

Information Collection Request

Supporting Statement for Information Collection Request for the EPA's National Fish Program (previously referred to as Information Collection Request for the National Listing of Fish Advisories)

Renewal ICR

**May 2018
(Revised March 2019)**

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(Non-Regulatory)**

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1. Identification of the Information Collection

1(a) Title of the Information Collection

Environmental Protection Agency (EPA) National Fish Program.

1(b) Short Characterization/Abstract

The Clean Water Act (CWA) section 101(a)(2) interim goal provides for the protection and propagation of fish, shellfish, and wildlife and for recreation in and on the water. The EPA includes the safe consumption of fish and shellfish as part of this fundamental CWA goal. There is a continuing need to maintain the overall quality and availability of public information concerning fish advisories, which includes, but is not limited to, water quality standards, monitoring and assessment activities, and the issuance of advisories and bans related to fish and shellfish consumption. Primary responsibility for these activities lies with state and tribes. However, within a state there are often several agencies that share responsibility for the water quality and advisory activities, which has led to inconsistent reporting of advisories.

The nationwide collection of fish advisory information by EPA began in 1994 with a survey of the 50 states, the District of Columbia, and U.S. territories (Guam, American Samoa, Puerto Rico, and the U.S. Virgin Islands) and the Great Lakes Indian Fish & Wildlife Commission, a total of 56 potential respondents. In 2000, 36 tribal organizations were added to the survey. There are currently 44 tribes with tribal-adopted water quality standards in effect under the Clean Water Act. Over the 3-year period of this ICR (2019-2022), the EPA will collect data/information from potentially 44 tribal organizations, as well as the original 56 respondents.

Previous fish program surveys were voluntary surveys used to obtain both qualitative and quantitative advisory information on new advisories and fish tissue data. For this ICR, EPA is proposing only to request annually the fish tissue data that served as the basis for fish advisories issued by each state, territory, and tribal organization in recent years. The EPA is no longer requesting fish advisory information because this information is publicly available on state and tribal websites. For a list of state, territorial and tribal websites go to <https://fishadvisoryonline.epa.gov/Contacts.aspx>.

In early 2000s, the EPA began entering fish tissue data provided by the states into EPA's National Listing of Fish Advisories (NLFA) database and currently has data for 48 states and the District of Columbia. These data, which serve as the basis for fish consumption advisories, are not currently provided by states on their websites. These data are useful for states, universities and others who are interested in which states are monitoring for various pollutants and the levels they are finding. These data are also useful for the EPA to plan more effective research and policies to reduce risks to consumers of locally caught, chemically contaminated fish.

To reduce operations and maintenance costs, the EPA is transitioning from the NLFA database by migrating the state/tribal fish tissue contaminant data in the NLFA to the Water Quality Exchange (WQX). During the transition, the EPA will work collaboratively with states, territories and tribes to ensure that data migrated are accurate, complete, standardized and consistent with how these jurisdictions report their data. The EPA's focus moving forward will be to use the WQX as a place where states, territories, and tribes can voluntarily submit fish tissue data so that the data collected by the EPA and the states, territories and tribes can be accessed in one location through Water Quality Portal.

The EPA estimates that up to 100 requests will be sent to states, territories and tribes per year for fish tissue data. The actual cost for a respondent to complete the survey is anticipated to decrease because EPA will only be requesting fish tissue data. When the fish program data collection is implemented, the total annual respondent cost under this ICR is estimated to be \$25,968.00 (5.78 hours per year at an average labor rate of \$44.93 per hour per respondent for 100 respondents).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA needs this information to inform their understanding of whether recreational and subsistence fishers are at additional risk of exposure to chemical contaminants through their consumption of locally caught fish and shellfish. The fish program data collection will provide information on the types of contaminants that trigger the issuance of advisories, the monitoring designs states use with respect to the numbers of samples collected and number of stations surveyed, and the chemical contaminants being analyzed in fish tissue.

