

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

Activity	Average Annual Burden Hours (from Table A-3)	Hourly Cost	Average Annual Cost
Technical Review of revised application & reapplication	2,560	\$85.58 <sup>a</sup>	\$219,085
Evaluate revised applications/reapplications for compliance with 301(h) criteria/prepare 301(h) decisions	2,080	\$47.07 <sup>b</sup>	\$97,906
Evaluate monitoring and toxic control program adequacy	1,860	\$47.07 <sup>b</sup>	\$87,550
Review State determinations and State certifications and coordinate with State	140	\$47.07 <sup>b</sup>	\$6,590
<b>TOTAL</b>	<b>6,640</b>		<b>\$411,131</b>

It is assumed that the majority of reapplications and additional information submissions are reviewed by a contractor. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$77,396 or \$89,005/year. Thus, based on 2,080 working hours/year, the average salary of a contractor is \$42.79/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$85.58. (Hourly rate based on 2020 DC-B salary rate table.)

<sup>b</sup>It is assumed that the salary level of a typical government employee working on the 301(h) program is \$77,396/year. Based on 2,080 working hours/year, the average hourly salary of a Federal employee is \$42.79/hour. Assuming 10 percent overhead costs, the labor cost for Federal employees is \$47.07/hour. (Hourly rate based on 2020 DC-B salary rate table.)

NOTE: Numbers may not add due to rounding.

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

Activity	Average Annual Burden Hours	Hourly Cost	Average Annual Cost
<b>COST TO POTW RESPONDENTS</b>			
Application Revision	1,791	\$85.58 <sup>a</sup>	\$153,274
Reapplication	2,386	\$85.58 <sup>a</sup>	\$204,194
Monitoring Program	21,088	\$22.86 <sup>b</sup>	\$482,072
Toxics Control Program	18,560	\$22.86 <sup>b</sup>	\$424,282
<b>TOTAL</b>	<b>43,825</b>		<b>\$1,263,822</b>
<b>COST TO STATE RESPONDENTS</b>			
Determination	870	31.48 <sup>c</sup>	\$27,388
Certification	290	31.48 <sup>c</sup>	\$9,129
<b>TOTAL</b>	<b>1,160</b>		<b>\$36,517</b>
<b>TOTAL POTW AND STATE RESPONDENTS</b>	<b>44,985</b>		<b>\$1,300,339</b>

<sup>a</sup>It is assumed that much of the reapplication and additional information is prepared by a contractor with specialized expertise and equipment. It is further assumed that the salary level of a contractor working on the 301(h) program is 15 percent higher than that of a GS-9, Step 10, \$77,396, or \$89,005/year. Thus, based on 2,080 working hours/year, the average hourly salary of a contractor is \$42.79/hour. Assuming 100 percent overhead costs for the private sector, the labor cost for contractors is \$85.58/hour. (Hourly rate based on 2020 DC-B salary rate table.)

<sup>b</sup>It is assumed that the salary level of a typical local government employee working on the 301(h) program is a GS-5, Step 4, or \$43,222. Based on 2,080 working hours/year, the average hourly salary of a local employee is \$20.78/hour. Assuming 10 percent overhead costs, the labor cost for local government employees is \$22.86/hour. (Hourly rate based on 2020 DC-B salary rate table.)

<sup>c</sup>It is assumed that the salary level of a typical State government employee working on the 301(h) program is a GS-9, Step 1, or \$59,534/year. Based on 2,080 working hours/year, the average hourly salary of a State government employee is \$28.62/hour. Assuming 10 percent overhead costs, the labor cost for State government employees is \$31.48/hour. (Hourly rate based on 2020 DC-B salary rate table.)

