

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST NUMBER 2002.08  
“CROSS-MEDIA ELECTRONIC REPORTING RULE”**

**April 28, 2021**

Office of Mission Support  
U.S. Environmental Protection Agency  
Washington, D.C. 20460

## TABLE OF CONTENTS

<b>1.</b>	<b>IDENTIFICATION OF THE INFORMATION COLLECTION.....</b>	<b>1</b>
1(a)	TITLE.....	1
1(b)	SHORT CHARACTERIZATION/ABSTRACT.....	1
<b>2.</b>	<b>NEED FOR AND USE OF THE COLLECTION.....</b>	<b>3</b>
2(a)	NEED/AUTHORITY FOR THE COLLECTION.....	3
2(b)	PRACTICAL UTILITY/USERS OF THE DATA.....	4
<b>3.</b>	<b>NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA.....</b>	<b>6</b>
3(a)	NONDUPLICATION.....	6
3(b)	PUBLIC NOTICE REQUIRED PRIOR TO ICR SUBMISSION TO OMB.....	6
3(c)	CONSULTATIONS.....	6
3(d)	EFFECTS OF LESS FREQUENT COLLECTION.....	11
3(e)	GENERAL GUIDELINES.....	12
3(f)	CONFIDENTIALITY.....	12
3(g)	SENSITIVE QUESTIONS.....	12
<b>4.</b>	<b>RESPONDENTS AND THE INFORMATION REQUESTED.....</b>	<b>13</b>
4(a)	RESPONDENTS/NAICS CODES.....	13
4(b)	INFORMATION REQUESTED.....	13
<b>5.</b>	<b>AGENCY ACTIVITIES, METHODS, AND INFORMATION MANAGEMENT.....</b>	<b>20</b>
5(a)	AGENCY ACTIVITIES.....	20
5(b)	COLLECTION METHODOLOGY AND MANAGEMENT.....	21
5(c)	SMALL ENTITY FLEXIBILITY.....	21
5(d)	COLLECTION SCHEDULE.....	21
<b>6.</b>	<b>ESTIMATING BURDEN AND COST.....</b>	<b>23</b>
6(a)	ESTIMATING RESPONDENT BURDEN.....	23
6(b)	ESTIMATING RESPONDENT COSTS.....	23
6(c)	ESTIMATING AGENCY BURDEN AND COST.....	28
6(d)	ESTIMATING THE RESPONDENT UNIVERSE AND TOTAL BURDEN AND COSTS.....	28
6(e)	BOTTOM LINE BURDEN HOUR AND COST TABLES.....	39
6(f)	REASONS FOR CHANGE IN BURDEN.....	40
6(g)	BURDEN STATEMENT.....	40

## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) TITLE**

This Information Collection Request (ICR) is entitled “Cross-Media Electronic Reporting Rule,” EPA ICR Number 2002.08, OMB Control Number 2025-0003.

### **1(b) SHORT CHARACTERIZATION/ABSTRACT**

The U.S. Environmental Protection Agency (EPA) allows regulated entities who are required to submit a document to one of EPA’s programs to satisfy the requirement with an electronic document, in lieu of a paper document, provided that specified conditions are met (40 CFR 3.2). The legal framework for electronic reporting under EPA’s regulatory programs is established under the Cross-Media Electronic Reporting Rule (CROMERR).<sup>1</sup> CROMERR also allows state, tribal, and local governments to seek EPA approval, as provided under 40 CFR 3.1000, to accept electronic documents to satisfy reporting requirements under the authorized or delegated environmental programs that they administer. In seeking EPA approval, these state, tribal, and local governments must upgrade existing electronic document receiving systems or develop new electronic document receiving systems to satisfy the criteria laid out at 40 CFR 3.2000. In the remainder of this document, we refer to state, tribal, and local governments as “States/Tribes/Locals.” At the current time, EPA is aware of one tribal government that is planning to develop such a system during the next three years.

Regulated entities that use an electronic signature device in submitting electronic documents to EPA or a State/Tribal/Local receiving system must comply with identity proofing requirements in CROMERR. There are two ways to do this. One is to establish identity through verification by, and attestation of, a disinterested individual<sup>2</sup>, based on identifiers. The other way is to include the user’s handwritten signature as part of the electronic signature agreement (ESA) process. Where the ESA is executed on paper with a handwritten signature, it is called a “subscriber agreement.”

CROMERR does not require any regulated entity to report electronically to EPA or States/Tribes/Locals. CROMERR establishes requirements for utilizing electronic reporting as an alternative to paper-based reporting. It does not require States/Tribes/Locals to implement electronic reporting; rather, it establishes the framework for implementing the electronic reporting alternative for Federal laws that they administer. In this regard, regulated entities are affected only as follows:

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<sup>1</sup> In this document, EPA is using the term “electronic reporting” in a sense that excludes submission of a report via magnetic media, (i.e., via diskette, compact disc, or tape). EPA also is excluding transmission via hard copy facsimile. Likewise, EPA’s use of the term “electronic document” throughout this document refers exclusively to documents that are transmitted via a telecommunications network, excluding hard copy facsimile.

<sup>2</sup> Per 40 CFR 3.2, a “disinterested individual” means an individual who is not connected with the person in whose name the electronic signature device is issued. A disinterested individual is not any of the following: The person's employer or employer's corporate parent, subsidiary, or affiliate; the person's contracting agent; member of the person's household; or relative with whom the person has a personal relationship.

- Regulated entities that report electronically to EPA have to register with EPA’s electronic document receiving system also known as the Central Data Exchange or CDX (e.g., log on to the [EPA’s CDX Web site](#) and enter requested information), comply with the identity proofing provisions, and then commence electronic reporting. In this document, we refer to these entities as “direct reporters.”
- States/Tribes/Locals must ensure that their electronic document receiving systems meet the CROMERR requirements at 40 CFR 3.2000 prior to allowing electronic reporting under an authorized program. These States/Tribes/Locals must apply for EPA program modification approval under 40 CFR 3.1000. They also must implement the identity proofing requirements at 40 CFR 3.2000(b)(5).
- Regulated entities that report electronically to States/Tribes/Locals must comply with the identity proofing requirements at 40 CFR 3.2000(b)(5). In this document, we refer to these entities as “indirect reporters.”
- Regulated entities that opt to implement the local registration authority (LRA) alternative for identity proofing must identify an individual who will collect paper subscriber agreements from each individual that intends to use an electronic signature device in reporting electronically to a State/Tribe/Local electronic document receiving system. In this document, we refer to these entities as “indirect reporting firms.”
- The LRA must collect and store paper subscriber agreements from individuals in his/her indirect reporting firm. The LRA also must prepare an agreement collection certification and submit a certification of receipt and secure storage<sup>3</sup> to the corresponding State/Tribal/Local agency.

Sections 1 through 5 of this document describe the information collection requirements covered in this ICR (e.g., in regard to need and use of the information collected). Section 6 estimates the annual burden to respondents. This ICR does not address the burden savings to respondents that opt to conduct electronic reporting, in lieu of paper-based reporting, to satisfy requirements under the various EPA programs. These burden savings are addressed in program-specific ICRs as electronic reporting becomes available under EPA programs.

CROMERR establishes requirements applicable to electronic reporting and receiving systems, as specified. Many of the activities to be conducted by direct reporters will be determined by the instructions associated with CDX, which guides direct reporters through the registration and reporting procedures. In developing this ICR, EPA referred to the regulatory text, as well as CDX, to describe direct reporters’ activities and associated burden.

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<sup>3</sup> In this context, “secure storage” means that the paper subscriber agreements have been stored in a manner that prevents unauthorized access to these agreements by anyone other than the local registration authority.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) NEED/AUTHORITY FOR THE COLLECTION**

EPA established the CROMERR requirements to ensure compliance with the Government Paperwork Elimination Act (GPEA).<sup>4</sup> GPEA requires that Federal agencies be prepared, by October 21, 2003, to allow persons who are required to maintain, submit, or disclose information, the option of doing so electronically, when practicable, as a substitute for paper; and to use electronic authentication (electronic signature) methods to verify the identity of the sender and the integrity of electronic content. GPEA specifically provides that electronic records, and their related electronic signatures, are not to be denied legal effect, validity, or enforceability merely because they are in electronic form.