The EPA is collecting this information under the authority of CWA section 104, which provides for the collection of information to be used to protect human health and the environment. However, providing fish tissue data is voluntary. Copies of the relevant section of the CWA are provided in Appendix B.

2(b) Practical Utility/Users of the Data

The EPA uses the information collected to address issues in three specific areas for state, tribal and territorial fish advisory programs:

- Enhancing the public's right-to-know about the safety of fish and shellfish harvested from local waters by making this information available online.
- Improving the scientific and policy foundations in support of state, territorial, tribal, and local actions.
- Providing up-to-date sampling and analysis methods, risk assessment, risk management, and risk communication procedures for the states, territories and tribes to use to better protect the health of recreational and subsistence fishers in a more timely and comprehensive manner.

The information collected will be compiled to determine the status and nature of chemical contamination in the nation's waters and the level of effort by jurisdictions to monitor and evaluate fish tissue residue data at their monitoring sites. The EPA will use the analysis to plan more effective research and policies to reduce risks to consumers of locally caught, chemically contaminated fish.

The Office of Water will share this information with other program offices, such as the Office of Research and Development and the Office of Policy, to evaluate scientific research needs and policy implications. The EPA Regions will use the information to address concerns regarding fish advisories and monitoring programs. The Centers for Disease Control and Prevention and other federal agencies will also be able to use this information. The information compiled in this survey will permit state, tribal, and local organizations, such as public health agencies, environmental protection agencies, and fish and wildlife departments, to easily review

cumulative information on monitoring programs for the purpose of prioritizing resources to address water quality concerns directly related to chemical contamination of fish.

Summary and individual state/tribal data will also be made available to non-governmental organizations and to the public. By accessing the data through the Internet, the public will be able to determine whether the waterbody they want to fish has been monitored to assess the level of chemical contamination in the fish. This data coupled with advisory information available on state and tribal websites will provide consumers with information that they can use to make informed decisions on waterbodies they fish in and the amount and types of fish they consume.

3. Non-duplication, Consultations, and Other Collection Criteria

3(a) Non-duplication

The survey of fish advisories has been performed since 1994 under previously approved ICRs for the 305(b) Water Quality Collection Effort (OMB Control No. 2040-0071; EPA ICR No. 1560.03 and 1560.04); however, tribal organizations had not been comprehensively targeted by these surveys. The EPA examined the information collected from each of the previous surveys and determined that none of them addressed all its needs to inventory the locations of the nation's waterbodies under advisories, as well as to compile nationwide information on state, territory, and tribal fish advisory programs.

In 2000, a new ICR was submitted to OMB for approval to cover additional questions and respondents not covered by the 305(b) Water Quality Collection Effort because the Office of Water wanted to obtain additional information on fish advisories from the 50 states, the District of Columbia, four U.S. territories, and additional Tribal groups. Since then, the survey of fish advisories has been performed under an approved ICR for the National Listing of Fish Advisories (OMB Control No. 2040-0226; EPA ICR No. 1959.01, expired on 01/31/2004; EPA ICR No. 1959.02, expired on 09/30/2007; EPA ICR No. 1959.03, expired on 02/28/2011; EPA ICR No. 1959.04, expired on 11/30/2014; EPA ICR No. 1959.05 expiring on 07/31/2018). This ICR is a renewal to gather a subset of the data previously collected (i.e., fish tissue data), now under a new title: National Fish Program.

All information collected under this ICR are available from other sources, i.e., state, territorial and/or tribal fish programs. Consequently, the EPA does not intend to duplicate data collection efforts already conducted by others. That is, respondents would not be collecting data specifically for EPA, but instead sharing their collected data with EPA for consolidation.

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

In compliance with the 1995 Paperwork Reduction Act, the EPA solicited comments for a 60-day period on this ICR. Comments were requested on the proposed ICR renewal in the Federal Register on February 22, 2018 at 83 FR 7719. The notice included a request for comments and information to enable the EPA to: (i) evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility; (ii) evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; (iii) enhance the quality, utility, and clarity of the information to be collected; and (iv) minimize the burden of the collection of information on

those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses. The comment period closed on April 23, 2018.

