

2511.01 - Attachment G

Since the burden activities associated with the work plan and reporting are already covered under the existing *EPA’s General Regulation for Assistance Programs ICR*” (OMB Control No. 2030-0020; EPA ICR No. 0938.18), a summary of the baseline burden hours associated with only the STAG grantees was developed for comparison and is used as the burden baseline in Table 1. For the FIFRA program specific ICR burden hour projections, the estimates and cost projected assume that all the grantees, 81 states, territories and tribes, will use the template for their work plan and reporting requirements. The burden also assumes that all grantees would report to EPA biannually, and will conduct all the activities. This is a conservative estimate, since not all 81 FIFRA grantees will participate in all of the FIFRA grant program activities.

Table 1- FIFRA baseline biannual workplan plan, reporting and record keeping burdens hours from OMB Control No. 2030-0020

| | Manager | | Technical | | Average Per Response | | Number of Respondents | Responses / Respondent | Annual Totals | |
|--|--------------|-------------------|--------------|-----------------|----------------------|-------------------|-----------------------|------------------------|---------------|---------------------|
| | Hrs. | \$43.67/hr. | Hrs. | \$31.80/hr. | Hrs | Costs (\$) | | | Burden (hrs) | Costs (\$) |
| 40 CFR Sections 30.50, 52, and 31.42 | 2.67 | \$116.59 | 2.33 | \$74.09 | 5.0 | \$190.68 | 81 | 2 | 810 | \$30,890.16 |
| 40 CFR Sections 30.51 and 31.40 | 3.47 | \$151.53 | 3.03 | \$96.35 | 6.5 | \$247.88 | 81 | 2 | 1053 | \$40,156.56 |
| 40 CFR Section 30.25 (low frequency) | | | N/A | | N/A | | | | | |
| 40 CFR Sections 30.25 and 31.32 | 1.6 | \$69.87 | 1.4 | \$44.52 | 3.0 | \$114.39 | 81 | 2 | 486 | \$18,531.18 |
| 30.30-37 and 31.32 | 1.6 | \$69.87 | 1.4 | \$44.52 | 3.0 | \$114.39 | 81 | 2 | 486 | \$18,531.18 |
| 40 CFR Sections 30.33 and 31.32 (low frequency %1 of all Agency projects) | 1.07 | \$46.72 | .93 | \$29.57 | 2.0 | \$76.29 | 81 | 2 | 324 | \$12,358.98 |
| 40 CFR Section 30.36 (invention reports) | | | NA | | NA | | | | | |
| 40 CFR Sections 30.4 and 31.6 | 4.28 | \$186.90 | 3.72 | \$118.29 | 8.0 | \$305.19 | 81 | 2 | 1296 | \$49,440.78 |
| 40 CFR Sections 30.63 and 31 subpart F (low frequency less than %1 of all Agency projects) | 8.56 | \$373.81 | 7.44 | \$236.59 | 16.0 | \$610.40 | 81 | 2 | 2592 | \$98,884.80 |
| 40 CFR Section 30.40-48 and 31.36 | .267 | \$11.65 | .233 | \$7.40 | 0.5 | \$19.05 | 81 | 2 | 81 | \$3,086.10 |
| 40 CFR Section 31.11 (Ex. order 12372) | | | NA | | NA | | | | | |
| 40 CFR Section 31.36(h) | .267 | \$11.65 | .233 | \$7.40 | 0.5 | \$19.05 | 81 | 2 | 81 | \$3,086.10 |
| Total | 23.78 | \$1,038.59 | 20.72 | \$658.73 | 44.5 | \$1,697.32 | -- | -- | 7209 | \$274,965.84 |

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Numbers may not add due to rounding. Wage rates reflect the average hourly wage rate estimate provide by the Bureau of Labor Statistics for the North American Industry Classification System (NAICS) code for all levels of government (NAIC code 999000). 2012 base data is used. Under the current ICR, OMB Control No. 2030-0020 (EPA ICR No. 0938.18), the average for *one reporting event* is 44.5 hours, most grantees report biannually or an estimated 89 hours annually. The current ICR does not provide a labor category break-out, so for this comparison we redistributed the total burden between the managerial (approximately 53% of the burden) and technical wage rate categories. The clerical category was not used because the consultation with the grantees indicates this labor category is rarely used.