#### **(1) Registering with EPA Electronic Document Receiving System**

Regulated entities must initially register with the EPA electronic document receiving system (i.e., CDX) to establish a user account. EPA needs the registration information to identify the registrant, contact information, and registrant's organization. Registrants also select a password and username during registration. This information is needed to ensure that only the registrant has access to his/her account.

#### **(2) Compliance with Identity Proofing Requirements**

The identity proofing provisions in 40 CFR 3.2000(b)(5) are needed to strengthen the non-repudiation provisions of CROMERR. The paper subscriber agreement or electronic ESA<sup>5</sup>, required in Section 3.2000(b)(5)(v), establishes that the signatory was informed of their obligation to keep the signature device from compromise, by ensuring that it is not made available to anyone else. These provisions are intended to ensure that the Federal laws regarding the falsification of information submitted to the government still apply to any and all electronic transactions, and that fraudulent electronic submissions will be prosecuted to the fullest extent of the law. In establishing clear requirements for electronic reporting systems, CROMERR helps to minimize fraud by assuring that the responsible individuals can be readily identified.

#### **(3) Approval of State/Tribe/Local Electronic Document Receiving System Applications**

EPA needs information submitted by States/Tribes/Locals in their program modification applications to evaluate the States/Tribes/Locals' electronic document receiving systems to ensure they satisfy the criteria at 40 CFR 3.2000.

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<sup>4</sup> Title XVII of Pub. L. 105 277.

<sup>5</sup> Pursuant to 40 CFR 3.3, "subscriber agreement" means an electronic signature agreement signed by an individual with a handwritten signature. This agreement must be stored until five years after the associated electronic signature device has been deactivated. "Electronic signature agreement" means an agreement signed by an individual with respect to an electronic signature device that the individual will use to create his or her electronic signatures requiring such individual to protect the electronic signature device from compromise; to promptly report to the agency or agencies relying on the electronic signatures created any evidence discovered that the device has been compromised; and to be held as legally bound, obligated, or responsible by the electronic signatures created as by a handwritten signature.

EPA also needs the information contained in the program modification application to evaluate whether the State/Tribe/Local's modified program has been satisfactorily revised or modified in regard to their electronic document receiving system. In particular, the application must include a certification that the State/Tribe/Local has sufficient legal authority provided by lawfully enacted or promulgated statutes or regulations to implement the electronic reporting component of its authorized program covered by the application; and to enforce the affected programs using electronic documents collected under these programs. The certification must be signed by the governmental official who is legally competent to certify with respect to legal authority on behalf of their government. In the case of a state, this official must be the Attorney General or designee. In the case of a tribe or local government, this official must be the chief administrative official or officer or designee. As a legal matter, EPA's position is that Attorneys General or their designees are the only officials capable of certifying with respect to their states' legal authority. Where there are substantial administrative obstacles involving the Attorney General in such certifications, EPA urges the State Attorney General to provide for a legally competent designee who is available to participate in the submission of the state's application.

## **2(b) PRACTICAL UTILITY/USERS OF THE DATA**

### **(1) Registering with EPA Electronic Document Receiving System**

Regulated entities must initially register with the EPA electronic document receiving system (i.e., CDX) to establish a user account and create a password. EPA uses the information to identify the registrant (e.g., by name and/or organization), establish the account, and contact the registrant if needed. Regulated entities use the password to access their account and to protect it from unauthorized use.

### **(2) Compliance with Identity Proofing Requirements**

EPA, States/Tribes/Locals, and LRAs use the identity proofing information from registrants to determine each registrant's identity and relationship to their regulated entity. The information may be used in an EPA or State/Tribe/Local enforcement action to rebut a signatory's attempt to repudiate their electronic signature and/or other elements of the document that was signed.

When EPA or State/Tribe/Local agency receives a paper subscriber agreement, an electronic ESA, a certification of receipt and secure storage<sup>6</sup>, or other identity-proofing information, the agency will review, process, and file the submittal. EPA or State/Tribe/Local agency would then provide the registrant with access to the electronic document receiving system (e.g., open its account) so that it may begin using the electronic signature device in reporting electronically.

### **(3) Approval of State/Tribe/Local Electronic Document Receiving System Applications**

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<sup>6</sup> Certifications of receipt and secure storage are provided by LRAs. In this context, "secure storage" means that the paper subscriber agreements have been stored in a manner that prevents unauthorized access to these agreements by anyone other than the local registration authority.

EPA uses the information submitted by States/Tribes/Locals in their program modification applications to evaluate the States/Tribes/Locals' upgraded or new electronic document receiving systems against the criteria at 40 CFR 3.2000(b)(1)-(5). For example, EPA will review the application to determine if the systems are able to generate data as needed, and in a timely manner, including copy of record for each electronic document received, sufficient to prove that the electronic document was not altered without detection during transmission or at any time after receipt.

EPA also reviews the application to ensure that the State/Tribe/Local has taken all necessary steps to modify its regulations and statutes, as needed, so that it has authority to implement electronic reporting and enforce the affected programs using electronic documents collected under its programs. This includes, among other things, an evaluation of the Attorney General's certification under 40 CFR 3.1000(b)(1)(i).

### **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a) NONDUPLICATION**

CROMERR establishes uniform, Agency-wide criteria for electronic document receiving systems, thereby minimizing the potential for duplication or redundancy across EPA or State/Tribe/Local programs. In addition, electronic reporting is voluntary, and will likely be used by facilities only if cost-effective and non-duplicative with their other compliance activities. CROMERR does not alter the reporting requirements under existing regulations and statutes, and does not affect whether a document must be created, submitted, or retained under existing 40 CFR provisions.

#### **3(b) PUBLIC NOTICE REQUIRED PRIOR TO ICR SUBMISSION TO OMB**

In compliance with the Paperwork Reduction Act of 1995 (PRA), EPA issued a public notice in the *Federal Register* on January 15, 2021 (86 FR 4066). The notice indicated that EPA was planning to submit an ICR, "Cross-Media Electronic Reporting Rule" (EPA ICR No. 2002.08, OMB Control No. 2025-0003), to the Office of Management and Budget (OMB) for review and approval in accordance with the PRA. The notice also requested comments on the information collection and burden estimates covered in the ICR. The public comment period extended through March 16, 2021. No public comments were received in response to the notice.

#### **3(c) CONSULTATIONS**

Most of the underlying assumptions in this ICR (e.g., hour and cost burden estimates) are based on EPA consultations with industry and States/Tribes/Locals during the development of the CROMERR requirements (i.e., the rulemaking process) and the renewal of previous CROMERR ICRs. In developing this current ICR, EPA carefully reviewed all of the ICR's data

and assumptions and determined that a few should be strengthened based on additional consultations.

Table 1 identifies the organizations contacted.

**Table 1**  
**Organizations EPA Contacted during the Development of this ICR**  
**(February 2021)**

Organization	Contact Name	Phone Number
<b>State/Local Agencies</b>		
City of Nampa (Idaho)	Nathan Costner	208-468-5842
Iowa Department of Natural Resources	Kevin Connolly	515-725-9569
Kansas Department of Health and Environment	Connie Ellis	785-296-1556
Massachusetts Department of Environmental Protection	Victoria Phillips	617-292-5956
Michigan Department of Environment, Great Lakes, and Energy	Sarah Ehinger	269-216-1341
Missouri Department of Natural Resources	Keith Bertels	573-526-4227
South Carolina Department of Health & Environmental Control	Dale Stoudemire	803-898-4209
Sacramento Regional County Sanitation District (Regional San)	Nicole Sears	916-876-7378

The following paragraphs summarize the feedback obtained from State/Tribal/Local agencies on the burden associated with various information collection activities.

**(1) Identity Proofing Activities**

- **Receive, process, review, approve, and file a paper subscriber agreement.** EPA was informed by four of the eight State/Tribal/Local agencies contacted that the ICR's original burden for receiving, processing, reviewing, approving, and filing a paper subscriber agreement (i.e., 10 minutes or 0.167 hour per paper subscriber agreement) was a realistic national average. Three State/Tribal/Local agencies indicated that the burden for this activity should be revised to 10-15 minutes, 15-20 minutes, or 22 minutes. One State/Tribal/Local agency did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving, processing, reviewing, approving, and filing a paper subscriber agreement was estimated to be 12 minutes or 0.2004 hours per paper subscriber agreement.
- **Receive, process, review, approve, and file an electronic ESA.** EPA was informed by three of the eight State/Tribal/Local agencies contacted that the ICR's original burden for receiving, processing, reviewing, approving, and filing an electronic ESA (i.e., 4 minutes or

0.0668 hours per electronic ESA) was a realistic national average. One State/Tribal/Local agency indicated that the burden for this activity should be revised to 10-15 minutes. Four State/Tribal/Local agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving, processing, reviewing, approving, and filing an electronic ESA was estimated to be 7 minutes or 0.1169 hours per electronic ESA.

