

Table A1. Respondents Activities table (permittees)

Activity Description	Respondent Type	Total Hours per response	capital / startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Year 1	Year 2	Year 3	Annual Average Number of Respondents	Frequency of Reporting	Number of Responses / respondent / yr	Number of Responses Year	Total Hours /Year	Total Labor Cost	Type of Activity OMB (Reporting / Recordkeeping / 3rd party disclosure)
NOI preparation & submittal	operators - PGP Table 1-1	2	\$0	\$0	\$0	9,125	1,825	1,825	1,825	1,825	once every 5 yrs	1	1,825	3,650	\$272,235	Reporting
NOI preparation & submittal	operators under PGP - informal ESA	6	\$0	\$0	\$0	37	7	7	7	7	once every 5 yrs	1	7	44	\$3,312	Reporting
NOI preparation & submittal	operators under PGP - formal ESA	20	\$0	\$0	\$0	18	4	4	4	4	once every 5 yrs	1	4	73	\$5,445	Reporting
NOT Preparation & submittal	operators - PGP Table 1-1 (all)	0.5	\$0	\$0	\$0	456	91	91	91	91	once	1	91	46	\$4,907	Reporting
Develop PDMP	operators - NOI filers (large)	40	\$0	\$0	\$0	4,836	967	967	0	645	once	1	645	25,793	\$1,157,527	Reporting
Update PDMP	operators - NOI filers (large)	2	\$0	\$0	\$0	4,836	1,209	1,209	1,209	1,209	ongoing	1	1,209	2,418	\$100,618	Reporting
Monitoring (large site)	operators - NOI filers (large)	0.25	\$0	\$0	\$0	4,836	4,836	4,836	4,836	4,836	ongoing	16	77,380	19,345	\$804,945	Reporting
Monitoring (small site)	operators - NOI filers (small)	0.25	\$0	\$0	\$0	4,289	4,289	4,289	4,289	4,289	ongoing	4	17,155	4,289	\$178,455	Reporting
Monitoring	other operators	0.25	\$0	\$0	\$0	355,875	355,875	355,875	355,875	355,875	ongoing	1	355,875	88,969	\$3,701,990	Reporting
Annual Report preparation & submittal	operators - NOI filers (large & ESA)	8	\$0	\$0	\$0	4,892	4,892	4,892	4,892	4,892	yearly	1	4,892	39,132	\$1,628,283	Reporting
Adverse Incident Documentation	all operators	2	\$0	\$0	\$0	365,000	37	37	37	37	occasionally/As Needed	1	37	73	\$3,038	Reporting
Adverse Incident verbal notification	all operators	2	\$0	\$0	\$0	365,000	37	37	37	37	occasionally/As Needed	1	37	73	\$3,038	Reporting
Adverse Incident to Threatened or Endangered Species	all operators	2	\$0	\$0	\$0	365,000	4	4	4	4	occasionally/As Needed	1	4	7	\$304	Reporting
Spill, Leaks Documentation	all operators	1	\$0	\$0	\$0	365,000	365	365	365	365	occasionally/As Needed	1	365	365	\$15,188	Reporting
Corrective Action Documentation	all operators	5	\$0	\$0	\$0	365,000	365	365	365	365	occasionally/As Needed	1	365	1,825	\$75,938	Reporting
Permittee Report of Planned Facility Changes	all operators	4	\$0	\$0	\$0	365,000	365	365	365	365	occasionally/As Needed	1	365	1,460	\$60,751	Reporting
Permittee Report of Anticipated Noncompliance	all operators	5	\$0	\$0	\$0	365,000	365	365	365	365	occasionally/As Needed	1	365	1,825	\$75,938	Reporting
Permittee Report of Inaccurate Previous Information	all operators	2	\$0	\$0	\$0	365,000	183	183	183	183	occasionally/As Needed	1	183	366	\$15,229	Reporting
Noncompliance Reports	all operators	5	\$0	\$0	\$0	365,000	183	183	183	183	occasionally/As Needed	1	183	915	\$38,073	Reporting
Recordkeeping (basic)	all operators	1	\$0	\$0	\$0	365,000	365,000	365,000	365,000	365,000	ongoing	1	365,000	365,000	\$12,063,250	recordkeeping
Recordkeeping	operators - non-NOI filers	0.5	\$0	\$0	\$0	355,875	355,875	355,875	355,875	355,875	ongoing	1	355,875	177,938	\$7,403,979	recordkeeping
Full Recordkeeping	operators - NOI filers (large)	1	\$0	\$0	\$0	4,836	4,836	4,836	4,836	4,836	ongoing	16	77,380	77,380	\$3,219,782	recordkeeping
Recordkeeping (PDEW)	operators - NOI filers (small)	1	\$0	\$0	\$0	4,289	4,289	4,289	4,289	4,289	ongoing	4	17,155	17,155	\$7,630,458	recordkeeping
<b>TOTAL</b>													<b>1,276,395</b>	<b>828,141</b>	<b>\$38,462,682</b>	

1. Total hours per response are from the EA or ICR for NPDES Program except for the Update PDMP.

2. Total number of respondents: assumed 2.5% of 365,000 respondents are required to submit NOIs; assumed 0.1% of 36,500 respondent will need to address ESA informally and 0.05% formally; assumed 5% of the respondents required to submit NOIs will file NOT; assumed 47% of the respondents required to submit NOIs are small entities and 53% are large entities; assumed respondent with ESA issue will submit annual reports.

