

# Supporting Statement for EPA ICR 2470.02

## 1. Identification of the Information Collection

### 1(a) Title:

Technical Assistance Needs Assessments (TANAs) at Superfund Remedial or Removal Sites, EPA ICR 2470.02, OMB Control Number 2050-0211.

### 1(b) Abstract:

ICR 2050-0211 addresses Federally-conducted community involvement for remedial activities at sites on the National Priority List (Superfund sites) or for removal actions lasting 120 days or longer. This ICR covers specifically the usage of TANAs with members of the impacted community in order to determine how the community is receiving technical information about a site; whether the community needs additional assistance in order to understand and respond to site-related technical information; and whether there are organizations in the community that are interested or involved in site related issues and capable of acting as an appropriate conduit for technical assistance services to the affected community. The TANA will help ensure the community's needs for technical assistance are defined as early in the remedial/removal process as possible and enable meaningful community involvement in the Superfund decision-making process. Additionally, the TANA process produces a blueprint for designing a coordinated effort to meet the community's needs for additional technical assistance while minimizing the overlap of services provided.

## 2. Need for and Use of the Information Collection

### 2(a) Need/Authority for Collection:

TANAs are not required by statute or regulation; however, they are strongly recommended whenever an impacted community may require additional technical assistance. EPA believes involvement of the members of the community surrounding a Superfund site is critical to ensuring effective site cleanups.

#### *What information will be collected?*

The TANA will identify unaddressed technical assistance needs relating to the remedial/removal activities occurring at a given site, including non-advocacy information assistance and expertise; community education needs; organizational capacity-building assistance; and mediation or conflict resolution services.

#### *From whom will the information be collected?*

When the TANA is being conducted concurrently with the Community Involvement Plan (CIP) community interviews, the Community Involvement Coordinator (CIC) should identify interviewees by using the *Community Interviews* tool and conduct the TANA interviews with a smaller number of individuals who can help define the community's specific needs. TANA interviewees may include state and local government officials, a Potentially Responsible Party (PRP) representative (if applicable), and community members who have expressed a specific interest in, or knowledge of, the community's technical assistance needs (including but not limited to those participating in the site's Technical Assistance Grant (TAG), Community Advisory Group (CAG), or Technical Assistance Services for Communities (TASC)). The CIC should make every effort to ensure all affected stakeholder groups are represented in the TANA interviews.

If the TANA is being conducted after the CIP community interviews have been completed, the CIC may select interviewees from those participating in the original community interviews and include others who

may be able to define the community's potential technical assistance needs. Given the specific nature of the TANA, eight to ten persons are generally expected to be interviewed. If the TANA is conducted concurrently with the CIP community interviews, this number may be greater. The interviews will be targeted towards those individuals requesting additional support on technical issues (e.g., inquiring about site documents to review.)

*How will the information be collected?*

The interviews associated with the TANA may be one of the first opportunities the EPA has to engage with community members one-on-one. Remedial Project Managers (RPMs) and On-Scene Coordinators (OSCs) accompany the CIC to learn firsthand about the community member's concerns. Whenever a contractor conducts the TANA interviews, EPA personnel will be present. The interviewer will ask each stakeholder a series of questions, with the responses being documented. The stakeholder interview process should incorporate additional questions or request supplemental information as needed. The TANA interviews may be conducted either in-person or over the phone.

CICs can use contractor support to prepare for and conduct the TANA. The contractor support will be utilized judiciously and may be useful for documenting the interviews and summarizing notes from individual interviews. The CIC usually is responsible for summarizing the interviews into a final TANA summary (succinct, 4-6 page document).

*How frequently will the information be collected?*

The TANA can be conducted concurrently with the initial *Community Interviews* administered for development of a CIP or at a later date if the technical assistance needs of the community cannot be adequately defined by community members at that time. Conducting the TANA concurrently with the CIP community interviews can help minimize EPA staff time, defray costs and reduce the administrative/time burden placed on community members. The CIC can conduct a TANA at any time during the Superfund remedial process if it becomes evident that the technical assistance needs of the community are not being effectively addressed through existing technical assistance mechanisms. TANAs will only be conducted at sites where communities have unaddressed technical assistance needs and most frequently once during the remedial/removal process.

