental programs that they administer must process, review, and approve the identity proofing information submitted by indirect reporters.

CDX and 40 CFR 3.2000(a)(2) require that any electronic document must bear the valid electronic signature of a signatory if that signatory would be required under the authorized program to sign the paper document for which the electronic document substitutes, except as otherwise specified. In the case of an electronic document that must bear electronic signatures of individuals as provided by CDX and 40 CFR 3.2000(a)(2), each signatory must sign either an electronic signature agreement, or a subscriber agreement with respect to the electronic signature device used to create their electronic signature on the electronic document.

CDX and 40 CFR 3.2000(b)(5)(vii) require that the identity of the individual uniquely entitled to use the device and their relation to any entity for which he or she will sign electronic documents must be determined with legal certainty by EPA or State/Local, as applicable. In the case of priority reports, this determination must be made before the electronic document is received, by means of:

- Identifiers or attributes that are verified by attestation of disinterested individuals to be uniquely true of the individual in whose name the application is submitted, based on information or objects of independent origin, at least one item of which is not subject to change without governmental action or authorization.
- A method of determining identity no less stringent than the one above.
- Collection of either a subscriber agreement or a certification from a LRA that such an agreement has been received and securely stored.

The term “subscriber agreement” means an electronic signature agreement signed by an individual with a handwritten signature. The agreement must be signed by an individual with respect to an electronic signature device that the individual will use to create his/her electronic signature requiring such individual to protect the electronic signature device from compromise; to promptly report to the agency or agencies relying on the electronic signatures created any evidence discovered that the device has been compromised; and to be held as legally bound, obligated, or responsible by the electronic signatures created as by a handwritten signature. This agreement must be stored until five years after the associated electronic signature device has been deactivated.

The term “Local Registration Authority” means an individual who is authorized by a State/Local to issue an agreement collection certification, whose identity has been established by notarized affidavit, and who is authorized in writing by a regulated entity to issue agreement collection certifications on its behalf. Once approved by EPA or State/Local, the LRA would collect subscriber agreements from each individual in the regulated entity that intends to use an electronic signature device in reporting electronically to EPA or State/Local electronic document receiving system. The LRA would collect and store the subscriber agreements in a manner that prevents authorized or unauthorized access to these agreements by anyone other than the LRA. The LRA would prepare an agreement collection certification and submit a certification of receipt and secure storage to the EPA or State/Local.

(i) Data Items:

- Compliance with identity proofing requirements by means of identifiers, attributes, or alternative method:
 - Identifiers or attributes that are verified by attestation of disinterested individuals to be uniquely true, as specified.
 - Other information necessary to determine identity.
- Compliance with subscriber agreement provisions:
 - Subscriber agreement.
 - Report of compromised or surrendered electronic signature.
- Submission of subscriber agreement to LRA:
 - Subscriber agreement.
 - Report of breach of security.
 - Report of compromised or surrendered electronic signature.
- Designation of LRA:
 - Application to designate a LRA, including notarized affidavit and a written authorization from the regulated entity to issue collection agreement certifications on its behalf.
- Collection of subscriber agreements by LRA:
 - Agreement collection certification. This is a signed statement by which a LRA certifies that a subscriber agreement has been received from a registrant; the agreement has been stored in a manner that prevents authorized or unauthorized access to these agreements by anyone other than the LRA; and the LRA has no basis to believe that any of the collected agreements have been tampered with or prematurely destroyed.
 - Certification of receipt and secure storage.

(ii) Respondent Activities:

Direct and indirect reporters must perform the following activities, as applicable:

- Comply with requirements for identifier, attribute, or alternative method:
 - Prepare and submit information on identifiers, attributes, or other identity-proofing information.
- Comply with subscriber agreement provisions:
 - Prepare and submit a subscriber agreement.
 - File subscriber agreement.
 - Prepare and submit new subscriber agreement, for employee turnover.
 - File new subscriber agreement, for employee turnover.

- Contact the Help Desk for technical support.
- Report compromised or surrendered electronic signature device and prepare/submit new subscriber agreement if necessary.
- Submit subscriber agreement to LRA:
 - Prepare subscriber agreement and send to LRA.
 - Prepare and submit new subscriber agreement to LRA, for employee turnover.
 - Report breach of security or compromise/surrender of electronic signature device.
 - Prepare and submit new subscriber agreement to LRA subsequent to breach of security or compromise of electronic signature device, if necessary.
- Conduct ongoing management:
 - Identify and resolve problems.

Indirect reporting firms and LRAs must perform the following activities, as applicable:

- Designating a LRA:
 - Develop a process or plan to implement the requirement, designate the LRA, and submit LRA application to agency.
 - Register the LRA with the electronic document receiving system.
 - Redesignate LRA, due to turnover, and send application materials.
 - Register new LRA with electronic document receiving system.
- Collect subscriber agreements from reporters:
 - Collect and securely store subscriber agreements
 - Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage.
 - Collect and securely store subscriber agreements, for employee turnover.
 - Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for employee turnover.
 - Collect and securely store subscriber agreements, for breach of security/compromise of electronic signature device.
 - Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for breach of security/compromise of electronic signature device.

State/Local agencies acting as regulators must perform the following activities:

- Collect identifiers, attributes, or alternative information:
 - Receive, process, review, and approve identifier, attribute, or alternative information.

- Collect subscriber agreements:
 - Receive, process, review, approve, and file new subscriber agreements.
 - Receive, process, review, approve, and file new subscriber agreements, for employee turnover.
 - Receive, process, review, and approve report of compromise or surrender of electronic signature device.
- Collect submittals from LRAs:
 - Receive, process, review, and approve certification of receipt and secure storage.
 - Receive, process, review and approve updated certification of receipt and secure storage, for employee turnover.
 - Receive notification of breach of security or compromise/surrender of electronic signature and take action.
 - Receive, process, review, and approve certification of receipt and secure storage, for breach of security or compromise/surrender of electronic signature device.
- Collect applications for designation of LRAs:
 - Receive application to designate first-time LRA.
 - Receive application to designate LRA, for LRA turnover.
- Conduct ongoing management:
 - Identify and resolve problems.
 - Respond to information requests.

(3) Approval of State/Local Electronic Document Receiving System Applications

To obtain EPA approval of authorized program revision or modification using procedures provided under 40 CFR 3.1000, a State /Local must submit an application for program revision to EPA that includes the elements specified in Sections 3.1000(b)(1)(i) through(iv).

A State/Local that revises or modifies more than one (1) authorized program for receipt of electronic documents, in lieu of paper documents, may submit a consolidated application covering more than one authorized program, provided the consolidated application complies with applicable requirements for each authorized program.

If the State/Local receives a notice from EPA that its application is incomplete or does not satisfy the requirements at 40 CFR 3.2000, the State/Local must submit an amendment to the original application that includes the missing information.

A State/Local that accepts electronic documents in lieu of paper documents under an authorized program for which EPA has approved program revisions or modifications under the procedures provided in 40 CFR 3.2000(a)(1) must keep EPA apprised of those changes to laws,

policies, or the electronic document receiving systems that have the potential to affect program conformance with Section 3.2000.

The State/Local program must satisfy the requirements at 40 CFR 3.2000. Pursuant to Section 3.2000, authorized programs that receive electronic documents, in lieu of paper documents, to satisfy requirements under such programs must use an acceptable electronic document receiving system as specified and require that any electronic document must bear valid electronic signatures to the same extent that the paper submission for which it substitutes would bear handwritten signatures under the authorized program, unless otherwise specified. An electronic document receiving system that receives electronic documents, submitted in lieu of paper documents, to satisfy requirements under an authorized program must be able to generate data with respect to any such electronic document, as needed and in a timely manner, including a copy of record for the electronic document, that meets the criteria specified at Sections 3.2000(b) (1) through (5).

(i) Data Items:

- An application (or application amendment) for program revision that includes the following elements:
 - A certification that the State/Local has sufficient legal authority provided by lawfully enacted or promulgated statutes or regulations that are in full force and effect on the date of certification to implement the electronic reporting component of its authorized programs covered by the application in conformance with Section 3.2000 and to enforce the affected programs using electronic documents collected under these programs, together with copies of the relevant statutes and regulations, signed by the State Attorney General or designee, or in the case of an authorized tribal or local government program, by the Chief Administrative Official or Officer of the governmental entity or designee.
 - A listing of all State/Local electronic document receiving systems to accept the electronic documents being addressed by the program modification or revisions that are covered by the application, together with a description for each such system that specifies how the system meets the applicable criteria in Section 3.2000(b) with respect to those electronic documents.
 - A schedule of upgrades for electronic document receiving systems that have the potential to affect the program's continued conformance with Section 3.2000, if appropriate.
 - Other such information as the Administrator may request to fully evaluate the application.
- Appraisals to EPA of changes to laws, policies, or electronic document receiving systems.

(ii) Respondent Activities:

State/Local agencies that are regulated entities must perform the following activities:

- Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 requirements and apply for EPA program modification approval under 40 CFR 3.1000.
- Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000.
- Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000.

5. THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) AGENCY ACTIVITIES

(1) Registering with EPA Electronic Document Receiving System

EPA activities associated with facility reporting to EPA's electronic document receiving system (i.e., CDX) include:

- Develop, operate, and maintain CDX.

(2) Compliance with Identity Proofing Requirements

EPA activities associated with the identity proofing requirements covered in this ICR include:

- Collect identifiers or attributes or other information:
 - Receive, process, review, and approve identifier, attribute, or alternative information.
- Collect subscriber agreements:
 - Receive, process, review, approve, and file new subscriber agreements.
 - Receive, process, review, approve, and file new subscriber agreements, for employee turnover.
 - Receive, process, review, and approve report of compromise or surrender of electronic signature device.
- Conduct ongoing management:
 - Identify and resolve problems.
 - Respond to information requests.

(3) Approval of State/Local Electronic Document Receiving System Applications

EPA activities associated with the approval of State/Local electronic document receiving systems include:

- Process and file applications submitted by States/Locals seeking to modify their programs, as required by 40 CFR 3.1000.
- Process and file amendments to program modification applications submitted by States/Locals.
- Process and file appraisals of changes to laws, policies, or electronic document receiving systems.

5(b) COLLECTION METHODOLOGY AND MANAGEMENT

CDX serves as EPA's primary gateway for electronic documents received by EPA. CDX functions include:

- Access management allowing or denying an entity access to CDX.
- Data interchange accepting and returning data via various file transfer mechanisms.
- Signature/certification management providing devices and required scenarios for individuals to sign and certify what they submit.
- Submitter and data authentication assuring that electronic signatures are valid and data is uncorrupted.
- Transaction logging providing date, time, and source information for data received to establish "chain of custody."
- Acknowledgment and provision of copy of record providing the submitter with confirmations of the data received.
- Archiving placing files received and transmission logs into secure, long term storage.
- Error checking flagging obvious errors in documents and document transactions, including duplicate documents and unauthorized submissions.
- Translating, forwarding, and converting submitted documents into formats that will load to EPA databases, and forwarding them to the appropriate systems.
- Outreach providing education and other customer services to CDX users (e.g., user manuals, Help Desk).

5(c) SMALL ENTITY FLEXIBILITY

CROMERR allows electronic reporting by permitting the use of electronic document receiving systems to receive electronic documents in satisfaction of certain document submission requirements in EPA's regulations. Electronic reporting under CROMERR is voluntary. These changes will reduce the burden on all affected entities, including small businesses. In addition, facilities will find that the initial set up process requires little expenditure of time and resources, and in the long run, this process will reduce the time spent on submissions each year.

5(d) COLLECTION SCHEDULE

The collection frequencies associated with CDX include the following:

- Registrants must initially register with the electronic document receiving system and obtain electronic signature certification, if applicable.
- Facilities must comply with requirements for determining the identity of individuals who use electronic signature devices (e.g., prepare/submit subscriber agreements or certification of receipt and secure storage), before submitting electronic reports using the associated device.
- Registrants must submit a notice of compromise or surrender of electronic signature device promptly, should this occur.

States/Locals that did not have an electronic document receiving system in use or substantially developed on or before October 13, 2005 must, using specified procedures, apply for and receive EPA approval of revisions or modifications to the authorized program before the program may receive electronic documents in lieu of paper documents to satisfy requirements of such program.

Within 75 calendar days of receiving an application for program revision or modification, the Administrator will respond with a letter that either notifies the State/Local that the application is complete or identifies deficiencies in the application that render the application incomplete. The State/Local receiving a notice of deficiencies may amend the application and resubmit it. Within 30 calendar days of receiving the amended application, the Administrator will respond with a letter that either notifies the applicant that the amended application is complete or identifies remaining deficiencies that render the application incomplete.

Except where an opportunity for public hearing is required, if the Administrator does not take any action on a specific request for revision or modification of a specific authorized program addressed by an application submitted within 180 calendar days of notifying the State/Local that the application is complete, the specific request for program revision or modification for the specific authorized program is considered automatically approved by EPA at the end of the 180 calendar days unless the review period is extended at the request of the State/Local submitting the application.

If a State/Local submits material to amend its application after the date that the Administrator sends notification that the application is complete, this new submission will constitute withdrawal of the pending application and submission of a new, amended application for program revision or modification, and the 180-day time period will begin again only when the Administrator makes a new determination and notifies the State/Local under that the amended application is complete.

6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION

6(a) ESTIMATING RESPONDENT BURDEN HOURS

Exhibit 1 provides estimates of the respondent hourly burden associated with the information collection requirements covered in this ICR. The exhibit includes burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents. The majority of the hour estimates in Exhibit 1 are based on the Agency's technical background document, *Cross Media Electronic Reporting Rule Cost Benefit Analysis*, and consultations with industry and states.

6(b) ESTIMATING RESPONDENT COSTS

Exhibit 1 provides estimates of the annual respondent costs associated with the information collection requirements covered in this ICR. These costs are based on the cost of labor, capital, and operation and maintenance (O&M).

