

**SUPPORTING STATEMENT FOR EPA'S  
INFORMATION COLLECTION REQUEST (ICR)  
UNDER TITLE I OF THE MARINE PROTECTION, RESEARCH, AND  
SANCTUARIES ACT**

**Prepared by**

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**Prepared by Oceans, Wetlands and Communities Division of the Office of Wetlands,  
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**SUPPORTING STATEMENT FOR THE COLLECTION OF INFORMATION  
UNDER TITLE I OF THE MARINE PROTECTION, RESEARCH, AND  
SANCTUARIES ACT**

**EPA ICR No. 0824.07**

**ICR OMB Control No. 2040-0008**

**ICR Title: Implementation of Title I of the Marine Protection, Research, and Sanctuaries Act**

**Introduction**

This document supports EPA's compliance with requirements of the Paperwork Reduction Act for the Marine Protection, Research, and Sanctuaries Act (MPRSA). The purposes of the Paperwork Reduction Act of 1980 (PRA) (P. L. 96-511) and implementing regulations (44 U.S.C. Chapter 35) are to: 1) minimize the federal paperwork burden for small businesses, state and local governments, and other individuals; 2) minimize the Federal government's cost of collecting, maintaining, using, and disseminating information; and 3) maximize the usefulness of information collected by federal agencies.

This Information Collection Request (ICR), "Implementation of Title I of the Marine Protection, Research, and Sanctuaries Act," is made by the Oceans, Wetlands and Communities Division in the Office of Water, EPA Headquarters. The proposed information collection activities are accomplished by the least burdensome and least costly means and are not duplicated by other sources.

EPA administers the MPRSA, as amended. The MPRSA is also referred to as the Ocean Dumping Act. The MPRSA regulates the dumping and transportation for the purpose of dumping of material into ocean waters. The collections of information described in this document derive from EPA's authorities under and responsibilities in implementing the MPRSA.

EPA plays a primary role in protecting and preserving our ocean and coastal resources from dumping at sea. The Oceans, Wetlands and Communities Division in the Office of Water at EPA Headquarters and the seven coastal EPA Regional Offices (Regions 1, 2, 3, 4, 6, 9, and 10) jointly administer EPA's Ocean Dumping Management Program. Ocean dumping cannot occur unless a permit is issued under the MPRSA. EPA is responsible for issuing ocean dumping permits for all materials except dredged material. The U.S. Army Corps of Engineers (USACE) is responsible for issuing ocean dumping permits for dredged material using EPA's ocean dumping criteria. Ocean dumping permits for dredged material (and federal projects involving ocean dumping of dredged material) are subject to EPA review and concurrence. EPA is also responsible for designating and managing ocean disposal sites for the disposal of wastes and other materials, and establishing Site Management and Monitoring Plans (SMMPs) for ocean disposal sites.

EPA regulations establish ocean dumping criteria (hereinafter the "Ocean Dumping Criteria") for the evaluation of MPRSA permit applications. The Ocean Dumping Criteria consider, among other things: the environmental impact of the dumping; the need for the dumping; the effect of the dumping on aesthetic, recreational, or economic values; land-based alternatives to ocean

dumping; and the adverse effects of the dumping on other uses of the ocean. The Ocean Dumping Criteria are codified in 40 CFR parts 227-228.

Congress vested EPA with the authority and discretion to issue ocean dumping permits for all materials except dredged material. The other materials for which EPA issues permits, and that are currently dumped in the ocean include human remains, vessels, and fish processing wastes. Section 101 of the MPRSA (33 U.S.C. 1411) prohibits all ocean dumping activities except those activities authorized by a permit. Dumping of some materials is prohibited by the statute and may not be permitted. Under MPRSA section 102, EPA can issue various types of permits: special, general, research (including incineration at sea),<sup>1</sup> or emergency permits. EPA may issue special permits to applicants seeking to dispose of materials in the ocean. EPA may issue a general permit for materials that will have a minimal adverse environmental impact and are generally disposed of in small quantities. EPA may issue research permits for the dumping of materials as part of a research project when it is determined that the scientific merit of the proposed project outweighs the potential environmental or other damage that may result from dumping. EPA may issue emergency permits only in situations where the material to be disposed poses “an unacceptable risk relating to human health and admits of no other feasible solution.” “Emergency” refers to situations requiring action with a marked sense of urgency but is not limited to circumstances requiring immediate action.

While not relevant to this ICR, USACE issues ocean dumping permits for dredged material (and conducts federal projects associated with ocean dumping of dredged material) using the Ocean Dumping Criteria, and dumping under those permits and federal projects are subject to EPA review and concurrence.

The United States is a Contracting Party to the London Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, 1972. The United States implements the London Convention through the MPRSA. In compliance with treaty obligations, the United States (through EPA and USACE) provides annual reports to the treaty organization regarding the ocean dumping of materials authorized over the preceding year.

Lastly, EPA works closely with USACE and the U.S. Coast Guard to implement the MPRSA. Compliance and enforcement of the MPRSA are the responsibilities of EPA, USACE, and the U.S. Coast Guard. EPA also works with the other federal agencies, as needed, on particular issues (e.g., the National Oceanic and Atmospheric Administration (NOAA) in mapping vessels disposed under the vessel disposal general permit).

### **Organization of Information Collection Request Statement**

This document follows the format for ICR outlined in the Information Collection Review Handbook (Office of Management and Budget, 1989) and the Instructions for Standard Form 83

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<sup>1</sup> For the purposes of this ICR, incineration at sea permits are included in the “research permit” category of MPRSA permits. Under 40 CFR 220.3(f), “permits for incineration of wastes at sea will be issued only as research permits until specific criteria to regulate this type of disposal are promulgated, except in those cases where studies on the waste, the incineration method and vessel, and the site have been conducted and the site has been designated for incineration at sea in accordance with the procedures of § 228.4(b) of this chapter. In all other respects the requirements of parts 220 through 228 apply.” The opportunity for research permits for incineration at sea excludes the incineration of industrial wastes, which may not be ocean dumped as a result of the Ocean Dumping Ban Act amendments to the MPRSA.

(revised version dated September 1983). No exceptions to this format are taken. Those topics identified in the Information Collection Review Handbook, which are not relevant to this application, are noted and the basis for this determination stated. EPA's Information Resources Management Policy Manual (July 1987), Regulation Development in EPA (September 1992), and EPA's Instructions for Preparing Information Collection Requests (June 1992) also guided the development of this document.

This ICR is organized into two chapters. Both chapters address activities that are subject to the requirements of the PRA. Chapters 1 and 2 address ocean dumping activities for materials other than dredged material.

- Chapter 1 analyzes activities associated with new MPRSA special, general, research, and emergency permits. In addition to the permits themselves, this chapter also includes reporting requirements associated with dumping of material for an emergency to safeguard life at sea, where no permit is required.
- Chapter 2 analyzes activities associated with the three existing general permits that have applicable collections of information within the meaning of the Paper Work Reduction Act. Currently, there are three existing general permits with applicable collections of information within the meaning of the Paperwork Reduction Act: 1) burial at sea general permit, 2) transportation and disposal of vessels at sea general permit, and 3) ocean disposal of marine mammal carcasses.

EPA has taken a conservative approach, specifically to overstate potential burden and costs, throughout this analysis, and all information collection and record keeping requirements are included in this analysis.

This ICR was developed based on program office knowledge of the process, a review of collections of information similar to those being called for under this ICR, a review of EPA regional practices in collecting information, a review of the literature on the ocean dumping program and, ultimately, by an independent review by four likely respondents.

# **Chapter 1. Supporting Statement for the Collection of Information for Special, General, Research, and Emergency Ocean Dumping Permits**

## **SECTION 1: Identification of the Information Collection**

### **1(a): Title of the Information Collection**

Collection of Information for Special, Research, Emergency, and new General (other than for Burial at Sea and for Vessel Disposal) Ocean Dumping Permits

### **1(b): Short Characterization/Abstract**

Chapter 1 of this ICR covers collections of information associated with new ocean dumping permits. This chapter is organized by each category of ocean dumping permit according to EPA's regulations:

- Special
- General (other than for burial at sea, vessel disposal at sea, and ocean disposal of marine mammal carcasses)
- Research
- Emergency

In addition to these permits, this chapter includes the following reporting requirements where no permit is required:

- Emergency to Safeguard Life at Sea

## **SECTION 2: Need for and Use of the Collection**

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

Section 104(e) of the MPRSA authorizes EPA to collect permit application information. The information collected is codified in 40 CFR 221.1 based on the category of permit sought (special, general, research, and emergency). EPA collects this information to ensure that ocean dumping is appropriately regulated and will not harm human health or the marine environment, based on applying the Ocean Dumping Criteria. To meet United States' reporting obligation under the London Convention, EPA also reports some of this information in the annual United States Ocean Dumping Report.

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

EPA uses ocean dumping information to make decisions regarding whether to issue or deny a permit. This information is also used to develop the conditions in ocean dumping permits issued by EPA in order to ensure consistency with the Ocean Dumping Criteria. EPA uses monitoring and reporting data to assess compliance with ocean dumping permits, including associated monitoring activities.

## **SECTION 3: Non-duplication, Public Notice, Consultations, and Other Collection Criteria**

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

All information requested from respondents under this ICR is required to ensure that material proposed for ocean dumping is appropriately regulated and does not harm human health or the marine environment, based on applying the Ocean Dumping Criteria. The information is not generally available from other sources.

### **3(b): Public Notice Required Prior to ICR Submission to the Office of Management and Budget (OMB)**

Public comments were previously requested via the Federal Register (83 FR 50363) on October 5, 2018, during a 60-day comment period. No comments were received.

### **3(c): Consultations**

The permits in this chapter occur infrequently and are on a case-by-case basis. Burden estimates for this chapter are based on best professional judgement. EPA consulted with one respondent to obtain input on the burden associated with the emergency permits. The consultation for an emergency permit was conducted with a representative from the U.S Army Corps of Engineers (USACE). Since USACE is a federal government agency, they do not qualify as an official MPRSA respondent, however, they are the only recent entity that was able to provide an estimate of the hourly burden and comment on the accuracy of the respondent wage rates. The respondent said that EPA's approach to calculating the burden estimate is accurate and that the costs conservative for the activities are described.

### **3(d): Effects of Less Frequent Collection**

The application is only filed once in order to obtain the benefit of a permit and less frequent filing (i.e., no application) would preclude EPA from providing the benefit.

### **3(e): General Guidelines**

The information collection activities discussed in this chapter of the ICR are fully consistent with all guidelines in 5 CFR § 1320.5(d)(2).

### **3(f): Confidentiality**

To the extent that information collection activities discussed in this chapter of the ICR require the submission of any confidential information, EPA ensures compliance with the Agency's confidentiality regulations. 40 CFR 2.201 et seq.

