

## **SUPPORTING STATEMENT**

### **1. Identification of the Information Collection**

Title: Brownfields Program – Accomplishment Reporting (OMB Control Number 2050-0192; EPA ICR No. 2104.07).

This is a request to renew an existing Information Collection Request (ICR). This ICR covers the collection of information from those organizations that receive cooperative agreements from EPA under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the 2002 Small Business Liability Relief and Brownfields Revitalization Act and the 2018 Build Act. Subtitle A of the 2002 Business Liability Relief and Brownfields Revitalization Act authorizes EPA to award grants or cooperative agreements to states, tribes, local governments, and other eligible entities to support the assessment and cleanup of brownfields properties, and subtitle C authorizes a noncompetitive \$50 million program to establish and enhance state and tribal response programs. The authority for these financial assistance programs is codified at CERCLA 104(k) and CERCLA 128(a) respectively. Congress appropriates specific amounts of funding for both programs in EPA's State and Tribal Assistance Grant account.

With this ICR, EPA's Office of Brownfields and Land Revitalization (OBLR) seeks authorization to collect information from cooperative agreement recipients (recipients) using several standard forms that will streamline the data collection effort and improve the quality of information collected. The information collected under this ICR supplements the minimum reporting and record keeping requirements that recipients are subject to under 2 CFR Part 200 and 2 CFR Part 1500. EPA estimates that all respondents who voluntarily respond to this information collection by electing to participate in the Brownfields program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

### **2. Need for/Use of the Collection**

Under CERCLA 104(k) states, tribes, local governments, and other eligible entities may receive cooperative agreements to:

- (1) inventory, characterize, assess, and conduct planning and community involvement related to brownfields sites;
- (2) carry out cleanup activities at brownfields sites;
- (3) capitalize revolving loan funds and provide subawards for cleanup activities; and
- (4) support the research, technical assistance and training including the creation and implementation of environmental job training and placement programs.

Under CERCLA 128(a) States and tribes may receive cooperative agreements to:

(1) establish or enhance a response program that includes elements such as:

- a. Surveys and inventories of brownfield sites.
- b. Oversight and enforcement authorities including legislation, regulations, procedures, or guidance that would establish or enhance the legal structure of the program.
- c. Opportunities for public participation in the process of developing a public record for cleanup decisions and other site activities.
- d. Site-specific assessment and cleanup activities.
- e. Approval of cleanup plans and verifications that response actions are complete.

(2) capitalize a revolving loan fund for brownfields remediation under CERCLA 104(k)(3); and

(3) purchase environmental insurance, develop a risk sharing or indemnity pool, or other insurance mechanisms for the response program.

Under CERCLA 101(39), a brownfields site means real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Brownfields sites may also include property contaminated with petroleum. For funding purposes, EPA uses the term “brownfields property(ies)” synonymously with the term “brownfields site(s).”

While the Agency collects basic cooperative agreement information as part of its Federal stewardship responsibilities to manage and oversee recipient activities and expenditures under 2 CFR Part 200, OBLR needs additional information from recipients to be reported in a consistent manner to evaluate the effectiveness of the program and to report on program activities and accomplishments to Congress and other program stakeholders. Specifically, OBLR has used and will continue to use the information collected from recipients to oversee the activities carried out using cooperative agreement funds, to evaluate program implementation and effectiveness, and to meet the Agency’s responsibilities under the Government Performance and Results Act to report on OBLR’s accomplishments. The information collection activities covered by this renewed ICR are intended to: (1) continue to improve the alignment of reporting requirements with programmatic performance measures; and (2) simplify and standardize reporting requirements to reduce uncertainty and burden imposed on recipients. Without the information collection, OBLR would have limited access to information needed to effectively assess the relationship between those activities funded by EPA’s Brownfields cooperative agreements and the intent of Congress with the passage of the Brownfields Amendments.

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

3(a). Non-duplication – There is no other known source for the information that EPA seeks under this ICR. Moreover, this ICR supplements, and does not duplicate, the information that EPA collects as part of its reporting and record keeping provisions under the Agency’s general assistance regulations at UGG 2 CFR Part 200 which became effective December 26, 2014. **Exhibit 1** identifies the tasks and burdens of recipients that are covered under other OMB-approved ICRs. This ICR addresses the burden imposed on recipients and EPA associated with the reporting requirements that are unique to cooperative agreements awarded by EPA under authority of CERCLA 104k and CERCLA 128(a).