Seven comments were received during the comment period. Three comments were out of scope. The remaining comments were within the scope of the ICR and were submitted by the Oregon Health Authority, Great Lakes Consortium for Fish Consumption Advisories, New York State Department of Health and New York State Department of Environmental Conservation. Some commenters supported EPA's efforts in gathering fish advisory information and creating a comprehensive database of fish tissue data, while expressing concerns about providing data using the EPA templates because of the amount of time and effort involved. Other comments questioned the following: why EPA collects fish advisory information; the data elements included in the templates; and how EPA will ensure data quality, analyze data, and minimize the burden for data collection. Recommendations were provided on how to improve the data collection and analysis process. Comments can be viewed on www.regulations.gov under Docket ID: EPA-HQ-OW-2014-0350. The ICR has been revised to address the comments raised by these commenters. EPA has clarified that use of the templates is optional and has explained how it will ensure data accuracy and completeness. Additionally, EPA may request feedback from jurisdictions on possible data elements for future information collections and discuss ways to extract data directly from publicly available state databases using tools such as web services to minimize reporting burden.

3(c) Consultations

Prior to revising the ICR, the EPA notified the states, territories and tribes fish advisory programs. To prepare this ICR renewal, the EPA sought input by email from 9 jurisdictions (Alaska, Arizona, Delaware, Maryland, Michigan, New York, Utah, Great Lakes Fish and Wildlife Consortium, and the Aroostook Band of Micmacs) so that the Agency would have more recent information upon which to update the amount of time it would take to respond to the information requested described in section 4b (i.e., burden hours). Delaware, Michigan and Utah provided estimates on the amount of time it would take to review instructions, enter fish advisory and fish tissue data into the templates, and respond to periodic requests for information. Delaware indicated that it was willing to provide the EPA with fish tissue data but did not plan to use the templates provided due to limited staff and the complexity of the information submitted on tissue data.

As a result of consultations with states, territories and tribes and the OMB, EPA has revised this supporting statement to remove the collection of fish advisory information. Additionally, OMB has provided guidance that the types of periodic requests discussed in the draft supporting statement are not intended to be covered under the Paperwork Reduction Act and consequently this activity has also been removed from this ICR. Where a particular request warrants coverage under an ICR, EPA will seek coverage under the Agency's generic ICRs.

3(d) Effects of Less Frequent Collection

Depending on the availability of resources, a request or reminder will be sent to respondents at least once per year in order to gather current fish tissue data from monitoring that occurred during the previous 12-month (calendar year) fishing season. Jurisdictions that are responsible for fish tissue monitoring generally collect fish tissue each year during summer and

fall, and then send the fish tissue samples for analysis during fall and winter. Risk assessments are conducted when residue analysis of the fish tissue samples have been completed, typically in late winter.

Fish tissue contaminant data helps to characterize the pollutants that trigger fish advisories. For many years, mercury, dioxins/furans, polychlorinated biphenyls (PCBs), chlordane, and dichlorodiphenyl-trichloroethane (DDT) have accounted for most of the advisories issued nationwide. Regular annual collection of fish tissue information will permit the evaluation of whether or not waters under advisories are meeting water quality standards, so that trends can be identified and resources allocated to deal with the problems of greatest concern. It may also help with identifying bioaccumulative pollutants of emerging concern in fish.

3(e) General Guidelines

This ICR does not exceed any of the OMB guidelines found 5 CFR 1320.5(d) (2).

3(f) Confidentiality

Fish tissue information is maintained for public record by the state/tribal public health agency or other state/tribal agencies and no sensitive material is involved.

3(g) Sensitive Questions

No questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private are included in this information collection.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The following categories of respondents will be surveyed:

State (or other entity) health departments

9431 Administration of public health programs (Administration of public health programs, including the following: Categorical health program administration—government, communicable disease program administration—government, environmental health programs—government, and public health agencies—non-operating).