### **3(g): Sensitive Questions**

The information collection activities discussed in this chapter of the ICR do not require the submission of any sensitive information concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

## **SECTION 4: The Respondents and the Information Requested**

### **4(a): Respondents/SIC Codes**

Any private person or entity, or any officer, employee, agent, department, agency, or instrumentality of the federal government, of any state or local unit of government, or of any foreign government may apply for an MPRSA permit. This broad range of potential respondents precludes EPA from identifying particular respondents based on SIC/NAICS Codes.

### **4(b): Information Requested**

As described above, EPA seeks information necessary to evaluate a permit application, including reporting requirements such as records, reports, and monitoring information that may be prescribed as part of an ocean dumping permit.

#### ***i) Data Items for Permit Application:***

Pursuant to 40 CFR 221.1-221.2, and as part of the initial application, EPA requires all ocean dumping permit applicants to supply the following information:

- Name and address of applicant.
- Name of the person or firm transporting the material for dumping, the name of the person(s) or firm(s) producing or processing all materials to be transported for dumping, and the name or other identification, and usual location, of the conveyance to be used in the transportation and dumping of the material to be dumped, including information on the transporting vessel's communications and navigation equipment.
- Adequate physical and chemical description of material to be dumped, including results of tests necessary to apply the Ocean Dumping Criteria, and the number, size, and physical configuration of any containers to be dumped.
- Quantity of material to be dumped.
- Proposed dates and times of dumping.
- Proposed dump site, and, in the event the proposed dump site is not designated in subchapter H, detailed physical, chemical and biological information relating to the proposed dump site and sufficient to support its designation as a site according to part 228 of subchapter H.
- Proposed method of releasing the material at the dump site and means by which the disposal rate can be controlled, as required.
- Identification of the specific process or activity producing the material.
- Description of the manner in which the type of material proposed to be dumped has been previously disposed of by or on behalf of the person(s) or firm(s) producing such material.
- A statement of the need for the proposed dumping and an evaluation of short- and long-term alternative means of disposal, treatment or recycle of the material. Means of disposal shall include but is not limited to: landfill, well injection, incineration, spread of material over open ground; biological,

chemical or physical treatment; recovery and recycle of material, and storage. The statement shall also include an analysis of the availability and environmental impact of such alternatives.

- An assessment of the anticipated environmental impact of the proposed dumping, including but not limited to: the relative duration of the effect of the proposed dumping on the marine environment, navigation, living and non-living marine resource exploitation, scientific study, recreation and other uses of the ocean.

Under 40 CFR 222.2, after EPA notifies an applicant that its permit application is complete, EPA makes a tentative determination whether the proposed ocean dumping activity meets the Ocean Dumping Criteria. A final determination is made after the opportunity for a public hearing or after a hearing is conducted.

EPA manages each ocean dumping permit over the term of the permit. EPA's management role may involve reviewing periodic reports, site visits, and other measures on a case-by-case basis in compliance with 40 CFR part 224.

Each permittee must maintain complete records of the following information in compliance with 40 CFR 224.1:

- The physical and chemical characteristics of the material dumped pursuant to the permit.
- The precise times and locations of the dumping.
- Any other information required as a condition of the permit by EPA.

#### ***ii) Data Items for Emergency to Safeguard Life at Sea:***

Situations involving an emergency to safeguard life at sea are excluded from the ocean dumping regulations under 40 CFR 220.1(c). The exclusion, however, is subject to the reporting requirement contained in 40 CFR 224.2(b). The owner or operator of the vessel or aircraft from which ocean dumping occurred under 40 CFR 220.1(c)(4) must, as soon as feasible:

- Inform the Administrator, Regional Administrator, or nearest Coast Guard district of the incident.
- Within 10 days, file a written report to the Administrator or Regional Administrator with the following information.
  - The physical and chemical characteristics of the material dumped.
  - The precise times and locations of dumping.
  - Any other information required by the Administrator or the Regional Administrator.
  - A complete description of the circumstances under which the dumping occurred, including how human life at sea was in danger and how the emergency dumping reduced that danger.
- If the material dumped included containers, the vessel owner or operator shall immediately request the U.S. Coast Guard to publish in the local Notice



to Mariners the dumping location, the type of container, and whether the contents are toxic or explosive.

- Notify the Food and Drug Administration, Shellfish Sanitation Branch, Washington, DC 20204, as soon as possible.

## **SECTION 5: The Information Collected — Agency Activities, Collection Methodology and Information Management**

### **5(a): Agency Activities**

EPA collects the information submitted by applicants as part of an initial ocean dumping permit application under 40 CFR 221.1-221.2. After EPA issues an ocean dumping permit, EPA collects records and reports as described in 40 CFR 224.1-224.2.

### **5(b): Collection Methodology and Information Management**

EPA's collection activities begin with the receipt of an ocean dumping permit application. Applicants requesting general,<sup>2</sup> special, emergency, and research permits under section 102 of the MPRSA must submit a formal application to either EPA Headquarters or to the appropriate Regional Office, authorized by 40 CFR 220.4 to act on the application. Under 40 CFR 222.2(a), upon receipt of an initial application, the Administrator or the Regional Administrator, has 30 days to notify the applicant in writing whether or not the application is complete or whether additional information is needed.

Pursuant to 40 CFR 222.2(b), and after EPA provides notice that an application is complete, EPA makes a tentative determination to issue or to deny the permit. If EPA proposes to issue the permit, it also provides notice of:

- proposed time limitations, if any;
- proposed rate of discharge from the barge or vessel transporting the material;
- proposed dumping site; and
- a brief description of any other proposed conditions determined to be appropriate for inclusion in the permit.

EPA then develops the terms and conditions of the permit consistent with the ocean dumping regulations and finalizes the permit. Notice of tentative determination is required for every complete application for a general, special, and research permit. In the case of an emergency permit, the Administrator determines that the emergency poses an unacceptable risk relating to human health, that no other feasible solution exists, and that the public interest requires the issuance of an emergency permit as soon as possible. Notice of issuance of the emergency permit is published as soon as practicable after issuance. Upon receipt, and until a final determination to grant or deny a general, special, research or emergency permit, EPA may collect additional information from the applicant to make its decision.

EPA collects information related to ocean dumping permits and monitoring information to

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<sup>2</sup> EPA may issue a general permit upon application by an interested person or may be issue without such an application. 40 CFR 220.3(a).

determine compliance with permit conditions and to evaluate the impact of the disposal on the marine environment. These permits require the permittee to submit the information to the Administrator or the Regional Administrator. This information also helps EPA manage the dump site. All of the information pertaining to a permit will be stored in a database.

#### **5(c): Small Entity Flexibility**

The collections of information described in this chapter of the ICR will only affect a *de minimis* number of small entities. Since enactment of the Ocean Dumping Ban Act, amendment prohibiting the ocean dumping of industrial wastes, EPA has received very few ocean dumping permit applications from small entities. The small entities that do dump materials in the ocean are, for the most part, authorized under the general permits for burial at sea, vessel disposal at sea, and ocean disposal of marine mammal carcasses, none of which requires an individual application. The general permits for burial at sea, vessel disposal at sea, and ocean disposal of marine mammal carcasses are specifically discussed in Chapter 2. Given the lack of interest and inquiries regarding ocean dumping permits from small entities, this ICR is not excessively burdensome on small entities.

#### **5(d): Collection Schedule**

Permit applications for MPRSA special, general, research, and emergency permits occur on infrequent intervals, approximately 1 to 3 of each per every 10 years. The requirements for a permit application are described in 40 CFR part 222. If a permit is issued, or material is dumped for an emergency to safeguard life at sea, records and reporting are required according to 40 CFR 224.1-224.2.

## **SECTION 6: Estimating the Burden Hours and Cost of the Collection**

#### **6(a): Estimating Respondent Burden**

This section estimates the relative annual burden (time in hours) and burden per response for each permit category, as well as for emergencies to safeguard life at sea.

Information collection burden hours were reviewed by respondents who had previously participated in the permit application process during the ten-year period 2008-2017. The estimated burden hours reflect the burden (time in hours) that an individual respondent will require to complete an activity needed for an ocean dumping permit application. The level of effort estimates presented for these tables were reviewed by EPA staff and managers, all of whom have experience in assessing information collection work similar to that described in this chapter of this ICR. An effort has been made to consistently use conservative estimates.

In summary, the estimated burden per respondent to complete an application and reporting requirements is 274 hours for a special permit, 54 hours for a new general permit, 137 hours for a research permit and 597 hours for an emergency permit. The estimated burden per respondent to complete the necessary reporting requirements for an emergency to safeguard life at sea is 7 hours. The total burden per year was calculated by multiplying the burden hours per response by the number of respondents, which corresponds to the number of permit applications the EPA expects per year. This analysis is shown in Tables 2 through 6. See

section 6(d) of chapter 1 of this supporting statement for a description of how the respondent numbers (i.e., respondent universe) were estimated.

**6(b): Estimating Respondent Costs**

To estimate the labor costs, EPA used labor and cost-rate data listed on the U.S. Bureau of Labor Statistics (BLS) Compensation Cost Trends homepage.<sup>3</sup> The BLS homepage includes links to publications and reports related to labor costs by category. Given the broad range of potential respondents, EPA used average rates for the following three general respondent occupation categories to derive its burden and cost estimates:

- Management occupations<sup>4</sup> (Management)
- Environmental scientists<sup>5</sup> (Technical)
- Office and administrative support occupations<sup>6</sup> (Clerical)

EPA used the hourly figures listed by BLS to approximate the labor burdened hourly rates for the occupational categories contained in this chapter of the ICR. These are listed in Table 1<sup>7</sup>.

**Table 1. Respondent Labor Costs: Hourly Loaded Wage Estimate of Affected Industry**

<b>BLS: Occupational Earnings (May 2017)</b>	<b>ICR Respondent Job Classification Titles</b>	<b>Hourly Rate (USD)</b>	<b>Benefits Factor</b>	<b>Loaded Hourly Rate (USD)</b>
Management Occupations	Management	\$57.65/hr	× 1.3	\$74.95/hr
Environmental Scientists	Technical	\$36.64/hr	× 1.3	\$47.63/hr
Office and administrative support occupations	Clerical	\$18.24/hr	× 1.3	\$23.71/hr

EPA predicts no respondent capital or start-up costs associated with the activities described in this chapter of the ICR. Non-labor operations and maintenance (O&M) include the cost of contracted services expected to be needed, where the cost is not tied to labor hours for the respondent or EPA. These costs include costs for photocopying, postage, telephone charges, as well as major activities associated with ocean monitoring or laboratory analyses.

<sup>3</sup> The BLS webpage is available on-line at: <http://www.bls.gov/ncs/ect/>.

<sup>4</sup> For management labor costs, EPA used the website titled Occupational Employment and Wages, May 2017, available online at: <http://www.bls.gov/oes/current/oes110000.htm>.

<sup>5</sup> For technical labor costs, EPA used the website titled Occupational Employment and Wages, May 2017, available online at: <http://www.bls.gov/oes/current/oes192041.htm>.

