

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

Activity	Average Annual Burden Hours (from Table A-3)	Hourly Cost	Average Annual Cost
Technical Review of revised application & reapplication	2,560	\$79.03 <sup>a</sup>	\$202,317
Evaluate revised applications/reapplications for compliance with 301(h) criteria/prepare 301(h) decisions	2,288	\$37.80 <sup>b</sup>	\$86,486
Evaluate monitoring and toxic control program adequacy	1,960	\$37.80 <sup>b</sup>	\$74,088
Review State determinations and State certifications and coordinate with State	160	\$37.80 <sup>b</sup>	\$6,048
<b>TOTAL</b>	<b>6,968</b>		<b>\$368,939</b>

It is assumed that the majority of reapplications and additional information submissions are reviewed by a contractor. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$71,467 or \$82,187/year. Thus, based on 2,080 working hours/year, the average salary of a contractor is \$39.51/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$79.03. (Hourly rate based on 2017 DC-B salary rate table.)

<sup>b</sup>It is assumed that the salary level of the typical government employee working on the 301(h) program is a GS-9, Step 10 salary, or \$71,467/year. Based on 2,080 working hours/year, the average hourly salary of a Federal employee is \$34.36/hour. Assuming 10 percent overhead costs, the labor cost for Federal employees is \$37.80/hour. (Hourly rate based on 2017 DC-B salary rate table.)

NOTE: Numbers may not add due to rounding.

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

Activity	Average		Average Annual Cost
	Annual Burden Hours	Hourly Cost	
<b>COST TO POTW RESPONDENTS</b>			
Application Revision	1,791	\$79.03 <sup>a</sup>	\$141,543
Reapplication	2,641	\$79.03 <sup>a</sup>	\$208,718
Monitoring Program	19,208	\$21.11 <sup>b</sup>	\$405,481
Toxics Control Program	15,120	\$21.11 <sup>b</sup>	\$319,183
<b>TOTAL</b>	<b>38,760</b>		<b>\$1,074,925</b>
<b>COST TO STATE RESPONDENTS</b>			
Determination	960	29.07 <sup>c</sup>	\$27,907
Certification	320	29.07 <sup>c</sup>	\$9,302
<b>TOTAL</b>	<b>1,280</b>		<b>\$37,210</b>
<b>TOTAL POTW AND STATE RESPONDENTS</b>			
	<b>40,040</b>		<b>\$1,112,135</b>

<sup>a</sup>It is assumed that much of the reapplication and additional information is prepared by a contractor with specialized expertise and equipment. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$71,467, or \$82,187/year. Thus, based on 2,080 working hours/year, the average hourly salary of a contractor is \$39.51/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$79.03/hour. (Hourly rate based on 2017 DC-B salary rate table.)

<sup>b</sup>It is assumed that the salary level of a typical local government employee working on the 301(h) program is a GS-5, Step 4, or \$39,911. Based on 2,080 working hours/year, the average hourly salary of a local employee is \$19.19/hour. Assuming 10 percent overhead costs, the labor cost for local government employees is \$21.11/hour. (Hourly rate based on 2017 DC-B salary rate table.)

<sup>c</sup>It is assumed that the salary level of a typical State government employee working on the 301(h) program is a GS-9, Step 1, or \$54,972/year. Based on 2,080 working hours/year, the average hourly salary of a State government employee is \$26.43/hour. Assuming 10 percent overhead costs, the labor cost for State government employees is \$29.07/hour. (Hourly rate based on 2017 DC-B salary rate table.)

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

Activity	Burden Hours/Activity		Number of Permits to be Processed Annually <sup>a</sup>						Federal Burden Hours/Activity for 3 Years of ICR			Average Annual Burden <sup>b</sup>
	S	L	FY 2017		FY 2018		FY 2019		S	L	TOTAL	
Technical review of revised application and reapplication	360	1650	1	2	1	1	1	1	1,080	6,600	7,680	2,560
Evaluate revised applications and reapplications for compliance with 301(h) criteria	208	1040	4	2	4	1	5	1	2,704	4,160	6,864	2,288
Evaluate monitoring and toxic control program adequacy	60	100	21	7	21	7	21	7	3,780	2,100	5,880	1,960
Review State determinations and State certifications and coordinate with the State	20	20	5	4	5	2	6	2	320	160	480	160
<b>TOTAL</b>									<b>7,884</b>	<b>13,020</b>	<b>20,904</b>	<b>6,968</b>