3. Annual number of respondents: total divide by 5 for NOI, NOT, PDMP (5-year permit cycle); update plans - assumed 25%; adverse incident - assumed 0.01%; adverse incident to TES - assumed 0.001%; report of anticipated noncompliance & inaccurate previous info - assumed 0.05%; others - assumed 0.1%

4. Total Labor rate: used same rate as those in the EA updated to 2013 dollars - average managerial rate \$107.56, technical rate \$41.61, clerical rate \$33.05. NOI (50% managerial, 50% technical); NOT (all managerial); PDMP (2hr managerial, 36hr technical, 2hr clerical); PDEW (0.5hr managerial, 9hr technical, 0.5hr clerical); other activities (technical rate or clerical rate)

5. This ICR marks a shift from the approval period (years 4 and 5 of the PGP) to the permit implementation and renewal period (year 6 of the PGP) when permittees renewing their coverage in year 3 of this ICR (year 6 of the PGP) would not need to develop a new PDMP. This is the reason why there are no respondents assumed to develop a PDMP in year 3.

**Table A2. Respondents Activities table (States)**

Activity Description	Respondent Type	Total Hours per response	capital / startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents	Frequency of Reporting	Number of Responses / respondent /yr	Number of Responses Year	Total Hours / Year	Total Labor Cost	Type of Activity OMB (Reporting / Recordkeeping / 3rd party disclosure)	Type of Activity (EPA classification)	Obligation of Response OMB (mandatory, voluntary)	Affected Public (OMB)
NOI processing & review	States	0.5	\$0	\$0	\$0	47	47	every 5 yrs	34.94680851	1,643	821	\$24,802	Reporting	1. Application	mandatory	States
NOT processing & review	States	0.25	\$0	\$0	\$0	47	47	ongoing	1.747340426	82	21	\$620	Reporting	1. Application	mandatory	States
Annual Report processing & review	States	1	\$0	\$0	\$0	47	47	yearly	93.45542553	4,392	4,392	\$132,651	Reporting	4. Reporting	mandatory	States
Adverse Incident report review	States	2	\$0	\$0	\$0	47	47	occasionally/As Ne	0.69893617	33	66	\$1,984	Reporting	4. Reporting	mandatory	States
Permittee Report of Planned Facility Changes	States	0.5	\$0	\$0	\$0	47	47	occasionally/As Ne	6.989361702	329	164	\$4,960	Reporting	4. Reporting	mandatory	States
Permittee Report of anticipated noncompliance	States	2	\$0	\$0	\$0	47	47	occasionally/As Ne	6.989361702	329	657	\$19,841	Reporting	4. Reporting	mandatory	States
Permittee Report of Inaccurate Previous Information	States	1	\$0	\$0	\$0	47	47	occasionally/As Ne	3.504255319	165	165	\$4,974	Reporting	4. Reporting	mandatory	States
Noncompliance Reports	States	2	\$0	\$0	\$0	47	47	occasionally/As Ne	3.504255319	165	329	\$9,948	Reporting	4. Reporting	mandatory	States
<b>TOTAL</b>										<b>7,136</b>	<b>6,615</b>	<b>\$199,780</b>				

**Table A3. Agency Activities Table**

Activity Description	Respondent Type	Total Hours per response	capital / startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents	Frequency of Reporting	Number of Responses / respondent /yr	Number of Responses Year	Total Hours / Year	Total Labor Cost	Type of Activity OMB (Reporting / Recordkeeping / 3rd party disclosure)	Type of Activity (EPA classification)	Obligation of Response OMB (mandatory, voluntary)	Affected Public (OMB)
NOI processing & review	EPA	0.5						once every 5 yrs		183	91	\$3,792	Reporting	1. Application	mandatory	EPA
NOI processing & review (informal)	Services	0.5						occasionally/As Needed		7	4	\$154	Reporting	1. Application	mandatory	Services
NOI processing & review (formal)	Services	5						occasionally/As Needed		4	18	\$758	Reporting	1. Application	mandatory	Services
NOT processing & review	EPA	0.25						ongoing		9	2	\$95	Reporting	1. Application	mandatory	EPA
Annual Report processing & review	EPA	1						yearly		500	500	\$20,788	Reporting	4. Reporting	mandatory	EPA
Adverse Incident report review	EPA	2						occasionally/As Needed		4	7	\$303	Reporting	4. Reporting	mandatory	EPA
Adverse Incident to Threatened or Endangered Species	Services	2						occasionally/As Needed		4	7	\$303	Reporting	4. Reporting	mandatory	Services
Permittee Report of Planned Facility Changes	EPA	0.5						occasionally/As Ne		37	18	\$758	Reporting	4. Reporting	mandatory	EPA
Permittee Report of anticipated noncompliance	EPA	2						occasionally/As Ne		37	73	\$3,034	Reporting	4. Reporting	mandatory	EPA
Permittee Report of Inaccurate Previous Information	EPA	1						occasionally/As Ne		18	18	\$761	Reporting	4. Reporting	mandatory	EPA
Noncompliance Reports	EPA	2						occasionally/As Ne		18	37	\$1,521	Reporting	4. Reporting	mandatory	EPA
<b>TOTAL</b>										<b>820</b>	<b>776</b>	<b>\$32,268</b>				

- Total hours per response are from the ICR for NPDES Program.
- Number of responses/yr - EPA is 10% of permittee's total number of responses/yr
- Labor Rate for Federal is \$41.56 and for State is \$30.20