2(b) Practical Utility/Users of the Data:

*What will the information be used for?*

A TANA will aid the CIC and the RPM or OSC in determining the technical assistance needs of a community affected by a given site. This assessment will provide the Agency with a detailed record of potentially unmet technical assistance needs and provide a working document from which the most appropriate forms of informal and formal technical assistance can be identified and provided to the community. One of the additional objectives for conducting a TANA is to avoid unnecessary duplication of technical assistance provided to a community through EPA funding vehicles and via university and nonprofit partners.

*Will the information be shared with any other organizations inside or outside EPA?*

The TANA will enhance opportunities for EPA to cooperate with other organizations (e.g., National Institute of Environmental Health Sciences (NIEHS) Superfund Research Program grantees, nonprofits providing capacity building assistance) with the shared goal of addressing a community's technical assistance needs. If appropriate, the TANA summary document may be shared with universities and nonprofits currently enrolled in the Partners in Technical Assistance Program (PTAP). Upon receipt of the TANA summary document, any PTAP members interested in providing non-advocacy technical assistance will contact the CIC responsible for the TANA in order to determine if collaborative technical assistance services are possible.

### **3. Non- duplication, consultations, and other ICR criteria**

#### 3 (a) Non- duplication:

There is no duplication as there are no other sources available to collect this information. In addition, the *Community Interviews* conducted for a CIP have been revised to incorporate questions in regard to whether a formal TANA should be conducted. The development of the technical assistance needs assessment questions were coordinated with a revision of the *Community Interviews* tool to ensure questions asked of community members were not duplicative.

#### 3 (b) Public Notice Required Prior to ICR submission to OMB:

The Paperwork Reduction Act requires that ICRs be made available to the public for comment prior to submission to OMB. This is done through two notices to the Federal Register. The first Federal Register Notice, which describes the ICR and provides numbers for burden hours and costs and solicits public comment, was published on September 19, 2018 under 83 FR 47335. A 60-day comment period was given, which closed on November 19, 2018 and no comments were received. The second Federal Register Notice will be published at the same time the ICR is submitted to OMB. This notice states that the ICR has been submitted and provides an abstract and final burden numbers.

#### 3 (c) Consultations:

EPA did not consult with members of the public per 5 CFR 1320.8(d)(1).

#### 3 (d) TANA and other Community Interview Questions:

The TANA was written to specifically complement interviews conducted to develop or revise a CIP. Definitive questions (per ICR 2050-0179) have been added to the *Community Interviews* tool guiding the CIC to only conduct a formalized TANA when an impacted community has unaddressed technical assistance needs and those needs are not expected to be effectively addressed through informal technical assistance provided directly by EPA staff (e.g., fact sheets, workshops, availability sessions, etc.). For the majority of sites, informal technical assistance will be sufficient to meet the needs of the community. Information collection through TANAs will be conducted with the minimal amount necessary to ensure the technical assistance needs of impacted communities are appropriately assessed and addressed.

#### 3 (e) General Guidelines:

The final TANA and resulting summary documents will be included in the official site file in the information repository. The site records are to be maintained for the duration of remedial responses at sites and for as long as necessary for litigation purposes. Responsibility for these files will continue beyond the three-year ICR period as cleanups typically take more than three years. This information collection contains no special circumstances that would conflict with the general guidelines in 5 CFR § 1320.5.

### 3 (f) Confidentiality:

The nature of the data being gathered as part of this information collection is not confidential. Lists of participants in community interviews and lists of attendees of public meetings are not confidential. Some data gathered during community interviews may not be releasable, however, due to privacy concerns.

### 3 (g) Sensitive Questions:

The information gathering activities discussed in this ICR generally do not involve any sensitive questions. No questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private are included in this information collection.

## **4. Respondents and Information requested**

### 4(a) Respondents

Respondents to this ICR are individual community members who may be impacted by a Superfund site or a removal action lasting 120 days or longer. These community members voluntarily participate in community involvement activities throughout the remedial phase of the Superfund process. State/local officials and potentially responsible parties might want to review and comment on the information collected from the community members.

### 4(b) Information requested

This ICR voluntarily requests information from community members at sites where the impacted community may have unaddressed technical assistance needs including but not limited to: non-advocacy information assistance and expertise; community education needs; organizational capacity-building assistance; and mediation or conflict resolution services.