## (2) Local Registration Authority Activities

- ***Receive, process, review, and approve certification of receipt and secure storage.*** EPA was informed by four of the eight State/Tribal/Local agencies contacted that the ICR's original burden for receiving, processing, reviewing, and approving a certification of receipt and secure storage (i.e., 10 minutes or 0.167 hour per certification) was a realistic national average. The remaining four State/Tribal/Local agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving, processing, reviewing, and approving a certification of receipt and secure storage was not revised and thus, remained at 10 minutes or 0.167 hours per certification.
- ***Receive notification of breach of security or compromised/surrendered electronic signature device, and take action.*** EPA was informed by three of the eight State/Tribal/Local agencies contacted that the ICR's original burden for receiving a notification of breach of security or compromised/surrendered electronic signature device, and taking action (i.e., 1 hour per notification) was a realistic national average. One State/Tribal/Local agency indicated that the burden for this activity should be revised to 2.5 hours. Four State/Tribal/Local agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving a notification of breach of security or compromised/surrendered electronic signature device, and taking action was estimated to be 1.3841 hours per notification.
- ***Receive application to designate LRA.*** EPA was informed by two of the eight State/Tribal/Local agencies contacted that the ICR's original burden for receiving an application to designate an LRA (i.e., 30 minutes or 0.50 hours per reporting firm) was a realistic national average. Six State/Tribal/Local agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving an application to designate an LRA was not revised and thus, remained at 30 minutes or 0.50 hours per reporting firm.

### (3) On-Going Management Activities

- ***Identify and resolve problems related to completing the registration and identity proofing processes.*** EPA was informed by six of the eight State/Tribal/Local agencies contacted that the ICR's original burden for identifying and resolving problems related to completing the registration and identity proofing processes (i.e., 1.2 hours per problem) was a realistic national average. One State/Tribal/Local agencies indicated that the burden for this activity should be revised to 1.5 hours. One State/Tribal/Local agency did not provide feedback on this information collection activity. Based on the consultation information, the average burden for identifying and resolving problems was estimated to be 1.25 hours per problem.
- ***Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes.*** EPA was informed by five of the eight State/Tribal/Local agencies contacted that the ICR's original burden for responding to information requests (i.e., 1.170 hours per request) was a realistic national average. However, one of them indicated that the hourly burden should be allocated to the managerial labor category, not the technical labor category. Two State/Tribal/Local agencies indicated that the burden for this activity should be revised to 0.0835 hours (5 minutes) or 1.5 hours. One State/Tribal/Local agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for responding to information requests was estimated to be 1.1169 hours per request.

### (4) State/Local Electronic Document Receiving System Application Activities

- ***Read the CROMERR regulations.*** EPA was informed by seven of the eight State/Tribal/Local agencies contacted that the ICR's original burden for reading the regulations (i.e., 9.130 hours of technical labor per State/Tribal/Local agency) was a realistic national average. However, one of them indicated that the hourly burden should be allocated to the managerial labor category, not the technical labor category. The remaining State/Tribal/Local agency did not provide feedback on this information collection activity. Based on the consultation information, the average burden for reading the regulations was estimated to be 4.0668 hours of managerial labor and 5.0501 hours of technical labor per State/Tribal/Local agency.
- ***Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 and apply for EPA program modification approval under 40 CFR 3.1000 (State agencies).*** Of the eight State/Tribal/Local agencies contacted, six were State agencies. EPA was informed by one of the six State agencies that the ICR's original burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval (i.e., 331 hours per State agency) was a realistic national average. Two State agencies indicated that the burden for this activity should be revised to 345 hours or 434 hours. The remaining three State agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR

3.2000 and applying for EPA program modification approval was estimated to be 370 hours per State agency (36.6680 hours of managerial time and 333.3340 hours of technical time).

- ***Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 and apply for EPA program modification approval under 40 CFR 3.1000 (Tribal/Local agencies).*** Of the eight State/Tribal/Local agencies contacted, two were Tribal/Local agencies. EPA was informed by one of the two Tribal/Local agencies that the ICR's original burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval (i.e., 331 hours per Tribal/Local agency) was a realistic national average. The remaining Tribal/Local agency did not provide feedback on this information collection activity. Based on the consultation information, the average burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval was not revised and thus, remained at 331 hours per Tribal/Local agency.
- ***Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000 (when receiving notice from EPA that the application is incomplete or does not satisfy the requirements at 40 CFR 3.2000).*** EPA was informed by four of the eight State/Tribal/Local agencies contacted that the ICR's original burden for submitting an amendment to the original application for EPA program modification approval under 40 CFR 3.1000 (i.e., 24 hours per State/Tribal/Local agency) was a realistic national average. However, one of them indicated that the hourly burden should be re-allocated among the managerial and technical labor categories: 20 hours of managerial time and 4 hours of technical time. Four State/Tribal/Local agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for submitting an amendment to the original application for EPA program modification approval under 40 CFR 3.1000 was not revised and thus, remained at 24 hours (11 hours of managerial time and 13 hours of technical time) per State/Tribal/Local agency.
- ***Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (State/Tribal/Local agencies with approved applications).*** EPA was informed by two of the eight State/Tribal/Local agencies contacted that the ICR's original burden for submitting a notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (i.e., 11.39 hours per State/Tribal/Local agency) was a realistic national average. Three State/Tribal/Local agencies indicated that the burden for this activity should be revised to 9.62 hours, 12 hours, or 48 hours. Three State/Tribal/Local agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for submitting a notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 was estimated to be 18.4686 hours per State/Tribal/Local agency.

- **Capital cost for upgrading or developing electronic document receiving system (State agency).** Of the eight State/Tribal/Local agencies contacted, six were State agencies. EPA was informed by five of the six State agencies that the ICR's cost estimate for upgrading or developing an electronic document receiving system (i.e., \$184,100 per State agency<sup>7</sup>) was a realistic national average. The remaining State agency did not provide feedback on costs associated with this activity. Based on the consultation information, the average cost for upgrading or developing an electronic document receiving system was not revised and thus, remained at \$184,100 per State agency.
- **Capital cost for upgrading or developing electronic document receiving system (Tribal/Local agency).** Of the eight State/Tribal/Local agencies contacted, two were Tribal/Local agencies. EPA was informed by one of the two Tribal/Local agencies that they opted to use Shared CROMERR Services, which has no capital costs, only staff time. The remaining Tribal/Local agency did not provide feedback on the capital costs associated with upgrading or developing electronic document receiving system. Due to the lack of new information on capital cost incurred by Tribal/Local agencies in upgrading their existing electronic document receiving system or developing a new electronic document receiving system, this ICR relies on the capital cost contained in the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.07, dated May 14, 2018). Refer to Section 6(b) of this document for additional information on this capital cost.

The above feedback is reflected in the burden assumptions of this ICR, as appropriate. Detailed information on EPA's assumptions regarding these and other activities are fully discussed in Section 6 of this document.

### **3(d) EFFECTS OF LESS FREQUENT COLLECTION**

#### **(1) Registering with EPA Electronic Document Receiving System**

Facilities must initially register with EPA's electronic document receiving system (i.e., CDX) to establish a user account. Registration information is collected at the time of registration (i.e., a one-time event) and updated if needed. Because it is a one-time activity, the information cannot be collected less frequently. If this information were not collected, EPA would not have a way to learn the identity of the registrant and establish its account.

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<sup>7</sup> The capital cost included the consultation questionnaire was derived based on data contained in the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.07, dated May 14, 2018). The capital cost was adjusted to 2020 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics. The value was rounded to the nearest hundred.

Bureau of Labor Statistics, "All items in U.S. city average, all urban consumers, not seasonally adjusted," U.S. City Average, 1982-84=100. March 2021. Available at [https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata\\_tool=XGtable&output\\_view=data&include\\_graphs=true](https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true). April 2018=250.546 and December 2020=260.474.