**Exhibit 1: Grant Burdens Covered Under Other Agency ICRs**

<b>Task/Burden</b>	<b>Authority</b>	<b>Agency Approved ICR</b>
Preliminary Grant Proposal	2 CFR Part 200	OMB 2030-0020
Final Grant Proposal	2 CFR Part 200	OMB 2030-0020
Budget Sheets	2 CFR Part 200	OMB 2030-0020
Quarterly Progress Reports	2 CFR Part 200	OMB 2030-0020
Notification of Significant Developments	2 CFR Part 200	OMB 2030-0020
Procurement Reports	2 CFR Part 200	OMB 2030-0020
Financial Reports	2 CFR Part 200	OMB 2030-0020
Project Records	2 CFR Part 200	OMB 2030-0020

3(b). Public Notice Required Prior to ICR Submission to OMB. The first notification of the Agency’s request for the renewal of this ICR was published in the Federal Register at 84 FR 2862 on February 8, 2019. It did not receive any comments.

3(c). Consultations – EPA has more than 25 years of experience managing Brownfields cooperative agreement programs that awarded more than 5,500 cooperative agreements to state, local, and tribal governments to address brownfields properties. For these Brownfields cooperative agreements, EPA staff has worked closely with the recipients to help them participate in the program and address their brownfields properties. As such, EPA has a detailed understanding of the activities that recipients undertake and the burden they incur for voluntarily participating in EPA’s cooperative agreement programs. In addition, during the preparation of the initial ICR in 2003 and the reporting forms that are included, EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft forms included in this ICR. Recipient responses form the basis of EPA’s initial calculations of the burden hours and costs.

Since the initial ICR, there have been several revisions to help improve the original Property Profile and Job Training Reporting Forms to ensure they are as efficient as possible for cooperative agreement recipients. For the first renewal in 2006, the ICR was expanded to include

reporting from CERCLA 128(a) recipients. To do so, EPA consulted with several State and Tribal representatives when working on modifications to the Property Profile Form. For the second renewal in 2009, EPA added additional fields to the Property Profile Form. EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft new fields for the Property Profile Form included in the renewal. In 2012, EPA made no changes to the Property Profile Form and Job Training Reporting Form. In 2015, EPA made changes to streamline some questions on the Property Profile Form, including making it easier to identify the correct geographical location of a property, and avoid duplicate property records in ACRES. Additionally, EPA created a new form for the Area-Wide Planning recipients to make it easier for them to report their accomplishments to EPA.

For this renewal of the ICR, EPA shortened the Property Profile Form, eliminating questions that were not resulting in regular responses from recipients, while also clarifying past questions that caused confusion. EPA also created the Program Activity Levels (PALs) Form, a new form for CERCLA 128(a) recipients to update annually. This will allow a much more streamlined approach for 128(a) recipients than the current technique for gathering the needed information. No changes were made to the Job Training Reporting Form and Area-Wide Planning Reporting Form. Individuals contacted for this revision include the following:

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3. Marc Gerdeman  
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Phone: 419-936-3771 (office); 419-936-3959 (fax)  
[Marc.Gerdeman@toledo.oh.gov](mailto:Marc.Gerdeman@toledo.oh.gov).

3(d). Effects of Less Frequent Collection – The information collection schedule is consistent with the Agency’s reporting schedule for general assistance agreements. Less frequent collection may not enable EPA to oversee and manage Brownfields cooperative agreements effectively and would lessen OBLR’s ability to report up-to-date and accurate information on program activities and accomplishments. In consideration of the burden imposed on recipients, EPA has adopted less frequent reporting for the Property Profile Form in which recipients are required to update and submit the form as notable activities or changes occur at a particular property. EPA anticipates that recipients of CERCLA 104(k) assessment, cleanup, revolving loan

fund and multipurpose cooperative agreements will submit an updated Property Profile Form to EPA at least twice but not more than four times over the life of the cooperative agreement. For CERCLA 128(a) state and tribal response program cooperative agreements, EPA anticipates that recipients will submit a Property Profile Form to EPA twice a year in line with the bi-annual reporting guidelines. 128(a) recipients will also submit the PALs form once a year, in line with their end-of-year reporting.