(1) Labor Costs

Using the total burden hours discussed in Section 6(a) and the hourly respondent labor costs outlined in this section, Exhibit 1 illustrates the labor costs associated with the information collection requirements covered in this ICR.

(a) Direct Reporters, Indirect Reporters, Indirect Reporting Firms, and Local Registration Authorities

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$61.63 for legal staff, \$39.50 for managerial staff, \$39.17 for technical staff, and \$17.23 for clerical staff. These respondent labor costs were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.05, dated June 22, 2011), and updated to 2014 levels using Employment Cost Indexes developed by the Bureau of Labor Statistics.³

(b) State/Local Agencies

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$41.13 for legal staff, \$41.13 for managerial staff, \$31.15 for technical staff, and \$14.78 for clerical staff. These respondent labor costs were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.05, dated June 22, 2011), and updated to 2014 levels using Employment Cost Indexes developed by the Bureau of Labor Statistics.⁴

³ Bureau of Labor Statistics; "Table 4. Employment Cost Index for total compensation, for civilian workers, by occupational and industry;" *Employment Cost Index, Historical Listing – Volume V, Continuous Occupational and Industry Series, September 1975 –June 2014*; July 2014. Available online at: <http://www.bls.gov/web/eci/ecicois.pdf>, last accessed on October 8, 2014. Civilian Workers, All Workers, March 2011=114.0 and June 2014= 121.4.

⁴ Bureau of Labor Statistics, "Table 7. Employment Cost Index for total compensation, for State and local government workers, by occupational and industry," *Employment Cost Index, Historical Listing – Volume V, Continuous Occupational and Industry Series, September 1975 –June 2014*; July 2014. Available online at:

(2) Capital Costs

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment.

(a) Direct Reporters, Indirect Reporters, Indirect Reporting Firms, and Local Registration Authorities

EPA does not anticipate that direct reporters, indirect reporters, indirect reporting firms, and LRAs will incur capital costs in carrying out the information collection requirements covered in this ICR.

(b) State/Local Agencies

EPA anticipates that State/Local agencies will incur capital costs in upgrading their existing electronic document receiving systems or developing new electronic document receiving systems to satisfy CROMERR standards at 40 CFR 3.2000 (e.g., copy of record, Secure Sockets Layer (SSL), e-mail notification, electronic signature, electronic signature agreement). In particular, EPA estimates that each state agency will incur a cost of \$310,688 and that each local agency will incur a cost of \$57,996. The capital costs for state agencies were obtained from consultations (refer to Section 3(c) of this document). The capital costs for local agencies were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.05, dated June 22, 2011), and updated to 2014 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics.⁵ The above capital costs are shown in Exhibit 1 for all applicable respondent activities.

EPA notes that capital costs for local agencies are estimated to be lower than the capital costs for state agencies because local agencies are expected to have simpler electronic document receiving systems that cover fewer programs and fewer electronic reports than state systems. For example, EPA has received only one application from a local agency under CROMERR, and that system only accepts reports under one authorized program.

(3) Operation and Maintenance Costs

O&M costs are those costs associated with an information collection requirement incurred continually over the life of the ICR.

<http://www.bls.gov/web/eci/ecicois.pdf>, last accessed on October 8, 2014. State and Local Government Workers, All Workers, March 2011=116.6 and June 2014= 123.1.

⁵ Bureau of Labor Statistics, "Table 24. Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items," *CPI Detailed Report for August 2014*; August 2014. Available online at: <http://www.bls.gov/cpi/cpid1408.pdf>, last accessed on October 8, 2014. April 2011=224.906 and August 2014=237.852.

(a) Direct Reporters, Indirect Reporters, Indirect Reporting Firms, and Local Registration Authorities

O&M costs include:

- EPA estimates that employee registrants that submit subscriber agreements to EPA or States/Locals will incur a cost of \$3.82 to mail a one-ounce letter by certified mail (i.e., \$0.49 for first-class letter postage, \$3.30 for the certified-mail fee, and \$0.03 for standard business envelope).^{6,7,8}
- EPA estimates that employee registrants that submit subscriber agreements to their LRA will incur a cost of \$0.52 to mail a one-ounce letter using first-class mail (i.e., \$0.49 for first-class letter postage and \$0.03 for standard business envelope).^{9, 10}
- EPA estimates that indirect reporting firms will incur a cost of \$2.78 for obtaining a notarized affidavit to establish the identity of a LRA. This O&M cost was obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.05, dated June 22, 2011), and updated to 2014 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics.¹¹

The above O&M costs are shown in Exhibit 1 for all applicable respondent activities.

(b) State/Local Agencies

For State/Local agencies, O&M costs include mailing costs. In particular, EPA estimates that State/Local agencies submitting documentation to EPA (e.g., applications for program modification approval under 40 CFR 3.1000) will incur a cost of \$6.09 to mail a nine-ounce large envelope by certified mail (\$2.66 for first-class large envelope postage, \$3.30 for the

⁶ U.S. Postal Service; “First-Class Mail Prices.” Available online at: <https://www.usps.com/2014/mailing/m-fcm-retail.xls>, last accessed on October 8, 2014.

⁷ U.S. Postal Service; “Extra Services Prices.” Available online at: <https://www.usps.com/2014/mailing/m-dom-extra-services.xls>, last accessed on October 8, 2014.

⁸ Standard business envelope cost based on current market price, as of October 8, 2014 (i.e., box of 500 standard business envelopes with gummed closure at \$15.59).

⁹ U.S. Postal Service; “First-Class Mail Prices.” Available online at: <https://www.usps.com/2014/mailing/m-fcm-retail.xls>, last accessed on October 8, 2014.

¹⁰ Standard business envelope cost based on current market price, as of October 8, 2014 (i.e., box of 500 standard business envelopes with gummed closure at \$15.59).

¹¹ Bureau of Labor Statistics, “Table 24. Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items,” *CPI Detailed Report for August 2014*; August 2014. Available online at: <http://www.bls.gov/cpi/cpid1408.pdf>, last accessed on October 8, 2014. April 2011=224.906 and August 2014=237.852.

certified-mail fee, and \$0.13 for catalog envelope).^{12, 13, 14} These O&M costs are shown in Exhibit 1 for all applicable respondent activities.

6(c) ESTIMATING AGENCY HOUR AND COST BURDEN

EPA estimates the Agency hour and cost burden associated with the information collection requirements covered in this ICR in Exhibit 2. As shown in the exhibit, EPA estimates an average hourly labor cost of \$65.58 for legal staff (GS-14, Step 5), \$55.50 for managerial staff (GS-13, Step 1), \$46.67 for technical staff (GS-12, Step 1), and \$23.68 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2014.¹⁵ This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates.

EPA estimates that, each year, the Agency will incur a capital cost of \$173,600 in CDX development, operation, and maintenance activities.¹⁶ This capital cost is shown in Exhibit 2.

O&M costs include electronic transaction fees associated with the processing of electronic subscriber agreements (ESA) by a third party vendor. In particular, EPA estimates that the Agency will incur an electronic transaction cost of \$0.61 per subscriber agreement.¹⁷ This O&M cost is shown in Exhibit 2 for all applicable activities.

6(d) ESTIMATING RESPONDENT UNIVERSE AND TOTAL HOUR AND COST BURDEN

In this section, EPA first describes the estimated respondent universe. EPA then estimates the annual burden to respondents under the information collection requirements covered in this ICR.

EPA notes that, as used in this document, the term “respondent” includes:

- Direct reporters, indirect reporters, indirect reporting firms, and LRAs complying with the registration and identity proofing requirements covered in this ICR, as applicable. This includes:

¹² U.S. Postal Service; “First-Class Mail Prices.” Available online at: <https://www.usps.com/2014/mailing/m-fcm-retail.xls>, last accessed on October 8, 2014.

¹³ U.S. Postal Service; “Extra Services Prices.” Available online at: <https://www.usps.com/2014/mailing/m-dom-extra-services.xls>, last accessed on October 8, 2014.

¹⁴ Catalog envelope cost based on current market price, as of October 8, 2014 (i.e., box of 100 6” x 9” brown kraft catalog envelopes with gummed closure at \$13.29).

¹⁵ US Office of Personnel Management, “Base Hourly Rate,” *2014 General Schedule (Base)*, January 2014. Available online at: http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/GS_h.pdf, last accessed on October 8, 2014.

¹⁶ Based on data current as of October 13, 2014.

¹⁷ Based on data current as of September 10, 2014.

- Private sector entities; and
 - State/Local agencies that are regulated entities¹⁸.
- State/local agencies administering electronic document receiving systems subject to CROMERR¹⁹. In this document, we refer to these respondents as “State/Local agencies acting as regulators.”
 - State/local agencies seeking EPA approval to allow electronic reporting under CROMERR²⁰. In this document, we refer to these respondents as “State/Local agencies that are regulated entities.”

(1) Respondent Universe

EPA estimates that, in total, 102,387 respondents will be subject to the information collection requirements covered in this ICR. This includes 77,482 direct reporters, 24,834 indirect reporters, 48 State/Local agencies acting as regulators, and 23 State/Local agencies that are regulated entities. The following paragraphs provide additional information on how these respondent universe estimates were derived.

(a) Direct Reporter Employees

EPA estimates that, each year, 77,482 direct reporters will be subject to the information collection requirements covered in this ICR. This includes 55,483 direct reporter employees expected to register with CDX and 21,999 direct reporters expected to submit subscriber agreements.

Table 2 presents information on the annual number of employee registrants expected to register with CDX during the three-year period covered by the ICR. As shown in the table, EPA estimates that, on average, 55,483 employees will register with CDX each year.

Appendix B provides detailed information on the methodology used to estimate the average annual number of direct reporters expected to register with the CDX during the three-year period covered by this ICR.

¹⁸ Addressing State/Local agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the PRA.

¹⁹ Ibid.

²⁰ Ibid.

Table 2
Annual Number of Direct Reporter Employees Expected to Register with EPA’s CDX during the Three-Year Period Covered by the ICR

Respondent Universe	Average Annual Number of New Employee Registrants ^a
Private Sector Entities	47,772
State/Local Agencies that are Regulated Entities	7,711
Total	55,483

^a Federal government employees are not reflected in the table because they are exempt from ICR requirements.

Table 3 presents information on the estimated annual number of subscriber agreements to be submitted to EPA during the three-year period covered by the ICR. As shown in the table, direct reporters have various options for complying with the subscriber agreement requirements covered in this ICR:

- **Paper subscriber agreement.** Direct reporters have the option of preparing and mailing a paper subscriber agreement (i.e., a non-ESA).
- **Electronic subscriber agreement (ESA).** Direct reporters have the option of completing and submitting an ESA directly to CDX (i.e., without using a third party vendor). This eliminates the requirement to prepare and mail new paper subscriber agreements.
- **Reuse (Consolidated) ESA.** Direct reporters now have the option of “reusing” an ESA. CDX has the ability to recognize when a registrant has already provided sufficient forensic evidence through wet-ink signature, organization information, and audit information tying forensic evidence to CDX credentials in order to allow reuse of the forensic evidence and accept a digitally signed (electronic) signature using the registrant’s existing CDX credential. This eliminates the requirement to prepare and mail new paper subscriber agreements.
- **Third Party ESA.** Direct reporters now have the option of completing and submitting an ESA through a third party vendor. CDX provides a voluntary method for real-time identity proofing using a third party vendor to validate government identification (ID) and additional personal information in compliance with OMB Memorandum M-04-04, while retaining repeatable digital evidence of validation using cryptographic hash technology and not retaining the highly sensitive personally identifying information. The third party process validates both identity and business affiliation. This eliminates the requirement to prepare and mail new paper subscriber agreements.

Appendix B provides detailed information on the methodology used to estimate the average annual number of subscriber agreements to be submitted to EPA during the three-year period covered by this ICR.

Table 3
Annual Number of Subscriber Agreements to Be Submitted to EPA
during the Three-Year Period Covered by the ICR ^a

Type of Subscriber Agreement	Annual Number of Subscriber Agreements ^{b, c}			Average
	2015	2016	2017	
Private Sector Entities				
Non-ESA Registrants	1,696	1,867	1,856	1,806
ESA Registrants	8,701	9,693	9,792	9,395
Reuse (Consolidated) ESA Registrants	1,040	506	68	538
Third Party ESA Registrants	6,476	6,872	8,256	7,201
<i>Subtotal</i>	<i>17,913</i>	<i>18,938</i>	<i>19,972</i>	<i>18,941</i>
State/Local Agencies that Are Regulated Entities				
Non-ESA Registrants	274	301	300	292
ESA Registrants	1,404	1,565	1,581	1,517
Reuse (Consolidated) ESA Registrants	168	82	11	87
Third Party ESA Registrants	1,045	1,109	1,333	1,162
<i>Subtotal</i>	<i>2,891</i>	<i>3,057</i>	<i>3,225</i>	<i>3,058</i>
Total				
Non-ESA Registrants	1,970	2,168	2,156	2,098
ESA Registrants	10,105	11,258	11,373	10,912
Reuse (Consolidated) ESA Registrants	1,208	588	79	625
Third Party ESA Registrants	7,521	7,981	9,589	8,364
Total	20,804	21,995	23,197	21,999

^a Table includes rounding error.

^b Table contains data provided by EPA's Office of Information Collection (OIC), and are current as of August 8, 2014.

^c Federal government employees are not reflected in the table because they are exempt from ICR requirements.

(b) Indirect Reporter Employees

Table 4 presents information on the annual number of employee registrants expected to register and comply with identify proofing requirements of State/Local electronic document receiving systems during the three-year period covered by the ICR. As shown in the table, EPA estimates that, on average, 24,834 employees from indirect reporting facilities will register and comply with identify proofing requirements of State/Local electronic document receiving systems each year.