## **(2) Compliance with Identity Proofing Requirements**

Facilities must comply with the identity proofing provisions of CDX and 40 CFR 3.2000(b)(5), as applicable. These provisions provide that, in the case of priority reports for which an electronic signature device was used to create an electronic signature, a determination of identity must be made before the electronic document is received. It is critical that registrants submit the identity proofing paperwork in advance of their priority reports so that the agency can establish a link between each registrant and its electronic signature device to hold them accountable for their submittals. Facilities also must report any compromise or surrender of its electronic signature device to EPA or State/Tribe/Local.

LRAs must report any breach of storage of its paper subscriber agreements. These are as-needed submittals. If these reports were not collected, EPA and States/Tribes/Locals would not have a way to learn about the signature compromise/surrender or storage breaches. Hence, they would not be in a position to take follow up action as needed (e.g., to temporarily prevent access to an account whose signature device has been compromised). This could result in the unauthorized use an electronic signature device.

## **(3) Approval of State/Tribe/Local Electronic Document Receiving System Applications**

CROMERR sets forth timeframes for EPA receipt, review, and approval of State/Tribe/Local program modification applications to implement electronic document receiving systems. States/Tribes/Locals that did not have an electronic document receiving system in use or substantially developed on or before October 13, 2005 must apply to EPA for program modification approval before receiving electronic documents (40 CFR 3.10000(a)(2)). If this frequency were not specified, EPA would not have assurance that States/Tribes/Locals are developing and using electronic document receiving systems that comply with CROMERR's provisions at 40 CFR 3.2000.

### **3(e) GENERAL GUIDELINES**

With the following exception, this ICR adheres to the guidelines listed at 5 CFR 1320.5(d)(2).

EPA notes that subscriber agreements must be kept on file until five years after deactivation of the associated electronic signature device. A five-year retention period is necessary to ensure that such records are available in case of an EPA or State/Tribe/Local enforcement action. EPA recognizes that a registrant may use an electronic signature device in signing a range of enforcement-sensitive reports. Certain reports may have relevance to an enforcement action long after it is submitted to EPA or State/Tribe/Local. Because of this, EPA needed to establish a sufficiently long retention period for the subscriber agreements so that they would be available for such enforcement actions.

**3(f) CONFIDENTIALITY**

If a confidentiality claim were asserted, EPA would treat the information in accordance with the confidentiality regulations at 40 CFR Part 2, Subpart B. EPA also would ensure that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

**3(g) SENSITIVE QUESTIONS**

Persons registering with CDX are asked to provide knowledge-based information (e.g., date of birth) to ensure the security of their password, username, and other information supplied. If the person loses his/her password or username, or otherwise needs to confirm his/her identity to EPA, EPA could use the knowledge-based information to confirm his/her identity.

## **4. RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) RESPONDENTS/NAICS CODES**

The information collection requirements covered in this ICR will likely have broad applicability across industries. Refer to Appendix A for a list of the North American Industry Classification System (NAICS) codes associated with industries most likely affected by these requirements.

### **4(b) INFORMATION REQUESTED**

Following is a description of the data items and activities associated with the information collection requirements covered in this ICR. Refer to Section 1(b) for the types of respondents examined in this subsection.

#### **(1) Registering with EPA Electronic Document Receiving System**

Facilities must register their employees with EPA's electronic document receiving system, CDX, before reporting electronically to EPA. The employees must update their registration information if it changes.

##### **(i) Data Items:**

- An on-line registration application:
  - Registrant name.
  - Organization name.
  - Address.
  - Knowledge-based information (e.g., user-supplied secret question-and-answer pair).

##### **(ii) Respondent Activities:**

Facility employees (i.e., registrants) must perform the following activities:

- Log on to receiving system site and enter requested information (e.g., registrant name, email address, phone number, organization).
- Update the information, as needed.

#### **(2) Compliance with Identity Proofing Requirements**

Direct reporters, indirect reporters, indirect reporting firms, and LRAs must comply with the identity proofing provisions of CDX and CROMERR, as applicable. In addition, States/Tribes/Locals that accept electronic documents to satisfy reporting requirements under the authorized or delegated environmental programs that they administer must process, review, and approve the identity proofing information submitted by indirect reporters.

CDX and 40 CFR 3.2000(a)(2) require that any electronic document must bear the valid electronic signature of a signatory if that signatory would be required under the authorized program to sign the paper document for which the electronic document substitutes, except as otherwise specified. In the case of an electronic document that must bear electronic signatures of individuals as provided by CDX and 40 CFR 3.2000(a)(2), each signatory must sign either a paper subscriber agreement or electronic ESA with respect to the electronic signature device used to create their electronic signature on the electronic document.

CDX and 40 CFR 3.2000(b)(5)(vii) require that the identity of the individual uniquely entitled to use the device and their relation to any entity for which he or she will sign electronic documents must be determined with legal certainty by EPA or State/Tribe/Local, as applicable. In the case of priority reports, this determination must be made before the electronic document is received, by means of:

- Identifiers or attributes that are verified by attestation of disinterested individuals to be uniquely true of the individual in whose name the application is submitted, based on information or objects of independent origin, at least one item of which is not subject to change without governmental action or authorization.
- A method of determining identity no less stringent than the one above.
- Collection of either a paper subscriber agreement or a certification from a LRA that such an agreement has been received and securely stored.

The term “subscriber agreement” means an electronic signature agreement signed by an individual with a handwritten signature. The agreement must be signed by an individual with respect to an electronic signature device that the individual will use to create his/her electronic signature requiring such individual to protect the electronic signature device from compromise; to promptly report to the agency or agencies relying on the electronic signatures created any evidence discovered that the device has been compromised; and to be held as legally bound, obligated, or responsible by the electronic signatures created as by a handwritten signature. This agreement must be stored until five years after the associated electronic signature device has been deactivated.

The term “Local Registration Authority” means an individual who is authorized by a State/Tribe/Local to issue an agreement collection certification, whose identity has been established by notarized affidavit, and who is authorized in writing by a regulated entity to issue agreement collection certifications on its behalf. Once approved by EPA or State/Tribe/Local, the LRA would collect paper subscriber agreements from each individual in the regulated entity that intends to use an electronic signature device in reporting electronically to EPA or State/Tribe/Local electronic document receiving system. The LRA would collect and store the paper subscriber agreements in a manner that prevents authorized or unauthorized access to these agreements by anyone other than the LRA. The LRA would prepare an agreement collection certification and submit a certification of receipt and secure storage to EPA or State/Tribe/Local.

(i) Data Items:

- Compliance with identity proofing requirements by means of identifiers, attributes, or alternative method:
  - Identifiers or attributes that are verified by attestation of disinterested individuals to be uniquely true, as specified.
  - Other information necessary to determine identity.
- Compliance with paper subscriber agreement or electronic ESA provisions:
  - Paper subscriber agreement or electronic ESA.
  - Report of compromised or surrendered electronic signature.
- Submission of paper subscriber agreement to LRA:
  - Paper subscriber agreement.
  - Report of breach of security.
  - Report of compromised or surrendered electronic signature.
- Designation of LRA:
  - Application to designate a LRA, including notarized affidavit and a written authorization from the regulated entity to issue collection agreement certifications on its behalf.
- Collection of paper subscriber agreements by LRA:
  - Agreement collection certification. This is a signed statement by which an LRA certifies that a paper subscriber agreement has been received from a registrant; the agreement has been stored in a manner that prevents authorized or unauthorized access to these agreements by anyone other than the LRA; and the LRA has no basis to believe that any of the collected agreements have been tampered with or prematurely destroyed.
  - Certification of receipt and secure storage.

(ii) Respondent Activities:

***Direct and indirect reporters*** must perform the following activities, as applicable:

- Comply with requirements for identifier, attribute, or alternative method:
  - Prepare and submit information on identifiers, attributes, or other identity-proofing information.
- Comply with paper subscriber agreement or electronic ESA provisions:
  - Prepare and submit a paper subscriber agreement or electronic ESA.
  - Store paper subscriber agreement or electronic ESA.
  - Report compromised or surrendered electronic signature device.
  - Contact the Help Desk for technical support.
  -

- Submit paper subscriber agreement to LRA:
  - Prepare paper subscriber agreement and send to LRA.
  - Prepare and submit new paper subscriber agreement to LRA, for employee turnover.
  - Report breach of security or compromise/surrender of electronic signature device.
  - Prepare and submit new paper subscriber agreement to LRA subsequent to breach of security or compromise of electronic signature device.
- Conduct ongoing management:
  - Identify and resolve problems related to completing the registration and identity proofing processes.