3(e). General Guidelines – The information collection is consistent with the guidelines set forth in 5 CFR 1320.6 of the Paperwork Reduction Act Guidelines.

3(f). Confidentiality – No confidentiality is provided and no sensitive information is collected under this ICR.

3(g). Sensitive Questions – Sensitive questions are not associated with the information collection activities performed under Public Law 107-118.

#### **4. Respondents and Information Requested**

4(a). Respondents – Respondents under this ICR are those entities who voluntarily elect to participate in the Brownfields cooperative agreement programs and receive funding from EPA under the authority of CERCLA 104(k) and CERCLA 128(a). Specifically, respondents to this information collection include: general purpose units of local government (NAICS Code: 92411); land clearance authorities or other quasi-governmental entities that operate under the supervision and control of, or as an agent of, a general purpose unit of local government (NAICS Code: 92411); government entities created by State legislature (NAICS Code: 92411); regional councils or groups of general purpose units of local government (NAICS Code: 92411); redevelopment agencies that are chartered or otherwise sanctioned by the State (NAICS Code: 92411); States (NAICS Code: 92411); Indian Tribes other than in Alaska (NAICS Code: 92115); Alaska Native Regional Corporations, Alaska Native Village Corporations, and Metlakatla Indian Communities (NAICS Code: 92115); and non-profit organizations<sup>1</sup> (NAICS Code: 81331<sup>2</sup>).

4(b). Information Requested – The information requested by EPA under this ICR includes information from recipients specific to the activities undertaken and the accomplishments that result using Brownfields funds. The information to be collected by EPA will vary by the type of cooperative agreement awarded to the respondent.

For Brownfields assessment, cleanup, revolving loan fund and multipurpose cooperative agreements, and site-specific activities of the State and Tribal Response Program Cooperative Agreements, EPA requires CERCLA 104(k) and CERCLA 128(a) recipients to prepare an initial Brownfields Property Profile Form for each property the cooperative agreement intends to address. The Property Profile Form compliments the information collected as part of the progress reports required by the general assistance regulations, and requests basic information about each

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<sup>1</sup> For the purposes of the Brownfields grant program, EPA uses the definition of non-profit organization contained in Section 4(6) of the Federal Financial Assistance Management Improvement Act of 1999, Public Law 106-107.

<sup>2</sup> NAICS Codes as of 2017. Source: <https://www.census.gov/eos/www/naics/>

brownfields property covered by the cooperative agreement, such as property name, location, parcel number, and size. EPA requires recipients to update the Property Profile Form as notable activities or changes occur on the property, but no more frequently than quarterly for CERCLA 104(k) recipients and no more than twice a year for CERCLA 128(a) recipients. For example, as an assessment of the property is completed, recipients are required to complete the portion of the Property Profile Form that applies to assessments and provide basic information to EPA on the type of assessment, date of completion, and results or findings of the assessment. Other sections of the Property Profile Form collect basic information on cleanups and any redevelopment activities that occur on the property, including estimates of the number of jobs that result.

CERCLA 128(a) recipients are required to complete an annual Program Activity Levels Reporting Form. Recipients are required to provide updates once a year, reporting on measures that help to demonstrate the program's overall impact and success. Measures reported on this form are included in the annual metrics reported to Congress.

Brownfields Area-Wide Planning recipients are required to complete an initial Area-Wide Planning Reporting Form. Recipients are then required to provide form updates as notable events occur pertaining to revitalizing the BF AWP project area.

Environmental Workforce Development Job Training recipients are required to complete the Job Training Reporting Form on a quarterly basis. The form asks for information about the number of training participants, their success in obtaining employment after the training, and the leveraged funds from the job training program.

