

**ICR SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY (EPA)**

1. Identification of the Information Collection

1(a) Title of Information Collection

State Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCP) Annual Reporting Form (Renewal), EPA ICR Number 1748.10, OMB Control Number 2060-0337

1(b) Short Characterization (Abstract)

This ICR is an annual collection of State Small Business Environmental Assistance Programs (SBEAP) gathered by the EPA Asbestos Small Business Ombudsman (ASBO) team. Information is collected to measure activities and accomplishments from the preceding calendar year. The collection of data is used by the EPA ASBO to evaluate the progress of state implementation of Section 507 of the 1990 Clean Air Act Amendments. The reports the EPA ASBO generates based off of the data collection under this ICR may be used by Congress; by states, both externally and internally to manage and highlight their programs; by national small business trade associations, and by other federal agencies, primarily the Small Business Administration, in evaluating the effectiveness of this type of assistance effort.

The information that is collected is evaluated, summarized, and developed into a report, which is made available to the Congress, as required under Section 507 of the Clean Air Act's (CAA) Amendments of 1990. The information collected will reveal trends in program advancement, budget changes, and numbers of small businesses assisted. The outcome questions provide a foundation for reporting on the effectiveness of the 507 program efforts. This information is valuable to Congress, federal stakeholders, as well as the small business community because it highlights state program accomplishments, as well as progress toward improved environmental performance.

A total of 53 respondents will complete the survey. Specifically, information collected will include the following: program contacts; program resources (budget and staffing), programmatic structure (which can vary greatly from state to state), assistance activities, outreach efforts with the small business community, types and numbers of such activities, technical assistance that their program provides to small businesses, as well approximate figures for the number of businesses that they have assisted each year. The data collected is stored in a spreadsheet that is made available to programs upon request.

The EPA ASBO does not mandate any requirement on file storage and retention. Each state may set its own requirements on the length of time and the manner in which they store and retain their files. The Asbestos Small Business Ombudsman Team will evaluate, review, summarize, and compile the information for preparation of the Status of State Small Business Compliance Assistance Programs report.

2. NEED AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

This collection of information is in response to the direction for EPA's Small Business Ombudsman to monitor the program under Section 507, Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) (d) of the Clean Air Act as amended in 1990, Public Law 101-549, November 15, 1990. This Act directs EPA to monitor the 507 programs and to provide a periodic report to Congress.

2(b) Practical Utility/Users of the Data

The EPA ASBO will compile the results of this collection into a report, including an objective summary of conclusions and recommendations relative to funding or other environmental legislative consideration. This information will be made available online for Congressional staff and committees interested in environmental matters and small business assistance activities at the state and local levels. In addition, this information will be made available to small business trade associations for their use in promoting the utility and viability of assistance programs, to EPA Headquarters and Regional Offices, to other federal agencies such as the Small Business Administration, to all state small business ombudsmen and small business environmental assistance program directors, to state governors, and other interested parties.

Both state and federal officials are able to use the information generated in the report to evaluate how well the programs are functioning, and to plan how to render more effective and less costly assistance. The constantly evolving nature of these programs means that this information provides key details to policy makers at the federal, state, and local levels.

The Agency has shared this information within its periodic reports with all the stakeholders listed above. The State 507 programs have found this process to be a valuable tool for learning about other program's strengths and innovations. It promotes a continual process of sharing ideas across programs. The EPA ASBO is also a resource for stakeholders and provides relevant data and narratives to policy makers at the federal and state levels upon request. The ASBO relies on the information collected to support recommendations made to other offices within the EPA on how to effectively assist small business efforts to improve their environmental compliance.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

Information is being requested from and about programs mandated under Section 507 of the CAA of 1990; therefore, this information is unique to this collection.

3(b) Public Notice Required Prior to ICR Submission to OMB

Public notice on the renewal of this ICR was published in the *Federal Register* on December 11, 2014 under 79 FR 73576. This notice indicates that the ICR is up for renewal and that public

comments on the previous burden estimates and any proposed changes are being sought by the EPA Office of Small Business Program, which the ASBO is located under. There were no comments received.