<sup>6</sup> For office and administrative support occupations, EPA used the website titled Occupational Employment and Wages, May 2017, available online at: <http://www.bls.gov/oes/current/oes430000.htm>.

<sup>7</sup> The above labor rate data are “fully burdened” or “hourly loaded” and include wages/salaries, and overhead and fringe benefits of the affected industry. EPA added 30 percent to the indicated average hourly wage to allow for overhead and fringe benefits. Only fully burdened BLS labor cost data are used in the analysis described in all chapters of the ICR.

O&M expenses listed in Tables 2 through 6 are predominantly internet (including email), printing, photocopy, postage, and related paperwork distribution expenses, as well as contracted services.

Respondent costs are compiled in Tables 2 through 6 for each ocean dumping permit category and for emergencies to safeguard life at sea. In summary, the estimated labor cost per respondent to complete an application and its corresponding reporting requirements is \$63,085.93 for special permits, \$25,169.69 for a new general permit, \$63,085.93 for research permits, and \$27,857.27 for emergency permits. The estimated cost per respondent to complete the reporting requirements for an emergency to safeguard life at sea is \$3,364.61. Annualized costs are based on the number of permits expected per year and include both labor costs and non-labor O&M costs.

**Table 2. Respondent Burden and Cost for Special Permits**

Special Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt \$74.95/hr	Technical \$47.63/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Response/s/Year	Total Hours/Year	Total Cost/Year (\$)
1. Application (40 CFR 221.1)									
a. Read regulations/guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	0.20	2.00	\$91.16
b. Plan Activities	20.00	100.00	20.00	140.00	\$6,736.34	\$0.00	0.20	28.00	\$1,347.27
c. Create/obtain new information	20.00	500.00	18.00	538.00	\$25,741.72	\$300,000.00*	0.20	107.60	\$65,148.34
d. Gather existing information	20.00	120.00	40.00	180.00	\$8,163.22	\$0.00	0.20	36.00	\$1,632.64
e. Complete application	16.00	100.00	60.00	176.00	\$7,385.04	\$10.00	0.20	35.20	\$1,479.01
2. Reporting Requirements (40 CFR 224.1-224.2)									
a. Read permit/regulations/ guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	0.20	2.00	\$91.16
b. Record dumping and monitoring activity information	20.00	150.00	40.00	210.00	\$9,592.18	\$0.00	0.20	42.00	\$1,918.44
c. Submit dumping and monitoring reports	10.00	60.00	40.00	110.00	\$4,555.85	\$10.00	0.20	22.00	\$913.17
<b>Subtotal (hours and costs)</b>	108.00	1044.00	222.00	1374.00	\$63,085.93	\$300,020.00	0.20*	274.80	\$72,621.19

\*Assumes the cost for five samples of material proposed for dumping to be collected and analyzed based on the ocean dumping regulations (bioassays for toxicity and bioaccumulation, chemical analyses for water quality) procedures in the ocean dumping testing manual.

**Table 3. Respondent Burden and Cost for General Permits**

General Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$74.95/hr	Technical \$47.63/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Application (40 CFR 221.1)									
a. Read regulations/guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	0.10	1.00	\$45.58
b. Plan Activities	10.00	50.00	10.00	70.00	\$3,368.17	\$0.00	0.10	7.00	\$336.82
c. Create/obtain new information	10.00	250.00	9.00	269.00	\$12,870.86	\$0.00	0.10	26.90	\$1,287.09
d. Gather existing information	10.00	60.00	20.00	90.00	\$4,081.61	\$0.00	0.10	9.00	\$408.16
e. Complete application	8.00	50.00	30.00	88.0	\$3,692.52	\$10.00	0.10	8.80	\$370.25
2. Reporting Requirements (40 CFR 224.1-224.2)									
a. Read permit/regulations/guidance	1.00	2.00	0.00	3.00	\$170.21	\$0.00	0.10	0.30	\$17.02
b. Record dumping and monitoring activity information	2.00	5.00	3.00	10.00	\$459.19	\$0.00	0.10	1.00	\$45.92
c. Submit dumping and monitoring report(s)	0.00	1.00	1.00	2.00	\$71.34	\$10.00	0.10	0.20	\$8.13
<b>Subtotal (hours and costs)</b>	42.00	425.00	75.00	542.00	\$25,169.69	\$20.00	0.10	54.20	\$2,518.97

**Table 4. Respondent Burden and Cost for Research Permits**

Research Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$74.95/hr	Technical \$47.63/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours / Year	Total Cost/Year (\$)
1. Application (40 CFR 221.1)									
a. Read regulations/guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	0.10	1.00	\$45.58
b. Plan Activities	20.00	100.00	20.00	140.00	\$6,736.34	\$0.00	0.10	14.00	\$673.63
c. Create/obtain new information	20.00	500.00	18.00	538.00	\$25,741.72	\$1,000,000.00*	0.10	53.80	\$102,574.17
d. Gather existing information	20.00	120.00	40.00	180.00	\$8,163.22	\$0.00	0.10	18.00	\$816.32
e. Complete application	16.00	100.00	60.00	176.00	\$7,385.04	\$10.00	0.10	17.60	\$739.50
2. Reporting Requirements (40 CFR 224.1-224.2)									
a. Read permit/regulations/guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	0.10	1.00	\$45.58
b. Record dumping and monitoring activity information	20.00	150.00	40.00	210.00	\$9,592.18	\$0.00	0.10	21.00	\$959.22
c. Submit dumping and monitoring reports	10.00	60.00	40.00	110.00	\$4,555.85	\$10.00	0.10	11.00	\$456.59
<b>Subtotal (hours and costs)</b>	108.00	1,044.00	222.00	1374.00	\$63,085.93	\$1,000,020.00	0.10	137.40	\$106,310.59

\* Assumes the cost for five samples of material proposed for dumping to be collected and analyzed based on the ocean dumping regulations (bioassays for toxicity and bioaccumulation, chemical analyses for water quality) procedures in the ocean dumping testing manual. This also includes assumed environmental oceanographic monitoring during research, including water and sediment sampling with associated chemical and biological testing.

**Table 5. Respondent Burden and Cost for Emergency Permits**

Emergency Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$74.95/hr	Technical \$47.63/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Application (40 CFR 221.1)									
a. Read regulations/guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	1.00	10.00	\$455.79
b. Plan Activities	10.00	50.00	10.00	70.00	\$3,368.17	\$0.00	1.00	70.00	\$3,368.17
c. Create/obtain new information	10.00	250.00	10.00	269.00	\$12,894.57	\$0.00	1.00	269.00	\$12,894.57
d. Gather existing information	10.00	60.00	20.00	90.00	\$4,081.61	\$0.00	1.00	90.00	\$4,081.61
e. Complete application	8.00	50.00	30.00	88.00	\$3,692.52	\$10.00	1.00	88.00	\$3,702.52
2. Reporting Requirements (40 CFR 224.1-224.2)									
a. Read permit/regulations/guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	1.00	10.00	\$455.79
b. Record dumping and monitoring activity information	10.00	20.00	10.00	40.00	\$1,939.21	\$0.00	1.00	40.00	\$1,939.21
c. Submit dumping and monitoring reports	5.00	10.00	5.00	20.00	\$969.61	\$10.00	1.00	20.00	\$979.61
<b>Subtotal (hours and costs)</b>	55.00	454.00	89.00	597.00	\$27,857.27	\$20.00	1.00	597.00	\$27,877.27

**Table 6. Respondent Burden and Cost for Emergencies to Safeguard Life at Sea**

Emergency to Safeguard Life at Sea - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$74.95/hr	Technical \$47.63/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses / Year	Total Hours/Year	Total Cost/Year (\$)
1. Reporting Requirements									
a. Read regulations/guidance	1.00	7.00	2.00	10.00	\$455.79	\$0.00	0.10	1.00	\$45.58
b. Record dumping and monitoring activity information according to 40 CFR 224.1	10.00	20.00	10.00	40.00	\$1,939.21	\$0.00	0.10	4.00	\$193.92
c. Submit report to EPA under 40 CFR 224.2(b)	5.00	10.00	5.00	20.00	\$969.61	\$10.00	0.10	2.00	\$97.96
<b>Subtotal (hours and costs)</b>	16.00	37.00	17.00	70.00	\$3,364.61	\$10.00	0.10	7.00	\$337.46



**6(c): Estimating Agency Burden and Cost**

EPA’s labor costs data associated with this chapter of the ICR reflect the pay scale rates for GS-9, GS-12, and GS-14 employees.<sup>8</sup> The salary rates for EPA’s labor costs apply to the Agency job classifications listed in Table 2 below for:

- GS-14 (Management)
- GS-12 (Technical)
- GS-9 (Clerical)

To arrive at the loaded hourly rates listed in Table 7, hourly rates were multiplied by 160% to reflect a fully loaded (wages + benefits) hourly rate.

**Table 7. Agency Labor Costs: Hourly Loaded Agency Wage Estimate**

ICR Agency Job Classification	January 2018 Annual GS Salary (Step 1)	Work Hours Per Year Factor	Benefits Factor	Loaded Hourly Rate
Management	GS-14, \$114,590	÷ 2,080	× 1.6	\$88.15/hr
Technical	GS-12, \$81,584	÷ 2,080	× 1.6	\$62.76/hr
Clerical	GS-9, \$56,233	÷ 2,080	× 1.6	\$43.26/hr

In summary, the estimated EPA burden per respondent for a special permit is 1,100 hours with a labor cost per respondent of \$68,113.02. The estimated burden per respondent for a general permit is 500 hours with a labor cost per respondent of \$31,967.31. The estimated burden per respondent for a research permit is 930 hours with a labor cost per respondent of \$56,233.77. The estimated burden per respondent for an emergency permit is 164 hours with a labor cost per respondent of \$10,533.56. The estimated burden per respondent to complete the requirements for an emergency to safeguard life at sea is 24 hours with a labor cost per respondent of \$1,541.50. Annualized burden and costs are based on the number of permits expected per year. This analysis is shown in Tables 8 through 12.

**Table 8. Agency (EPA) Burden and Cost for Special Permits**

<sup>8</sup> <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>. The salary scales contained in Table 2 were effective January 2018; EPA used Step 1 of the General Schedule (GS) salaries for the ICR analysis. The 2018 GS Locality Pay Tables can be found at <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/DCB.aspx>. The annual GS salary rates were converted to hourly rates according to instructions in Section 6(c) of the EPA ICR Handbook (12/96 version). Total salaries were divided by 2,080, which represent the average number of hours work in a calendar year, and then multiplied by a factor of 1.6. The benefits factor “multiplier” represents the standard government benefits multiplication factor. The loaded hourly rate listed in Table 2 reflects the true cost to the federal government to employ a federal worker for one hour.