For indirect reporters, EPA assumes that only a portion of employee registrants from medium-size and large firms will use the LRA alternative. The remaining facility employees will comply with the subscriber agreement provisions. Thus, in order to perform the analysis, EPA categorized employee registrants based on the size of their firms (i.e., small firm or medium-size and large firm). Table 4 presents information on the annual number of employee registrants by type of firm.

As shown in Table 4, EPA estimates that, on average, 13,372 employees from small firms and 11,462 employees from medium-size and large firms will register and comply with identify proofing requirements of State/Local electronic document receiving systems each year.

Appendix C provides detailed information on the methodology used to estimate the average annual number of indirect reporters for the three-year period covered by this ICR.

Table 4
Annual Number of Indirect Reporter Employees Expected to Register and Comply with Identify Proofing Requirements during the Three-Year Period Covered by the ICR

Type of Firm	Average Annual Number of Employee Registrants ^a
Private Sector Entities	
Small Firms	11,514
Medium-Size and Large Firms	9,869
<i>Subtotal</i>	21,383
State/Local Agencies that are Regulated Entities	
Small Firms	1,858
Medium-Size and Large Firms	1,593
<i>Subtotal</i>	3,451
Total	
Small Firms	13,372
Medium-Size and Large Firms	11,462
Total	24,834

^a Federal government employees are not reflected in the table because they are exempt from ICR requirements.

(c) Indirect Reporting Firms

As shown in Table 4, EPA estimates that, on average, 13,372 employees from small indirect reporting firms will register and comply with identify proofing requirements of State/Local electronic document receiving systems each year. Each small firm is expected to have an average of three employees²¹, for a total of 4,457 small *firms* (i.e., 13,372 employees ÷ 3 employees/firm).

EPA also estimates that, on average, 11,462 employees from medium-size and large indirect reporting firms will register with State/Local electronic document receiving systems each year. Each medium-size and large firm is expected to have an average of 18 employees²², for a total of 637 medium-size and large *firms* (i.e., 11,462 employees ÷ 18 employees/firm).

(d) State/Local Agencies Acting as Regulators

Based on data from EPA's CROMERR Program and Stakeholder Management (PSM) System, EPA estimates that, currently, 48 State/Local agencies administer electronic document receiving systems subject to CROMERR.²³

²¹ This assumption was taken from *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final*, dated November 17, 2004.

²² This assumption was taken from *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final*, dated November 17, 2004.

²³ PSM is a custom implementation of a Salesforce.com platform that integrates database records, online file storage, multiple distinct spreadsheets, and email logs, to support the reduction of Technical Review Committee (TRC) and EPA's Office of Environmental Information (OEI) levels of effort in managing the application approval

(e) States/Locals Agencies That Are Regulated Entities

Based on information currently available to EPA on the submission and approval of program modification applications under 40 CFR 3.1000 (i.e., CROMERR applications), EPA estimates that, on average, four States/Locals (i.e., 3 state agencies and 1 local agency) will upgrade their existing electronic document receiving systems or develop new electronic document receiving systems and submit CROMERR applications each year.

EPA also estimates that, on average, 15 States/Locals (i.e., 15 state agencies and 0 local agencies) will submit amendments to their original CROMERR applications each year.

In addition, EPA estimates that, on average, 4 States/Locals (i.e., 4 state agencies and 0 local agencies) will submit notifications to EPA about changes to laws, policies, or electronic document receiving systems each year.

Based on the above information, EPA estimates that, each year, 23 State/Local agencies will be regulated entities during the three-year period covered by this ICR.

(2) Annual Respondent Burden (Exhibit 1)

(a) Registering with EPA Electronic Document Receiving System – Direct Reporters

EPA estimates that, on average, 55,483 employees of direct reporting facilities will register with EPA's electronic document receiving system each year. EPA also estimates that, of the 55,483 employee registrants, approximately 10 percent (or 5,548) will need to update their registration information each year.

(b) Compliance with Identity Proofing Requirements – Direct Reporters

The following paragraphs discuss the assumptions associated with compliance with the identity proofing requirements by direct reporters.

Comply with Requirements for Identifier, Attribute, or Alternative Method

EPA does not anticipate that direct reporters will prepare and submit information on identifiers or attributes, or other identity-proofing information.

Comply with Subscriber Agreement Provisions

EPA assumes that all direct reporters will comply with the subscriber agreement requirements.

Non-ESA Registrants. EPA estimates that, on average, employee registrants from direct reporting facilities will prepare, submit, and file a total of 2,097 paper subscriber agreements each year. EPA also estimates that, of the 2,097 paper subscriber agreements prepared each year, 89 percent (1,867) will be from new and existing employee registrants (e.g., employees registering for the first time with a data flow); 10 percent (209) will be associated with employee turnover, which requires the submittal of a new subscriber agreement by the employee replacement; and one percent (21) will be associated with a compromised electronic signature, which requires the submittal of a new subscriber agreement. EPA anticipates that all employee registrants preparing a paper subscriber agreement will contact the Help Desk for technical support.

ESA Registrants. EPA estimates that, on average, employee registrants from direct reporting facilities will prepare, submit, and file a total of 10,912 ESAs each year. EPA also estimates that, of the 10,912 ESAs prepared each year, 89 percent (9,712) will be from new and existing employee registrants (e.g., employees registering for the first time with a data flow); 10 percent (1,091) will be associated with employee turnover, which requires the submittal of a new subscriber agreement by the employee replacement; and one percent (109) will be associated with a compromised electronic signature, which requires the submittal of a new subscriber agreement. EPA anticipates that all employee registrants preparing an ESA will contact the Help Desk for technical support.

Reuse (Consolidated) ESA Registrants. EPA estimates that, on average, 625 employee registrants from direct reporting facilities will reuse their ESA each year. EPA also estimates that, of the 625 reuse (consolidated) ESAs, 89 percent (556) will be from existing employee registrants (e.g., existing employee registrants registering for the first time with a data flow); 10 percent (63) will be associated with employee turnover, which requires the submittal of a new subscriber agreement by the employee replacement; and one percent (6) will be associated with a compromised electronic signature, which requires the submittal of a new subscriber agreement. EPA anticipates that all employee registrants reusing an ESA will contact the Help Desk for technical support.

Third Party ESA Registrants. EPA estimates that, on average, employee registrants from direct reporting facilities will prepare, submit, and file a total of 8,364 third party ESAs each year. EPA also estimates that, of the 8,364 third party ESAs prepared each year, 89 percent (7,444) will be from new and existing employee registrants (e.g., employees registering for the first time with a data flow); 10 percent (836) will be associated with employee turnover, which requires the submittal of a new subscriber agreement by the employee replacement; and one percent (84) will be associated with a compromised electronic signature, which requires the submittal of a new subscriber agreement. EPA anticipates that all employee registrants preparing a third party ESA will contact the Help Desk for technical support.

Conduct On-Going Management

EPA assumes that, of the 21,999 employee registrants from direct reporting facilities, three percent (660) will have to work with EPA to resolve problems involving their agreements or certifications each year.

(c) Compliance with Identity Proofing Requirements – Indirect Reporters

The following paragraphs discuss the assumptions associated with compliance with the identity proofing requirements by indirect reporters.

Comply with Requirements for Identifier, Attribute, or Alternative Method

EPA does not anticipate that indirect reporters will prepare and submit information on identifiers or attributes, or other identity-proofing information.

Comply with Subscriber Agreement Provisions

For indirect reporters, EPA assumes that all *employee registrants* from small firms (13,372) and 98 percent of *employee registrants* from medium-size and large firms (11,462 x 0.98 = 11,233) will comply with the subscriber agreement requirements. In addition, EPA estimates that indirect reporters submit information to 1.3 State/Local electronic document receiving systems, on average; hence, their employees must submit subscriber agreements for 1.3 receiving systems, on average.²⁴ EPA assumes that all employee registrants from indirect reporting facilities will submit paper subscriber agreements.

Based on the above assumptions, EPA estimates that, on average, employee registrants from indirect reporting facilities will prepare, submit, and file a total of 31,986 subscriber agreements each year (i.e., [13,372 small firm employees + 11,233 medium-size and large firm employees] x 1.3 subscriber agreements/employee).

EPA also estimates that, of the 31,986 subscriber agreements prepared each year, 89 percent (28,468) will be from new and existing employee registrants (e.g., employees registering for the first time with a data flow); 10 percent²⁵ (3,199) will be associated with employee turnover, which requires the submittal of a new subscriber agreement by the employee replacement; and one percent (320) will be associated with a compromised electronic signature, which requires the submittal of a new subscriber agreement

EPA anticipates that all employee registrants preparing a subscriber agreement will contact the Help Desk for technical support.

Submit Subscriber Agreements to Local Registration Authority

EPA assumes that two percent of medium-size and large firms will use the LRA alternative. EPA also assumes that indirect reporting firms submit information to 1.3 State/Local electronic document receiving systems, on average; hence, their employees must submit subscriber agreements for 1.3 receiving systems, on average.²⁶ Based on these assumptions, EPA

²⁴ Ibid.

²⁵ This assumption was taken from Section 2.3.4.2 (page 29) of *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final*, dated November 17, 2004.

²⁶ Ibid.

estimates that, on average, *employees* from indirect reporting firms will prepare and send to their LRA a total of 298 subscriber agreements each year (i.e., [11,462 medium-size and large firm employees x 0.02] x 1.3 subscriber agreements/employee).

EPA estimates that, of the 298 subscriber agreements prepared each year, 89 percent (265) will be from new employee registrants; 10 percent (30) will be associated with employee turnover, which requires the submittal of a new subscriber agreement by the employee replacement; and one percent (3) will be associated with a compromised electronic signature, which requires the submittal of a new subscriber agreement.

Conduct On-Going Management

EPA assumes that, of the 24,605 employee registrants from indirect reporting facilities (13,372 + 11,233 = 24,605), three percent (738) will have to work with States/Locals to resolve problems involving their agreements each year.

(c) Implementation of Local Registration Authority Alternative – Indirect Reporting Firms and Local Registration Authorities

The following paragraphs discuss the assumptions associated with implementation of the LRA alternative by indirect reporting firms and LRAs.

Designating a Local Registration Authority

As stated above, EPA assumes that two percent of medium-size and large indirect reporting *firms* (637 x 0.02 = 13) will use the LRA alternative. These *firms* will develop a process or plan to implement the LRA alternative, designate the LRA, submit the LRA application to the agency, and register the LRA with the electronic document receiving system.

Of the 13 medium-size and large indirect reporting *firms* that will use the LRA alternative, two percent (1) will need to redesignate the LRA annually due to turnover, which requires registration of the new LRA with the electronic document receiving system.

Collect Subscriber Agreements from Reporters

EPA estimates that, on average, LRAs will collect a total of 298 subscriber agreements each year. Of these 298 subscriber agreements, 265 will be from new employee registrants, 30 will be associated with employee turnover, and 3 will be associated with a compromised electronic signature. For each of these subscriber agreements, LRAs will need to prepare an agreement collection certification after securely storing the subscriber agreements, and submit a certification of receipt and secure storage.

(d) Compliance with Identity Proofing Requirements – State/Local Agencies Acting as Regulators

Collect Identifier, Attribute, or Alternative Information

EPA does not anticipate that indirect reporters will prepare and submit information on identifiers or attributes, or other identity-proofing information.

Collect Subscriber Agreements

EPA estimates that, on average, employee registrants from indirect reporting facilities will prepare, submit, and file a total of 31,987 subscriber agreements each year. This includes 28,468 subscriber agreements from new employee registrants, 3,199 subscriber agreements associated with employee turnover, and 320 subscriber agreements associated with a compromised electronic signature. State/Local agencies will receive, process, review, approve, and file all these subscriber agreements.

Collect Submittals from Local Registration Authority

EPA estimates that, each year, employee registrants from indirect reporting facilities will submit 298 subscriber agreements to their LRAs. This includes 265 subscriber agreements from new employee registrants, 30 subscriber agreements associated with employee turnover, and 3 subscriber agreements associated with a compromised electronic signature. State/Local agencies will need to receive, process, review, and approve the certification of receipt and secure storage submitted by the LRAs.

Collect Applications for Designation of Local Registration Authority

EPA estimates that, each year, 13 indirect reporting *firms* will use the LRA alternative. EPA also estimates that, each year, one of these firms will need to redesignate the LRA due to turnover. State/Local agencies will need to receive and approve these LRA applications.

Conduct On-Going Management

EPA estimates that, each year, State/Local agencies will have to work with 738 employee registrants to resolve problems involving their agreements or certifications, and respond to information requests.

(e) Approval of State/Local Electronic Document Receiving System Applications – State/Local Agencies that Are Regulated Entities

Read the Regulations

EPA estimates that, on average, 23 States/Locals will submit documentation to EPA associated with the approval of State/Local electronic document receiving systems each year. These States/Locals are expected to read the regulations at 40 CFR Part 3.

Submit Electronic Document Receiving System Application

EPA estimates that, on average, 4 States/Locals will upgrade their existing electronic document receiving systems or develop new electronic document receiving systems and submit a CROMERR application each year. This includes 3 state agencies and 1 local agency.

Submit Amendment to Original Application

EPA estimates that, on average, 15 states will submit amendments to their original CROMERR application each year. EPA does not anticipate that Locals will submit amendments to their original CROMERR applications during the three-year period covered by this ICR.

Submit Notification on Changes to Laws, Policies, or Electronic Document Receiving System

EPA estimates that, on average, 4 state agencies will submit a notification about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000. EPA does not anticipate that local agencies will submit this notification during the three-year period covered by this ICR.

6(e) BOTTOM LINE HOUR AND COST BURDEN

(1) Respondent Tally

Exhibits 3 and 4 summarize the total annual respondent hour and cost burden associated with all the requirements covered in this ICR. Exhibit 3 presents information on the total estimated respondent hour and cost burden for all respondents. Exhibit 4 presents information on the total estimated respondent hour and cost burden, by type of respondent. As used in this document, the term “respondent” includes private sector and State/Local entities.²⁷ As shown in the exhibits, EPA estimates the annual respondent burden to be 49,604 hours and \$2,995,642. The bottom line burden to respondents over three years is estimated to be 148,812 hours and \$8,986,926.