***Indirect reporting firms and LRAs*** must perform the following activities, as applicable:

- Designating a LRA:
  - Develop a process or plan to implement the requirement, designate the LRA, and submit LRA application to agency.
  - Register the LRA with the electronic document receiving system.
  - Redesignate LRA, due to turnover, and send application materials.
  - Register new LRA with electronic document receiving system.
- Collect paper subscriber agreements from reporters:
  - Collect and securely store paper subscriber agreements.
  - Prepare agreement collection certification after securely storing paper subscriber agreements, and submit certification of receipt and secure storage.
  - Collect and securely store paper subscriber agreements, for employee turnover.
  - Prepare agreement collection certification after securely storing paper subscriber agreements, and submit certification of receipt and secure storage, for employee turnover.
  - Collect and securely store paper subscriber agreements, for breach of security/compromise of electronic signature device.
  - Prepare agreement collection certification after securely storing paper subscriber agreements, and submit certification of receipt and secure storage, for breach of security/compromise of electronic signature device.

***State/Tribe/Local agencies acting as regulators*** must perform the following activities:

- Collect identifiers, attributes, or alternative information:
  - Receive, process, review, and approve identifier, attribute, or alternative information.

- Collect paper subscriber agreements or electronic ESAs:
  - Receive, process, review, approve, and file new paper subscriber agreements or electronic ESAs.
  - Receive, process, review, and approve report of compromise or surrender of electronic signature device.
- Collect submittals from LRAs:
  - Receive, process, review, and approve certification of receipt and secure storage.
  - Receive, process, review and approve updated certification of receipt and secure storage, for employee turnover.
  - Receive notification of breach of security or compromise/surrender of electronic signature device and take action.
  - Receive, process, review, and approve certification of receipt and secure storage, for breach of security or compromise/surrender of electronic signature device.
- Collect applications for designation of LRAs:
  - Receive application to designate first-time LRA.
  - Receive application to designate LRA, for LRA turnover.
- Conduct ongoing management:
  - Identify and resolve problems related to completing the registration and identity proofing processes.
  - Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes.

### **(3) Approval of State/Tribe/Local Electronic Document Receiving System Applications**

To obtain EPA approval of authorized program revision or modification using procedures provided under 40 CFR 3.1000, a State /Local/Tribe must submit an application for program revision to EPA that includes the elements specified in Sections 3.1000(b)(1)(i) through(iv). This ICR does not require or mandate any forms, however the Agency provides voluntary templates for guidance and to expedite submittal of all required documentation (See Appendix D).

A State/Tribe/Local that revises or modifies more than one (1) authorized program for receipt of electronic documents, in lieu of paper documents, may submit a consolidated application covering more than one authorized program, provided the consolidated application complies with applicable requirements for each authorized program.

If the State/Tribe/Local receives a notice from EPA that its application is incomplete or does not satisfy the requirements at 40 CFR 3.2000, the State/Tribe/Local must submit an amendment to the original application that includes the missing information.

A State/Tribe/Local that accepts electronic documents, in lieu of paper documents, under an authorized program for which EPA has approved program revisions or modifications under

the procedures provided in 40 CFR 3.2000(a)(1) must keep EPA apprised of those changes to laws, policies, or the electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000.

The State/Tribe/Local program must satisfy the requirements at 40 CFR 3.2000. Pursuant to Section 3.2000, authorized programs that receive electronic documents, in lieu of paper documents, to satisfy requirements under such programs must use an acceptable electronic document receiving system, as specified, and require that any electronic document must bear valid electronic signatures to the same extent that the paper submission for which it substitutes would bear handwritten signatures under the authorized program, unless otherwise specified. An electronic document receiving system that receives electronic documents, submitted in lieu of paper documents, to satisfy requirements under an authorized program must be able to generate data with respect to any such electronic document, as needed and in a timely manner, including a copy of record for the electronic document, that meets the criteria specified at Sections 3.2000(b) (1) through (5).

(i) Data Items:

- An application (or application amendment) for program revision that includes the following elements:
  - A certification that the State/Tribe/Local has sufficient legal authority provided by lawfully enacted or promulgated statutes or regulations that are in full force and effect on the date of certification to implement the electronic reporting component of its authorized programs covered by the application in conformance with 40 CFR 3.2000 and to enforce the affected programs using electronic documents collected under these programs, together with copies of the relevant statutes and regulations, signed by the State Attorney General or designee, or in the case of an authorized tribal or local government program, by the Chief Administrative Official or Officer of the governmental entity or designee.
  - A listing of all State/Tribe/Local electronic document receiving systems to accept the electronic documents being addressed by the program modification or revisions that are covered by the application, together with a description for each such system that specifies how the system meets the applicable criteria in 40 CFR 3.2000(b) with respect to those electronic documents.
  - A schedule of upgrades for electronic document receiving systems that have the potential to affect the program's continued conformance with 40 CFR 3.2000, if appropriate.
  - Other such information as the Administrator may request to fully evaluate the application.
- Appraisals to EPA of changes to laws, policies, or electronic document receiving systems.

(ii) Respondent Activities:

***State/Tribe/Local agencies that are regulated entities*** must perform the following activities:

- Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 requirements and apply for EPA program modification approval under 40 CFR 3.1000.
- Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000.
- Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000.

## **5. AGENCY ACTIVITIES, METHODS, AND INFORMATION MANAGEMENT**

### **5(a) AGENCY ACTIVITIES**

#### **(1) Registering with EPA Electronic Document Receiving System**

EPA activities associated with facility reporting to EPA's electronic document receiving system (i.e., CDX) include:

- Develop, operate, and maintain CDX.

#### **(2) Compliance with Identity Proofing Requirements**

EPA activities associated with the identity proofing requirements covered in this ICR include:

- Collect identifiers or attributes or other information:
  - Receive, process, review, and approve identifier, attribute, or alternative information.
- Collect paper subscriber agreements or electronic ESAs:
  - Receive, process, review, approve, and file paper subscriber agreements or electronic ESAs.
  - Receive, process, review, and approve report of compromise or surrender of electronic signature device.
- Conduct ongoing management:
  - Identify and resolve problems related to completing the registration and identity proofing processes.
  - Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes.

#### **(3) Approval of State/Tribe/Local Electronic Document Receiving System Applications**

EPA activities associated with the approval of State/Tribe/Local electronic document receiving systems include:

- Process and file applications submitted by States/Tribes/Locals seeking to modify their programs, as required by 40 CFR 3.1000.
- Process and file amendment to original application for EPA program modification approval under 40 CFR 3.1000.
- Process and file appraisals of changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000.

## **5(b) COLLECTION METHODOLOGY AND MANAGEMENT**

CDX serves as EPA's primary gateway for electronic documents received by EPA. CDX functions include:

- Access management allowing or denying an entity access to CDX.
- Data interchange accepting and returning data via various file transfer mechanisms.
- Signature/certification management providing devices and required scenarios for individuals to sign and certify what they submit.
- Submitter and data authentication assuring that electronic signatures are valid and data is uncorrupted.
- Transaction logging providing date, time, and source information for data received to establish "chain of custody."
- Acknowledgment and provision of copy of record providing the submitter with confirmations of the data received.
- Archiving placing files received and transmission logs into secure, long term storage.
- Error checking flagging obvious errors in documents and document transactions, including duplicate documents and unauthorized submissions.
- Translating, forwarding, and converting submitted documents into formats that will load to EPA databases, and forwarding them to the appropriate systems.
- Outreach providing education and other customer services to CDX users (e.g., user manuals, Help Desk).

## **5(c) SMALL ENTITY FLEXIBILITY**

CROMERR allows electronic reporting by permitting the use of electronic document receiving systems to receive electronic documents in satisfaction of certain document submission requirements in EPA's regulations. Electronic reporting under CROMERR is voluntary. These changes will reduce the burden on all affected entities, including small businesses. In addition, facilities will find that the initial set up process requires little expenditure of time and resources, and in the long run, this process will reduce the time spent on submissions each year.