Special Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hr	Technical \$62.76/hr	Clerical \$43.26/hr	Total Hours/ Response	Labor Cost/ Response	O & M Cost (\$)	Number Response s/ Year	Total Hours/ Year	Total Cost/ Year (\$)
1. Application									
a. Receive and review application information under 40 CFR 221.1 and issue of permit	100.00	500.00	100.00	700.0	\$44,518.69	\$10.00	0.20	140.00	\$8,905.74
b. Maintain records throughout the application process under 40 CFR Part 222	50.00	100.00	150.00	300.0	\$17,171.42	\$0.00	0.20	60.00	\$3,434.28
2. Reporting Requirements									
a. Collect reported information and review for consistency with permit / MPRSA requirements	20.00	40.00	20.00	80.0	\$5,138.32	\$10.00	0.20	16.00	\$1,029.66
b. Maintain reports and monitoring information for future reviews	5.00	10.00	5.00	20.0	\$1,284.58	\$0.00	0.20	4.00	\$256.92
<b>Subtotal (hours and costs)</b>	175.0	650.0	275.0	1,100.0	\$68,113.02	\$20.00	0.20	220.00	\$13,626.60

**Table 9. Agency (EPA) Burden and Cost for General Permits**

General Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hr	Technical \$62.76/hr	Clerical \$43.26/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)*	Number Responses /Year	Total Hours/Year	Total Cost/Year (\$)
1. Application									
a. Receive and review application information under 40 CFR 221.1 and issue permit	50.00	200.00	50.00	300.00	\$19,121.50	\$10.00	0.10	30.00	\$1,913.15
b. Maintain records throughout the application process under 40 CFR Part 222	25.00	50.00	25.00	100.00	\$6,422.90	\$0.00	0.10	10.00	\$642.29
2. Reporting Requirements									
a. Collect reported information and review for consistency with permit / MPRSA requirements	20.00	40.00	20.00	80.00	\$5,138.32	\$10.00	0.10	8.00	\$514.83
b. Maintain reports and monitoring information for future reviews	5.00	10.00	5.00	20.00	\$1,284.58	\$0.00	0.10	2.00	\$128.46
<b>Subtotal (hours and costs)</b>	100.00	300.00	100.00	500.00	\$31,967.31	\$20.00	0.10	50.00	\$3,198.73

**Table 10. Agency (EPA) Burden and Cost for Research Permits**

Research Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hr	Technical \$62.76/hr	Clerical \$43.26/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)*	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Application									
a. Receive and review application information under 40 CFR 221.1 and issue permit	80.00	300.00	100.00	480.00	\$30,204.38	\$10.00	0.10	48.00	\$3,021.44
b. Maintain records throughout the application process under 40 CFR Part 222	25.00	150.00	150.00	325.00	\$18,105.62	\$0.00	0.10	32.50	\$1,810.56
2. Reporting Requirements									
a. Collect reported information and review for consistency with permit / MPRSA requirements	25.00	50.00	30.00	105.00	\$6,639.18	\$10.00	0.10	10.50	\$664.92
b. Maintain reports and monitoring information for future reviews	5.00	10.00	5.00	20.00	\$1,284.58	\$0.00	0.10	2.00	\$128.46
<b>Subtotal (hours and costs)</b>	135.00	510.00	285.00	930.00	\$56,233.77	\$20.00	0.10	93.00	\$5,625.38

**Table 11. Agency (EPA) Burden and Cost for Emergency Permits**

Emergency Permit - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hr	Technical \$62.76/hr	Clerical \$43.26/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Application									
a. Receive and review application information under 40 CFR 221.1 and issue permit	25.00	50.00	25.00	100.00	\$6,422.90	\$10.00	1.00	100.00	\$6,432.90
b. Maintain records throughout the application process under 40 CFR Part 222	10.00	20.00	10.00	40.00	\$2,569.16	\$0.00	1.00	40.00	\$2,569.16
2. Reporting Requirements									
a. Collect reported information and review for consistency with permit / MPRSA requirements	5.00	10.00	5.00	20.00	\$1,284.58	\$10.00	1.00	20.00	\$1,294.58
b. Maintain reports and monitoring information for future reviews	1.00	2.00	1.00	4.00	\$256.92	\$0.00	1.00	4.00	\$256.92
<b>Subtotal (hours and costs)</b>	41.00	82.00	41.00	164.00	\$10,533.56	\$20.00	1.00	164.00	\$10,553.56

**Table 12. Agency (EPA) Burden and Cost for Emergency to Safeguard Life at Sea**

Emergency to Safeguard Life at Sea - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hr	Technical \$62.76/hr	Clerical \$43.26/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Reporting Requirements									
a. Collect reported information and review for consistency with permit / MPRSA requirements	5.00	10.00	5.00	20.00	\$1,284.58	\$10.00	0.10	2.00	\$129.46
b. Maintain reports and monitoring information for future reviews	1.00	2.00	1.00	4.00	\$256.92	\$0.00	0.10	0.40	\$25.69

Emergency to Safeguard Life at Sea - Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hr	Technical \$62.76/hr	Clerical \$43.26/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
<b>Subtotal (hours and costs)</b>	6.00	12.00	6.00	24.00	\$1,541.50	\$10.00	0.10	2.40	\$155.15

**6(d): Estimating the Respondent Universe**

The potential respondent universe consists of any “person,” as defined by the MPRSA, interested in applying for a new permit. The estimated number of respondents for the special, general (other than burial at sea and vessel disposal), research, and emergency permits, as well as the reporting requirements for an emergency to safeguard life at sea are based on historical data. Applications for these permits occur infrequently (< 1 per year) and in order for burdens and costs to be annualized, the respondent numbers are represented as a decimal.

The number of respondents for these permits was based on an estimate of permit applications expected per year, based on an average number of each permit issued during a previous ten-year time frame (2008-2017) in which data is available. The burden and cost for the general permit for the transportation and disposal of vessels and general permit for the burial as sea are not included in this section, as they are accounted for separately in Chapter 2. There was one new general permit issued during the time frame of interest for marine mammals; therefore, we will assume 1 new general permit will be issued per every 10 years or 0.1 per year. The same assumption is made for emergencies to safeguard life at sea. Three emergency permits were issued during the time frame of interest, creating a frequency of 10 per 10 years or 1.0 per year. There were zero research or special permits issued during the ten-year time frame of interest, and we used the frequency of 1 per 10 years or 0.10 per year as a precaution.

**6(e): Total Burden Hours and Cost Tables**

The total estimated ocean dumping burdens and costs associated with chapter 1 of the ICR are as follows:

1) Respondent

- Respondents per year: 1.50
- Total hours per year: 1,070.40
- Total labor cost per year: \$49,636.48
- Total annual O&M costs: \$160,029.00
- Total annual cost: \$209,665.48

1) Agency

- Respondents per year: 1.50
- Total hours per year: 529.40
- Total labor cost per year: \$33,130.42
- Total annual O&M costs: \$29.00

- Total annual cost: \$33,159.42

The total estimated ocean dumping burdens associated with Chapter 1 are summarized in Tables 13 and 14 for respondents and agencies, respectively.

**Table 13. Total Estimated Respondent Burden and Cost\* Summary**

<b>Permit:</b>	<b>Respondents Per Year</b>	<b>Total Hours Per Year</b>	<b>Total Labor Cost Per Year (\$)</b>	<b>Total Annual O&amp;M Costs (\$)</b>	<b>Total Annual Cost (\$)</b>
Special	0.20	274.80	\$12,617.19	\$60,004.00	\$72,621.19
General (other than burial at sea and vessel disposal)	0.10	54.20	\$2,516.97	\$2.00	\$2,518.97
Research	0.10	137.40	\$6,308.59	\$100,002.00	\$106,310.59
Emergency Permit Dumping	1.0	597.00	\$27,857.27	\$20.00	\$27,877.27
Emergency Dumping	0.10	7.00	\$336.46	\$1.00	337.46
Total	1.50	1,070.40	\$49,636.48	\$160,029.00	\$209,665.48

\* These data are from Tables 2 through 6 of this ICR

**Table 14: Total Estimated Agency (EPA) Burden and Cost\* Summary**

<b>Permit:</b>	<b>Respondents Per Year</b>	<b>Total Hours Per Year</b>	<b>Total Labor Cost Per Year (\$)</b>	<b>Total Annual O&amp;M Costs (\$)</b>	<b>Total Annual Cost (\$)</b>
Special	0.20	220.00	\$13,622.60	\$4.00	\$13,626.60
General (other than burial at sea and vessel disposal)	0.10	50.00	\$3,196.73	\$2.00	\$3,198.73
Research	0.10	93.00	\$5,623.38	\$2.00	\$5,625.38
Emergency Permit Dumping	1.00	164.00	\$10,533.56	\$20.00	\$10,553.56
Emergency Dumping	0.10	2.40	\$154.15	\$1.00	\$155.15
Total	1.50	529.40	\$33,130.42	\$29.00	\$33,159.42

\* These data are from Tables 8 through 12 of this ICR

### **6(f): Reasons for Change in Burden**

There is no significant increase in the burden for the permits covered in Chapter 1. When compared to the existing ICR, there is an increase in the Total Hours and a decrease in the Total Annual Cost. There is an increase of 281 hours and a decrease of \$14,735 in the total estimated respondent burden compared with the ICR currently approved by OMB. This increase is due to the number of reported permit applications over the past ten years and reflects updated reporting burden estimates. Specifically, since the issuance of the current



ICR, there were more Emergency Permits issued over the past ten years which increased the number of hours, and fewer Special Permits which decreased the cost..

**6(g): Burden Statement**

The annual public reporting and record keeping burden for this collection of information is 1,374.0 hours for a special permit, 542.0 hours for a new general permit, 1,374.0 hours for a research permit, and 597 hours for an emergency permit, per response. The estimated burden per respondent to complete the necessary reporting requirements for an emergency to safeguard life at sea is 70 hours per response. EPA is estimated to average 1,100 hours for a special permit, 500 hours for a general permit, 930 hours for a research permit, and 164 hours for an emergency permit, per response. EPA estimates an average of 24 hours to complete the requirements for an emergency to safeguard life at sea 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, 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 request for 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 request for 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 EPA's need for this information, the accuracy of the burden estimates, and 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 No. EPA-HQ-OW-2015-0613, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:00 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 Water Docket is (202) 566-2426. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). Use [www.regulations.gov](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 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, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number (EPA-HQ-OW-2015-0613) and OMB control number (2040-0008) in any correspondence.

## **Chapter 2. Supporting Statement for the Collection of Information for General Permits: Burial at Sea, Transportation and Disposal of Vessels, and Disposal of Marine Mammal Carcasses**

### **SECTION 1: Identification of the Information Collection**

#### **1(a): Title of the Information Collection**

Collection of Information for General Permits: Burial at Sea, Transportation and Disposal of Vessels and Disposal of Marine Mammal Carcasses

#### **1(b): Short Characterization/Abstract**

Chapter 2 of this ICR covers collections of information associated with three general permits. Specifically, this chapter addresses information collections associated with the general permits for (1) burial at sea, (2) transportation and disposal of vessels and (3) disposal of marine mammal carcasses.