(2) Agency Tally

Exhibit 5 summarizes the total annual EPA hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual agency burden to be 22,393 hours and \$1,226,664. The bottom line burden to the agency over three years is estimated to be 67,179 hours and \$3,679,992.

6(f) REASONS FOR CHANGE IN BURDEN

The annual respondent burden estimate in the previously approved CROMERR ICR (EPA ICR Number 2002.05) was 39,763 hours. The annual respondent burden estimate for this ICR (EPA ICR Number 2002.06) is 49,604 hours. This represents an increase of 9,841 hours.

²⁷ Refer to Section 6(d) for additional clarification on the types of respondents examined in this ICR.

This increase in burden occurred primarily because, in developing this ICR, EPA carefully reviewed the respondent activities. Based on consultations with industry and state agencies, EPA increased some of the hourly burden estimates. EPA believes that the revised burden estimates included in this ICR reflect a realistic average.

Note, however, that the increase in burden associated with the revised hourly burden estimates was offset by a decrease in the total annual number of employees complying with CROMERR's identity proofing requirements, from 58,996 employees (i.e., 33,072 direct reporters + 25,924 indirect reporters) in the previously approved ICR to 46,833 employees (i.e., 21,999 direct reporters + 24,834 indirect reporters) in this ICR. In estimating the annual number of employees complying with the CROMERR's identity proofing requirements for this ICR, EPA was able to take advantage of improvements in data software and hardware capabilities and thus, develop estimates based on actual data instead of the complex calculations used in the previously approved ICR. In particular, EPA was able to obtain actual numbers and growth rates for the annual number of subscriber agreements submitted to CDX over the past several years. These data were used to improve the estimate for the annual number of subscriber agreements submitted by direct reporters. EPA believes that the respondent estimates included in this ICR are a reasonable approximation of the actual respondent universe.

All changes in burden are considered "adjustments," since they resulted from changes in the size of the respondent universe and refinements to the assumptions used in the development of the ICR.

6(g) PUBLIC BURDEN STATEMENT

(1) Registering with EPA Electronic Document Receiving System – Direct Reporters

The reporting burden is estimated to be 10 minutes for a facility employee to register with CDX. This includes time for preparing the on-line application and calling the CDX Help Desk. There are no recordkeeping requirements associated with registering with the CDX application.

(2) Compliance with Identity Proofing Requirements – Direct and Indirect Reporters

The reporting burden is estimated to be about 80 minutes for a facility employee to prepare and submit identifier, attribute, or alternative information. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to range from 17 minutes to 25 minutes for a facility employee to prepare and submit a subscriber agreement. The recordkeeping burden for the facility employee is estimated to be about 7 minutes to file an agreement on site.

(3) Implementation of Local Registration Authority Alternative – Indirect Reporting Firms and Local Registration Authorities

The reporting burden is estimated to be 13 hours for a firm to develop a process or plan to use the LRA alternative, designate the LRA, submit the LRA application to the agency, and register the LRA with the electronic document receiving system. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 1 hour for a firm to redesignate the LRA, due to turnover; send the LRA application to the agency; and register the new LRA with the electronic document receiving system. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 10 minutes for a LRA to prepare and submit a certification of receipt and secure storage after receiving a subscriber agreement. The recordkeeping burden is estimated to be 10 minutes for a LRA to compile subscriber agreements from employee registrants within the LRA's firm and place them in secure storage.

(4) Compliance with Identity Proofing Requirements – State/Local Agencies Acting as Regulators

The reporting burden is estimated to be 30 minutes for a State/Local agency to receive, process, review, and approve identifier, attribute, or alternative information. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 10 minutes for a State/Local agency to receive, process, review, and approve subscriber agreements. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 30 minutes for a State/Local agency to receive, process, review, and approve an LRA application. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 2.5 hours for a State/Local agency to resolve problems involving subscriber agreements or certifications, and respond to information requests. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

(5) Approval of State/Local Electronic Document Receiving System Applications – State/Local Agencies that Are Regulated Entities

The reporting burden is estimated to range from 210 hours to 331 hours for a State/Local agency to prepare and submit the CROMERR application to EPA. The recordkeeping burden is estimated to be 90 minutes to read the regulations.

The reporting burden is estimated to be 24 hours for a State/Local agency to prepare and submit an amendment to its original CROMERR application to EPA. The recordkeeping burden is estimated to be 90 minutes to read the regulations.

The reporting burden is estimated to be about 11 hours for a State/Local agency to notify EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000. The recordkeeping burden is estimated to be 90 minutes to read the regulations.

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 Number EPA-HQ-OEI-2011-0096, which is available for online viewing at www.regulations.gov, or in person viewing at the Office of Environmental Information (OEI) Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 OEI Docket is (202) 566-1752. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OEI-2011-0096 and OMB Control Number 2025-0003 in any correspondence.

EXHIBIT 1

CROSS-MEDIA ELECTRONIC REPORTING RULE

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours and Costs Per Respondent Per Activity									Total Hours and Costs	
	Leg. \$61.63/ Hour	Mgr. \$39.50/ Hour	Tech. \$39.17/ Hour	Cler. \$17.23/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Registering with EPA Electronic Document Receiving System - Direct Reporters											
Log on to the receiving system site and enter requested information	0.00	0.00	0.15	0.00	0.15	\$5.88	\$0.00	\$0.00	55,483	8,322.45	\$326,240.04
Update the information as needed	0.00	0.00	0.02	0.00	0.02	\$0.78	\$0.00	\$0.00	5,548	110.96	\$4,327.44
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	8,433.41	\$330,567.48
Compliance with Identity Proofing Requirements - Direct Reporters											
Comply with Requirements for Identifier, Attribute, or Alternative Method											
Prepare and submit requested information	0.00	0.25	1.00	0.10	1.35	\$50.77	\$0.00	\$0.00	0	0.00	\$0.00
Comply with Subscriber Agreement Provisions - Non-ESA Registrants											
Prepare and submit a subscriber agreement	0.00	0.00	0.42	0.00	0.42	\$16.45	\$0.00	\$3.82	1,867	784.14	\$37,844.09
File subscriber agreement	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	1,867	224.04	\$8,774.90
Prepare and submit a new subscriber agreement, for employee turnover	0.00	0.00	0.42	0.00	0.42	\$16.45	\$0.00	\$3.82	209	87.78	\$4,236.43
File new subscriber agreement, for employee turnover	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	209	25.08	\$982.30
Report compromised or surrendered electronic signature device and prepare/submit new subscriber agreement if necessary	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$3.82	21	3.57	\$220.08
Contact the Help Desk for technical support	0.00	0.00	0.06	0.00	0.06	\$2.35	\$0.00	\$0.00	2,097	125.82	\$4,927.95
Comply with Subscriber Agreement Provisions - ESA Registrants											
Prepare and submit a subscriber agreement	0.00	0.00	0.28	0.00	0.28	\$10.97	\$0.00	\$0.00	9,712	2,719.36	\$106,540.64
File subscriber agreement	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	9,712	1,165.44	\$45,646.40
Prepare and submit a new subscriber agreement, for employee turnover	0.00	0.00	0.28	0.00	0.28	\$10.97	\$0.00	\$0.00	1,091	305.48	\$11,968.27
File new subscriber agreement, for employee turnover	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	1,091	130.92	\$5,127.70
Report compromised or surrendered electronic signature device and prepare/submit new subscriber agreement if necessary	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	109	18.53	\$725.94
Contact the Help Desk for technical support	0.00	0.00	0.06	0.00	0.06	\$2.35	\$0.00	\$0.00	10,912	654.72	\$25,643.20
Comply with Subscriber Agreement Provisions - Reuse (Consolidated) ESA Registrants											
Prepare and submit a subscriber agreement	0.00	0.00	0.28	0.00	0.28	\$10.97	\$0.00	\$0.00	556	155.68	\$6,099.32
File subscriber agreement	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	556	66.72	\$2,613.20
Prepare and submit a new subscriber agreement, for employee turnover	0.00	0.00	0.28	0.00	0.28	\$10.97	\$0.00	\$0.00	63	17.64	\$691.11
File new subscriber agreement, for employee turnover	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	63	7.56	\$296.10
Report compromised or surrendered electronic signature device and prepare/submit new subscriber agreement if necessary	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	6	1.02	\$39.96
Contact the Help Desk for technical support	0.00	0.00	0.06	0.00	0.06	\$2.35	\$0.00	\$0.00	625	37.50	\$1,468.75
Comply with Subscriber Agreement Provisions - Third Party ESA Registrants											
Prepare and submit a subscriber agreement	0.00	0.00	0.28	0.00	0.28	\$10.97	\$0.00	\$0.00	7,444	2,084.32	\$81,660.68
File subscriber agreement	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	7,444	893.28	\$34,986.80
Prepare and submit a new subscriber agreement, for employee turnover	0.00	0.00	0.28	0.00	0.28	\$10.97	\$0.00	\$0.00	836	234.08	\$9,170.92
File new subscriber agreement, for employee turnover	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	836	100.32	\$3,929.20
Report compromised or surrendered electronic signature device and prepare/submit new subscriber agreement if necessary	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	84	14.28	\$559.44
Contact the Help Desk for technical support	0.00	0.00	0.06	0.00	0.06	\$2.35	\$0.00	\$0.00	8,364	501.84	\$19,655.40
Conduct On-Going Management											
Identify and resolve problems	0.00	0.00	1.67	0.00	1.67	\$65.41	\$0.00	\$0.00	660	1,102.20	\$43,170.60
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	11,461.32	\$456,979.38

^a Exhibit includes rounding error.

EXHIBIT 1 (CONTINUED)

CROSS-MEDIA ELECTRONIC REPORTING RULE
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN

	Hours and Costs Per Respondent Per Activity									Total Hours and Costs	
	Leg. \$61.63/ Hour	Mgr. \$39.50/ Hour	Tech. \$39.17/ Hour	Cler. \$17.23/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Compliance with Identity Proofing Requirements - Indirect Reporters											
Comply with Requirements for Identifier, Attribute, or Alternative Method											
Prepare and submit requested information	0.00	0.25	1.00	0.10	1.35	\$50.77	\$0.00	\$0.00	0	0.00	\$0.00
Comply with Subscriber Agreement Provisions - Non-ESA Registrants											
Prepare and submit a subscriber agreement	0.00	0.00	0.42	0.00	0.42	\$16.45	\$0.00	\$3.82	28,468	11,956.56	\$577,046.36
File subscriber agreement	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	28,468	3,416.16	\$133,799.60
Prepare and submit a new subscriber agreement, for employee turnover	0.00	0.00	0.42	0.00	0.42	\$16.45	\$0.00	\$3.82	3,199	1,343.58	\$64,843.73
File new subscriber agreement, for employee turnover	0.00	0.00	0.12	0.00	0.12	\$4.70	\$0.00	\$0.00	3,199	383.88	\$15,035.30
Report compromised or surrendered electronic signature device and prepare/submit new subscriber agreement if necessary	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$3.82	320	54.40	\$3,353.60
Contact the Help Desk for technical support	0.00	0.00	0.06	0.00	0.06	\$2.35	\$0.00	\$0.00	31,987	1,919.22	\$75,169.45
Submit Subscriber Agreement to Local Registration Authority											
Prepare subscriber agreement and send to LRA (non-ESA registrant)	0.00	0.00	0.42	0.00	0.42	\$16.45	\$0.00	\$0.52	265	111.30	\$4,497.05
Prepare new subscriber agreement and send to LRA, for employee turnover (non-ESA registrant)	0.00	0.00	0.42	0.00	0.42	\$16.45	\$0.00	\$0.52	30	12.60	\$509.10
Report breach of security or compromise/surrender of electronic signature device	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	3	0.51	\$19.98
Prepare new subscriber agreement and send to LRA subsequent to breach of security/compromise of electronic signature device (non-ESA registrant)	0.00	0.00	0.42	0.00	0.42	\$16.45	\$0.00	\$0.52	3	1.26	\$50.91
Conduct On-Going Management											
Identify and resolve problems	0.00	0.00	1.67	0.00	1.67	\$65.41	\$0.00	\$0.00	738	1,232.46	\$48,272.58
Implementation of Local Registration Authority Alternative - Indirect Reporting Firms and Local Registration Authorities											
Designating a Local Registration Authority											
Develop a process or plan to implement the requirement, designate the LRA, and submit LRA application to agency	1.00	0.00	12.00	0.00	13.00	\$531.67	\$0.00	\$6.60	13	169.00	\$6,997.51
Register LRA with the electronic document receiving system	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	13	2.21	\$86.58
Redesignate LRA, due to turnover, and send application materials	0.00	0.00	1.00	0.00	1.00	\$39.17	\$0.00	\$6.60	1	1.00	\$45.77
Register new LRA with electronic document receiving system	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	1	0.17	\$6.66
Collect Subscriber Agreements from Reporters											
Collect and securely store subscriber agreements	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	265	45.05	\$1,764.90
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$2.79	265	45.05	\$2,504.25
Collect and securely store subscriber agreements, for employee turnover	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	30	5.10	\$199.80
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for employee turnover	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$2.79	30	5.10	\$283.50
Collect and securely store subscriber agreements, for breach of security/compromise of electronic signature device	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$0.00	3	0.51	\$19.98
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for breach of security/compromise of electronic signature device	0.00	0.00	0.17	0.00	0.17	\$6.66	\$0.00	\$2.79	3	0.51	\$28.35
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	20,705.63	\$934,534.96

^a Exhibit includes rounding error.