## **5. The Information Collected – Agency Activities, Collection, Methodology and Information Management**

5(a). Agency Activities – EPA is responsible to Congress and other stakeholders to ensure that its resources are being used efficiently and effectively, to evaluate the progress of the recipients in meeting the goals of EPA's Office of Brownfields and Land Revitalization, and to share the successes, lessons learned, and best practices among Brownfields recipients. EPA will collect the information using standardized forms that minimize the burden on respondents while ensuring consistent information that can be easily aggregated and accurately reported. EPA program staff will review the information collected to keep current on recipient activities. For ease, recipients enter the information into the Agency's Assessment, Cleanup, and Redevelopment Exchange System (ACRES). EPA uses ACRES to maintain information on all Environmental Workforce Development Job Training and Area-Wide Planning cooperative agreements and all Brownfields cooperative agreements' property specific activities. ACRES is also used to develop reports to support management and program evaluation activities, and to report accomplishments achieved as part of the Agency's responsibilities under GPRA.

5(b). Collection Methodology and Management – EPA will collect data under this ICR using a standard set of forms, instructions, and guidance that are designed to simplify and facilitate the reporting requirements for recipients. In fulfilling the requirements under the

Government Paperwork Elimination Act (Public Law 105-277), EPA developed an electronic reporting process that will allow recipients to report their data electronically. This electronic reporting process is integrated with EPA's Enterprise Architecture to further streamline the Agency's data management and reporting responsibilities. EPA released the electronic reporting process in January 2007 and all Brownfields recipients starting from FY 2003 have been given access. EPA has modified its reporting guidance and provides training on the electronic reporting process. EPA has achieved positive returns in user acceptance of the electronic reporting process since its release and the electronic reporting process reduces the burden placed on recipients.

5(c). Small Entity Flexibility – This information collection request is expected to affect small governmental jurisdictions, which are defined as governments of cities, counties, towns, townships, villages, school districts, or special districts with populations of less than 50,000. This definition may also include Indian Tribes, in keeping with the President's Federal Indian Policy. EPA has considered whether to establish different reporting requirements for small entities and has determined that: (1) different reporting requirements among recipients will result in inconsistent data that may lessen the Agency's ability to oversee and report on program activities and accomplishments; (2) the burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and (3) the Brownfields program is voluntary and respondents who elect to participate in this program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

5(d). Collection Schedule – The information to be collected under this ICR for CERCLA 104(k) assessment, cleanup, revolving loan fund and multipurpose recipients shall not occur more frequently than quarterly, and no more than twice a year for CERCLA 128(a) property specific activities. For CERCLA 104(k) assessment, cleanup, revolving loan fund, and multi-purpose cooperative agreements, and CERCLA 128(a) property specific activities, recipients will be required to prepare an initial Property Profile Form for each property at which the cooperative agreement starts to address, and to update the Property Profile forms for only those properties in which notable activities or changes have occurred during the last reporting period. CERCLA 128(a) recipients must complete the Program Activity Levels Report annually. Environmental Workforce Development Job Training recipients must complete and/or update their Job Training Reporting Form every quarter. Brownfields Area-Wide Planning recipients must complete and/or update their Brownfields Area-Wide Planning Reporting Form bi-annually.

## **6. Estimating the Burden and Cost of the Collection**

6(a). Estimating respondent burden - A "unit" burden is the burden incurred by a respondent for performing a specific activity that is not covered by another ICR (such as 2 CFR Part 200). The estimated burden is incurred by the following activities:

- Completion of the Job Training Reporting Form;
- Initial completion of the Brownfields Area-Wide Planning Reporting Form;

- Periodic updating of the Area-Wide Planning Reporting Form as new activities, accomplishments, resources, changes, and other information pertaining to revitalizing the BF AWP project area is available.
- Initial completion of the Brownfields Property Profile Form; and
- Periodic updating of the Brownfields Property Profile Form to report progress on specific properties undergoing assessment, cleanup, or redevelopment.
- Completion of the Program Activity Levels form

The estimated burden for respondents is presented in Exhibit 2.

If any burdens were found to be imposed in the ICR by a rule that supersedes CERCLA, as amended, those burdens, or a percentage of those burdens, were removed from the overall burden calculation in this ICR (see Exhibit 1).