### **SECTION 2: Need for and Use of the Collection**

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

Section 104(b) of the MPRSA authorizes the Administrator to prescribe reporting requirements for permits “as he [EPA] deems appropriate.” The information that EPA collects in the general permits for burial at sea, vessel disposal and marine mammal carcass disposal ensures that ocean dumping is appropriately regulated and will not harm human health or the marine environment, based on applying the Ocean Dumping Criteria. To meet United States’ reporting obligation under the London Convention, EPA also reports some of this information in the annual United States Ocean Dumping Report.

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

EPA uses monitoring and reporting data from permittees to assess compliance with ocean dumping permits, including associated monitoring activities.

### **SECTION 3: Non-duplication, Public Notice, Consultations, and Other Collection Criteria**

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

All information requested from respondents under this ICR is required to ensure that material proposed for ocean dumping is appropriately regulated and does not harm human health or the marine environment, based on applying the Ocean Dumping Criteria. The information is not generally available from other sources.

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

Public comments were previously requested via the Federal Register (83 FR 50363) on

October 5, 2018, during a 60-day comment period. No comments were received.

**3(c): Consultations**

EPA consulted with four respondents to obtain input on the burden associated with the burial at sea and transportation and disposal of vessels general permits. The consultations for burial at sea were conducted with one representative from the New England Burials at Sea, LLC and one representative from the U.S Coast Guard Auxiliary. Both contacts provided estimates of the hourly burden. During the consultations, respondents were also asked to comment on the accuracy of the respondent wage rates. EPA received feedback on the labor rate of the funeral director and, based on the response, increased its initial labor rate estimate accordingly. For the transportation and vessel disposal general permit, EPA consulted with a representative from Cape Cod Bay Scallop Fisheries, Inc. and a boat owner in Gloucester, MA who has disposed of a vessel under this general permit. EPA consulted with a representative of the EPA Regional office in New York regarding the use of the Marine Mammal general permit.

**3(d): Effects of Less Frequent Collection**

The collection of information described in this chapter of the ICR occurs only once per authorization: once after the burial has been conducted under the burial at sea general permit and once each time a general permittee seeks authorization under the general permit for transportation and disposal of vessels. Thus, collections cannot occur on a less frequent basis. The notification required under the burial at sea general permit is necessary to track burials at sea and enable EPA to evaluate impacts on human health or the marine environment. Information collected under the transportation and disposal of vessels general permit is necessary to ensure the dumping does not unreasonably endanger human health or the marine environment, or other uses of the ocean (such as fisheries and navigation), and to ensure the disposal is conducted in a safe manner. Collection of this information less frequently (i.e., not at all) would preclude EPA from accomplishing these purposes.

**3(e): General Guidelines**

The information collection activities discussed in this chapter of the ICR are fully consistent with all guidelines in 5 CFR § 1320.5(d)(2).

**3(f): Confidentiality**

To the extent that information collection activities discussed in this chapter of the ICR do require the submission of any confidential information, EPA ensures compliance with the Agency's confidentiality regulations 40 CFR 2.201 et seq.

**3(g): Sensitive Questions**

The information collection activities discussed in this chapter of the ICR do not require the submission of any sensitive information concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

## SECTION 4: The Respondents and the Information Requested

### 4(a): Respondents/SIC Codes

#### 1) *Burial at Sea*

Any private person or entity, or any officer, employee, agent, department, agency, or instrumentality of the federal government, of any state or local unit of government, or of any foreign government is eligible to use the burial at sea general permit. Funeral homes, mortuaries, cemeteries, and crematories (SIC 7261/NAICS 812200), and deep-sea passenger transportation (SIC 4481/NAICS 483112) are likely respondents for activities relevant to this chapter of the ICR related to burials at sea.

#### 2) *Vessel Disposal*

Any private person or entity, or any officer, employee, agent, department, agency, or instrumentality of the federal government, of any state or local unit of government, or of any foreign government is eligible to use the disposal of vessels general permit. Navigational services related to shipping (includes cargo salvaging, marine docking and undocking marine vessel services, marine salvaging services, marine vessel traffic reporting services (NAICS 488330)) and towing and tugboat services (SIC 4492/ NAICS 488330) are potential respondents for collections of information as described in this chapter of the ICR related to vessel disposals.

#### 3) *Disposal of Marine Mammal Carcasses*

Any officer, employee, agent, department, agency, or instrumentality of federal, state, tribal, or local unit of government, as well as any Marine Mammal Health and Stranding Response Program (MMHSRP) Stranding Agreement Holder, and any Alaskan Native, who already may take a marine mammal under the Marine Mammal Protection Act (MMPA) and Endangered Species Act (ESA), is eligible to use the general permit for ocean disposal of marine mammal carcasses.

### 4(b): Information Requested:

#### 1) *Burial at Sea*

Information collected by EPA related to the burial at sea general permit includes the following:

(i) *Name of the deceased:*

- Full name of the deceased.

(ii) *Date of the burial/scatter:*

- Date of the burial/scattering of the remains of the deceased.

(iii) *Type of remains (cremated or whole body):*

- Describe whether the remains of the deceased were either cremated or whole body.

(iv) *Latitude of burial/scatter:*

- The approximate latitude of the site at which the burial or scatter took place.

(v) *Longitude of burial/scatter:*

- The approximate longitude of the site at which the burial/scatter took place.

(vi) *Distance from land:*

- Confirm that the burial at sea was conducted at least 3 nautical miles (nm) from the baseline.

(vii) *Depth of water:*

- The approximate depth of water at which the burial/scatter took place.

(viii) *Vessel point of contact, name/address/phone/email:*

- At least one vessel point of contact, including the contact's name, address, phone number, and e-mail.

(ix) *Port of departure:*

- The port of departure from which the vessel carrying the remains departed.

(x) *Director or person(s) responsible for burial arrangements, name/address/phone/email:*

- Director or responsible person for the burial arrangements (if applicable), including at least one method of contacting this person.

(xi) *Whether the remains appear to rapidly sink below the surface:*

- Describe whether the remains of the deceased appeared to rapidly sink below the surface.

(xii) *EPA Region from which the vessel carrying the remains departed:*

- Report the EPA Region from which the vessel carrying the remains departed.

## **2) *Transportation and Disposal of Vessels***

There are five collections of information in sequential time intervals contained in the transportation and disposal of vessels general permit, though the timing requirement of each need not apply in emergency situations:

*(1) No later than 1 month prior to the proposed disposal date, provide written notification to the EPA Regional Administrator of the following under 40 CFR 229.3(a)(1):*

- i. A statement detailing the need for the disposal of the vessel.
- ii. Type and description of vessel to be disposed of and type of cargo normally carried.
- iii. Detailed description of the proposed disposal procedures.
- iv. Information on the potential effect of the vessel disposal on the marine environment.
- v. Documentation of an adequate evaluation of alternatives to ocean disposal (i.e., scrap, salvage, and reclamation).

(2) Notify EPA and U.S. Coast Guard that the vessel has been cleaned and is available for inspection no later than 10 days prior to the proposed disposal date under § 229.3(a)(4).

(3) Notify EPA, U.S. Coast Guard, and Captain-of-the-Port no later than 48 hours in advance of proposed disposal under § 229.3(a)(8).

(4) Notify EPA and Captain-of-the-Port no later than 12 hours before the vessel's departure from port under § 229.3(a)(8) with such details as:

- i. the proposed departure time and place;
- ii. disposal site location;
- iii. estimated time of arrival on site; and
- iv. the name and communication capability of the towing vessel.

(5) Notify NOAA in writing within one week of the disposal with the exact coordinates where the vessel disposal took place so that it may be marked on appropriate charts as required by 40 CFR 229.3(a)(9).

### **3) Disposal of Marine Mammal Carcasses**

There are two separate collections of information in sequential time intervals contained in the transportation and disposal of marine mammals.

#### **A. General Requirements for Governmental Entities and Stranding Agreement Holders**

(1) *The permittee shall submit a report on the ocean disposal activities authorized by this general permit to the applicable EPA Regional Office within 30 days after carcass disposal. This report shall include:*

*a. A description of the carcass(es) disposed:*

- Identify the mammal species, the approximate length and any other descriptive information.

*b. The date and time of the disposal as well as the latitude and longitude of the disposal site. Latitude and longitude of the disposal site shall be reported at the highest degree of accuracy available on board the vessel or vehicle that transported the carcass (e.g., onboard geographic position system technology):*

- Report the time, dates and approximate latitude and longitude of the disposal site.

*c. The name, title, affiliation, and contact information of the person in charge of the disposal operation and the person in charge of the vessel or vehicle that transported the carcass (if different than the person in charge of the disposal):*

- List the name, title, affiliation and contact information of the person in charge of the disposal and the person in charge of the vessel.

*d. A statement of need and rationale for selecting ocean disposal rather than other disposal options:*

- Provide a statement identifying the need for an ocean disposal.

(2) *The permittee shall immediately notify EPA of any violation of any condition of this general permit.*

- Report any violations immediately to the EPA Region.

#### B. Requirements for any Alaskan Native Engaged in Subsistence Uses

(1) Notwithstanding Section A, any Alaskan Native engaged in subsistence uses is hereby granted a general permit to transport and dispose of marine mammal carcasses in ocean waters subject to the following conditions: *The permittee shall submit a report (via email or letter) on all disposal activities authorized by this general permit that the permittee has conducted in the prior calendar year. Reports shall be submitted to EPA Region 10 within 30 days of the end of the calendar year. This report shall include:*

*a. The number and type of carcasses disposed:*

- Report the number of carcasses and the species.

*b. A description of the general vicinity in which the carcasses were disposed:*

- Describe the general area where the carcass(es) is(are) disposed using proximity to cities, towns or latitude and longitude coordinates.

*c. The name and contact information of the permittee:*

- Provide the name and contact information of the permittee.

## **SECTION 5: The Information Collected — Agency Activities, Collection Methodology and Information Management**

### **5(a): Agency Activities**

#### **1) *Burial at Sea***

EPA collects information from persons who dispose of human remains pursuant to the burial at sea general permit. The information is not required to be reported until after the burial has been conducted, specifically, within 30 days of the burial.

#### **2) *Transportation and Disposal of Vessels***

EPA sponsors collections of information as specified in the vessel disposal general permit. The collection process is codified in 40 CFR 229.3.

#### **3) *Disposal of Marine Mammal Carcasses***

EPA collects information from persons who dispose of marine mammal carcasses. For Part A, the permittee may obtain concurrence via telephone and then submit information within 30 days after carcass disposal. For Part B, any Alaskan Native shall submit reports to EPA within 30 days of the end of the calendar year.