EXHIBIT 1 (CONTINUED)
CROSS-MEDIA ELECTRONIC REPORTING RULE
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg.	Mgr.	Tech.	Cler.	Respon.	Labor	Capital/	O&M	Number of	Total	Total
	\$41.13/ Hour	\$41.13/ Hour	\$31.15/ Hour	\$14.78/ Hour	Hours/ Activity	Cost/ Activity	Startup Cost				
Compliance with Identity Proofing Requirements - State/Local Agencies Acting as Regulators											
Collect Identifier, Attribute, or Alternative Information											
Receive, process, review and approve identifier, attribute, or alternative information	0.00	0.00	0.50	0.00	0.50	\$15.58	\$0.00	\$0.00	0	0.00	\$0.00
Collect Subscriber Agreements											
Receive, process, review, approve and file new subscriber agreements	0.00	0.00	0.17	0.00	0.17	\$5.30	\$0.00	\$0.00	28,468	4,839.56	\$150,880.40
Receive, process, review, approve and file new subscriber agreements, for employee turnover	0.00	0.00	0.17	0.00	0.17	\$5.30	\$0.00	\$0.00	3,199	543.83	\$16,954.70
Receive, process, review, approve report compromise/surrender electronic signature device	0.00	0.00	0.17	0.00	0.17	\$5.30	\$0.00	\$0.00	320	54.40	\$1,696.00
Collect Submittals from Local Registration Authority											
Receive, process, review, and approve certification of receipt and secure storage	0.00	0.00	0.17	0.00	0.17	\$5.30	\$0.00	\$0.00	265	45.05	\$1,404.50
Receive, process, review and approve updated certification of receipt and secure storage, for employee turnover	0.00	0.00	0.17	0.00	0.17	\$5.30	\$0.00	\$0.00	30	5.10	\$159.00
Receive notification of breach of security or compromise/surrender of electronic signature device and take action	0.00	0.00	1.00	0.00	1.00	\$31.15	\$0.00	\$0.00	3	3.00	\$93.45
Receive, process, review and approve certification of receipt and secure storage, for breach of security	0.00	0.00	0.17	0.00	0.17	\$5.30	\$0.00	\$0.00	3	0.51	\$15.90
Collect Applications for Designation of Local Registration Authority											
Receive application to designate first-time LRA	0.00	0.00	0.50	0.00	0.50	\$15.58	\$0.00	\$0.00	13	6.50	\$202.54
Receive application to designate LRA, for LRA turnover	0.00	0.00	0.50	0.00	0.50	\$15.58	\$0.00	\$0.00	1	0.50	\$15.58
Conduct On-Going Management											
Identify and resolve problems	0.00	0.00	1.00	0.00	1.00	\$31.15	\$0.00	\$0.00	738	738.00	\$22,988.70
Respond to information requests	0.00	0.00	1.50	0.00	1.50	\$46.73	\$0.00	\$0.00	738	1,107.00	\$34,486.74
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	7,343.45	\$228,897.51

^a Exhibit includes rounding error.

EXHIBIT 1 (CONTINUED)

CROSS-MEDIA ELECTRONIC REPORTING RULE

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$41.13/ Hour	Mgr. \$41.13/ Hour	Tech. \$31.15/ Hour	Cler. \$14.78/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Approval of State/Local Electronic Document Receiving System Application - State/Local Agencies that Are Regulated Entities											
Read the Regulations											
Read the regulations	0.00	1.13	1.13	0.00	2.26	\$81.68	\$0.00	\$0.00	23	51.98	\$1,878.64
Submit Electronic Document Receiving System Application											
Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 and apply for EPA program modification approval under 40 CFR 3.1000 (state agencies)	0.00	31.00	300.00	0.00	331.00	\$10,620.03	\$310,688.35	\$6.09	3	993.00	\$963,943.41
Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 and apply for EPA program modification approval under 40 CFR 3.1000 (local agencies)	0.00	20.00	190.00	0.00	210.00	\$6,741.10	\$57,996.00	\$6.09	1	210.00	\$64,743.19
Submit Amendment to Original Application											
Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000 (States/Locals)	0.00	8.00	16.00	0.00	24.00	\$827.44	\$0.00	\$6.09	15	360.00	\$12,502.95
Submit Notification on Changes to Laws, Policies, or Electronic Document Receiving System											
Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (States/Locals with approved applications)	0.00	3.77	7.62	0.00	11.39	\$392.42	\$0.00	\$6.09	4	45.56	\$1,594.04
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	1,660.54	\$1,044,662.23
TOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	49,604.35	\$2,995,641.56

^a Exhibit includes rounding error.

**EXHIBIT 2
CROSS-MEDIA ELECTRONIC REPORTING RULE
ESTIMATED ANNUAL EPA HOUR AND COST BURDEN ^a**

INFORMATION COLLECTION ACTIVITY	Hours and Labor Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$65.58/ Hour	Mgr. \$55.50/ Hour	Tech. \$46.67/ Hour	Cler. \$23.68/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
Registering with EPA Electronic Document Receiving System											
Develop, operate, and maintain CDX	0.00	330.00	13,790.00	0.00	14,120.00	\$661,894.30	\$173,600.00	\$0.00	1	14,120.00	\$835,494.30
Subtotal	0.00	330.00	13,790.00	0.00	14,120.00	\$661,894.30	\$173,600.00	\$0.00	1	14,120.00	\$835,494.30
Compliance with Identity Proofing Requirements											
Collect Identifier, Attribute, or Alternative Information											
Receive, process, review and approve identifier, attribute, or alternative information	0.00	0.00	0.50	0.00	0.50	\$23.34	\$0.00	\$0.00	0	0.00	\$0.00
Collect Subscriber Agreements - Non-ESA Registrants											
Receive, process, review, approve and file new subscriber agreements ^b	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	1,867	0.00	\$0.00
Receive, process, review, approve and file new subscriber agreements, for employee turnover ^b	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	209	0.00	\$0.00
Receive, process, review, approve report compromise/surrender electronic signature device	0.00	0.00	0.17	0.00	0.17	\$7.93	\$0.00	\$0.00	21	3.57	\$166.53
Collect Subscriber Agreements - ESA Registrants											
Receive, process, review, approve and file new subscriber agreements	0.00	0.00	0.52	0.00	0.52	\$24.27	\$0.00	\$0.00	9,712	5,050.24	\$235,710.24
Receive, process, review, approve and file new subscriber agreements, for employee turnover	0.00	0.00	0.52	0.00	0.52	\$24.27	\$0.00	\$0.00	1,091	567.32	\$26,478.57
Receive, process, review, approve report compromise/surrender electronic signature device	0.00	0.00	0.17	0.00	0.17	\$7.93	\$0.00	\$0.00	109	18.53	\$864.37
Collect Subscriber Agreements - Reuse (Consolidated) ESA Registrants											
Receive, process, review, approve and file new subscriber agreements ^c	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	556	0.00	\$0.00
Receive, process, review, approve and file new subscriber agreements, for employee turnover ^c	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	63	0.00	\$0.00
Receive, process, review, approve report compromise/surrender electronic signature device	0.00	0.00	0.17	0.00	0.17	\$7.93	\$0.00	\$0.00	6	1.02	\$47.58
Collect Subscriber Agreements - Third Party ESA Registrants											
Receive, process, review, approve and file new subscriber agreements ^d	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.61	7,444	0.00	\$4,540.84
Receive, process, review, approve and file new subscriber agreements, for employee turnover ^d	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.61	836	0.00	\$509.96
Receive, process, review, approve report compromise/surrender electronic signature device	0.00	0.00	0.17	0.00	0.17	\$7.93	\$0.00	\$0.00	84	14.28	\$666.12
Conduct On-Going Management											
Identify and resolve problems	0.00	0.00	1.00	0.00	1.00	\$46.67	\$0.00	\$0.00	660	660.00	\$30,802.20
Respond to information requests	0.00	0.00	1.50	0.00	1.50	\$70.01	\$0.00	\$0.00	660	990.00	\$46,206.60
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	7,304.96	\$345,993.01

^a Exhibit includes rounding error.

^b Labor cost associated with the collection of subscriber agreements from non-ESA registrants is equal to \$0.00 because it is included in the registration costs covered under "Reporting to EPA Electronic Document Receiving System."

^c Labor cost associated with the collection of subscriber agreements from reuse (consolidated) ESA registrants is equal to \$0.00 because, under this option, registrants can use their existing CDX credential. As a result, EPA does not need to receive, process, review, approve, and file new paper subscriber agreements from these registrants.

^d Labor cost associated with the collection of subscriber agreements from third party ESA registrants is equal to \$0.00 because, under this option, a third party vendor processes the subscriber agreements for an electronic transaction fee of \$0.61 per subscriber agreement.

EXHIBIT 2 (CONTINUED)
 CROSS-MEDIA ELECTRONIC REPORTING RULE
 ESTIMATED ANNUAL EPA HOUR AND COST BURDEN ^a

	Hours and Labor Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$65.58/ Hour	Mgr. \$55.50/ Hour	Tech. \$46.67/ Hour	Cler. \$23.68/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Approval of State/Local Electronic Document Receiving System Applications											
Process and file receiving system documentation submitted by State/Local seeking to modify their programs, as required by 40 CFR 3.1000 (state agencies)	0.00	0.00	160.00	0.00	160.00	\$7,467.20	\$0.00	\$0.00	3	480.00	\$22,401.60
Process and file receiving system documentation submitted by State/Local seeking to modify their programs, as required by 40 CFR 3.1000 (local agencies)	0.00	0.00	80.00	0.00	80.00	\$3,733.60	\$0.00	\$0.00	1	80.00	\$3,733.60
Process and file amendment to original application for EPA program modification approval under 40 CFR 3.1000 (States/Locals)	0.00	0.00	24.00	0.00	24.00	\$1,120.08	\$0.00	\$0.00	15	360.00	\$16,801.20
Process and file notifications about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (States/Locals with approved applications)	0.00	0.00	12.00	0.00	12.00	\$560.04	\$0.00	\$0.00	4	48.00	\$2,240.16
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	968.00	\$45,176.56
TOTAL	0.00	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	22,392.96	\$1,226,663.87

^a Exhibit includes rounding error.

EXHIBIT 3
CROSS-MEDIA ELECTRONIC REPORTING
TOTAL ESTIMATED RESPONDENT HOUR AND COST BURDEN SUMMARY ^a

	Annual Burden Hours	Annual Labor Cost	Annual Capital/Startup Cost	Annual O&M Cost	Total Annual Cost
Registering with EPA Electronic Document Receiving System - Direct Reporters	8,433.41	\$330,567.48	\$0.00	\$0.00	\$330,567.48
Compliance with Identity Proofing Requirements - Direct Reporters	11,461.32	\$448,968.84	\$0.00	\$8,010.54	\$456,979.38
Compliance with Identity Proofing Requirements - Indirect Reporters	20,705.63	\$811,265.84	\$0.00	\$123,269.12	\$934,534.96
Compliance with Identity Proofing Requirements - State/Local Agencies Acting as Regulators	7,343.45	\$228,897.51	\$0.00	\$0.00	\$228,897.51
Approval of State/Local Electronic Document Receiving System Application - State/Local Agencies that Are Regulated Entities	1,660.54	\$54,461.11	\$990,061.05	\$140.07	\$1,044,662.23
Total	49,604	\$1,874,161	\$990,061	\$131,420	\$2,995,642
3-year Total	148,812	\$5,622,483	\$2,970,183	\$394,260	\$8,986,926

^a Exhibit includes rounding error.

EXHIBIT 4
CROSS-MEDIA ELECTRONIC REPORTING
TOTAL ESTIMATED RESPONDENT HOUR AND COST BURDEN SUMMARY, BY TYPE OF RESPONDENT ^a

	Annual Burden Hours	Annual Labor Cost	Annual Capital/Startup Cost	Annual O&M Cost	Total Annual Cost
Private Sector Respondents					
Registering with EPA Electronic Document Receiving System - Direct Reporters	7,261.34	\$284,625.42	\$0.00	\$0.00	\$284,625.42
Compliance with Identity Proofing Requirements - Direct Reporters	9,870.63	\$386,657.49	\$0.00	\$6,898.92	\$393,556.41
Compliance with Identity Proofing Requirements - Indirect Reporters	17,827.07	\$698,476.85	\$0.00	\$106,140.31	\$804,617.16
<i>Subtotal for Private Sector Respondents</i>	<i>34,959.04</i>	<i>\$1,369,759.76</i>	<i>\$0.00</i>	<i>\$113,039.23</i>	<i>\$1,482,798.99</i>
State/Local Respondents					
Reporting to EPA Electronic Document Receiving System - Direct Reporters	1,172.07	\$45,942.06	\$0.00	\$0.00	\$45,942.06
Compliance with Identity Proofing Requirements - Direct Reporters	1,590.69	\$62,311.35	\$0.00	\$1,111.62	\$63,422.97
Compliance with Identity Proofing Requirements - Indirect Reporters	2,878.56	\$112,788.99	\$0.00	\$17,128.81	\$129,917.80
Compliance with Identity Proofing Requirements - State/Local Agencies Acting as Regulators	7,343.45	\$228,897.51	\$0.00	\$0.00	\$228,897.51
Approval of State/Local Electronic Document Receiving System Application - State/Local Agencies that Are Regulated Entities	1,660.54	\$54,461.11	\$990,061.05	\$140.07	\$1,044,662.23
<i>Subtotal for State/Local Respondents</i>	<i>14,645.31</i>	<i>\$504,401.02</i>	<i>\$990,061.05</i>	<i>\$18,380.50</i>	<i>\$1,512,842.57</i>
Total for All Respondents (i.e., Private Sector and State/Local)	49,604	\$1,874,161	\$990,061	\$131,420	\$2,995,642

^a Exhibit includes rounding error.