State (or other entity) EPAs

9511 Air and Water Resource and Solid Waste Management (Administration of Environmental Quality, including the following: Water control and quality agencies—government and environmental protection agencies—government).

4(b) Information Requested

(i) Data items, including record keeping

The information that the EPA is requesting states, territories and tribes voluntarily provide under this ICR is already routinely collected by states, territories and/or tribes as part of their fish monitoring efforts to protect public health. No additional collection effort will be required by these entities in order to respond to the EPA's request for the following:

(1) Tissue data that supports the advisory determination including contaminant, residue concentration, type(s) of sample(s) (e.g., fillet, whole, plug, shellfish, wildlife, composite), sample length, and locational coordinates for the data/sample locations (e.g., station IDs, site names, locations, counties, latitude/longitude).

(ii) Respondent Activities

The following activities are required for a respondent to assemble and submit fish tissue information discussed above:

- Review transmittal email and instructions on what data or information should be provided and how to submit or upload the data.
- Gather or prepare fish tissue data for submission.
- Prepare transmittal email to submit data to EPA for uploading into WQX or import the data into WQX web using the [WQX web biological template](#) (i.e., template consisting of two Excel spreadsheets) and export the WQX-compatible data file through the Central Data Exchange (CDX) into WQX.

5. The Information Collected—Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

Agency activities consist of the following:

- Update current mailing list of state, territory, and tribal fish advisory programs
- Prepare transmittal email and instructions for submitting fish tissue data. States, territories and tribes will have the flexibility to submit their data to the EPA using the WQX web or in the manner that is most convenient and efficient for them. The EPA will provide training and detailed instructions on how to use the WQX web template. While use of the template will allow jurisdictions to automate the data submission process (e.g., mapping data to domains) to make future submissions much easier, use of the WQX web template for submitting data is optional. The EPA will work with jurisdictions to revise the data elements to be collected and discuss ways to extract data directly from available state databases using tools such as web services to minimize their reporting burden.
- Send data request to respondents and respond to questions from jurisdictions.
- Convert data into a WQX-compatible format, import data into WQX web, address data import errors, and export the WQX-compatible data file through CDX to WQX.

5(b) Collection Methodology and Management

All state, territorial, or tribal respondents on the mailing list developed and maintained by EPA will receive email requests to voluntarily provide new fish tissue data. The EPA periodically, and at least annually, checks in with fish advisory program managers to ensure we have the correct contacts listed on EPA’s Fish Program website. The transmittal emails will explain the purpose of the data collection effort, that it is voluntary, and provide instructions on how to submit the data to EPA. Respondents will be asked to enter their fish tissue data into the WQX web biological template (an Excel spreadsheet) and either load it to WQX data system or provide the data in any other electronic format available except PDF to the EPA for

incorporation into the WQX database. As a courtesy, email reminders will be sent to respondents who have not returned the requested information. An example transmittal email request is included in Appendix C and the WQX web biological template is available at https://www3.epa.gov/storet/wqx/wqxweb_downloads.html. Use of this template is optional. States, territories and tribes have the flexibility to submit their data to the EPA in the manner that is most convenient and efficient for them or to choose not to participate.

The EPA will ensure the accuracy and completeness of collected information by reviewing each dataset submitted to EPA for upload into WQX. The WQX data upload process will also provide a secondary review on the completeness of the data with the WQX data standards. Data reviews for accuracy and completeness will follow EPA's quality guidance (e.g., *Guidance for Quality Assurance Project Plans*, EPA QA/G-5, and *Guidance for Evaluating and Documenting the Quality of Existing Scientific and Technical Information*) and a project-specific quality assurance plan. Fish tissue data will not be added to the existing database if it does not meet the minimum data requirements for loading in WQX and/or agreed to by the state and tribal fish advisory programs. Fish tissue data will be reformatted as necessary to ensure successful upload into WQX.