NOTE: S = small, L = large

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

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

Activity/Unit Burden	Burden Hours	FY 2017		FY 2018		FY 2019		TOTAL		Average	
		Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All
Application Revision (POTW)											
Sm Facility Hr.	255	1	255	1	255	1	255	3	765	1	255
Lg. Facility Hr.	1,152	2	2,304	1	1,152	1	1,152	4	4,608	1	1,536
SUBTOTAL		3	2,559	2	1,407	2	1,407	7	5,373	2	1,791
Reapplication (POTW)											
Sm Facility Hr.	255	4	1,020	4	1,020	5	1,275	13	3,315	4	1,105
Lg. Facility Hr.	1,152	2	2,304	1	1,152	1	1,152	4	4,608	1	1,536
SUBTOTAL		6	3,324	5	2,172	6	2,427	17	7,923	6	2,641
Monitoring (POTW)											
Sm Facility Hr.	328	21	6,888	21	6,888	21	6,888	63	20,664	21	6,888
Lg. Facility Hr.	1,760	7	12,320	7	12,320	7	12,320	21	36,960	7	12,320
SUBTOTAL		28	19,208	28	19,208	28	19,208	84	57,624	28	19,208
Toxics Control											
Sm Facility Hr.	80	21	1,680	21	1,680	21	1,680	63	5,040	21	1,680
Lg. Facility Hr.	1,920	7	13,440	7	13,440	7	13,440	21	40,320	7	13,440
SUBTOTAL		28	15,120	28	15,120	28	15,120	84	45,360	28	15,120
TOTAL (POTWs)											
Sm Facility Hr.		21	9,843	21	9,843	21	10,098	63	29,784	21	9,928
Lg Facility Hr.		7	30,368	7	28,064	7	28,064	21	86,496	7	28,832
TOTAL (All POTWs) <sup>a</sup>		28	40,211	28	37,907	28	38,162	84	116,280	28	38,760
Determination (States)											
Sm Facility Hr.	90	5	450	5	450	6	540	16	1,440	5	480
Lg Facility Hr.	180	4	720	2	360	2	360	8	1,440	3	480
SUBTOTAL		9	1,170	7	810	8	900	24	2,880	8	960
Certification (States)											
Sm Facility Hr.	30	5	150	5	150	6	180	16	480	5	160
Lg Facility Hr.	60	4	240	2	120	2	120	8	480	3	160
SUBTOTAL		9	390	7	270	8	300	24	960	8	320
Total (States) <sup>b</sup>		6	1,560	6	1,080	6	1,200	6	3,840	6	1,280
GRAND TOTAL(States + POTWs)		34	41,771	34	38,987	34	39,362	34	120,120	34	40,040

<sup>a</sup>There are 28 POTWs in the 301(h) universe.<sup>b</sup>There are 6 States in the 301(h) universe.

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

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

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

	FY 2017		FY 2018		FY 2019		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	1	2	1	1	1	1	3	4	2
Burden (burden from Table A-5 x number of respondents)	255	2,304	255	1,152	255	1,152	765	4,608	1,791

Note: S = small, L = large

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

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

	FY 2017		FY 2018		FY 2019		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	4	2	4	1	5	1	13	4	6
Burden (burden from Table A-5 x number of respondents)	1,020	2,304	1,020	1,152	1,275	1,152	3,315	4,608	2,641

Note: S = small, L = large

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

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

	Number of Respondents						Average Annual Number of Respondents	Burden Hours/Permittee		Annual Burden				Average Annual Burden <sup>a</sup>
	FY 2017		FY 2018		FY 2019			S	L	FY 2017	FY 2018	FY 2019	TOTAL	
	S	L	S	L	S	L								
Monitoring Program	21	7	21	7	21	7	28	328	1,760	19,208	19,208	19,208	57,624	19,208
Toxics Control Program	21	7	21	7	21	7	28	80	1,920	15,120	15,120	15,120	45,360	15,120

Note: S = small, L = large

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



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

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

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

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

	FY 2017 <sup>a</sup>		FY 2018		FY 2019		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents	5	4	5	2	6	2	24	8
Burden <sup>b</sup>	450	720	450	360	540	360	2,880	960

Note: S = small, L = large

<sup>a</sup>Calculated by dividing the number of respondents and the total burden for 3 years by 3. There are 6 states in the 301(h) universe.

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

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

	FY 2017		FY 2018		FY 2019		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents <sup>b</sup>	5	4	5	2	6	2	24	8
Burden <sup>c</sup>	150	240	150	120	180	120	960	320

Note: S = small, L = large

<sup>a</sup>Calculated by dividing total burden hours and number of respondents for the 3 years by 3. There are 6 states in the 301(h) universe.

<sup>b</sup>Number derived by assuming 24 permit reapplications and application revisions over 3 years of the ICR; 16 small and 8 large; and will result in the final approval and preparation of a draft permit, thus requiring State certification. It is assumed that the application review process takes approximately one year.

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

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

Respondent/Activity	Number of Respondents/Responses	Hours per Response <sup>b</sup>	Average Annual Burden
<b>POTWs</b>			
Application Revision	2	896	1,791
Reapplication	6	440	2,641
Monitoring Program	28	686	19,208
Toxics Control Program	28	540	15,120
<b>TOTAL: POTWs</b>	<b>28</b>		<b>38,760</b>
<b>STATES</b>			
Determinations	8	120	960
Certifications	8	40	320
<b>TOTAL: STATES</b>	<b>6</b>		<b>1,280</b>
<b>TOTAL: POTWs AND STATES</b>	<b>34</b>		<b>40,040</b>

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

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

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

Activity	Burden from Previous ICR		Difference	Reason for Change
Application Revision	2,559	1,791	-768	Fewer respondents <sup>a</sup>
Reapplication	3,963	2,641	-1,322	Fewer respondents <sup>a</sup>
Monitoring Program Toxics Control Program	27,888	19,208	-8,680	Fewer respondents <sup>a</sup>
State Determination	23,200	15,120	-8,080	Fewer respondents <sup>a</sup>
	1,320	960	-360	Fewer respondents <sup>ab</sup>
State Certification	440	320	-120	Fewer respondents <sup>ab</sup>
<b>TOTAL</b>	<b>59,370</b>	<b>40,040</b>	<b>-19,330</b>	<b>Fewer respondents<sup>ab</sup></b>

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

<sup>b</sup>Number of States in 301(h) universe has decreased since the previous ICR