EXHIBIT 5
CROSS-MEDIA ELECTRONIC REPORTING
TOTAL ESTIMATED EPA HOUR AND COST BURDEN SUMMARY ^a

	Annual Burden Hours	Annual Labor Cost	Annual Capital/ Startup Cost	Annual O&M Cost	Total Annual Cost
Registering with EPA Electronic Document Receiving System	14,120.00	\$661,894.30	\$173,600.00	\$0.00	\$835,494.30
Compliance with Identity Proofing Requirements	7,304.96	\$340,942.21	\$0.00	\$5,050.80	\$345,993.01
Approval of State/Local Electronic Document Receiving System Applications	968.00	\$45,176.56	\$0.00	\$0.00	\$45,176.56
Total	22,393	\$1,048,013	\$173,600	\$5,051	\$1,226,664
3-year Total	67,179	\$3,144,039	\$520,800	\$15,153	\$3,679,992

^a Exhibit includes rounding error.

Appendix A
List of North American Industry Classification System (NAICS)
Codes Associated with Industries Most Likely Affected by the
Information Collection Requirements Covered in this ICR

11	Agriculture, Forestry, Fishing and Hunting	42	Wholesale Trade
111	Crop Production	421	Wholesale Trade, Durable Goods
112	Animal Production	422	Wholesale Trade, Nondurable Goods
113	Forestry and Logging		
114	Fishing, Hunting and Trapping	44-45	Retail Trade
115	Support Activities for Agriculture and Forestry	441	Motor Vehicle and Parts Dealers
		442	Furniture and Home Furnishings Stores
		443	Electronics and Appliance Stores
21	Mining	444	Building Material and Garden Equipment and Supplies Dealers
211	Oil and Gas Extraction		
212	Mining (except Oil and Gas)	445	Food and Beverage Stores
213	Support Activities for Mining	446	Health and Personal Care Stores
		447	Gasoline Stations
22	Utilities	448	Clothing and Clothing Accessories Stores
221	Utilities		
		451	Sporting Goods, Hobby, Book, and Music Stores
23	Construction		
233	Building, Developing, and General Contracting	452	General Merchandise Stores
		453	Miscellaneous Store Retailers
234	Heavy Construction	454	Nonstore Retailers
235	Special Trade Contractors		
		48-49	Transportation and Warehousing
31	Manufacturing	481	Air Transportation
311	Food Manufacturing	482	Rail Transportation
312	Beverage and Tobacco Product Manufacturing	483	Water Transportation
		484	Truck Transportation
313	Textile Mills	485	Transit and Ground Passenger Transportation
314	Textile Product Mills		
315	Apparel Manufacturing	486	Pipeline Transportation
316	Leather and Allied Product Manufacturing	487	Scenic and Sightseeing Transportation
		488	Support Activities for Transportation
321	Wood Product Manufacturing	491	Postal Service
322	Paper Manufacturing	492	Couriers and Messengers
323	Printing and Related Support Activities	493	Warehousing and Storage
324	Petroleum and Coal Products Manufacturing		
325	Chemical Manufacturing	51	Information
326	Plastics and Rubber Products Manufacturing	511	Publishing Industries
327	Nonmetallic Mineral Product Manufacturing	512	Motion Picture and Sound Recording Industries
331	Primary Metal Manufacturing	513	Broadcasting and Telecommunications
332	Fabricated Metal Product Manufacturing	514	Information Services and Data Processing Services
333	Machinery Manufacturing		
334	Computer and Electronic Product Manufacturing	52	Finance and Insurance
335	Electrical Equipment, Appliance, and Component Manufacturing	521	Monetary Authorities Central Bank
		522	Credit Intermediation and Related Activities
336	Transportation Equipment Manufacturing	523	Securities, Commodity Contracts, and Other Financial Investments and Related Activities
337	Furniture and Related Product Manufacturing	524	Insurance Carriers and Related Activities
339	Miscellaneous Manufacturing	525	Funds, Trusts, and Other Financial Vehicles

53	Real Estate and Rental and Leasing	924	Administration of Environmental Quality Programs
531	Real Estate	925	Administration of Housing Programs, Urban Planning, and C
532	Rental and Leasing Services	926	Administration of Economic Programs
533	Lessors of Nonfinancial Intangible Assets (except Copyrighted Works)	927	Space Research and Technology
		928	National Security and International Affairs
54	Professional, Scientific, and Technical Services		
541	Professional, Scientific, and Technical Services		
55	Management of Companies and Enterprises		
551	Management of Companies and Enterprises		
56	Administrative and Support and Waste Management and Remediation Services		
561	Administrative and Support Services		
562	Waste Management and Remediation Services		
61	Educational Services		
611	Educational Services		
62	Health Care and Social Assistance		
621	Ambulatory Health Care Services		
622	Hospitals		
623	Nursing and Residential Care Facilities		
624	Social Assistance		
71	Arts, Entertainment, and Recreation		
711	Performing Arts, Spectator Sports, and Related Industries		
712	Museums, Historical Sites, and Similar Institutions		
713	Amusement, Gambling, and Recreation Industries		
72	Accommodation and Food Services		
721	Accommodation		
722	Food Services and Drinking Places		
81	Other Services (except Public Administration)		
811	Repair and Maintenance		
812	Personal and Laundry Services		
813	Religious, Grantmaking, Civic, Professional, and Similar		
814	Private Households		
92	Public Administration		
921	Executive, Legislative, and Other General Government Support		
922	Justice, Public Order, and Safety Activities		
923	Administration of Human Resource Programs		

Appendix B

Methodology for Estimating the Annual Number of Facility Employees Expected to Register and Comply with the Identity Proofing Requirements of EPA’s Electronic Document Receiving System during the Three-Year Period Covered by the ICR

This appendix describes the methodology for estimating the annual number of facility employees expected to register and comply with the identity proofing requirements of EPA’s electronic document receiving system (i.e., CDX) during the three-year period covered by the ICR.

1. Annual Number of New Employee Registrants

This section describes the methodology for estimating the annual number of facility employees expected to register with CDX during the three-year period covered by the ICR (i.e., new employee registrants). Section 1.1 provides an overview of the methodology, Section 1.2 provides a detailed discussion of the methodology, and Section 1.3 presents the results.

1.1. Overview

In estimating the annual number of facility employees expected to register with CDX, EPA first compiled historical information on the number of new employee registrants for years 2011 through 2013. We then estimated the annual number of new employee registrants for the three-year period covered by the ICR (i.e., years 2015 through 2017).

1.2. Detailed Discussion

EPA took the following steps to carry out the methodology.

- A. *Compile historical information on number of new employee registrants.* EPA referred to CDX in order to compile historical information on the number of new registrants for years 2011 through 2013.

Year	Number of New Employee Registrants
2011	45,755
2012	83,701
2013	40,511

- B. *Estimate annual number of new employee registrants over the three-year period covered in the ICR.* We estimated the annual number of new employee registrants over the three-year period covered by the ICR (i.e., years 2015 through 2017) by averaging the number of new employee registrants for years 2011 through 2013. That is, we assumed that 56,656 new registrants (i.e., $(45,755 + 83,701 + 40,511) \div 3$) will register with CDX each year.

- C. *Estimate annual number of new registrants by type of ownership (i.e., private sector vs. State/Local) and remove Federal government employee registrants from this analysis.* We referred to data published by the Bureau of Labor Statistics on the number of employees in the U.S. These data indicate that 84.32 percent of U.S. employees work for the private sector, 13.61 percent of employees work for States/Locals, and 2.07 percent of employees work for the Federal government. We applied these percentages to the annual number of new employee registrants in Step B. We then excluded Federal Government employees from the analysis because they are exempt from ICR requirements.

1.3. Results

Exhibit B-1 presents information on the average annual number of facility employees expected to register with CDX.

Exhibit B-1
Annual Number of Facility Employees Expected to Register with EPA's CDX during the Three-Year Period Covered by the ICR

Respondent Universe	Average Annual Number of New Employee Registrants ^a
Private Sector	47,772
States/Locals	7,711
Total	55,483

^a Federal government employees are not reflected in the table because they are exempt from ICR requirements.

2. Annual Number of Subscriber Agreements

This section describes the methodology for estimating the annual number of subscriber agreements submitted to EPA to comply with the identity proofing requirements of CDX during the three-year period covered by the ICR. Section 2.1 provides an overview of the methodology, Section 2.2 provides a detailed discussion of the methodology, and Section 2.3 presents the results.

2.1. Overview

In estimating the annual number of subscriber agreements submitted to CDX, EPA first compiled information on the number of ESAs for years 2012 through 2014. We then estimated the annual number of subscriber agreements (i.e., paper subscriber agreements, electronic subscriber agreements (ESAs), reuse (consolidated) ESAs, and third party ESAs) for the three-year period covered by the ICR (i.e., years 2015 through 2017) based on analysis of growth rates and implementation rates.

2.2. Detailed Discussion

EPA took the following steps to carry out the methodology.

Non-Electronic Subscriber Agreements

- A. *Compile historical information on number of non-ESAs (i.e., paper subscriber agreements), by CROMERR data flow. Some of the CROMERR data flows do not support ESAs. For purposes of this analysis, the subscriber agreements associated with these data flows are categorized as “non-ESAs” or paper subscriber agreements.*

To estimate the number of non-ESAs or paper subscriber agreements for years 2015 through 2017, we referred to CDX in order to compile historical information on the number of non-ESAs, by CROMERR data flow, for years 2012 through 2014.

CROMERR Data Flow	Number of Non-ESAs or Paper Subscriber Agreements		
	2012	2013	2014 ^a
ARCS	3	26	9
CEDRI		23	314
CEDRI1	5	45	
CSPP	10	46	36
eSIPS			11
LEAD	36	500	349
MYRCRAID		17	11
ODS	1	2	1
OTAQDCFUEL	46	176	58
SSTS		6	39
TRIMEweb	1	1,317	1,719
Total	102	2,158	2,547

^a Number of paper subscriber agreements were available through July 2014. EPA projected the number of paper subscriber agreements for the entire year, based on available 2014 data.

- B. *Estimate total number of non-ESAs or paper subscriber agreements, by CROMERR data flow, for the three-year period covered in the ICR. We estimated the total number of non-ESAs or paper subscriber agreements, by CROMERR data flow, for years 2015 through 2017 by using the following equations:*

$$\begin{array}{l} \text{Number of} \\ \text{Non-ESAs} \\ \text{for Year Y} \end{array} = ([3 \times \text{Registrants}_{Y-1}] + [2 \times \text{Registrants}_{Y-2}] + [\text{Registrants}_{Y-3}]) / 6$$

The table below shows the estimated number of non-ESAs or paper subscriber agreements, by CROMERR data flow, for years 2015 through 2017.

CROMERR Data Flow	Number of Paper Subscriber Agreements ^a		
	2015	2016	2017
ARCS	14	14	13
CEDRI	165	191	203
CEDRI1	16	16	13
CSPP	35	37	36
eSIPS	6	7	7
LEAD	347	373	360
MYRCRAID	11	12	12
ODS	1	1	1
OTAQDCFUEL	95	96	89
SSTS	22	25	26
TRIMEweb	1,299	1,442	1,441
Total	2,011	2,214	2,201

^a Table includes rounding error.

Electronic Subscriber Agreements

- C. *Compile historical information on number of ESAs, by CROMERR data flow. EPA referred to CDX in order to compile historical information on the number of ESAs, by CROMERR data flow, for years 2012 through 2014.*

CROMERR Data Flow	Number of ESAs		
	2012	2013	2014 ^a
ARCS	2	1	0
CEDRI		32	1,731
CEDRI1	5	66	0
CSPP	30	66	35
eSIPS			21
LEAD	377	4,971	5,954
MYRCRAID		11	3
ODS		4	12
OTAQDCFUEL	3	2	110
SSTS		19	109
TRIMEweb	5	3,758	6,567
Total	422	8,930	14,542

^a Number of paper subscriber agreements were available through July 2014. EPA projected the number of paper subscriber agreements for the entire year, based on available 2014 data.

- D. *Estimate number of ESAs, by CROMERR data flow, for the three-year period covered in the ICR. We estimated the number of ESAs, by CROMERR data flow, for years 2015 through 2017 by using the following equation:*

$$\begin{array}{l} \text{Number of} \\ \text{ESAs} \\ \text{for Year Y} \end{array} = ([3 \times \text{Registrants}_{Y-1}] + [2 \times \text{Registrants}_{Y-2}] + [\text{Registrants}_{Y-3}]) / 6$$

The table below shows the estimated number of ESAs, by CROMERR data flow, for years 2015 through 2017.

CROMERR Data Flow	Number of ESAs ^a		
	2015	2016	2017
ARCS	1	1	1
CEDRI	876	1,020	1,091
CEDRI1	23	23	19
CSPP	45	45	43
eSIPS	11	13	14
LEAD	4,697	5,162	5,139
MYRCRAID	5	5	5
ODS	7	8	8
OTAQDCFUEL	56	65	70
SSTS	61	70	74
TRIMEweb	4,537	5,084	5,149
Total	10,319	11,496	11,613

^a Table includes rounding error.

- E. *Estimate number of reuse (consolidated) ESAs, by CROMERR data flow, for the three-year period covered in the ICR. We estimated the number of reuse (consolidated) ESAs, for participating data flows, by applying implementation rates derived from data provided by CDX to the number of ESAs obtained in Step D. The implementation rates are presented in the table below:*

CROMERR Data Flow	Implementation Rates for Reuse (Consolidated) ESAs		
	2012	2013	2014
ARCS		4%	
CEDRI		49%	1%
CSPP	97%	18%	29%
LEAD	2%	0.3%	0.02%
MYRCRAID		6%	
ODS	67%	50%	67%
OTAQDCFUEL	2%	2%	7%
SSTS		11%	2%
TRIMEweb	24%	1%	1%

The table below shows the estimated number of reuse (consolidated) ESAs, by CROMERR data flow, for years 2015 through 2017.