Fish tissue data will be available to the public by searching the Water Quality Portal application at <https://www.waterqualitydata.us/>. Fish Advisories will only be accessible from links to state, territorial and tribal advisory programs on the EPA's Fish Program website at <https://www.epa.gov/fish-tech/fish-advisory-contacts-and-partners>.

5(c) Small Entity Flexibility

Because fish tissue information requested is not available online, no alternatives have been found to be more cost effective than direct solicitation of the state health departments or other state, territorial, or tribal entities responsible for issuing fish advisories and that generate this information as a matter of public information for distribution to their residents. No additional gathering of information is required by the state/tribal/territorial health departments or other entities. "Small Governmental Jurisdictions" (defined for the purpose of this information collection as a government of a state, territory or tribe having a population of less than 50,000) may be included in this data request.

The submission of fish tissue data is voluntary. Thus, smaller entities that cannot provide the staff and resources to respond to EPA's data request are not required to do so. Identification of such smaller entities that do not initially respond will permit the EPA to develop options to assist these smaller entities. Options may include additional time for responding, simplifying the response procedures, or providing EPA or contractor assistance in completing the data request. The jurisdictions have been providing data electronically, which is an easier and more effective way for transmitting and receiving this information.

5(d) Collection Schedule

Requests for fish tissue data will be made at least once annually by the EPA. While submission of the requested data is voluntary, EPA may send up to two courtesy reminders by e-mail to nonrespondents. In addition, EPA may make follow-up telephone calls to nonrespondents to determine what, if any, assistance they need to complete the voluntary data request. If fish tissue data are not submitted within 60 days, the data will be considered unobtainable. Data will be processed, reviewed, analyzed and summarized with input from these jurisdictions.

6. Estimating the Burden and the Cost of the Collection

6(a) Estimating Respondent Burden

The EPA considered its previous burden estimates for collecting fish tissue and fish advisory information and revised them based on responses received from three states (see section 39(c)). (The annual respondent burden and cost presented in Table 1 reflects the estimated average annual labor hours and costs, calculated to occur during the 3-year OMB-approved period of this ICR).

- Labor hours are based on initial assumptions that up to 100 potential respondents will be asked to participate in the survey annually. Thus, the total number of surveys that might be processed during this ICR is 300 (3-year approval period).
- Senior-level managers (e.g., director, chief) are most likely to receive the data request and review instructions; however, it is anticipated that a lower-level technical staff member would provide the fish tissue data electronically to the EPA. Therefore, the average annualized respondent hour burden to review instructions is 0.50 hours, as shown below.

$$(0.10 \text{ hour--manager/year} + 0.40 \text{ hour--technician/year}) = 0.50 \text{ hours}$$

- The amount of time needed to compile the fish tissue data for submission may vary by jurisdiction depending on the number of years of data being provided and the amount of available fish tissue data based on the frequency of fish tissue monitoring and number chemicals analyzed in fish tissue. For the purposes of this ICR, the EPA estimates (based on the responses from three states), that jurisdictions may require on average 5.2 hours to enter data into the WQX web biological template. The information requested is compiled by each jurisdiction for the public record; hence little, if any, additional time will be needed to gather the information. We estimate that 5.2 hours may be needed each year to compile fish tissue data as shown below.

$$(0.2 \text{ hour--manager/year} + 5.0 \text{ hour--technician/year}) = 5.2 \text{ hours}$$

- Respondents have been submitting their fish tissue data electronically for the past several years and will require time to prepare a transmittal email to submit their data for the EPA to upload to WQX or to notify EPA that their data were directly uploaded in WQX. We estimate that 0.08 hour--technician/year will be needed each year to email the data to the EPA.