## **5(d) COLLECTION SCHEDULE**

The collection frequencies associated with CDX include the following:

- Registrants must initially register with the electronic document receiving system and obtain electronic signature certification, if applicable.
- Facilities must comply with requirements for determining the identity of individuals who use electronic signature devices (e.g., prepare/submit paper subscriber agreements, electronic ESAs, or certification of receipt and secure storage), before submitting electronic reports using the associated device.

- Registrants must submit a notice of compromise or surrender of electronic signature device promptly, should this occur.

States/Tribes/Locals that did not have an electronic document receiving system in use or substantially developed on or before October 13, 2005 must, using specified procedures, apply for and receive EPA approval of revisions or modifications to the authorized program before the program may receive electronic documents in lieu of paper documents to satisfy requirements of such program.

Within 75 calendar days of receiving an application for program revision or modification, the Administrator will respond with a letter that either notifies the State/Tribe/Local that the application is complete or identifies deficiencies in the application that render the application incomplete. The State/Tribe/Local receiving a notice of deficiencies may amend the application and resubmit it. Within 30 calendar days of receiving the amended application, the Administrator will respond with a letter that either notifies the applicant that the amended application is complete or identifies remaining deficiencies that render the application incomplete.

Except where an opportunity for public hearing is required, if the Administrator does not take any action on a specific request for revision or modification of a specific authorized program addressed by an application submitted within 180 calendar days of notifying the State/Tribe/Local that the application is complete, the specific request for program revision or modification for the specific authorized program is considered automatically approved by EPA at the end of the 180 calendar days unless the review period is extended at the request of the State/Tribe/Local submitting the application.

If a State/Tribe/Local submits material to amend its application after the date that the Administrator sends notification that the application is complete, this new submission will constitute withdrawal of the pending application and submission of a new, amended application for program revision or modification, and the 180-day time period will begin again only when the Administrator makes a new determination and notifies the State/Tribe/Local under that the amended application is complete.

## **6. ESTIMATING BURDEN AND COST**

### **6(a) ESTIMATING RESPONDENT BURDEN**

This ICR estimates the total annual respondent hourly burden associated with the information collection requirements under CROMERR. The majority of the hour estimates are based on the Agency's cost benefit analysis developed as part of the CROMERR rulemaking process<sup>8</sup>, and consultations with industry and States/Tribes/Locals. Appendix C (Exhibit C-1) includes detailed information on the burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents.

### **6(b) ESTIMATING RESPONDENT COSTS**

This ICR estimates the total annual respondent costs associated with the information collection requirements under CROMERR. These costs are based on the cost of labor, capital, and operation and maintenance (O&M). Appendix C (Exhibit C-1) includes detailed information on respondent costs.

#### **(1) Labor Costs**

Using the burden hours discussed in Section 6(a) and the hourly respondent labor costs outlined in this section, EPA estimated the labor costs associated with the information collection requirements covered in this ICR.

#### **(a) Direct Reporters, Indirect Reporters, Indirect Reporting Firms, and Local Registration Authorities**

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$71.08 for legal staff, \$45.56 for managerial staff, \$45.18 for technical staff, and \$19.88 for clerical staff. These respondent labor costs were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.07, dated May 14, 2018), and adjusted to 2020 levels using Employment Cost Indexes developed by the Bureau of Labor Statistics.<sup>9</sup>

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<sup>8</sup> U.S. Environmental Protection Agency (EPA). *Cross-Media Electronic Reporting Rule (CROMERR) Cost Benefit Analysis – Final*, November 17, 2004. Available at <https://www.regulations.gov/document/EPA-HQ-OEI-2003-0001-0248>.

<sup>9</sup> Bureau of Labor Statistics; "Table 4. Employment Cost Index for total compensation, for civilian workers, by occupational and industry;" *Employment Cost Index, Historical Listing – Volume V, Continuous Occupational and Industry Series, September 1975 –December 2020*; January 2021. Available at <http://www.bls.gov/web/eci/ecicois.pdf>. Civilian Workers, All Workers, June 2018=133.3 and December 2020=142.2.

**(b) State/Tribe/Local Agencies**

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$48.10 for legal staff, \$48.10 for managerial staff, \$36.43 for technical staff, and \$17.29 for clerical staff. These respondent labor costs were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.07, dated May 14, 2018), and adjusted to 2020 levels using Employment Cost Indexes developed by the Bureau of Labor Statistics.<sup>10</sup>

**(2) Capital Costs**

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment.

**(a) Direct Reporters, Indirect Reporters, Indirect Reporting Firms, and Local Registration Authorities**

EPA does not anticipate that direct reporters, indirect reporters, indirect reporting firms, and LRAs will incur capital costs in carrying out the information collection requirements covered in this ICR.

**(b) States/Tribes/Locals**

EPA anticipates that State/Tribal/Local agencies will incur capital costs in upgrading their existing electronic document receiving systems or developing new electronic document receiving systems to satisfy CROMERR standards at 40 CFR 3.2000 (e.g., copy of record, Secure Sockets Layer (SSL), e-mail notification, paper subscriber agreement, electronic ESA, electronic signature).

To estimate the average capital cost per agency for upgrading existing electronic document receiving systems or developing new electronic document receiving systems that satisfy the CROMERR standards at 40 CFR 3.2000, EPA used the weighted-average calculations in Table 2. EPA multiplied the percentage of State/Tribal/Local agencies that, in their program modification applications, indicated that they would opt for a custom, commercial off-the-shelf (COTS), core shared CROMERR services (SCS), or advanced SCS solution by the capital cost associated with each solution type. Then, EPA added the products for each solution type to calculate an overall weighted-average capital cost.

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<sup>10</sup> Bureau of Labor Statistics, "Table 7. Employment Cost Index for total compensation, for State and local government workers, by occupational and industry," *Employment Cost Index, Historical Listing – Volume V, Continuous Occupational and Industry Series, September 1975 –December 2020*; January 2021. Available at <http://www.bls.gov/web/eci/ecicois.pdf>. State and Local Government Workers, All Workers, June 2018=135.1 and December 2020=144.9.

**Table 2**  
**Assumptions and Weighted-Average Equations Used in Estimating Capital Cost to States/Tribes/Locals for Upgrading Existing Electronic Document Receiving Systems or Developing New Electronic Document Receiving Systems**

Solution Type	State Agencies			Tribal/Local Agencies		
	Capital Cost for Solution Type	Program Modification Applications		Capital Cost for Solution Type	Program Modification Applications	
		Number	Percent		Number	Percent
Custom	\$184,000	3	0.375	\$70,300	1	0.250
Commercial off-the-shelf (COTS) or Core shared CROMERR services (SCS)	\$70,300	4	0.500	\$70,300	1	0.250
Advanced SCS	\$10,000	1	0.125	\$10,000	2	0.500
<b>Weighted Average Capital Cost</b>	$(\$184,100 \times 0.375) + (\$70,300 \times 0.500) + (\$10,000 \times 0.125) =$ <b>\$105,400</b>			$(\$70,300 \times 0.250) + (\$70,300 \times 0.250) + (\$10,000 \times 0.500) =$ <b>\$40,150</b>		

For state agencies, the capital cost for custom solutions was derived based on consultations with a limited number of state agencies that already built their CROMERR-compliant systems.<sup>11</sup> The costs for COTS and core SCS solutions were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.07, dated May 14, 2018), and adjusted to 2020 levels using Consumer Price Indices developed by the Bureau of Labor Statistics.<sup>12</sup> The cost for advanced SCS solutions was provided by CDX staff with knowledge/experience on advanced SCS solutions.

For tribal/local agencies, the capital costs for custom, COTS, and core SCS solutions were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.07, dated May 14, 2018), and adjusted to 2020 levels using Consumer Price Indices developed by

<sup>11</sup> Refer to Section 3(c) of this document for information on consultations conducted by EPA during the development of this ICR.

<sup>12</sup> The previously approved ICR included a capital cost of \$67,556. This cost was adjusted to 2020 levels based on consumer price indices. Consumer Price Indices: Bureau of Labor Statistics, "All items in U.S. city average, all urban consumers, not seasonally adjusted," U.S. City Average, 1982-84=100. March 2021. Available at [https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata\\_tool=XGtable&output\\_view=data&include\\_graphs=true](https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true). April 2018=250.546 and December 2020=260.474. Capital cost was rounded to the nearest hundred.

the Bureau of Labor Statistics.<sup>13</sup> The cost for advanced SCS solutions was provided by CDX staff with knowledge/experience on advanced SCS solutions.