CROMERR Data Flow	Number of Reuse (Consolidated) ESAs ^a		
	2015	2016	2017
ARCS		0	
CEDRI		499	16
CSPP	44	8	13
LEAD	94	14	1
MYRCRAID		0	
ODS	5	4	5
OTAQDCFUEL	1	1	5
SSTS		8	1
TRIMEweb	1,089	66	40
Total	1,233	600	81

^a Table includes rounding error.

- F. *Estimate number of third party ESAs, by CROMERR data flow, for the three-year period covered in the ICR. We estimated the number of third party ESAs for participating data flows by applying implementation rates derived from data provided by CDX to the number of ESAs obtained in Step D. The implementation rates are provided in the table below:*

CROMERR Data Flow	Implementation Rates for Third Party ESAs		
	2012	2013	2014
CEDRI			81%
CEDRI1	50%	37%	
CSPP	2%	46%	47%
eSIPS			56%
LEAD	90%	86%	93%
OTAQDCFUEL	2%	6%	50%
SSTS		56%	67%
TRIMEweb	76%	71%	78%

The table below shows the estimated number of third party ESAs, by CROMERR data flow, for years 2015 through 2017.

CROMERR Data Flow	Implementation Rates for Third Party ESAs ^a		
	2012	2013	2014
CEDRI			882
CEDRI1	12	8	
CSPP	1	21	20
eSIPS			8
LEAD	4,227	4,456	4,801
OTAQDCFUEL	1	4	35
SSTS		39	50
TRIMEweb	3,439	3,622	3,995
Total	7,680	8,150	9,791

CROMERR Data Flow	Implementation Rates for Third Party ESAs ^a		
	2012	2013	2014

^a Table includes rounding error.

All Subscriber Agreements

- G. *Estimate annual number of subscriber agreements for the three-year period covered by the ICR.* Using the number of subscriber agreements obtained in Steps B, D, E, and F, we estimated the annual number of subscriber agreements for the three-year period covered by the ICR. To do this, we averaged the number of subscriber agreements for years 2015 through 2017. The results are presented in the table below.

Type of Subscriber Agreement	Number of Subscriber Agreements ^a			
	Year 2015	Year 2016	Year 2017	Average
Non-ESAs (Paper Subscriber Agreements)	2,011	2,214	2,201	2,142
ESAs	10,319	11,496	11,613	11,143
Reuse (Consolidated) ESAs	1,233	600	81	638
Third Party ESAs	7,680	8,150	9,791	8,540

^a Table includes rounding error.

- H. *Estimate number of subscriber agreements by type of ownership (i.e., private sector vs. State/Local) and remove subscriber agreements from Federal government employee registrants from this analysis.* We referred to data published by the Bureau of Labor Statistics on the number of employees in the U.S. These data indicate that 84.32 percent of U.S. employees work for the private sector, 13.61 percent of employees work for States/Locals, and 2.07 percent of employees work for the Federal government. We applied these percentages to the number of ESAs obtained in Step G. We then excluded the subscriber agreements from Federal Government employees from the analysis because Federal government employees are exempt from ICR requirements.

2.3. Results

Exhibit B-2 presents information on the average annual number of subscriber agreements to be submitted to CDX during the three-year period covered by this ICR.

Exhibit B-2
Annual Number Subscriber Agreements to be Submitted to
EPA's CDX during the Three-Year Period Covered by the ICR ^a

Type of Subscriber Agreement	Average Annual Number of Subscriber Agreements ^b
Private Sector	
Non-ESAs (Paper Subscriber Agreements)	1,806
ESAs	9,395
Reuse (Consolidated) ESAs	538
Third Party ESAs	7,201
<i>Subtotal</i>	<i>18,941</i>
States/Locals	
Non-ESAs (Paper Subscriber Agreements)	292
ESAs	1,517
Reuse (Consolidated) ESAs	87
Third Party ESAs	1,162
<i>Subtotal</i>	<i>3,058</i>
All (Private Sector and States/Locals)	
Non-ESAs (Paper Subscriber Agreements)	2,098
ESAs	10,912
Reuse (Consolidated) ESAs	625
Third Party ESAs	8,364
Total	21,999

^a Exhibit includes rounding error.

^b Federal government employees are exempt from ICR requirements. As a result, their subscriber agreements are not included in the exhibit.

Appendix C

Methodology for Estimating the Annual Number of Facility Employees Expected to Register and Comply with Identity Proofing Requirements of State/Local Electronic Document Receiving Systems during the Three-Year Period Covered by the ICR

This appendix describes the methodology for estimating the annual number of facility employees expected to register and comply with identity proofing requirements of State/Local electronic document receiving systems during the three-year period covered by the Information Collection Request (ICR). Section 1 provides an overview of the methodology, Section 2 provides a detailed discussion of the methodology, and Section 3 presents the results.

1. Overview

EPA estimated the number of facilities reporting to State/Local electronic document receiving systems by first identifying states with existing and new systems and compiling them into a table (referred to as the “Master Table” in this analysis).^{28, 29} We then referred to survey data compiled by EPA in 2002 from states that estimated the number of facilities subject to their respective receiving systems by environmental program. We updated these state estimates to current (2014) levels based on analysis of respondent universe growth rates in EPA program ICRs. We then extrapolated the updated survey data to the states in the Master Table to estimate their number of facilities. The extrapolation was performed by first finding the total number of commercial establishments in each state based on U.S. Census data, comparing the number of establishments in the survey states to the states in the Master Table, and using a scaling factor to extrapolate the number of facilities in the survey states to the states in the Master Table based on their respective number of commercial establishments. We performed this extrapolation by environmental program for all states in the Master Table. Finally, we estimated the number of employees based on the number of facilities.

2. Detailed Discussion

EPA took the following steps to carry out the methodology.

Find the Number of States with Receiving Systems, by State Environmental Program

²⁸ “Existing electronic document receiving system” means an electronic document receiving system that is being used to receive electronic documents in lieu of paper to satisfy requirements under an authorized program on October 13, 2005 or the system, if not in use, has been substantially developed on or before that date as evidenced by the establishment of system services or specifications by contract or other binding agreement (40 CFR 3.3). Pursuant to 40 CFR 3.1000(a)(3), States/Locals with an existing electronic document receiving system for an authorized program must submit an application to revise or modify such authorized program in compliance with 40 CFR 3.1000(a)(1) no later than January 13, 2010.

²⁹ “New electronic document receiving system” refers to an electronic document receiving system that was not being used to receive electronic documents in lieu of paper to satisfy requirements under an authorized program on October 13, 2005 or the system, if not in use, that had not been substantially developed on or before that date. Pursuant to 40 CFR 3.1000(a)(2), States/Locals with new electronic document receiving systems must receive EPA approval of revisions or modifications to the authorized program before the program may receive electronic documents in lieu of paper documents to satisfy program requirements.

- A. *Identify states with existing and new electronic document receiving systems.* To identify states with existing and new electronic document receiving systems, we referred to EPA’s CROMERR Program and Stakeholder Management (PSM) System. PSM is a custom implementation of a Salesforce.com platform that integrates database records, online file storage, multiple distinct spreadsheets, and email logs, to support the reduction of Technical Review Committee (TRC) and EPA’s Office of Environmental Information (OEI) levels of effort in managing the application approval process.

For purposes of this analysis, EPA categorized systems based on the following criteria:

Existing Electronic Document Receiving Systems		New Electronic Document Receiving Systems	
System Type	System Stage	System Type	System Stage
- Existing - New	- Approval Review - Completeness Review - Draft Received - EPA Approved - Incomplete - TRC Approved	- New	- Pending Receipt - Scoping

EPA used data current as of October 9, 2014.

- B. *Estimate the number of existing and new state receiving systems, by environmental program.* Existing and new receiving systems were categorized into state environmental programs based on the statute associated with the authorized program (e.g., Clean Air Act (CAA), Clean Water Act (CWA)). Attachment C-1 presents a table of the states with existing and new receiving systems, by state environmental program. This table is called the “Master Table” in this appendix.

Estimate the Number of Facilities, by State Environmental Program

- C. *Estimate number of facilities by state environmental program, based on CROMERR cost-benefit analysis (CBA) survey data.* To obtain information on the number of facilities by state environmental program, we referred to “Table V-2. Existing State Receiving Systems” of *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis - Final*; dated November 17, 2004. This table contains information on the number of facilities associated with state receiving systems reported in a survey conducted by EPA during the summer of 2002. Attachment C-2 shows the number of facilities by state environmental program based on CBA survey data.
- D. *Update CBA’s facility estimate for each state environmental program, based on ICR respondent data.* The data on number of facilities developed under Step C are based on 2002 data. In order to bring these numbers to the present (2014), we took the following steps:
- Obtained data on annual number of respondents in the ICRs listed in Attachment C-3. For each ICR, we obtained respondent universe estimates for at least two different

- years (e.g., 2003 and 2012) to enable us to estimate the annual percent change in the universe.
- Estimated the annual percent change in number of respondents for each ICR.
 - Multiplied the annual percent change by 12 to estimate percent change over the 2002-2014 period.
 - Applied the 2002-2014 percent change to facility estimates in order to update the number of facilities for each environmental program.

Attachment C-4 shows the ICR data used to update the CBA's facility estimates, by state environmental program.

Extrapolate Updated State Survey Data on Number of Facilities to All States in Master Table

- E. *Develop a scaling factor for use in extrapolation.* We referred to U.S. Census Bureau data on number of establishments by employment size for states.³⁰ Based on these data, which are presented in Attachment C-5, we obtained the following information for each environmental program:
- Number of commercial establishments in the survey states for which respondent data were available; and
 - Number of commercial establishments in states in the Master Table with existing and/or planned receiving systems.

We then used these data to derive a scaling factor to be used in Step F. This scaling factor was derived using the following equation:

$$\text{Scaling Factor} = \frac{\text{Number of establishments in states in Master Table}}{\text{Number of establishments in survey states}}$$

- F. *Extrapolate the CBA's updated facility estimates to states with existing and new receiving systems.* In deriving the total number of facilities in all states in the Master Table, we first estimated the total number of facilities associated with each environmental program. To do this, we multiplied the updated survey data (Step D) by the corresponding scaling factor derived in Step E. This gave us the total number of facilities reporting to the receiving systems of states in the Master Table, by environmental program. We then added up the total number of facilities in states in the Master Table across all environmental programs.
- G. *Estimate annual number of facilities subject to the ICR requirements.* In estimating the annual number of facilities subject to the ICR requirements, we made the following assumptions:
- Existing receiving systems: For purposes of this analysis, we assume that existing systems have been in operation since 2005. EPA estimates that 30 percent of facilities began to use the receiving system in the first year (i.e., 2005) and 10 percent in each subsequent year.

³⁰ U.S. Census Bureau, "Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States and States, Totals: 2011," December 2013. Available online at: <http://www.census.gov/econ/susb/>, last accessed on October 12, 2014. These are the latest Statistics of U.S. Businesses (SUSB) annual data.

- New receiving systems: We assume that one third of facilities will begin reporting in each year of the three-year period covered by the ICR. In each year of the ICR, EPA estimates that 30 percent of facilities will begin to use the receiving system in the first year and 10 percent in each subsequent year.

The above implementation rates for use of an electronic receiving system were taken from the CBA (Exhibit 2-5).

- H. *Estimate average annual number of facilities subject to the ICR requirements, by employment size.* In estimating the average annual number of facilities by employment size, we referred to the U.S. Census Bureau data presented in Attachment C-5. Based on these data, in the U.S., 70 percent of establishments have less than 20 employees and 30 percent of establishments have 20 or more employees. We applied these percentages to the annual number of facilities in Step G. Once we estimated the annual number of facilities for each year from 2015 through 2017 (i.e., the three-year period covered by the ICR), we obtained the average over three years.
- I. *Estimate average annual number of facility employees subject to the ICR requirements.* In estimating the average annual number of facility employees, we assumed that small firm facilities have three employees and that medium/large firm facilities have six employees. These estimates were taken from the CBA (Section 2.3.3, “Facilities;” page 26).
- J. *Estimate average annual number of facility employees subject to the ICR requirements by type of ownership (i.e., private sector vs. State/Local) and remove Federal government facilities from this analysis.* In estimating the average annual number of facility employees by type of ownership, we referred to data published by the Bureau of Labor Statistics on the number of employees in the U.S.³¹ These data indicate that 84.32 percent of U.S. employees work for the private sector, 13.61 percent of employees work for States/Locals, and 2.07 percent of employees work for the Federal government. We applied these percentages to the annual number of facility employees in Step I. We then excluded Federal government employees from the analysis because they are exempt from ICR requirements.

Attachments C-6 and C-7 present details on the application of the above methodology to existing and new receiving systems, respectively.

3. Results

Exhibit C-1 presents information on the average annual number of facility employees expected to register with existing and new State/Local receiving systems.

³¹ Bureau of Labor Statistics; Quarterly Census of Employment and Wages; Number of Employees (US Total, All Industries, All Establishment Sizes, All Employees); 2013 (Annual). Available online at: <http://data.bls.gov/pdq/querytool.jsp?survey=en>, last accessed on October 12, 2014.

Exhibit C-1
Average Annual Number of Facility Employees Expected to
Register with Existing and New State/Local Receiving Systems
during the Three-Year Period Covered by the ICR ^a

Type of Firm	Average Annual Number of Facility Employees ^b		
	Existing Receiving Systems	New Receiving System	All Receiving Systems (i.e., Existing and New)
Private Sector			
Small Firms	6,769	4,988	11,757
Medium-Size and Large Firms	5,803	4,275	10,078
<i>Subtotal</i>	<i>12,572</i>	<i>9,263</i>	<i>21,835</i>
States/Locals			
Small Firms	1,093	805	1,898
Medium-Size and Large Firms	937	690	1,627
<i>Subtotal</i>	<i>2,030</i>	<i>1,495</i>	<i>3,525</i>
All (Private Sector and States/Locals)			
Small Firms	7,862	5,793	13,655
Medium-Size and Large Firms	6,740	4,965	11,705
Total	14,602	10,758	25,360

^a Exhibit includes rounding error.