## **5(b): Collection Methodology and Information Management**

### ***1) Burial at Sea***

Burials conducted under the burial at sea general permit are to be reported within 30 days to the EPA Regional Administrator of the EPA Region from which the vessel carrying the remains departed. EPA Regions keep record of all reports, including: faxes, emails, mail, and other online submissions. The total number of burials at sea for each Region is reported to EPA Headquarters and is stored in a database.

EPA is developing an online reporting tool for persons to report burials at sea. This tool would create consistency, facilitate compliance with 40 CFR 229.1(d), and reduce burdens on respondents by allowing for online reporting. Once this goes into effect, EPA will be updating its website to include the number of burials at sea each year, so the public has easy access to the information.

### ***2) Transportation and Disposal of Vessels***

Under the general permit for transportation and disposal of vessels, information is collected and managed by EPA, U.S. Coast Guard (USCG), including the relevant USCG Captain-of-the-Port (COTP), and NOAA. Each of the following collections of information assists EPA in ensuring that material proposed for ocean dumping is appropriately regulated by relevant federal entities and does not harm human health or the marine environment.

The corresponding EPA Region collects all information pertaining to a vessel disposal and submits it to EPA Headquarters, where it is stored in a database. EPA submits an annual ocean dumping report to the International Maritime Organization. The new EPA ocean dumping website includes an interactive map, which includes location and basic information of all vessels disposals which occurred from 2006-2017.

### ***3) Disposal of Marine Mammal Carcasses***

Disposals of marine mammal carcasses conducted under the general permit for Part A are to be reported within 30 days to the applicable EPA Regional Administrator of the EPA Region from which the carcass is disposed and for Part B to EPA Region 10 within 30 days of the end of the calendar year. EPA Regions keep record of all reports, including: faxes, emails, mail, and other online submissions. The total number of marine mammal carcasses disposed for each EPA Region is reported to EPA Headquarters.

## **5(c): Small Entity Flexibility**

EPA certifies that this chapter of the ICR will not have a significant economic impact on a substantial number of small entities. While the three general permits described in this chapter of the ICR are available to any private person or entity, or any officer, employee, agent, department, agency, or instrumentality of the federal government, of any state or local unit of government, or of any foreign government, the transportation and disposal of vessels general permit and the ocean disposal of marine mammal carcasses permit are used much more infrequently than the burial at sea general permit.



## **5(d): Collection Schedule**

Reporting for each of the general permits depends on how many respondents choose to use the general permit. For burials at sea, EPA assumes an average of 2,762.5 events per year. For vessel disposals, EPA assumes an average of 3.5 events per year. For disposal of marine mammal carcasses, EPA assumes an average of 1 event per year for Part A General Permits and 1 event per year for Part B Alaskan Native engaged in subsistence uses. See Section 6 below for information on how these values were determined.

### ***1) Burial at Sea***

Under 40 CFR 229.1(d), a burial conducted under the burial at sea general permit must be reported within 30 days to the Regional Administrator of the EPA Region from which the vessel carrying the deceased's remains departed.

### ***2) Vessel Disposal***

The collection schedule for the transportation and disposal of vessels general permit is described in 40 CFR 229.3(a)(1-9).

EPA collects information at four sequential time intervals under the transportation and disposal of vessels general permit, though the timing requirement of each need not apply in emergency situations.

### ***EPA***

EPA receives the following notifications:

- One month prior to disposal (40 CFR 229.3(a)(1)).
- Ten days prior to disposal – notification that vessel has been cleaned (40 CFR 229.3(a)(4)).
- Forty-eight (48) hours prior to disposal (40 CFR 229.3(a)(8)).
- Twelve (12) hours prior to departure (40 CFR 229.3(a)(8)).

### ***USCG***

Under 40 CFR 229.3(a)(4) and 229.3(a)(8), USCG receives notification no later than 10 days prior to the proposed disposal date that the vessel has been cleaned and is available for inspection. The COTP at USCG also receives confirmatory notification. Under 40 CFR 229.3(a)(8), the COTP receives notification 48 hours prior to the proposed disposal and telephonic notification 12 hours prior to the vessel's departure from port.

### ***NOAA***

Under 40 CFR 229.3(a)(9), NOAA receives notification in writing within one week after the disposal with the exact coordinates of the disposal site so that it may be marked on appropriate charts.

### ***3) Disposal of Marine Mammal Carcasses***

The collection schedule for the reporting of marine mammal carcass disposal is described in the general permit. For Part A, the permittee may obtain concurrence via telephone and then submit information within 30 days after carcass disposal. For Part B, any Alaskan Native shall submit reports to EPA within 30 days of the end of the calendar year.

## **SECTION 6: Estimating the Burden and Cost of the Collection**

### **6(a): Estimating Respondent Burden**

This section estimates the annual burden for the burial at sea, transportation and disposal of vessels, and disposal of marine mammal carcasses general permits information collection burden hours/costs. The estimates were reviewed by respondents who had previously participated in burials at sea, vessel disposals, and/or carcass disposals. The estimated burden hours reflect the time taken to assemble and submit written information needed for a burial at sea, vessel disposal, and/or carcass disposal.

In summary, the estimated burden per respondent to complete reporting requirements for the burial at sea general permit is 0.83 hours. The activities required to complete notification requirements for a vessel disposal under the transportation and disposal of vessels general permit is broken down into four main categories. The estimated burden per respondent is 15.0 hours to complete activities related to a one-month notification, 10.0 hours for the notification of vessel cleaning and inspection, 9.5 hours for a 12- and 48-hour notification and 1.0 hour for the submission of coordinates. The EPA estimates a total of 35.5 hours per respondent to complete all activities pertaining to a vessel disposal under the general permit and 8.5 hours per respondent and 2.5 hours per Alaskan Native respondent for a marine mammal carcass disposal under the general permit. The total burden per year was calculated by multiplying the burden hours per response by the number of respondents, which corresponds to the number of respondents expected to use the permit per year. This analysis is shown in Tables 18 through 24. See section 6(d) of Chapter 2 of this supporting statement for a description of how the respondent numbers (i.e., respondent universe) were estimated.

### **6(b): Estimating Respondent Costs**

To estimate the labor costs, EPA used labor and cost-rate data listed on the U.S. Bureau of Labor Statistics (BLS) Compensation Cost Trends homepage.<sup>9</sup> EPA used the following labor categories for the burial at sea, transportation and disposal of vessels, and disposal of marine mammal carcasses general permits, respectively:

#### **1) Burial at Sea**

- Office and administrative support occupations<sup>10</sup> (Clerical)
- Average rate: Funeral home director<sup>11</sup> and ship boat captain<sup>12</sup> (Management Avg.)

#### **2) Vessel Disposal**

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<sup>9</sup> The BLS homepage is available on-line at: <http://www.bls.gov/ncs/ect/>.

<sup>10</sup> For clerical hourly rates, EPA used the website titled Occupational Employment and Wages, May 2017, available online at: <http://www.bls.gov/oes/current/oes430000.htm>.

<sup>11</sup> For management (funeral director) hourly rate, EPA used the website titles Occupational Employment and Wages, 11-9061 Funeral Service Manages, May 2017, available online at: <http://www.bls.gov/oes/current/oes119061.htm>.

<sup>12</sup> For management hourly rate, EPA used the website titled Occupational Employment and Wages, 53-5021 Captains, Mates, and Pilots of Water Vessels, May 2017, available online at: <http://www.bls.gov/oes/current/oes535021.htm>.

- Ship and boat captains and operators<sup>13</sup> (Management)
- Compliance officers<sup>14</sup> (Technical)
- Office and administrative support occupations<sup>15</sup> (Clerical)

### 3) Disposal of Marine Mammal Carcasses

- Manager<sup>16</sup> (Management)
- Compliance officers<sup>17</sup> (Technical)
- Office and administrative support occupations<sup>18</sup> (Clerical)

EPA used the mean hourly figures listed by BLS to approximate the labor burdened hourly rates for the occupational categories contained in this chapter of the ICR. EPA used the 90th percentile hourly wage for the funeral home director’s hourly wage. These are listed below in Tables 15 and 16.

**Table 15. Respondent Labor Costs: Burial at Sea Hourly Loaded Wage Estimate of Affected Industry [40 CFR 229.1]**

BLS: Occupational Earnings 2017	ICR Agency Job Classification	Hourly Rate	Benefits Factor	Loaded Hourly Rate
Funeral Home Director	Management	\$73.72/hr	× 1.3	\$95.84/hr
Ship and boat captains and operators	Management	\$38.93/hr	× 1.3	\$50.61/hr
Average rate (ship and boat captains and operators and funeral home director)	Management (Avg.)	\$56.33/hr	× 1.3	\$73.23/hr
Office and administrative support occupations	Clerical	\$18.24/hr	× 1.3	\$23.71/hr

**Table 16. Respondent Labor Costs: Vessel Disposal Hourly Loaded Wage Estimate of Affected Industry [40 CFR 229.3]**

13 For management hourly rate, EPA used the website titled Occupational Employment and Wages, 53-5021 Captains, Mates, and Pilots of Water Vessels, May 2017, available online at: <http://www.bls.gov/oes/current/oes535021.htm>.

14 For technical hourly rate, EPA used the website titled Occupational Employment and Wages, 13-1041 Compliance Officers, May 2017, available online at: <http://www.bls.gov/oes/current/oes131041.htm>.

15 For clerical hourly rate, EPA used the website titled Occupational Employment and Wages, May 2017, available online at: <http://www.bls.gov/oes/current/oes430000.htm>.

16 For management labor costs, EPA used the website titled Occupational Employment and Wages, May 2017, available online at: <http://www.bls.gov/oes/current/oes110000.htm>.

17 For technical hourly rate, EPA used the website titled Occupational Employment and Wages, 13-1041 Compliance Officers, May 2017, available online at: <http://www.bls.gov/oes/current/oes131041.htm>.

18 For clerical hourly rate, EPA used the website titled Occupational Employment and Wages, May 2017, available online at: <http://www.bls.gov/oes/current/oes430000.htm>.

<b>BLS: Occupational Earnings May 2017</b>	<b>ICR Agency Job Classification</b>	<b>Hourly Rate</b>	<b>Benefits Factor</b>	<b>Loaded Hourly Rate</b>
Ship and boat captains and operators	Management	\$38.93/hr	× 1.3	\$50.61/hr
Compliance officers	Technical	\$34.39/hr	× 1.3	\$44.71/hr
Office and administrative support occupations	Clerical	\$18.24/hr	× 1.3	\$23.71/hr

**Table 17. Respondent Labor Costs: Disposal of Marine Mammal Carcasses Hourly Loaded Wage Estimate of Affected Industry for Parts A and B [40 CFR 222.1-221.2]**

<b>BLS: Occupational Earnings May 2017</b>	<b>ICR Agency Job Classification</b>	<b>Hourly Rate</b>	<b>Benefits Factor</b>	<b>Loaded Hourly Rate</b>
Ship and boat captains and operators	Management	\$38.93/hr	× 1.3	\$50.61/hr
Compliance officers	Technical	\$34.39/hr	× 1.3	\$44.71/hr
Office and administrative support occupations	Clerical	\$18.24/hr	× 1.3	\$23.71/hr

Non-labor O&M includes costs for photocopying, postage, telephone charges, expenses, and contracted services. Contracted services costs include costs for vessel cleaning before a vessel disposal as required by the general permit.