As shown in Table 2, EPA estimates that each state agency will incur a capital cost of \$105,400, and that each tribal/local agency will incur a capital cost of \$40,150. EPA notes that capital costs for tribal/local agencies are estimated to be lower than the capital costs for state agencies because tribal/local agencies are expected to have simpler electronic document receiving systems that cover fewer programs and fewer electronic reports than state systems.

The above capital costs are shown in Appendix C (Exhibit C-1) for all applicable respondent activities.

### **(3) Operation and Maintenance Costs**

O&M costs are those costs associated with an information collection requirement incurred continually over the life of the ICR.

#### **(a) Direct Reporters, Indirect Reporters, Indirect Reporting Firms, and Local Registration Authorities**

O&M costs include:

- EPA estimates that registrants that submit paper subscriber agreements to EPA or States/Tribes/Locals will incur a cost of \$4.18 to mail a one-ounce letter by certified mail (i.e., \$0.55 for first-class letter postage, \$3.60 for the certified-mail fee, and \$0.03 for standard business envelope).<sup>14, 15, 16</sup>
- EPA estimates that registrants that submit paper subscriber agreements to their LRA will incur a cost of \$0.58 to mail a one-ounce letter using first-class mail (i.e., \$0.55 for first-class letter postage and \$0.03 for standard business envelope).<sup>17, 18</sup>

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<sup>13</sup> The previously approved ICR included a capital cost of \$67,556. This cost was adjusted to 2020 levels based on consumer price indices. Consumer Price Indices: Bureau of Labor Statistics, "All items in U.S. city average, all urban consumers, not seasonally adjusted," U.S. City Average, 1982-84=100. March 2021. Available at [https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata\\_tool=XGtable&output\\_view=data&include\\_graphs=true](https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true). April 2018=250.546 and December 2020=260.474. Capital cost was rounded to the nearest hundred.

<sup>14</sup> U.S. Postal Service; "First-Class Mail Prices." Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c037](https://pe.usps.com/text/dmm300/Notice123.htm#_c037).

<sup>15</sup> U.S. Postal Service; "Extra Services Prices." Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c191](https://pe.usps.com/text/dmm300/Notice123.htm#_c191).

<sup>16</sup> Standard business envelope cost based on current market price, as of March 2021 (i.e., box of 500 standard business envelopes with gummed closure at \$16.68).

<sup>17</sup> U.S. Postal Service; "First-Class Mail Prices." Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c037](https://pe.usps.com/text/dmm300/Notice123.htm#_c037).

<sup>18</sup> Standard business envelope cost based on current market price, as of March 2021 (i.e., box of 500 standard business envelopes with gummed closure at \$16.68).

- EPA estimates that indirect reporting firms that implement the LRA alternative and submit an LRA application to the Agency will incur a cost of \$7.18. This cost includes:
  - \$3.00 for obtaining a notarized affidavit to establish the identity of an LRA. This O&M cost was obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.07, dated May 14, 2018), and adjusted to 2020 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics.<sup>19</sup>
  - \$4.18 to mail a one-ounce letter by certified mail (i.e., \$0.55 for first-class letter postage, \$3.60 for the certified-mail fee, and \$0.03 for standard business envelope).<sup>20, 21, 22</sup>
- EPA estimates that, in submitting a certification of receipt and secure storage, the LRA will incur a cost of \$2.88 to mail a first-class large envelope (i.e., \$2.60 for first-class large envelope (not more than nine ounces) postage and \$0.28 for catalog envelope).<sup>23, 24</sup>

The above O&M costs are shown in Appendix C (Exhibit C-1) for all applicable respondent activities.

#### **(b) State/Tribe/Local Agencies**

For State/Tribe/Local agencies, O&M costs include mailing costs. In particular, EPA estimates that State/Tribe/Local agencies submitting documentation to EPA (e.g., applications for program modification approval under 40 CFR 3.1000) will incur a cost of \$6.48 to mail a

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<sup>19</sup> Bureau of Labor Statistics, "All items in U.S. city average, all urban consumers, not seasonally adjusted," U.S. City Average, 1982-84=100. March 2021. Available at [https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata\\_tool=XGtable&output\\_view=data&include\\_graphs=true](https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true). April 2018=250.546 and December 2020=260.474.

<sup>20</sup> U.S. Postal Service; "First-Class Mail Prices." Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c037](https://pe.usps.com/text/dmm300/Notice123.htm#_c037).

<sup>21</sup> U.S. Postal Service; "Extra Services Prices." Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c191](https://pe.usps.com/text/dmm300/Notice123.htm#_c191).

<sup>22</sup> Standard business envelope cost based on current market price, as of March 2021 (i.e., box of 500 standard business envelopes with gummed closure at \$16.68).

<sup>23</sup> U.S. Postal Service; "First-Class Mail Prices." Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c037](https://pe.usps.com/text/dmm300/Notice123.htm#_c037).

<sup>24</sup> Catalog envelope cost based on current market price, as of March 2021 (i.e., 6 x 9 brown kraft catalog envelopes, box of 100, at \$27.92).

nine-ounce large envelope by certified mail (\$2.60 for first-class large envelope postage, \$3.60 for the certified-mail fee, and \$0.28 for catalog envelope).<sup>25,26, 27</sup>

The above O&M costs are shown in Appendix C (Exhibit C-1) for all applicable respondent activities.

### **6(c) ESTIMATING AGENCY BURDEN AND COST**

This ICR estimates the total annual Agency hour and cost burden associated with the information collection requirements under CROMERR (see Exhibit C-2 in Appendix C). EPA estimates an average hourly labor cost of \$72.00 for legal staff (GS-14, Step 1), \$60.93 for managerial staff (GS-13, Step 1), \$51.23 for technical staff (GS-12, Step 1), and \$25.98 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2021.<sup>28</sup> This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates.

EPA estimates that, each year, the Agency will incur a capital cost of \$140,000 in CDX development, operation, and maintenance activities.

### **6(d) ESTIMATING THE RESPONDENT UNIVERSE AND TOTAL BURDEN AND COSTS**

In this section, EPA first describes the estimated respondent universe. EPA then estimates the annual burden to respondents under the information collection requirements covered in this ICR.

EPA notes that, as used in this document, the term “respondent” includes:

- Direct reporters, indirect reporters, indirect reporting firms, and LRAs complying with the registration and identity proofing requirements covered in this ICR, as applicable. This includes:
  - Private sector entities; and
  - State/Tribe/Local agencies that are regulated entities<sup>29</sup>.

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<sup>25</sup> U.S. Postal Service; “First-Class Mail Prices.” Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c037](https://pe.usps.com/text/dmm300/Notice123.htm#_c037).

<sup>26</sup> U.S. Postal Service; “Extra Services Prices.” Available at [https://pe.usps.com/text/dmm300/Notice123.htm#\\_c191](https://pe.usps.com/text/dmm300/Notice123.htm#_c191).

<sup>27</sup> Catalog envelope cost based on current market price, as of March 2021 (i.e., box of 100 6” x 9” brown kraft catalog envelopes with gummed closure at \$27.92).

<sup>28</sup> US Office of Personnel Management, “Base Hourly Rate,” *2021 General Schedule (Base)*, January 2021. Available at [http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS\\_h.pdf](http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf).

<sup>29</sup> Addressing State/Tribe/Local agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the PRA.

- State/Tribe/Local agencies administering electronic document receiving systems subject to CROMERR standards<sup>30</sup>. In this document, we refer to these respondents as “State/Tribe/Local agencies acting as regulators.”
- State/Tribe/Local agencies seeking EPA approval to allow electronic reporting under CROMERR<sup>31</sup>. In this document, we refer to these respondents as “State/Tribe/Local agencies that are regulated entities.”

## **(1) Respondent Universe**

EPA estimates that, in total, 132,724 respondents will be subject to the information collection requirements covered in this ICR. This includes 89,679 direct reporters, 42,972 indirect reporters, 48 State/Tribe/Local agencies acting as regulators, and 25 State/Tribe/Local agencies that are regulated entities. The following paragraphs provide additional information on how these respondent universe estimates were derived.