^b Federal government employees are not reflected in the table because they are exempt from ICR requirements.

Attachment C-1
Number of Existing and New State/Local Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the “Master Table”)

State	Existing Systems			New Systems		
	Air	Water	Waste	Air	Water	Waste
Alabama		X				
Alaska	X	X				
American Samoa						
Arizona		X		X		
Arkansas	X	X	X			
California	X	X			X	
Colorado		X				
Connecticut		X			X	
Delaware	X	X	X			
District of Columbia	X	X	X	X		
Florida	X	X	X			
Georgia	X	X				
Guam						
Hawaii		X			X	
Idaho	X					
Illinois	X	X				
Indiana	X	X	X			
Iowa	X	X				
Kansas	X	X	X			
Kentucky	X	X	X			
Louisiana		X				
Maine		X				
Maryland		X				
Massachusetts	X	X	X			X
Michigan	X	X	X			
Minnesota	X	X	X			
Mississippi	X	X	X			
Missouri ^b	X	X	X		X	
Montana		X				
Nebraska				X	X	
Nevada		X	X			
New Hampshire				X		
New Jersey	X	X	X			
New Mexico	X					

Attachment C-1 (continued)
Number of Existing and New State/Local Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the “Master Table”)

State	Existing Systems			New Systems		
	Air	Water	Waste	Air	Water	Waste
New York	X	X	X			
North Carolina	X	X		X	X	
North Dakota		X				
Northern Mariana Islands						
Ohio	X	X	X			
Oklahoma	X	X	X			
Oregon		X				
Pennsylvania						
Puerto Rico						
Rhode Island		X				
South Carolina		X				
South Dakota	X	X	X			
Tennessee		X		X		
Texas	X	X	X			
U.S. Virgin Islands						
Utah		X				
Vermont	X	X	X			
Virginia		X			X	X
Washington	X	X	X			
West Virginia		X				
Wisconsin	X	X	X			
Wyoming	X	X	X			

Source: U.S. Environmental Protection Agency (USEPA), CROMERR Program and Stakeholder Management (PSM) System, data current as of October 9, 2014.

Attachment C-2
Number of Facilities Associated with Existing State Electronic Document Receiving Systems
in the CROMERR Cost-Benefit Analysis Survey, by State Environmental Program
(Data Current as of Summer 2002)

State	Air								Water				Waste, USTs, Emergency Planning		
	Air (CEM)	Air Permits	Air (NEI)	Air Title V Emissions	Emission Reports (Non-Title V)	Air Quality	PTO Applications	Asbestos Notification	EDMR	Drinking/ Ground Water	Wastewater	UIC	HW Annual Report	UST	Risk Management
Florida									3						
New Jersey	12	1,500												1,000	
New Mexico			200												
North Dakota												250			
Ohio		200		780	2,400		780			5,700	1,550		480		500
Pennsylvania						125		6,000							
Wisconsin					5,200				22				600		

^a For purposes of this analysis, data for Wisconsin's "Consolidated (air, haz waste)" program was divided among the "Air" and "HW Annual Report" categories. Specifically, 90 percent of the facilities were allocated to the "Air" category and the remaining 10 percent were allocated to the "HW Annual Report" category. This allocation was based on Ohio's data and available information on the number of hazardous waste handlers that reported to the 2007 Hazardous Waste Report.

Source: U.S. Environmental Protection Agency (USEPA), "Table V-2. Existing State Receiving Systems" of Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final; November 17, 2004.

Acronyms

CEM	Continuous Emissions Monitoring
EDMR	Electronic Discharge Monitoring Report
HW	Hazardous Waste
NEI	National Emission Inventory
PTO	Permit to Operate
UIC	Underground Injection Control
UST	Underground Storage Tank

Attachment C-3
List of ICRs Used in Analysis, by Environmental Program

ICR Numbers	ICR Name
Air	
1587.06 1587.12	State Operating Permit Regulations
111.10 111.13	NESHAP for Asbestos
1088.10 1088.13	NSPS for Industrial-Commercial-Institutional Steam Generating Units
Water	
2.11 2.15	National Pretreatment Program
270.42 270.45	Public Water System Supervision Program
Waste, USTs, Emergency Planning	
261.14	Notification of Regulated Waste Activity
976.11	2007 Hazardous Waste Report
976.16	2013 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification
1380.07 1380.12	Underground Storage Tanks: Technical and Financial Requirements, and State Program Approval Procedures

Source: U.S. Environmental Protection Agency (USEPA), Information Collection Request, Review, and Approval System (ICRAS). Data obtained on August 13, 2014.

Attachment C-4a ICR Data Used to Update Number of Facilities Obtained from CROMERR CBA Air Programs

State Operating Permit Regulations

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	1587.06	1587.12
	2004	2011
Permitting Authorities and Sources Subject to Permitting under 40 CFR Part 70	17,738	16,052

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
-9.5%	7	-1.4%	0.59	-0.8%

Average Annual Percent Change for Environmental Program
-0.6%

NESHAP for Asbestos

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	111.10	111.13
	2003	2011
Respondents	9,848	9,517

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
-3.4%	8	-0.4%	0.35	-0.1%

NSPS for Industrial-Commercial-Institutional Steam Generating Units

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	1088.10	1088.13
	2003	2012
Respondents	1,230	1,727

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
40.4%	9	4.5%	0.06	0.3%

Total Number Respondents for All ICRs 27,296

Attachment C-4b ICR Data Used to Update Number of Facilities Obtained from CROMERR CBA Water Programs

National Pretreatment Program

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	2.11	2.15
	2004	2011
Industrial users (IUs), POTWs, and States	28,285	24,411

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
-13.7%	7	-2.0%	0.14	-0.3%

Average Annual Percent Change for Environmental Program
-0.8%

Public Water System Supervision Program

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	270.42	270.45
	2004	2011
Existing PWSs, Primary Agencies, and Laboratories	161,682	154,938

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
-4.2%	7	-0.6%	0.86	-0.5%

Total Number Respondents for All ICRs 179,349

Attachment C-4c ICR Data Used to Update Number of Facilities Obtained from CROMERR CBA Waste, USTs, Emergency Planning Programs

Notification of Regulated Waste Activity

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	2003	2012
Initial and Subsequent Notifications under RCRA Section 3010; 40 CFR Part 273, Subpart C; and 40 CFR Part 279	31,125	46,035

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
47.9%	9	5.3%	0.17	0.9%

Average Annual Percent Change for Environmental Program
-1.0%

Hazardous Waste Report

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	2003	2012
Respondents to the Hazardous Waste Report	10,178	10,533

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
3.5%	9	0.4%	0.04	0.0%

Underground Storage Tanks: Technical and Financial Requirements, and State Program Approval Procedures

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	2004	2011
Private and Governments	254,705	211,040

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
-17.1%	7	-2.4%	0.79	-1.9%

Total Number Respondents for All ICRs 267,608

Note: The "Notification of Regulated Waste Activity," "Hazardous Waste Report," and "Part A Hazardous Waste Permit Application and Modification," ICRs were consolidated into a single ICR. For purposes of this analysis, EPA reviewed the consolidated ICR and extracted information on the annual number of respondents associated with the notification and Hazardous Waste Report information collection requirements.

Attachment C-5
Number of Establishments (Facilities) by Employment Size, 2011

STATE	Less than 20 Employees	20 or More Employees	Total
<i>United States</i>	<i>5,160,237</i>	<i>2,193,806</i>	<i>7,354,043</i>
Alabama	63,531	34,212	97,743
Alaska	14,672	5,447	20,119
Arizona	87,427	42,878	130,305
Arkansas	43,523	20,948	64,471
California	620,726	228,590	849,316
Colorado	110,895	39,994	150,889
Connecticut	61,646	26,394	88,040
Delaware	15,928	8,204	24,132
District of Columbia	12,569	8,976	21,545
Florida	367,662	123,189	490,851
Georgia	146,828	67,807	214,635
Hawaii	21,295	10,177	31,472
Idaho	31,493	10,906	42,399
Illinois	221,285	91,152	312,437
Indiana	93,609	49,870	143,479
Iowa	54,344	25,769	80,113
Kansas	49,554	24,044	73,598
Kentucky	58,367	31,403	89,770
Louisiana	68,736	34,480	103,216
Maine	29,446	10,666	40,112
Maryland	91,698	41,550	133,248
Massachusetts	118,936	50,210	169,146
Michigan	151,473	65,871	217,344
Minnesota	101,406	43,200	144,606
Mississippi	38,705	19,887	58,592
Missouri	99,894	47,380	147,274
Montana	27,970	7,717	35,687
Nebraska	35,862	15,691	51,553
Nevada	39,689	19,088	58,777
New Hampshire	26,003	11,028	37,031
New Jersey	170,203	56,675	226,878
New Mexico	29,748	14,112	43,860
New York	404,335	117,202	521,537
North Carolina	145,815	69,298	215,113
North Dakota	15,765	6,605	22,370
Ohio	161,735	88,741	250,476
Oklahoma	62,095	27,654	89,749
Oregon	76,997	29,343	106,340

Attachment C-5 (continued)
Number of Establishments (Facilities) by Employment Size, 2011

STATE	Less than 20 Employees	20 or More Employees	Total
Pennsylvania	199,334	96,386	295,720
Rhode Island	20,622	7,559	28,181
South Carolina	66,893	33,588	100,481
South Dakota	18,501	6,993	25,494
Tennessee	81,870	47,619	129,489
Texas	346,994	178,426	525,420
Utah	50,110	18,637	68,747
Vermont	15,984	5,206	21,190
Virginia	127,999	63,064	191,063
Washington	126,548	46,963	173,511
West Virginia	24,565	13,585	38,150
Wisconsin	93,519	44,526	138,045
Wyoming	15,433	4,896	20,329

Source: U.S. Census Bureau, "Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States and States, Totals: 2011," December 2013. Available online at: <http://www.census.gov/econ/susb/>, last accessed on October 12, 2014. These are the latest Statistics of U.S. Businesses (SUSB) annual data.

Attachment C-6
Application of Methodology to Existing Receiving Systems

Environmental Program	States with Facility Data in CBA	Total Number of Facilities in CBA	Average Annual Percent Change for Environmental Program	2002-2014 Percent Change for Environmental Program	Updated Total Number of Facilities in CBA
Air	NJ, NM, OH, PA, WI	17,197	-0.6%	-7.2%	15,959
Water	FL, ND, OH, WI	7,525	-0.8%	-9.6%	6,803
Waste, USTs, Emergency Planning	NJ, OH, WI	2,580	-1.0%	-12.0%	2,270

Environmental Program	Number of Establishments for States with Facility Data in CBA	Number of Establishments for States with Existing Receiving Systems	Scaling Factor
Air	954,979	5,415,429	5.67
Water	901,742	6,883,480	7.63
Waste, USTs, Emergency Planning	615,399	3,696,214	6.01

Environmental Program	Updated Total Number of Facilities in CBA	Scaling Factor	Total Number of Facilities for States with Existing Receiving Systems
Air	15,959	5.67	90,488
Water	6,803	7.63	51,907
Waste, USTs, Emergency Planning	2,270	6.01	13,643
Total Number of Facilities for All Environmental Programs			156,038

Attachment C-6 (continued)
Application of Methodology to Existing Receiving Systems

Year	Number of Facilities
2005	46,811
2006	10,923
2007	9,830
2008	8,847
2009	7,963
2010	7,166
2011	6,450
2012	5,805
2013	5,224
2014	4,702
2015	4,232
2016	3,809
2017	3,428
2018	3,085
2019	2,776
2020	2,499

Legend:

Years Covered in the ICR

Type of Firm	Number of Facilities per Year			Average Annual Number of Facilities	Average Annual Number of Facility Employees
	Year 1	Year 2	Year 3		
Small Firms	2,962	2,666	2,400	2,676	8,028
Medium-Size and Large Firms	1,270	1,143	1,028	1,147	6,882
Total	4,232	3,809	3,428	3,823	14,910

Attachment C-7 Application of Methodology to New Receiving Systems

Environmental Program	States with Facility Data in CBA	Total Number of Facilities in CBA	Average Annual Percent Change for Environmental Program	2002-2014 Percent Change for Environmental Program	Updated Total Number of Facilities in CBA
Air	NJ, NM, OH, PA, WI	17,197	-0.6%	-7.2%	15,959
Water	FL, ND, OH, WI	7,525	-0.8%	-9.6%	6,803
Waste, USTs, Emergency Planning	NJ, OH, WI	2,580	-1.0%	-12.0%	2,270

Environmental Program	Number of Establishments for States with Facility Data in CBA	Number of Establishments for States with New Receiving Systems	Scaling Factor
Air	954,979	585,036	0.61
Water	901,742	1,573,831	1.75
Waste, USTs, Emergency Planning	615,399	360,209	0.59

Environmental Program	Updated Total Number of Facilities in CBA	Scaling Factor	Total Number of Facilities for States with New Receiving Systems
Air	15,959	0.61	9,735
Water	6,803	1.75	11,905
Waste, USTs, Emergency Planning	2,270	0.59	1,339
Total Number of Facilities for All Environmental Programs			22,979
Annual Number of Facilities that Will Come Online			7,660

Year System Will Come Online	Number of Facilities per Year		
	Year 1	Year 2	Year 3
Year 1	2,298	536	483
Year 2	0	2,298	536
Year 3	0	0	2,298
Total	2,298	2,834	3,317

Type of Firm	Number of Facilities per Year			Average Annual Number of Facilities	Average Annual Number of Facility Employees
	Year 1	Year 2	Year 3		
Small Firms	1,609	1,984	2,322	1,972	5,916
Medium-Size and Large Firms	689	850	995	845	5,070
Total	2,298	2,834	3,317	2,817	10,986