3(c) Consultations

In preparing this ICR and in revising the Reporting Form, the EPA ASBO worked with a group of staff that were willing to discuss the data collection forms and possible ways to improve its efficiency. The subcommittee consisted of representatives from the 507 programs. The following were contacted:

Tony Pendola, North Carolina, Small Business Ombudsman	919-707-8112, tony.pendola@ncdenr.gov
Sara Johnson, New Hampshire Small Business Ombudsman/Small Business Environmental Assistance Provider	603-271-1379, sara.johnson@des.nh.gov
Donavan Grimwood, Tennessee Small Business Environmental Assistance Provider	615-532-4966, Donavan.Grimwood@tn.gov
Christine Hoefler, Colorado Small Business Environmental Assistance Provider	303-692-3148, christine.hoefler@state.co.us

Those listed above were provided the opportunity to comment on the burden associated with the standard. The general consensus was that the current collection form adequately captures the program metrics for the majority of assistance efforts.

3(d) Effects of Less Frequent Collection

The submission of this information on less than an annual basis will make it difficult for EPA to monitor and adequately report on the effectiveness of the program which is outlined under Section 507 of the CAA. Annual reporting assures uniformity and consistency. Many of the states also use their annual data collected from the EPA SBO report form to organize and communicate their effectiveness and program success to their management and overall promotion within their own state.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

3(f) Confidentiality/Sensitive Questions

Information in the Annual Report is aggregated and is not of confidential nature. None of the information collected by this action results in or requests sensitive information of any nature.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

These departments/agencies typically are responsible for the conduct of the State 507 Programs. Respondents will be one of the following state offices.

Respondents/SIC Codes	
Environmental Agency	SIC 9511
Commerce or Economic Development Department	SIC 9611
Governor's Office	SIC 9111
Ombudsman's Office	SIC 9511

4(b) Information Requested

A copy of the reporting form is attached as Attachment A.

(i) Data Items

States will report on the data items shown in the following table. Each item is designated as a record keeping or reporting item; activities that are customary and usual business practices (CBP) also are indicated, as required in the following section. The EPA SBO imposes no record keeping requirements on any respondent. Each state may have its own requirement for retention of records. There have been no changes to the data items since the last clearance.

DATA ITEM	RECORD KEEPING	REPORTING	CBP
Program Information			
Name of State, Territory, or Local Agency		X	X
Reporting Form Contact		X	X
Combined SBO/SBAP/CAP Budget		X	X
Budgetary Funding Sources		X	X
Staffing			
SBO/SBAP FTEs		X	X
Status of CAP		X	X
Outreach and Technical Assistance			
Air-only or Multimedia Assistance		X	X
Data on Offered Services/Activities	X		X
Data on Promotional Activities	X		X
Data on Website Activities			X
Significant Accomplishments, Awards, Highlights		X	X
Outcome Measures	X		X

(ii) Respondent Activities (see draft survey below)

The respondents will engage in the following activities to assemble, submit, and store the data items listed in the previous section. These activities reflect the items of burden mandated by the 1995 Paperwork Reduction Act.

Review Instructions – The instructions are straight forward, include several examples, and makes note that the Form will remain the same for the next three years.

Acquire, Install, and Utilize Technology and Systems -- Information requested in this ICR is typical of information gathered as part of good business practices and anticipates future data needs. No special technology or systems are required for this collection. However programs will be encouraged to share methods they have developed to make the data collection easier.

Adjust the Existing Ways to Comply with Any Previously Applicable Instructions and Requirements -- The Reporting Form will remain the same from year to year. Respondents have consistently found the basic structure and breadth of questions to remain the same as the previously approved versions.

Search Data Sources -- Gathering and updating information is an annual task and states have been reporting on the activities of their programs since 1995. Most data items requested are in the current Form and all data are collected as a customary business practice.

Complete and Review the Collection of Information -- Programs will provide data and one narrative to complete their submissions. Most of the information should be readily available. For their narrative submission, states are encouraged to select examples that best demonstrate the operations and accomplishments of their programs. Recording and reviewing the required information should be straightforward and procedural. Completion and review of the Reporting Form is anticipated to be a cooperative effort among the key program staff.