In summary, the estimated labor cost per respondent to complete all activities required under the burial at sea general permit is \$44.44.

The activities required to complete the reporting requirements of a vessel disposal under the transportation and disposal of vessels general permit is broken down into four main categories. The estimated labor cost per respondent is \$605.92 to complete activities related to a one-month notification, \$461.83 for the notification of vessel cleaning and inspection, \$406.33 for a 12 and 48-hour notification, and \$47.66 for the submission of coordinates. EPA estimates a total labor cost of \$1,521.74 per respondent to complete all activities pertaining to the reporting requirements for a vessel disposal under the general permit. Annualized costs are based on the number of respondents expected to use the permit per year and include both labor costs and non-labor O&M costs.

**Table 18. Respondent Burden and Cost for Burial at Sea General Permit [40 CFR 229.1]**

<b>Information Collection Activity</b>	<b>Hours and Costs Per Response</b>	<b>Total Hours and Costs Per Year</b>
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	Mgmt. (Avg.) \$73.23/hr	Clerical \$23.71 / hr	Total Hours/ Response	Labor Cost/ Response	O & M Cost (\$)	Number Responses/ Year	Total Hours/ Year	Total Cost/ Year (\$)
1. Respondent conducts Burial at Sea								
a. Prepare and review information necessary to complete reporting questions	0.50	0.00	0.50	\$36.61	\$1.00	2,762.50	1,381.25	\$103,910.06
b. Submit information to EPA	0.00	0.33	0.33	7.82	\$1.00	2,762.50	911.63	\$24,378.95
<b>Subtotal (hours and costs)</b>	0.50	0.33	0.83	\$44.44	\$2.00	2,762.50	2,292.88	\$128,289.01

**Table 19. Vessel Disposal General Permit Respondent Burden and Cost under 40 CFR 229.3(a)(1) – 1 Month Notification to EPA**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$50.61/hr	Technical \$44.71/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Preparation									
a. Read regulations	0.50	0.50	0.00	1.00	\$47.66	\$0.00	3.5	3.5	\$166.80
2. Prepare information:									
a. Need for the disposal of the vessel	0.50	0.00	0.00	0.50	\$25.30	\$0.00	3.5	1.75	\$88.57
b. Type and description of vessel to be disposed of and type of cargo normally carried	0.00	0.50	0.00	0.50	\$22.35	\$0.00	3.5	1.75	\$78.24
c. Detailed description of the proposed disposal procedures	0.00	1.00	0.00	1.00	\$44.71	\$0.00	3.5	3.50	\$156.47
d. Information on the potential effect of the vessel disposal on the marine environment	0.50	2.00	0.00	2.50	\$114.72	\$0.00	3.5	8.75	\$401.51
e. Documentation of an adequate evaluation of alternatives to ocean disposal	1.00	3.00	0.00	4.00	\$184.73	\$0.00	3.5	14.00	\$646.56
3. Review and edit information for accuracy	1.00	0.00	2.00	3.00	\$98.03	\$0.00	3.5	10.50	343.12
4. Provide written information to EPA	0.00	1.00	1.00	2.00	\$68.42	\$10.00	3.5	7.00	\$274.47
<b>Subtotal (hours and costs)</b>	4.00	8.00	3.00	14.50	\$605.92	\$10.00	3.5	50.75	\$2,155.73

**Table 20. Vessel Disposal General Permit Respondent Burden and Cost under 40 CFR 229.3(a)(4) – 10 days Notification that the Vessel has been Cleaned and is Available for Inspection**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$50.61/hr	Technical \$44.71/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Preparation									
a. Read regulations	0.00	0.50	0.00	0.50	\$22.35	\$0.00	3.5	1.75	\$78.24
b. Ensure that the requirements listed in 40 CFR 229.3(a)(3) are met	0.50	5.00	0.00	5.50	\$248.84	\$0.00	3.5	19.25	\$870.94
2. Notify Coast Guard that the vessel has been cleaned and is ready for inspection	1.00	1.00	0.00	2.00	\$95.32	\$5.00	3.5	7.00	\$351.11
3. Notify EPA that the vessel has been cleaned and is ready for inspection	1.00	1.00	0.00	2.00	\$95.32	\$5.00	3.5	7.00	\$351.11
Subtotal (hours and costs)	2.50	7.50	0.00	10.00	\$461.83	\$10.00	3.5	35.00	\$1,651.39

**Table 21. Vessel Disposal General Permit Respondent Burden and Cost under 40 CFR 229.3(a)(8) – 12- and 48-Hour Notifications**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$50.61/hr	Technical \$44.71/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Read regulations	0.00	0.00	0.00	0.00	\$0.00	\$0.00	3.5	0.00	\$000
2. Prepare the following information for notification per 40 CFR 229.3(a)(8)									
Proposed departure time and place	0.00	0.50	0.00	0.50	\$22.35	\$5.00	3.5	1.75	\$95.74
Proposed disposal site location	0.00	0.50	0.00	0.50	\$22.35	\$5.00	3.5	1.75	\$95.74
c. Estimated time of arrival on site	0.00	0.50	0.00	0.50	\$22.35	\$5.00	3.5	1.75	\$95.74
d. Name and communication capability of the towing vessel	0.00	1.00	0.00	1.00	\$44.71	\$5.00	3.5	3.50	\$173.97
3. Review and edit information for accuracy	1.00	1.00	2.00	4.00	\$142.74	\$5.00	3.5	14.00	\$517.09
4. Notify EPA 48 hours prior to disposal	0.50	0.00	0.00	0.50	\$25.30	\$5.00	3.5	1.75	\$106.07
5. Notify Coast Guard 48 hours prior to disposal	0.50	0.00	0.00	0.50	\$25.30	\$5.00	3.5	1.75	\$106.07
6. Notify COTP 48 hours prior to disposal	0.50	0.00	0.00	0.50	\$25.30	\$5.00	3.5	1.75	\$106.07
7. Telephonically notify EPA 12 hours prior to vessel's departure	0.50	0.00	0.00	0.50	\$25.30	\$5.00	3.5	1.75	\$106.07
8. Telephonically notify Coast Guard 12 hours prior to vessel's departure	0.50	0.00	0.00	0.50	\$25.30	\$5.00	3.5	1.75	\$106.07
9. Telephonically notify COTP 12 hours prior to vessel's departure	0.50	0.00	0.00	0.50	\$25.30	\$5.00	3.5	1.75	\$106.07
<b>Subtotal (hours and costs)</b>	4.00	3.50	2.00	9.50	\$406.33	\$55.00	3.5	33.25	\$1,614.67



**Table 22. Vessel Disposal General Permit Respondent Burden and Cost under 40 CFR 229.3(a)(9) – Submission of Exact Coordinates of Disposal to NOAA**

Information Collection Activity	Total Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$50.61/hr	Technical \$44.71/hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Preparation									
a. Read regulations	0.00	0.00	0.00	0.00	\$0.00	\$0.00	3.5	0.00	\$0.00
b. Prepare and verify coordinates of disposal	0.00	0.50	0.00	0.50	\$22.35	\$0.00	3.5	1.75	\$78.24
2. Submit coordinates of disposal to NOAA	0.50	0.00	0.00	0.50	\$25.30	\$10.00	3.5	1.75	\$123.57
<b>Subtotal (hours and costs)</b>	0.50	0.50	0.00	1.00	\$47.66	\$10.00	3.5	3.50	\$201.80

The activities required to complete the reporting requirements of a marine mammal carcass disposal under the general permit for ocean disposal of marine mammal carcasses is broken down into two main categories. The estimated labor cost per respondent is \$352.77 to complete activities related to a Part A - General Permit and \$114.72 for the notification of Part B - Alaskan Native engaged in subsistence uses to complete reporting. Annualized costs are based on the number of respondents expected to use the permit per year and include both labor costs and non-labor O&M costs.

**Table 23. Disposal of Marine Mammal Carcasses General Permit Respondent Burden and Cost under 40 CFR 220.4**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$50.61/hr	Technical \$44.71hr	Clerical \$23.71/hr	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Preparation									
a. Read permit	0.00	0.00	0.00	0.00	\$0.00	\$0.00	1.00	0.00	\$0.00
b. Describe carcass	0.00	0.50	0.00	0.50	\$22.35	\$0.00	1.00	0.50	\$22.35
c. Record date, time and location	0.00	0.50	0.00	0.50	\$22.35	\$0.00	1.00	0.50	\$22.35
d. Provide contact information for the person in charge of disposal operation and vessel	0.00	1.00	0.00	1.00	\$44.71	\$10.00	1.00	1.00	\$54.71
e. Statement of need and rationale for ocean disposal	1.00	1.00	1.00	3.00	119.03	\$0.00	1.00	3.00	\$119.03
f. Submit information to EPA	0.50	0.00	0.00	0.50	\$25.30	\$0.00	1.00	0.50	\$25.30
2. Immediately notify EPA of any violation	1.00	1.00	1.00	3.00	\$119.03	\$0.00	1.00	3.00	\$119.03
<b>Subtotal (hours and costs)</b>	2.50	4.00	2.00	8.50	\$352.77	\$10.00	1.00	8.50	\$362.77

**Table 24. Disposal of Marine Mammal Carcasses General Permit for Alaskan Native Engaged in Subsistence Respondent Burden and Cost under 40 CFR 220.4**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$50.61/ hr	Technical \$44.71/ hr	Clerical \$23.71/ hr	Total Hours/ Response	Labor Cost/ Response	O & M Cost (\$)	Number Responses/ Year	Total Hours/ Year	Total Cost/ Year (\$)
1. Preparation									
a. Read permit	0.00	0.00	0.00	0.00	\$0.00	\$0.00	1.00	0.00	\$0.00
b. Record number and type of carcass(es)	0.00	0.50	0.00	0.50	\$22.35	\$0.00	1.00	0.50	\$25.30
c. Describe general vicinity of disposal	0.00	1.00	0.00	1.00	\$44.71	\$0.00	1.00	1.00	\$44.71
d. Provide contact information for the person in charge of disposal	0.00	0.50	0.00	0.50	\$22.35	\$0.00	1.00	0.50	\$22.35
e. Submit information to EPA	0.50	0.00	0.00	0.50	\$25.30	\$10.00	1.00	0.50	\$35.30
<b>Subtotal (hours and costs)</b>	0.50	2.00	0.00	2.50	\$114.72	\$10.00	1.00	2.50	\$124.72

**6(c): Estimating Agency Burden and Cost**

EPA’s labor costs data associated with this chapter of the ICR reflect the pay scale rates for GS-9, GS-12, and GS-14 employees. EPA’s labor costs apply to the Agency job classifications listed in Table 25 (below) for:

- GS-14 (Management)
- GS-12 (Technical)
- GS-9 (Clerical)

To arrive at the loaded hourly rates listed in Table 25, hourly rates were multiplied by 160% to reflect a fully loaded (wages + benefits) hourly rate.