### Exhibit 2 - Annual Respondent Burden and Cost

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year**	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
Job Training Reporting Form	4	\$119.89	\$479.57	30	120	\$14,387
Initial Completion of Property Profile Form (Subtitle A)	0.83	\$115.42	\$95.80	1,839	1,526	\$176,180
Initial Completion of Property Profile Form (Subtitle C)	0.83	\$115.42	\$95.80	1,456	1208	\$139,488
Update of Property Profile Form (Subtitle A)	1.25	\$115.42	\$144.28	1,287	1,609	\$185,732
Update of Property Profile Form (Subtitle C)	1.25	\$115.42	\$144.28	728	910	\$105,036
Initial Completion of Area-wide planning form	2	\$120.78	\$241.55	18	36	\$4,348
Update of Area-wide planning form (Subtitle C)	1.5	\$120.78	\$181.17	9	14	\$1,630
Program Activity Levels form	4.8	\$118.49	\$568.73	71	341	\$40,380
<b>TOTAL</b>				5438	5764	\$667,181
<b>AVERAGE TOTAL COST PER BURDEN HOUR</b>						\$115.75

\* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.



\*\* Figures may not sum due to rounding.

6(b). Estimating respondent costs - To estimate the unit burden (hours) and hourly rate for the original information collection activity, EPA relied on its extensive experience working closely with Brownfields recipients, as well as in-depth interviews with eight current or former Brownfields recipients submitting the Property Profile Form, nine Area-Wide Planning recipients, six Environmental Workforce Development Job Training recipients, and five 128(a) recipients submitting the new PALs form. Those interviewed were shown draft copies of all forms and accompanying instructions and guidance that would be used for reporting and asked to estimate: (1) the number of hours that would be required to perform each task; and (2) the labor mix required to perform each task (e.g., percentage of management, technical, clerical). The data gathered from these interviews were then analyzed to estimate the unit burden and labor mix.

For the renewal of this information collection request in 2019, EPA carried forward the same assumptions that were made for the original request. The type of data collected remains unchanged, with the addition of the PALs form being the only significant new burden estimate. For all form types, the unit labor cost (dollars) for this burden estimate is a weighted hourly rate based upon the estimated labor mix and wage rates gathered from the U.S. Bureau of Labor Statistics (BLS).

Data from consultations on the Property Profile Form, across all tasks, indicate that the average recipient will incur 5 percent of its burden with executive/managerial staff labor, 5 percent with professional specialty staff labor, 61 percent with technical labor, 13 percent with administrative support or clerical labor, and 16 percent with program participants and partners. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in June 2018<sup>3</sup> for a weighted hourly rate of \$54.96 and an estimated fully loaded rate of \$114.42.

On the Area-Wide Planning Reporting Form, consultations indicate that the average recipient will incur 10 percent of its burden with executive/managerial staff labor, 5 percent with professional specialty staff labor, 28 percent with technical labor, 5 percent with administrative support or clerical labor, and 53 percent with program participants and partners. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in June 2018<sup>3</sup> for a weighted hourly rate of \$52.61 and an estimated fully loaded rate of \$110.48.

On the Job Training Reporting Form, consultations indicate that the average recipient will incur 4 percent of its burden with executive/managerial staff labor, 54 percent with professional specialty staff labor, 13 percent with finance labor, 4 percent with administrative support or clerical labor, and 25 percent with program participants and partners. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in December 2015<sup>3</sup> for a weighted hourly rate of \$42.73 and an estimated fully loaded rate of \$89.72

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<sup>3</sup>See Bureau of Labor Statistics publication entitled "Employer costs per hour worked for employee compensation and costs as a percent of total compensation: State and local government, by occupational group, June 2018 <http://stats.bls.gov/news.release/ecec.t04.htm#content>.

On the Program Activity Level Form, consultations indicate that the average recipient will incur 75 percent of its burden with executive/managerial staff labor, 15 percent with finance labor, and 10 percent with administrative support or clerical labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in June 2018<sup>3</sup> for a weighted hourly rate of \$56.42 and an estimated fully loaded rate of \$118.49.