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

Activity	Burden Hours/Activity		Number of Permits to be Processed Annually <sup>a</sup>						Federal Burden Hours/Activity for 3 Years of ICR			Average Annual Burden <sup>b</sup>
	S	L	FY 2021		FY 2022		FY 2023		S	L	TOTAL	
Technical review of revised application and reapplication	360	1650	1	2	1	1	1	1	1,080	6,600	7,680	2,560
Evaluate revised applications and reapplications for compliance with 301(h) criteria	208	1040	3	2	3	1	4	1	2,080	4,160	6,240	2,080
Evaluate monitoring and toxic control program adequacy	60	100	16	9	16	9	16	9	2,880	2,700	5,580	1,860
Review State determinations and State certifications and coordinate with the State	20	20	4	4	4	2	5	2	260	160	420	140
<b>TOTAL</b>									<b>6,300</b>	<b>13,620</b>	<b>19,920</b>	<b>6,640</b>

NOTE: S = small, L = large

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

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

Activity/Unit Burden	Burden Hours	FY 2021		FY 2022		FY 2023		TOTAL		Average	
		Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All	Number Affected	Burden All
<b>Application Revision (POTW)</b>											
Sm Facility Hr.	255	1	255	1	255	1	255	3	765	1	255
Lg. Facility Hr.	1,152	2	2,304	1	1,152	1	1,152	4	4,608	1	1,536
<b>SUBTOTAL</b>		<b>3</b>	<b>2,559</b>	<b>2</b>	<b>1,407</b>	<b>2</b>	<b>1,407</b>	<b>7</b>	<b>5,373</b>	<b>2</b>	<b>1,791</b>
<b>Reapplication (POTW)</b>											
Sm Facility Hr.	255	3	765	3	765	4	1,020	10	2,550	3	850
Lg. Facility Hr.	1,152	2	2,304	1	1,152	1	1,152	4	4,608	2	2,304
<b>SUBTOTAL</b>		<b>5</b>	<b>3,069</b>	<b>4</b>	<b>1,917</b>	<b>5</b>	<b>2,172</b>	<b>14</b>	<b>7,158</b>	<b>5</b>	<b>2,386</b>
<b>Monitoring (POTW)</b>											
Sm Facility Hr.	328	16	5,248	16	5,248	16	5,248	48	15,744	16	5,248
Lg. Facility Hr.	1,760	9	15,840	9	15,840	9	15,840	27	47,520	9	15,840
<b>SUBTOTAL</b>		<b>25</b>	<b>21,088</b>	<b>25</b>	<b>21,088</b>	<b>25</b>	<b>21,088</b>	<b>75</b>	<b>63,264</b>	<b>25</b>	<b>21,088</b>
<b>Toxics Control</b>											
Sm Facility Hr.	80	16	1,280	16	1,280	16	1,280	48	3,840	16	1,280
Lg. Facility Hr.	1,920	9	17,280	9	17,280	9	17,280	27	51,840	9	17,280
<b>SUBTOTAL</b>		<b>25</b>	<b>18,560</b>	<b>25</b>	<b>18,560</b>	<b>25</b>	<b>18,560</b>	<b>75</b>	<b>55,680</b>	<b>25</b>	<b>18,560</b>
<b>TOTAL (POTWs)</b>											
Sm Facility Hr.		16	7,548	16	7,548	16	7,803	48	22,899	16	7,633
Lg Facility Hr.		9	37,728	9	35,424	9	35,424	27	108,576	9	36,960
<b>TOTAL (All POTWs)<sup>a</sup></b>		<b>25</b>	<b>45,276</b>	<b>25</b>	<b>42,972</b>	<b>25</b>	<b>43,227</b>	<b>75</b>	<b>131,475</b>	<b>25</b>	<b>43,825</b>
<b>Determination (States)</b>											
Sm Facility Hr.	90	4	360	4	360	5	450	13	1,170	4	390
Lg Facility Hr.	180	4	720	2	360	2	360	8	1,440	3	480
<b>SUBTOTAL</b>		<b>8</b>	<b>1,080</b>	<b>6</b>	<b>720</b>	<b>7</b>	<b>810</b>	<b>21</b>	<b>2,610</b>	<b>7</b>	<b>870</b>
<b>Certification (States)</b>											
Sm Facility Hr.	30	4	120	4	120	5	150	13	390	4	130
Lg Facility Hr.	60	4	240	2	120	2	120	8	480	3	160
<b>SUBTOTAL</b>		<b>8</b>	<b>360</b>	<b>6</b>	<b>240</b>	<b>7</b>	<b>270</b>	<b>21</b>	<b>870</b>	<b>7</b>	<b>290</b>
<b>Total (States)<sup>b</sup></b>		<b>6</b>	<b>1,440</b>	<b>6</b>	<b>960</b>	<b>6</b>	<b>1,080</b>	<b>6</b>	<b>3,480</b>	<b>6</b>	<b>1,160</b>
<b>GRAND TOTAL (States + POTWs)</b>		<b>31</b>	<b>46,716</b>	<b>31</b>	<b>43,932</b>	<b>31</b>	<b>44,307</b>	<b>31</b>	<b>134,955</b>	<b>31</b>	<b>44,985</b>

<sup>a</sup>There are 25 POTWs in the 301(h) universe.<sup>b</sup>There are 6 States in the 301(h) universe.