**Table 25. Agency Labor Costs [40 CFR 229.1, 229.3] Hourly Loaded Agency Wage Estimate**

ICR Agency Job Classification	January 2018 Annual GS Salary (Step 1)	Work Hours Per Year Factor	Benefits Factor	Loaded Hourly Rate
Management	GS-14, \$114,590	÷ 2,080	× 1.6	\$ 88.15/hr
Technical	GS-12, \$81,584	÷ 2,080	× 1.6	\$ 62.76/hr
Clerical	GS-9, \$56,233	÷ 2,080	× 1.6	\$43.26/hr

In summary, the estimated EPA burden per respondent to complete activities related to the burial at sea general permit is .11 hours with a labor cost per respondent of \$6.90. The estimated EPA burden per respondent to complete activities related to the vessel disposal general permit is 9.0 hours with a labor cost per respondent of \$666.37. The estimated EPA burden per respondent to complete activities related to disposal of marine mammal carcasses at sea is 2.0 hours with a labor cost per respondent of \$125.51. Annualized burden and costs are based on the number of permits expected per year. This analysis is shown in Tables 26, 27, 28 and 29.

**Table 26. Burial at Sea General Permit Agency (EPA) Burden and Cost [40 CFR 229.1]**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hour	Technical \$ 62.75/hour	Clerical \$43.25/hour	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)*	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Respondent conducts Burial at Sea and submits information to EPA									
a. Review recorded information as submitted and verify the information for accuracy and completeness	0.00	.10	0.00	0.10	\$6.28	\$0.10	2762.5	276.25	\$17,612.85
b. Organize and maintain submissions	0.00	.01	0.00	0.01	\$0.63	\$0.10	2762.5	27.625	\$2,009.91
<b>Subtotal (hours and costs)</b>	0.00	.11	0.00	0.11	\$6.90	\$0.20	2762.5	303.875	\$19,622.76

**Table 27. Vessel Disposal General Permit Agency (EPA) Burden and Cost under 40 CFR 229.3(a)(1)-(a)(8)**

Information Collection Activity	Total Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hour	Technical \$ 62.75/hour	Clerical \$43.25/hour	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)	Number Responses/Year	Total Hours/Year	Total Cost/Year
1. EPA receives notice no later than 1 month prior to vessel disposal date, recording and reviewing the required information	0.50	1.00	0.00	1.50	\$106.83	\$5.00	3.5	5.25	\$391.41
2. No later than 10 days prior to the proposed disposal date under 40 CFR 229.3(a)(4), EPA receives notification that the vessel has been cleaned and is available for inspection	1.00	1.00	0.00	2.00	\$150.90	\$5.00	3.5	7.00	\$545.66
3. EPA reviews the information provided, coordinating with Coast Guard, in determining whether the requirements of 40 CFR 229.3(a)(3) are met	1.00	1.00	0.00	2.00	\$150.90	\$5.00	3.5	7.00	\$545.66
3. 4. Under 40 CFR 229.3(a)(8), EPA receives notification no later than 48 hours prior to the proposed disposal date	0.50	0.00	0.00	0.50	\$44.07	\$5.00	3.5	1.75	\$171.76
5. Under 40 CFR 229.3(a)(8), EPA receives telephonic notification at least 12 hours in advance of the vessel's departure from port, recording and reviewing the information required	1.00	2.00	0.00	3.00	\$213.66	\$10.00	3.5	10.50	\$782.81
<b>Subtotal (hours and costs)</b>	4.00	5.00	0.00	9.00	\$666.37	\$30.00	3.5	31.50	\$2,437.29

**Table 28. Disposal of Marine Mammal Carcasses General Permit Agency (EPA) Burden and Cost under 40 CFR 220.4**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hour	Technical \$ 62.75/hour	Clerical \$43.25/hour	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)*	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Respondent conducts marine mammal disposal and submits information to EPA									
a. Review recorded information as submitted and verify the information for accuracy and completeness	0	1	0	1	\$62.76	\$0.00	1.00	1.00	\$62.76
b. Organize and maintain submissions	0	1	0	1	\$62.76	\$0.00	1.00	1.00	\$62.76
<b>Subtotal (hours and costs)</b>	0.00	2.00	0.00	2.00	\$125.51	\$0.00	1.00	2.00	\$125.51

**Table 29. Disposal of Marine Mammal Carcasses for Alaskan Native Engaged in Subsistence Uses General Permit Agency (EPA) Burden and Cost under 40 CFR 220.4**

Information Collection Activity	Hours and Costs Per Response						Total Hours and Costs Per Year		
	Mgmt. \$88.15/hour	Technical \$ 62.75/hour	Clerical \$43.25/hour	Total Hours/Response	Labor Cost/Response	O & M Cost (\$)*	Number Responses/Year	Total Hours/Year	Total Cost/Year (\$)
1. Alaskan Native respondent conducts marine mammal disposal and submits information to EPA									
a. Review recorded information as submitted and verify the information for accuracy and completeness	0	1	0	1	\$62.76	\$0.00	1.00	1.00	\$62.76
b. Organize and maintain submissions	0	1	0	1	\$62.76	\$0.00	1.00	1.00	\$62.76
<b>Subtotal (hours and costs)</b>	0.00	2.00	0.00	2.00	\$125.51	\$0.00	1.00	2.00	\$125.51

**6(d): Estimating the Respondent Universe**

The potential respondent universe for the burial at sea general permit is any person who disposes of human remains pursuant to the permit. The number of respondents was based on historical data. The number of respondents used for burial at sea is the average of the number

of persons who have used this permit during a previous six-year time frame (2005-2010) in which data was available. EPA expects 2,762.5 responses per year. The potential respondent universe for the transportation and disposal of vessels general permit is for all persons subject to title I of the MPRSA who dispose of the vessel pursuant to the permit. The number of respondents used for vessel disposals is the average number of vessels disposed of under this general permit during a previous 10-year time frame (2004-2013) as reported in the Ocean Dumping Reports. EPA expects 3.5 vessel disposals and 2 marine mammal carcass disposals per year.

**6(e): Bottom Line Burden Hours and Cost Tables**

The total estimated ocean dumping burdens and costs associated with Chapter 2 of the ICR are as follows:

1) Respondent

- Respondents per year: 2,768
- Total hours per year: 2,426.38
- Total labor cost per year: \$128,557.59
- Total annual O&M costs: \$5,842.50
- Total annual cost: \$134,400.09

1) Agency

- Respondents per year: 2,768
- Total hours per year: 339.38
- Total labor cost per year: \$21,653.58
- Total annual O&M costs: \$657.50
- Total annual cost: \$22,311.08

The total estimated ocean dumping burdens associated with Chapter 2 are summarized in Tables 30 and 31 for respondents and agencies, respectively.

**Table 30. Total Vessel Disposal, Burial at Sea and Disposal of Marine Mammal Carcasses General Permits Respondent Burden and Costs\* under 40 CFR 229.3**

<b>Respondent Total</b>	<b>Number of Respondents Per Year</b>	<b>Total Number of Hours Per Year</b>	<b>Total Labor Cost Per Year (\$)</b>	<b>Total Annual O&amp;M Costs (\$)</b>	<b>Total Cost Burden (\$)</b>
<b>Burial at Sea</b>	2762.5	2,292.88	\$122,764.01	\$5,525.00	\$128,289.01
<b>Vessel Disposal</b>	3.5	122.5	\$5,326.09	\$297.50	\$5623.59
<b>Disposal of Marine Mammal Carcasses</b>	2.0	11.00	\$467.49	\$20.00	\$487.49
<b>TOTAL</b>	2,768	2,426.38	\$128,557.59	\$5,842.50	\$134,400.09

\* These data are from Tables 26 through 29.

**Table 31. Total Burial at Sea, Vessel Disposal and Disposal of Marine Mammal Carcasses General Permit Agency (EPA) Burden and Costs\* under 40 CFR 229.3**

<b>Agency Total</b>	<b>Number of Respondents Per Year</b>	<b>Total Number of Hours Per Year</b>	<b>Total Labor Cost Per Year (\$)</b>	<b>Total Annual O&amp;M Costs (\$)</b>	<b>Total Cost Burden (\$)</b>
<b>Burial at Sea</b>	2762.5	303.88	\$19,070.26	\$552.50	\$19,622.76
<b>Vessel Disposal</b>	3.5	31.50	\$2,332.29	\$105.00	\$2,437.29
<b>Disposal of Marine Mammal Carcasses</b>	2.0	4.00	\$251.03	\$0.00	\$251.03
<b>TOTAL</b>	2,768.0	339.38	\$21,653.58	\$657.50	\$22,311.08

\* These data are from Tables 23 and 24.

**6(f): Reasons for Change in Burden**

There is no significant increase in the burden for the permits covered in Chapter 2. When compared to the existing ICR, there is an increase in the Total Hours and an increase in the Total Annual Cost. There is an overall increase of 9 hours and an overall increase of \$9,644 in the total estimated respondent burden compared with the ICR currently approved by OMB. This increase is due to a change in the program requirements and reflects updated reporting burden estimates using updated labor costs. Specifically, since the issuance of the current ICR, EPA issued an additional general permit under the MPRSA for the transport and disposal of marine mammal carcasses in ocean waters under specified conditions. The total amount of new estimated annual burden to respondents for the disposal of marine mammal carcasses totals 11 hours and \$487.

**6(g): Burden Statement**

*1) Burial at Sea*

The annual public reporting and record keeping burden for this collection of information is estimated to average 0.11 hours per response. EPA has an estimated average of 0.83 hours per response to review and record keep the information collected.

*2) Vessel Disposal*

The annual public reporting and record keeping burden for this collection of information is estimated to average 35.5 hours per response. EPA has an estimated average of 9.0 hours per response to review and record keep the information collected.

*3) Disposal of Marine Mammal Carcasses*

The annual public reporting and record keeping burden for this collection of information is estimated to average 8.5 hours per response for Part A of the general permit and 2.5 hours per response under Part B for Alaskan Natives engaged in subsistence uses. EPA has an estimated average of 2.0 hours per response to review and record keep the information collected.



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; 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 EPA's need for this information, the accuracy of the burden estimates, and 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 No. EPA-HQ-OW-2015-0613, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:00 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 Water Docket is (202) 566-2426. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). Use [www.regulations.gov](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 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, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number (EPA-HQ-OW-2015-0613) and OMB control number (2040-0008) in any correspondence.