6(b) Estimating Respondent Costs

The following resources and assumptions were made to estimate respondent costs for this information collection:

(i) Estimating Labor Costs

- Labor rates were obtained from the Bureau of Labor Statistics' Employer Costs for Employee Compensation – December 2017 (USDLE-17-0451, March 20, 2018) at <http://www.bls.gov/news.release/pdf/ecec.pdf>, and the following categories were used:

Manager (White collar: Executive, administrative, and managerial)	\$38.30/hour
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Technical (White collar)

\$27.52/hour

A benefits/overhead multiplication factor of 1.6 was used to obtain the total cost of employment for state (or other entity) respondents.

(ii) Estimating Capital and Operations and Maintenance Costs

- No capital/start-up costs are anticipated for the jurisdictions responding to the data request because they already collect the information requested for the public record.
- No operations and maintenance (O&M) cost are anticipated. Jurisdictions already maintain the information requested in this collection for the public record and will submit this information to the EPA electronically. Currently, all jurisdictions provide these data via email.

6(c) Estimating Agency Burden and Cost

Agency burden is estimated based on the assumption that less than 10 percent of the labor hours per year for each activity will be work done by the EPA and the remaining labor hours per year will be work done by a contractor. In addition, the EPA management oversight of work performed by technical staff is estimated to require 10 percent of the labor hours for one activity in Table 2.

Federal employee rates were obtained from the 2018 OPM General Schedule (GS) Salary Table for the Washington, DC, area for the midpoint (i.e., Step 5) of each salary grade (Available at the http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf), and the following categories were used:

Manager (GS 15)	\$73.20/hour
Technical (GS 13)	\$52.66/hour

A benefits/overhead multiplication factor of 1.6 was used to obtain the total labor cost for the EPA.

There are no capital/startup costs anticipated for the Agency.

O&M costs are anticipated for the Agency for revising the mailing list and transmittal letter with instructions; and for storing and archiving fish tissue data. Table 2 includes the estimated costs for each year of the ICR period. The following resources and assumptions were used to prepare the burden estimate for each activity:

- Preparation of the mailing list and a tracking database is estimated based on initial assumptions that up to 100 potential respondents nationwide will be sent a request for fish tissue data each year. Agency labor includes identifying potential respondents and sources for contact information (name, agency, address, phone number, fax number, and e-mail address) and is estimated to take 0.04 hours per respondent. O&M costs include contractor services to revise the mailing list and the tracking database, and enter and verify contact information, based on approximately 0.2 hours per respondent, with an estimated rate of \$95.00/hour (labor, overhead, and other direct costs). Agency labor and contractor service estimates are based on an estimated 50 edits to the respondent contact names and addresses annually. It is not likely that the number of respondents will change significantly. Because

the contact information will likely only need to be entered once, the Agency labor and contractor services are divided by three to provide an annualized estimate for the ICR.

- To prepare the data request transmittal email with instructions for submitting fish tissue data EPA estimates 0.03 hours per respondent. Fixed O&M costs include 4 contractor hours per year to prepare and revise the transmittal email and instructions.
- The database for storing fish tissue data is already in place. No Agency or contractor labor for this activity is anticipated.
- Each year, the Agency will submit a request for fish tissue data that states, tribes, and territories have collected to determine their need to rescind, continue, or issue new advisories. The EPA's oversight of this activity is estimated to be 0.01 hours per respondent. Contractor services to send the request and respond to respondents' questions are estimated to be 0.02 hours per respondent per year.
- Data request activities may include sending e-mail reminders to nonrespondents and making telephone contacts with nonrespondents and respondents in situations where additional information is required for clarification, if needed; e-mailing acknowledgment of materials that are received; and reviewing data for completeness and accuracy of responses. The EPA estimates that it will not be involved in these operations except for minor oversight (0.02 hours per respondent per year). Contractor services to perform these operations are based on 0.5 hour per respondent per year.
- The EPA expects that new fish tissue data will be provided electronically by respondents. Fish tissue data submitted to EPA for uploading into the WQX will have to be reviewed and if necessary reformatted for uploading in WQX. The EPA estimates that it will not be involved in these operations except for minor oversight (0.03 hours per respondent per year). Contractor services to enter data for those respondents are expected to be 3 hours per respondent per year. Contractor services to reformat fish tissue data files for all respondents are expected to be 4 hours per respondent per year and contractor services for reviewing fish tissue data are estimated to be 2 hours per respondent.
- Data obtained from the survey will be stored on the EPA servers. The EPA will provide technical oversight to ensure that data storage meets its requirements and program objectives. Labor is estimated at 0.02 hours per respondent per year. Fixed O&M costs include an estimate for computer equipment maintenance for this program of \$1,000 per year. O&M costs for contractor services to maintain the database and perform troubleshooting, if needed, estimated at \$5,000 per year.