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

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

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

	FY 2021		FY 2022		FY 2023		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	1	2	1	1	1	1	3	4	2
Burden (burden from Table A-5 x number of respondents)	255	2,304	255	1,152	255	1,152	765	4,608	1,791

Note: S = small, L = large

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

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

	FY 2021		FY 2022		FY 2023		TOTAL		Average Annual <sup>a</sup>
	S	L	S	L	S	L	S	L	
Number of Respondents	3	2	3	1	4	1	10	4	5
Burden (burden from Table A-5 x number of respondents)	765	2,304	765	1,152	1,020	1,152	2,550	4,608	2,386

Note: S = small, L = large

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

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

	Number of Respondents						Average Annual Number of Respondents	Burden Hours/Permittee		Annual Burden				Average Annual Burden <sup>a</sup>
	2021		FY 2022		FY 2023			S	L	FY 2021	FY 2022	FY 2023	TOTAL	
	S	L	S	L	S	L								
Monitoring Program	16	9	16	9	16	9	25	328	1,760	21,088	21,088	21,088	63,264	21,088
Toxics Control Program	16	9	16	9	16	9	25	80	1,920	18,560	18,560	18,560	55,680	18,560

Note: S = small, L = large

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

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

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

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

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

	FY 2017 <sup>a</sup>		FY 2018		FY 2019		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents	4	4	4	2	5	2	21	7
Burden <sup>b</sup>	360	720	360	360	450	360	2,610	870

Note: S = small, L = large

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

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

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

	FY 2017		FY 2018		FY 2019		Total	Average Annual <sup>a</sup>
	S	L	S	L	S	L		
Number of Respondents <sup>b</sup>	4	4	4	2	5	2	21	7
Burden <sup>c</sup>	120	240	120	120	150	120	870	290

Note: S = small, L = large

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

<sup>b</sup>Number derived by assuming 21 permit reapplications and application revisions over 3 years of the ICR; 13 small and 8 large; and will result in the final approval and preparation of a draft permit, thus requiring State certification. It is assumed that the application review process takes approximately one year.

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

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

Respondent/Activity	Number of Respondents/Responses	Hours per Response <sup>b</sup>	Average Annual Burden
<b>POTWs</b>			
Application Revision	2	896	1,791
Reapplication	5	477	2,386
Monitoring Program	25	844	21,088
Toxics Control Program	25	742	2,386
<b>TOTAL: POTWs</b>	<b>25</b>		<b>43,825</b>
<b>STATES</b>			
Determinations	7	145	870
Certifications	7	40	290
<b>TOTAL: STATES</b>	<b>6</b>		<b>1,160</b>
<b>TOTAL: POTWs AND STATES</b>	<b>31</b>		<b>44,985</b>

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

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

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

Activity	Burden from Previous ICR		Difference	Reason for Change
Application Revision	1,791	1,791	0	No change <sup>a</sup>
Reapplication	2,641	2,386	-255	Fewer respondents <sup>a</sup> Changes in Program status and information needs;
Monitoring Program	19,208	21,088	1,880	Fewer respondents <sup>a</sup> Changes in Program status and information needs; Program adjustment <sup>c</sup>
Toxics Control Program	15,120	18,560	3,440	Fewer respondents <sup>a</sup> Changes in Program status and information needs; Program adjustment <sup>c</sup>
State Determination	960	870	-90	Fewer respondents <sup>ab</sup>
State Certification	320	290	-30	Fewer respondents <sup>ab</sup>
<b>TOTAL</b>	<b>40,040</b>	<b>44,985</b>	<b>4,945</b>	Fewer respondents/changes in program status and information needs <sup>ab</sup> ; program adjustment <sup>c</sup>

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

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

<sup>c</sup> Program adjustment. 2 POTWs were recategorized from small to large to correct a clerical error. Large POTWs have high