Transmit or Otherwise Disclose the Information -- The Reporting Form will be given to the respondents via email. Each respondent will then complete the information and return it to the ASBO using the same method. This approach will enable the ASBO to efficiently compile the information from the individual programs and prepare a periodic report.

Store, File, and Maintain -- The EPA ASBO does not mandate any requirement on file storage and retention. Each state may set its own requirements on the length of time and the manner in which they store and retain their files.

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

5(a) Agency Activities

The electronic Reporting Form will be available to states and territories near the beginning of each calendar year. Respondents will have at least 60-90 days to respond to the request for

information. The EPA's SBO will answer questions from the respondents regarding the Reporting Form.

The EPA ASBO will collect, assemble, analyze, and store the information provided by the 507 programs. The ASBO will use this information to prepare the periodic report made available to the Congress. The periodic report, which will contain summary information developed from the data collection forms from the states, a perspective on the materials provided, selected highlights, conclusions, and recommendations on the overall effectiveness of the 507 program. The EPA ASBO will maintain copies of state submittals and the Annual Report electronically.

5(b) Collection Methodology and Management

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

1. Respondents receive electronic Reporting Form and instructions via email
2. Data quality will be checked upon receipt of each state's Reporting Form during analysis and the final Review
3. Data is processed using spreadsheet software and input manually
4. Data is made publicly accessible through Period Report made available to Congress and is accessible on-line

5(c) Small Entity Flexibility

The completion of the Reporting Form does not require any input or action by any small entity.

5(d) Collection Schedule

This is an annual (calendar year) collection of information on the states' activities, accomplishments, and data outputs under Section 507 of the CAA. A typical reporting schedule would look as follows:

- Electronic Reporting Form is made available to states: January-March
- States complete Reporting Form: March-June
- State agency submits reporting form to EPA SBO: May 31 with option for extension if needed, provided on a case by case basis.
- EPA ASBO Transfers Data to Spread sheet and conducts Analysis: June/July
- Data is made available to state programs: July or as requested
- EPA ASBO prepares a periodic report (per the 1990 CAA Amendment requirements) and obtains final EPA approvals: Typically on a bi-annual basis
- EPA ASBO makes the report available to congress: Fall of the Reporting Year, which is posted online with a memo to the Congress, notifying them of the report and how to access it.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden Hours

There are a total of 53 respondents with a total of 40 burden hours in responding to this data collection request. On average, the requested information can be compiled readily and maintained by the state within 40 hours (assuming the state organization continuously maintains their records in a reasonably efficient manner) using experienced professional or technical staff. The 40-hour forecast includes 36 hours for record keeping and 4 hours for reporting the required information.

Burden hour estimates are based on the results of a pretest of the original survey information and report preparation cycle, and experience with similar past surveys. The revised 2012 Reporting Form (which continues to be used to collect data) was discussed in great detail prior to the 2012 ICR renewal package with state program staff, included state ombudsmen and/or small business assistance program managers from ten of the 53 Section 507 reporting state programs (i.e., comprising the 50 states, the District of Columbia, the Virgin Islands, and Puerto Rico). They formulated a general consensus of how long it would take to complete the reporting form and who would likely be responsible from each state to complete the task.

The information requested was confirmed to be normal program activity information the 507 programs collect on an ongoing basis. Where a few state environmental agencies have delegated or contracted management of their technical assistance program, this information is part of the project management responsibilities. This requested reporting information typically would be compiled by experienced professional or technical staff.

6(b) Estimating the Respondent Burden Costs

The burden costs were derived from the labor hours, which remain consistent from the current ICR collection of 53 respondents, but have slightly increased due to inflation and the increase in salary costs for respondents. Labor rates were derived from the Bureau of Labor Statistics, Employment Cost Trends, Table 4: State and Local Government by Occupational and Industry Group (<http://data.bls.gov/cgi-bin/print.pl/news.release/ecec.t04.htm>). Please refer to Worksheet 1.