Table 1. Annual Respondent Burden and Cost

Information Collection Activity	Hours and Costs Per Respondent (Years 1-3)						Total Hours and Costs (Year 1)			Total Hours and Costs (Year 2)			Total Hours and Costs (Year 3)		
	Mgr. Hours at \$38.30/ Hour	Tech. Hours at \$27.52/ Hour	Resp. Hours/ Year	Labor Cost per Respondent/ Year ¹	Capital Start-Up Cost	O&M Cost	No. of Resp.	Total Resp. Hours/ Year	Total Resp. Cost/Year	No. of Resp.	Total Resp. Hours/ Year	Total Resp. Cost/Year	No. of Resp.	Total Resp. Hours/ Year	Total Respond. Cost/Year
Review instructions for fish tissue data request	0.10	0.40	0.50	\$23.74	\$0.00	\$0.00	100	50	\$2,374.00	100	50	\$2,374.00	100	50	\$2,374.00
Compile fish tissue data	0.20	5.00	5.20	\$232.42	\$0.00	\$0.00	100	520	\$23,242.00	100	520	\$23,242.00	100	520	\$23,242.00
Prepare transmittal email to submit data	0.00	0.08	0.08	\$3.52	\$0.00	\$0.00	100	8	\$352.00	100	8	\$352.00	100	8	\$352.00
Subtotals	0.30	5.48	5.78	\$259.68	\$0.00	\$0.00	Varies²	578	\$25,968.00	Varies²	578	\$25,968.00	Varies²	578	\$25,968.00

¹Labor cost per respondent includes a benefits/overhead multiplication factor of 1.6.

²Calculations are based on the total number of respondents but actual responses may vary since survey is voluntary.

Information Collection Activity	Hours Burden and Cost (Year 1)							Total Hours and Costs				
	Mgr. Hours at \$73.20/ Hour	Tech Hours at \$52.66/ Hour	Agency Hours per Resp./Year	Labor Cost per Resp./Year ¹	Capital/ Start-Up Cost	Fixed O&M Cost	Non_Fixed O&M Cost ²	Number of Resp.	Total Labor Cost/Year	Total O&M (fixed and non-fixed)	Total Agency Hours/Year	Total Agency Cost/Year
Prepare mailing list and tracking database	0.00	0.04	0.04	\$3.37	\$0.00	\$0.00	\$19.00	100	\$337.00	\$1,900.00	4.00	\$2,237.00
Prepare data request transmittal email and instructions for data submission	0.01	0.02	0.03	\$2.86	\$0.00	\$380.00	\$0.00	100	\$286.00	\$380.00	3.00	\$666.00
Send data request; answer respondents' questions	0.00	0.01	0.01	\$0.84	\$0.00	\$0.00	\$1.90	100	\$84.00	\$190.00	1.00	\$274.00
Record receipt of tissue data received; send reminders; perform follow-up and quality control activities	0.00	0.02	0.02	\$1.69	\$0.00	\$0.00	\$47.50	100	\$169.00	\$4,750.00	2.00	\$4,919.00
Enter fish tissue data into WQX, reformat tissue data and review data entries	0.00	0.03	0.03	\$2.53	\$0.00	\$0.00	\$285.00	100	\$253.00	\$28,500.00	3.00	\$85,753.00
							\$380.00	100		\$38,000.00		
							\$190.00	100		\$19,000.00		
Store the fish tissue data	0.00	0.02	0.02	\$1.69	\$0.00	\$6,000.00	\$0.00	100	\$169.00	\$6,000.00	2.00	\$6,169.00
Subtotals	0.01	0.14	0.15	\$12.98	\$0.00	\$6,380.00	\$923.40	Varies	\$1,298.00	\$98,720.00	15.00	\$100,018.00