### (i) Data items, including record-keeping requirements

#### Technical Assistance Needs Assessments

TANAs will be conducted by CICs when it is determined that a community impacted by a remedial or removal (activity lasting 120 days or longer) site has unaddressed technical assistance needs. TANAs are not required by statute or regulation and for most sites informal technical assistance (e.g., fact sheets, availability sessions, workshops, trainings, etc.) will be sufficient to meet the technical needs of a community and a formal TANA will not be necessary.

The interviews associated with the TANA may be one of the first opportunities the EPA has to engage with community members one-on-one. RPMs and OSCs are expected to accompany the CIC to learn firsthand about the community member's concerns. When the preliminary questions in the community interviews suggest the need to conduct a TANA, the CIC may conduct the TANA interviews with a smaller number of individuals who can help define the community's specific needs. TANA interviewees may include state and local government officials, a PRP representative (if applicable), and community members who have expressed a specific interest in, or knowledge of, the community's technical assistance needs. The CIC will make every effort to ensure all affected stakeholder groups are represented

in the TANA interviews. If the TANA is being conducted after the CIP community interviews have been completed, eight to ten persons are expected to be interviewed given the specific nature of the needs assessment.

The interviewer will ask each stakeholder a series of questions, with the responses being documented. The stakeholder interview process will incorporate additional questions or request supplemental information as needed. The interviews will be summarized into a succinct (4-6 page) summary document detailing the unaddressed technical assistance needs of the community. The CIC, RPM/OSC, and appropriate members of the Site Team will review the content of the summary document and distribute the final document to the community. The CIC will explore additional informal and formal (e.g., TAG grants, TASC contracts, or assistance provided by external universities and nonprofits) technical assistance options. The TANA summary document may be shared with external colleges, universities and nonprofits currently enrolled in the PTAP, if appropriate. The final TANA summary documents will be available at the site's information repository.

EPA expects approximately twenty-five TANAs to be completed at either remedial or removal sites in a given year. This estimate is based upon the number of TANAs conducted through contractor support at NPL sites from October 2015 – August 2018.

#### (ii) Respondent Activities

In participating in the remedial phase, community members may disclose information to EPA personnel during interviews. Community members may perform any or all of the following activities:

- Participate in interviews;
- Review the final TANA summary document;
- Meet with technical assistance providers (i.e., TAG coordinators, TASC work assignment managers, nonprofit staff, university technical assistance provider, etc.)

### **5. Information collected: Agency activities, collection methodology, information management**

#### 5(a) Agency activities

At any remedial or removal site where the impacted community may have unaddressed technical assistance needs, the Agency may conduct the following activities: TANA interviews, TANA summary document generation, coordinating technical assistance between the community and assistance providers.

#### 5(b) Collection methodology and management

The information collection methodology depends on the type of activity being conducted. TANAs will not require an extensive number of hours as eight to 10 persons per affected site are expected to be interviewed annually. It is preferable for the interviews to be conducted in person; however, phone interviews are advisable when travel funds or time are restrictive.

The activities reflected in this ICR do not lend themselves to automation because of the decentralized nature of each remedial/removal activity. These activities are site-specific and, therefore, are not conducive to mass data collection efforts. The use of improved information technology is not prohibited in any way.

#### 5(c) Small entity flexibility

Information collection from small entities (individual community members, community organizations, etc.) is primarily done on a voluntary basis. Since these respondents are providing information voluntarily, the Federal government is not placing any undue burden on small entities and does provide plenty of flexibility.

#### 5(d) Collection schedule

TANAs can be conducted concurrently with the initial *Community Interviews* administered for the development of a CIP or at a later date if the technical assistance needs of the community cannot be adequately defined by community members at that time. A TANA can be conducted at any time during the Superfund cleanup process if it becomes evident that the technical assistance needs of the community are not being effectively addressed through existing technical assistance mechanisms. A TANA is most effectively utilized when conducted as early as possible in the community engagement process.

### **6. Estimating the burden and cost of the Information Collection**

#### 6(a) Estimating respondent burden

Respondent burden estimates are calculated from an informal survey of CICs and EPA community involvement managers regarding the potential number of remedial/removal sites where the impacted community has unaddressed technical assistance needs which cannot be effectively addressed through informal technical assistance provided by the Agency. Additionally, TANAs conducted by EPA contractors were reviewed for estimating the time burden for community members and Agency personnel. The annual hours per activity figure is multiplied by the number of sites expected to be engaging in the activity every year. This calculation gives the total annual hours for all sites by activity.