CERCLA 104(k) assessment, cleanup, revolving loan fund and multipurpose recipients, and CERCLA 128(a) recipients that conduct property specific activities will be required to report progress with the “Brownfields Property Profile Form.” EPA anticipates that the initial completion of this form will require approximately .83 hours. Recipients will be required to update this form as milestones are achieved, though not more frequently than quarterly. It is estimated that each update will require approximately 1.25 hours for a unit burden of \$115.52 for both Subtitle A and Subtitle C entities. It is estimated that each form will be updated an average of twice per year.

CERCLA 104(k)(7) area wide planning recipients will be required to report progress with the “Brownfields Area-wide Planning Reporting Form.” EPA anticipates that the initial completion of this form will require approximately 2 hours. Recipients will be required to update this form as milestones are achieved, though not more frequently than quarterly. It is estimated that each update will require approximately 1.5 hours for a unit burden of \$165.72 for both non-profits and governmental entities. It is estimated that each form will be updated an average of twice per year.

Environmental Workforce Development Job Training recipients will be required to report progress on a quarterly basis using EPA’s “Job Training Reporting Form.” Recipients will be required to report progress on a quarterly basis, with each update requiring approximately 4 hours for a unit burden of \$479.57. The majority of this burden stems from the activities associated with the collection of salary or wage information from Environmental Workforce Development Job Training program participants who are able to find employment.

CERCLA 128(a) recipients will be required to report progress on an annual basis using EPA’s “Program Activity Levels” form. Recipients will be required to report progress on an annual basis, with each update requiring approximately 4.8 hours for a unit burden of \$118.49. The majority of this burden stems from the activities associated with the collection of the overall activities conducted by the response program to establish or enhance their program, and the number of sites that are currently enrolled in their response program, or otherwise supported by their response program.

Area-wide Planning, assessment, cleanup, multipurpose and job training cooperative agreements awarded under CERCLA 104(k) cover a period of performance of up to three years, and revolving loan fund cooperative agreements cover a period of performance up to five years. Based on the Agency’s experience under its program, EPA estimates that at the end of two years, approximately 75 percent of cooperative agreements will receive a no-cost extension, approximately 20 percent of recipients will receive supplemental awards, and 5 percent of

cooperative agreements will close out. Recipients that receive either a no-cost extension or a supplemental award will be required to continue to report on their activities using the forms authorized under this ICR. In addition, cooperative agreements that have closed out may undergo a five-year review conducted five years after close out. The five-year review gathers data on the current status of properties that benefited from EPA funding while the cooperative agreement was active using the forms authorized under this ICR. This burden is included in the estimated number of responses per year and, therefore, the overall burden calculation estimated for this ICR.

All awards made under CERCLA 128(a) have at least a one-year period of performance or can be a multi-year award depending on the State’s financial need for continued funding. Based on the Agency’s understanding of State response programs, EPA estimates that one-half of the State recipients have sophisticated response programs and can complete property specific activities within one year, therefore submitting a total of two responses. EPA further estimates that the remaining State, tribal, and US territories that receive funding take two years to complete property specific activities therefore submitting a total of four responses.

Start-up costs to meet the Brownfields reporting requirements are minimal and are a part of the customary and usual expenses incurred by recipients. There are no capital costs related to Brownfields reporting requirements. Therefore, total start-up and capital costs are zero. There are no operation and maintenance costs required.

6(c). Agency burden and costs - EPA incurs a burden in the process of requesting, reviewing and processing the information covered by this ICR. This burden includes:

- Reviewing and processing Job Training Reporting Forms
- Reviewing and processing initial Brownfields Property Profile Forms;
- Reviewing and processing updates of Brownfields Property Profile Forms;
- Reviewing and processing initial Brownfields Area-Wide Planning Forms;
- Reviewing and processing updates of Brownfields Area-Wide Planning Forms and
- Review and processing of Program Activity Levels Form

The estimated burden associated with EPA activities is presented in Exhibit 3.