Table 2. Agency Burden and Cost

¹Labor cost includes a benefits/overhead multiplication factor of 1.6.

²Includes costs of contractor services and postage.

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

The respondent universe for fish tissue data collection activities for this ICR is calculated based on a total number of 300 surveys to be completed during the 3-year ICR period for an average of up to 100 respondents per year (representing fish advisory contacts from 50 states, District of Columbia, the Great Lakes Indian Fish & Wildlife Commission, four U.S. territories, and 44 Native American Tribes). The number of respondents involved in each activity varies and not all respondents may complete each activity.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

One respondent table consisting of burden and cost for the respondent groups discussed above was prepared for this ICR.

Total Estimated Respondent Burden and Cost Summary

Technical and Financial Requirements	Number of Respondents	Number of Activities	Total Hours per Year	Total Labor Cost per Year	Total Annual Capital Costs	Total Annual O&M Costs	Total Annual Labor Costs
Year 1	100	3	578	\$25,968.00	\$0.00	\$0.00	\$25,968.00
Year 2	100	3	578	\$25,968.00	\$0.00	\$0.00	\$25,968.00
Year 3	100	3	578	\$25,968.00	\$0.00	\$0.00	\$25,968.00
TOTAL	300	9	1,734	\$77,904.00	\$0.00	\$0.00	\$77,904.00
AVERAGE	100	3	578	\$25,968.00	\$0.00	\$0.00	\$25,968.00

(ii) The Agency Tally

The Agency and contractor tables are summarized in the following table.

Total Estimated Agency Burden and Cost Summary

Technical and Financial Requirements	Number of Respondents	Number of Activities	Total Hours per Year	Total Labor Cost per Year	Total Annual Capital Costs	Total Annual O&M Costs	Total Annual Labor Costs
Year 1	100	6	15	\$1,298.00	\$0.00	\$98,720.00	\$100,018.00
Year 2	100	6	15	\$1,298.00	\$0.00	\$98,720.00	\$100,018.00
Year 3	100	6	15	\$1,298.00	\$0.00	\$98,720.00	\$100,018.00
TOTAL	300	18	45	\$3,894.00	\$0.00	\$296,160.00	\$300,054.00
AVERAGE	100	6	15	\$1,298.00	\$0.00	\$98,720.00	\$100,018.00

(iii) Variations in the Annual Bottom Line

A significant decrease in the collection activities and the burden and costs per respondent is anticipated during the period of this ICR.

6(f) Reasons for Change in Burden

There is a 69 percent decrease to the respondent average annual burden hours from the currently approved ICR (from 1,884 to 578), and a 64 percent decrease to the respondent average annual cost from the currently approved ICR (from \$73,116 to \$25,968). The decrease is due to the EPA no longer requesting fish advisory information as well as revised hourly burden estimates.

6(g) Burden Statement

The annual public reporting and record keeping burden for this voluntary collection of information is estimated to average 5.78 hours per respondent. 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 requirement; 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. These numbers for the EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the EPA'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, the EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2014-0350, which is available for public viewing at the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Avenue, NW, Washington, DC 20460. 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. An electronic version of the public docket is available online for viewing at <http://www.regulations.gov>. Use <http://www.regulations.gov> 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. Once in the system, select "search," then type 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, DC 20503, Attention: Desk Office for EPA. Please include EPA Docket ID (EPA-HQ-OW-2014-0350) and OMB Control Number (2040-0226) in any correspondence.