The estimated number of respondents reported for this information collection is 250. This number is based upon an annual increase in the usage of TANAs through contractor support at NPL sites from October 2015 – August 2018. The estimated respondent burden is based on an annual average of approximately twenty-five remedial/removal sites requiring a TANA in a given year with ten interviewees per site.

#### (i) Community Burden Hours

All community burden hours are due to voluntary participation in the TANA interviews. The Paperwork Reduction Act (PRA) requires the inclusion of information gathering activities in which the community participates. These activities are those for which information is expressly collected from community members. The PRA (5 CFR part 1320, “Controlling Paperwork Burdens on the Public, FRN 8/29/1995, Sect. 1320.3 (h) (8)) excludes the following activities from the definition of information for the purpose of Information Collection Requests: attendance at public informational meetings or briefings, response to comments on EPA documents, participation in community groups for which EPA is not a sponsor, reading fact sheets, and making use of EPA open office hours. This ICR records estimated burden hours for community members to participate in TANA interviews.

EPA estimates that 10 people will be interviewed for one hour each at 25 remedial or removal (action lasting 120 days or longer) sites each year in the process of conducting TANAs. The total annual estimated burden for TANA interviews is 250 hours. As noted earlier, these hours include state/local government staff and possibly a responsible party if they wish to participate in the survey.

6(b) Estimating respondent costs

Respondent costs are divided into labor costs and other costs, which includes all operation and maintenance, non-labor, and capital costs. The methodology for calculating these costs for the three-year ICR period is addressed in detail below.

(i) Estimating labor costs

The hourly rate for community members who participate in Superfund remedial activities on a voluntary, and non-paid, basis is \$23.25. The value is based on the Bureau of Labor Statistics July 2018 data, which reports an average hourly wage of \$22.65 for “production, non-supervisory on private non-farm payrolls, seasonally-adjusted” employees. The recent trend in this category of BLS data is for the rate to increase approximately \$0.60 per year. Therefore, \$23.25 is the average rate over the three-year period of this ICR for all activities in which the community may participate. Labor costs for community activities represent hypothetical costs only.

(ii) Estimating capital, operations and maintenance, and other costs

Community members have no O&M, non-labor or capital costs.

(iii) Annualizing capital costs

No capital costs are incurred during the activities described in this ICR.

**Table 1: Estimated Costs to Communities (Voluntary Activities, not actually expended costs)**

<b>Activity</b>	<b>Total Activities at Sites/ Year</b>	<b>Hours per Activity per year</b>	<b>Hourly Labor Rate</b>	<b>Annual Labor Costs per Activity</b>	<b>Capital, O&amp;M, Non-labor Costs per Activity per Year</b>	<b>Total Annual Costs per Activity</b>	<b>Total Annual Labor Costs for all Sites*</b>	<b>Total Annual Capital, O&amp;M, Non-labor Costs for all Sites</b>	<b>Total Annual Costs for all Sites</b>
TANA Interviews	250	1	\$23.25	\$23.25	\$0	\$23.25	\$5,812	\$0	\$5,812

6(c) Estimating Agency burden and cost

Burden on EPA covered in the ICR includes those hours and costs incurred in the implementation of Community Involvement activities. These activities include preparing for and conducting TANAs with community members impacted by a remedial or removal site. Total number of activities and the Federal hours required to complete them are estimated by a group of Headquarters and Regional Community Involvement EPA employees. The total estimated annual burden hours placed on EPA for the TANA process is 700 (Table 2).

**Table 2: Estimated Burden Hours for Federal TANA process**

<b>Activity</b>	<b># of Sites</b>	<b># of Activities at each Site</b>	<b>Hrs. per Activity/ yr.</b>	<b>Annual Hrs. for Activity at a Site</b>	<b>Total Annual Hrs. for all Sites</b>
Preparing for TANA Interviews	25	1	3	3	75
Conducting TANA interviews	25	10	1	10	250
Creating TANA Summary Document	25	1	5	5	125
Coordinating Technical Assistance to Community	25	1	10	10	250
				<b>TOTAL</b>	<b>700</b>

Labor costs to EPA were calculated using the assumption that 100 percent of the labor of these activities would be conducted through technical staff. To determine the hourly wage, 50 percent of the value of a Step 5, GS-12 (\$34.54) and GS-13 (\$41.07) are summed (\$75.61) and then adjusted for locality pay using a factor of 1.20, which results in \$45.37. To further adjust for overhead, \$45.37 is multiplied by 1.6, which results in \$72.59. The annual labor cost for each activity that involves use of Federal hours is calculated using this labor rate. The total estimated annual costs EPA incurs for the TANA process is \$50,925 (Table 3).