6(c) Estimating Agency Burden and Cost

Agency rates are based on the US Office of Personnel Management 2015 General Schedule Locality Pay Tables. EPA estimates an average hourly regional labor cost of \$68.56 for GS-15, \$49.32 for GS-13; and \$41.69 for GS-12 (all hourly rates are for step 5). Refer to Worksheet 2

6(d) Estimating the Respondent Universe and Total Burden and Costs

The Respondent Burden hours have remained consistent and have not changed since the last approved ICR. The burden hours continue to total 40 hours per each respondent. The total cost of these burden hours has slightly increased due to inflation. The total respondent cost is estimated to be

\$112,105.60 per year, which is a \$7,441.6 increase from the 2012 estimate of \$104,664, due to inflation and wage rate increases. Refer to Worksheet 1.

The Agency Burden has increased both in burden hours and in direct labor costs. Due to diminished financial resources EPA's Ombudsman office is compiling the data forms and reports without contractor support that was once available to assist in this effort. The previous 2012 ICR package included the contract support rates but that has been omitted from this package. EPA staff hours have increased to fill in this gap of support. Activities include Review/update survey instrument (not including the cost of renewing the ICR every three years), maintaining a master informational data base, answering respondent questions, review of submissions for accuracy and completeness, preparing a report from the data, Agency review and approval process, and distributing the report. Refer to Worksheet 2.

The Respondent Universe Burden and Costs is lower in both hourly burden and cost. The hours were less overall due to moving the data collection, review and reporting in-house, rather than having both agency and contractor hours and costs included as in previous years. The total cost is roughly \$383,000 for the full three years of the ICR, which is significantly lower than the previous 2012 ICR package of \$418,776. Refer to Worksheet 3.

6(e) Bottom Line Burden Hours and Cost Tables

Fifty-three states and territories will complete the Reporting form annually during the period covered by this ICR. No significant variation (more than 25 percent) in the annual reporting/record keeping burden over the life of this ICR is expected for the agency or the respondents. Please see Worksheets 1, 2 and 3. The cost over the entire period covered by the ICR is in Table 3.

6(f) Reasons for Change in Burden

There is no change in the total estimated respondent burden compared with the ICR currently approved by OMB.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection is estimated to average 40 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purpose of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjusting the existing ways to comply with any previous applicable instructions and requirements; train personnel to respond to 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 number 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-OA-2007-0706 , which is available for online viewing at www.regulations.gov, or in person viewing at 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) 566-1744. 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-OA-2007-0706 and OMB Control Number 2060-0337 in any correspondence.

WORKSHEET 1: ANNUAL RESPONDENT BURDEN/COST ESTIMATE

Collection Activity	Burden Hours	Total Labor Costs Per Year*	Capital Costs	O & M Costs	Respondent Universe	Total Hours Per Year-all respondents	Total Cost Per Year-all respondents
Annual Recordkeeping burden	36	\$1,903.68	0	0	53	1,908	\$100,895.04
Annual Reporting Burden	4	\$211.52	0	0	53	212	\$11,210.56
TOTALS	40	\$2,115.20	0	0	53	2,120	\$112,105.60

* Based on Prof/Tech rate of \$52.88 per hour, a \$3.51 an hour increase from the 2012 rate of \$49.37 per hour

WORKSHEET 2: ANNUAL AGENCY BURDEN/COST ESTIMATE

GS Level	Agency Burden Hours	Federal pay rate (step 5)	Annual Cost	Capital Costs	O & M Costs	Total Costs
GS15	75	\$68.56/hr	\$5,142	0	0	\$5,142
GS13	130	\$49.32/hr	\$6,411.60	0	0	\$6,411.60
GS12	100	\$41.69/hr	\$4,169	0	0	\$4,169
Total	305		\$15,722.60	0	0	\$15,722.60

WORKSHEET 3: COSTS OVER THE ENTIRE PERIOD COVERED BY THE ICR

	Total Annual Costs	Costs over 3 years
Agency	\$15,722.60	\$47,167.80
All respondents	\$112,105.60	\$336,316.80
TOTAL		\$383,484.60