**Exhibit 3 - Annual Agency Burden and Cost**

<b>Activity</b>	<b>Unit Burden (Hours)</b>	<b>Unit Labor Cost (Dollars)*</b>	<b>Total Unit Cost (Dollars)*</b>	<b>Average Number of Responses/Year**</b>	<b>Total Burden Hours/Year**</b>	<b>Total Cost/Year (Dollars)**</b>
Review and Process Job Training Reporting Form	1	\$51.71	\$51.71	30	30	\$1,551
Review and Process Initial Completion of Property Profile Form (Subtitle A)	0.75	\$52.97	\$39.73	1,839	1,379	\$73,065

Review and Process Initial Completion Property Profile Form (Subtitle C)	0.75	\$52.97	\$39.73	1,456	1,092	\$57,848
Review and Process Update to Property Profile Form (Subtitle A)	0.5	\$52.97	\$26.49	1,287	644	\$34,097
Review and Process Update to Property Profile Form (Subtitle C)	0.5	\$52.97	\$26.49	728	364	\$19,283
Reviewing and Process Initial Brownfields Area-Wide Planning Forms	1.5	\$52.68	\$79.02	18	27	\$1422
Reviewing and Process Update of Brownfields Area-Wide Planning Form	.5	\$52.68	26.34	9	5	\$263
Reviewing and Process Initial Brownfields Program Activity Level Form	.25	\$46.01	\$11.50	150	38	1725
<b>TOTAL</b>				5517	3579	\$189,254
<b>AVERAGE TOTAL COST PER BURDEN HOUR</b>						\$52.88

\* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

\*\* Figures may not sum due to rounding.

The burden imposed upon EPA was initially estimated by: (1) interviewing EPA Regional and Headquarters staff to gather individual estimates of the time required to perform each activity and the GS level of the staff performing those tasks; (2) averaging the time data to estimate the number of hours required for each burden element; (3) averaging the data on the percentage of time performed by particular staff GS levels; (4) developing a weighted hourly rate based upon percentage of staff labor at different GS levels devoted to each task; (5) applying a multiplier of 1.6 to the hourly rates to account for overhead and benefits; and (6) determining the product of the weighted hourly rate and the number of hours required per activity.

The weighted hourly rate utilized in the Federal burden estimate is based upon the following composite:

<b>GS Level</b>	<b>Percent</b>	<b>Hourly Wage Rate*</b>
GS 4, Step 1	8%	\$12.10
GS 11, Step 1	12%	\$24.83
GS 13, Step 1	67%	\$35.38

GS 14, Step 1	13%	\$41.81
<b>Weighted Rate</b>		<b>\$33.11</b>

\*Rates for 2016 General Schedule ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/GS_h.aspx) )

6(d). Estimated Respondent Universe and Total Burden and Costs – The estimated annual average number of respondents per year for this information collection is 2,890 respondents, with the average total number of responses per year estimated at 5,438. As presented in Exhibit 2, the total average annual burden to respondents is 5,764 hours per year at a cost of \$667,181

6(e). Bottom-line burden hours and costs – Exhibits 2 and 3 provide the bottom-line burden hours and costs for respondents and EPA, respectively. The hours and costs presented in these exhibits represent the average annual burden resulting from this information collection; the total burden hours and costs for the three-year period covered under this ICR is estimated to be three times the total hours and costs provided in each exhibit.

	Respondents	Responses	Hours
<b>Total</b>	<b>2,322</b>	<b>5,438</b>	<b>5,765</b>

6(f). Reasons for Change in Burden – The overall burden has increased 1,888 hours since the last ICR submittal. This increase is partially the result of adding the new Program Activity Levels Form for 128(a) recipients to fill out annually. The remainder of the burden increase is the result of an overall increase in wages and the large increase in the number of responses submitted to ACRES annually. Even with this increase, respondents indicated that improvements in the ACRES reporting system and increased familiarity with the program lead to a lower burden per individual entry.

6(g). Burden Statement – The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1 hour per Property Profile Form response for CERCLA 104(k) assessment, cleanup, revolving loan fund, multipurpose and CERCLA 128(a) recipients, 1.83 hours per Area-Wide Planning Form response (CERCLA 104(k)(7)), 4 hours per Job Training Reporting Form response (CERCLA 104(k)(7)) and 4.8. hours per Program Activity Levels Form response (CERCLA 128(a)). 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 the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-SFUND-2012-0104, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the OSWER Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the OSWER Docket is (202) 566-0276. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-SFUND-2012-0104 and OMB Control Number 2050-0192 in any correspondence.