**Table 3: Estimated Costs to the Federal Government for the TANA Process**

Activity	Total Activities at Sites	Hours per Activity per Year	Hourly Labor Rate	Annual Labor Costs per Activity *	Annual Capital Costs per Activity	Annual Non-Labor Cost per Activity	Annual O&M Costs per Activity	Total Annual Costs per Activity	Total Annual Labor Costs for all Sites*	Total Annual Capital Costs for all Sites	Total Annual Non-Labor Costs for all Sites	Total Annual O&M Costs for all Sites	Total Annual Costs for all Sites
Preparing for TANA Interviews	25	3	\$72.59	\$218	\$0	\$0	\$0	\$218	\$5,450	\$0	\$0	\$0	\$5,450
Conducting TANA interviews	250	1	\$72.59	\$73	\$0	\$0	\$0	\$73	\$18,250	\$0	\$0	\$0	\$18,250
Creating TANA Summary Document	25	5	\$72.59	\$363	\$0	\$0	\$0	\$363	\$9,075	\$0	\$0	\$0	\$9,075
Coordinating Technical Assistance to Community	25	10	\$72.59	\$726	\$0	\$0	\$0	\$726	\$18,150	\$0	\$0	\$0	\$18,150
												<b>TOTAL</b>	<b>\$50,925</b>

\*Rounded to the nearest whole dollar.

6(d) Estimating the respondent universe and total burden and cost

The number of sites where a TANA may be conducted over the three-year period of the ICR is based upon the number of TANAs conducted through contractor support at NPL sites over the past three years. The number of community members involved at each will site is expected to vary between eight to ten individuals. The total burden and cost to each respondent is a summation of all activities described in detail in previous sections of this document.

6(e) Bottom-line burden hours and cost tables

(i) Respondent tally

The total burden hours and costs displayed in the table below reflect the community members participating voluntarily at Superfund sites. Community costs of \$5,812 (Table 1) are all hypothetical and do not represent the actual expenditure of dollars because all participation is voluntary.

**Table 4: Total respondent Burden Hours and Costs**

<b>Respondent</b>	<b>Annual Burden</b>	<b>Annual Cost</b>	<b>Total 3 yr. Burden</b>	<b>Total 3 yr. Cost</b>
Communities	250	\$5,812	750	\$17,436
<b>Total</b>	<b>250</b>	<b>\$5,812</b>	<b>750</b>	<b>\$17,436</b>

(ii) Agency tally

The total burden and costs represented in the following table is the amount EPA expects to spend directly in preparing for and conducting TANAs with communities at Superfund sites.

**Table 5: Total Federal Agency Burden Hours and Costs**

<b>Respondent</b>	<b>Annual Burden</b>	<b>Annual Cost</b>	<b>Total 3 yr. Burden</b>	<b>Total 3 yr. Cost</b>
Federal-Community Activities	700	\$50,925	2,100	\$152,775
<b>Total</b>	<b>700</b>	<b>\$50,925</b>	<b>2,100</b>	<b>\$152,775</b>

(iii) Variations in the annual bottom line

Variations to the annual bottom line numbers may occur as TANA activities depend almost exclusively on the community needs at the site. EPA expects the relative number of annual activities to be similar in each year of the ICR period.

6(f) Reasons for change in burden

There is no projected change in burden from the initial ICR over the next three years.

6(g) Burden statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average one hour 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 purposes of collecting, validating, and verifying 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; 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. The OMB control numbers 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-SFUND-2012-0578, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Superfund Docket in 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 Superfund Docket is (202) 566-0276. An electronic version of the public docket is available at [www.regulations.gov](http://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-SFUND-2012-0578 and OMB Control Number 2050-0211 in any correspondence.