### **(a) Direct Reporters**

EPA estimates that, each year, 89,679 direct reporters will be subject to the information collection requirements covered in this ICR. This includes the 89,679 direct reporters expected to register with CDX. Of these 89,679 direct reporters, 27,359 direct reporters are expected to comply with identifier, attribute, or alternative method requirements (e.g., CDX 20-5-1); 3,752 direct reporters are expected to submit paper subscriber agreements, and 19,110 direct reporters are expected to submit electronic ESAs.

Table 3 presents information on the annual number of direct reporters expected to register with CDX during the three-year period covered by the ICR. To estimate the annual number of direct reporters expected to register with CDX, EPA used historical information on the annual number of registrants for years 2018 through 2020. In particular, EPA used the average annual number of registrants for the 2018-2020 period. As shown in Table 3, EPA estimates that, on average, 89,679 direct reporters will register with CDX each year.

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<sup>30</sup> Addressing State/Tribe/Local agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the PRA..

<sup>31</sup> Addressing State/Tribe/Local agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the PRA..

**Table 3**  
**Annual Number of Direct Reporters Expected to Register with EPA’s CDX during the Three-Year Period Covered by the ICR <sup>a</sup>**

Respondent Universe	Average Annual Number of Registrants <sup>b, c</sup>
Private Sector Entities	77,639
State/Tribe/Local Agencies that are Regulated Entities	12,040
<b>Total</b>	<b>89,679</b>

<sup>a</sup> Table includes rounding error.

<sup>b</sup> Table contains data current as of November 2020.

<sup>c</sup> Federal government direct reporters are not reflected in the table because they are exempt from ICR requirements.

Table 4 presents information on the annual number of direct reporters expected to comply with identifier, attribute, or alternative method requirements (e.g., CDX 20-5-1) during the three-year period covered by the ICR.<sup>32</sup> To estimate the annual number of direct reporters expected to comply with identifier, attribute, or alternative method requirements, EPA referred to user data from the CDX web site. In particular, EPA used data on the number of times CDX web pages related to the use of identifier, attribute, or alternative method requirements were visited (i.e., viewed) by unique users. As shown in Table 4, EPA estimates that, on average, 27,359 direct reporters will comply with identifier, attribute, or alternative method requirements each year.

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<sup>32</sup> One method to determine the identity of an individual is by means of identifiers, attributes, or alternative methods that are verified (and that may be re-verified at any time) by attestation of disinterested individuals to be uniquely true of (or attributable to) the individual in whose name the application is submitted, based on information or objects of independent origin, at least one item of which is not subject to change without governmental action or authorization.

**Table 4**  
**Annual Number of Direct Reporters Expected to Comply with**  
**with Identifier, Attribute, or Alternative Method Requirements**  
**during the Three-Year Period Covered by the ICR <sup>a, b</sup>**

Respondent Universe	Average Annual Number of Direct Reporters <sup>c</sup>
Private Sector Entities	23,686
State/Tribe/Local Agencies that are Regulated Entities	3,673
<b>Total</b>	<b>27,359</b>

<sup>a</sup> Table includes rounding error.

<sup>b</sup> Table contains data current as of November 2020.

<sup>c</sup> Federal government direct reporters are not reflected in the table because they are exempt from ICR requirements.

Table 5 presents information on the estimated annual number of paper subscriber agreements and electronic ESAs to be submitted to EPA during the three-year period covered by the ICR. To estimate the annual number of paper subscriber agreements and electronic ESAs, EPA referred to data from the CDX web site. In particular, EPA used data on the number of times CDX web pages related to paper subscriber agreements and electronic ESAs were visited (i.e., viewed) by unique users. As shown in Table 5, EPA estimates that, on average, direct reporters will submit 3,752 paper subscriber agreements and 19,110 electronic ESAs.

**Table 5**  
**Annual Number of Paper Subscriber Agreements**  
**and Electronic ESAs to be Submitted to EPA**  
**during the Three-Year Period Covered by the ICR <sup>a, b</sup>**

Type of Submission	Annual Number of Submissions <sup>c</sup>
<b>Private Sector Entities</b>	
Paper Subscriber Agreements	3,248
Electronic ESAs	16,544
<i>Subtotal</i>	<i>19,792</i>
<b>State/Tribe/Local Agencies that Are Regulated Entities</b>	
Paper Subscriber Agreements	504
Electronic ESAs	2,566
<i>Subtotal</i>	<i>3,070</i>
<b>Total</b>	
Paper Subscriber Agreements	3,752
Electronic ESAs	19,110
<b>Total</b>	<b>22,862</b>

<sup>a</sup> Table includes rounding error.

<sup>b</sup> Table contains data current as of November 2020.

<sup>c</sup> Federal government direct reporters are not reflected in the table because they are exempt from ICR requirements.

## (b) Indirect Reporters

EPA assumes that only a portion of indirect reporters will use the LRA alternative. The remaining indirect reporters will comply with the paper subscriber agreement or electronic ESA provisions. This section provides information on the annual number of paper subscriber agreements and electronic ESAs to be submitted by indirect reporters during the three-year period covered by this ICR.

Table 6 presents information on the estimated annual number of paper subscriber agreements and electronic ESAs to be submitted to State/Tribes/Locals during the three-year period covered by the ICR. As shown in the table, EPA estimates that, on average, indirect reporters will submit 16,701 paper subscriber agreements and 28,118 electronic ESAs each year.

**Table 6**  
**Annual Number of Paper Subscriber Agreements and Electronic ESAs**  
**Expected to be Submitted to State/Tribal/Local Systems**  
**during the Three-Year Period Covered by the ICR**

Type of Submission	Systems with Non-SCS Solutions	Systems with SCS Solutions	Total
<b>Private Sector Entities</b>			
Paper Subscriber Agreements	11,292	3,166	14,458
Electronic ESAs	1,255	23,088	24,343
<i>Subtotal</i>	<i>12,547</i>	<i>26,254</i>	<i>38,801</i>
<b>State/Tribe/Local Agencies that Are Regulated Entities</b>			
Paper Subscriber Agreements	1,752	491	2,243
Electronic ESAs	194	3,581	3,775
<i>Subtotal</i>	<i>1,946</i>	<i>4,072</i>	<i>6,018</i>
<b>Total</b>			
Paper Subscriber Agreements	13,044	3,657	16,701
Electronic ESAs	1,449	26,669	28,118
<b>Total</b>	<b>14,494</b>	<b>30,326</b>	<b>44,820</b>

<sup>a</sup> Table includes rounding error.

<sup>b</sup> Table contains SCS data from CDX, and are current as of November 2020.

<sup>c</sup> Federal government indirect reporters are not reflected in the table because they are exempt from ICR requirements.

As shown in Table 6, for purposes of this ICR, paper subscriber agreements and electronic ESAs submitted by indirect reporters are categorized into two groups based on the State/Tribal/Local electronic document receiving system: (1) systems with non-SCS solutions and (2) systems with SCS solutions. Appendix B provides detailed information on the methodology used to estimate the annual number of paper subscriber agreements and electronic ESAs to be submitted to systems with non-SCS solutions. The annual number of paper subscriber agreements and electronic ESAs to be submitted to systems with SCS solutions is based on data from CDX.

### (c) Indirect Reporting Firms

As stated earlier, EPA assumes that only a portion of indirect reporters will use the LRA alternative. The remaining indirect reporters will comply with the paper subscriber agreement or electronic ESA provisions. This section provides information on the number of indirect reporting *firms* expected to use the LRA alternative during the three-year period covered by this ICR.

EPA estimates that 2,553 indirect reporting *firms* will use the LRA alternative. This includes 2,220 small *firms* and 333 medium-size and large *firms*.

EPA uses the above number of indirect reporting *firms* to estimate the annual number of indirect reporters that will submit paper subscriber agreements to LRAs. Appendix B provides detailed information on the methodology used to estimate the annual number of paper subscriber agreements expected to be submitted to LRAs during the three-year period covered by this ICR.

**(d) State/Tribe/Local Agencies Acting as Regulators**

EPA estimates that, currently, 48 State/Tribe/Local agencies administer electronic document receiving systems subject to CROMERR.

**(e) States/Tribes/Locals Agencies That Are Regulated Entities**

Based on information currently available to EPA on the submission and approval of program modification applications under 40 CFR 3.1000 (i.e., CROMERR applications), EPA estimates that, on average, 12 States/Tribes/Locals (i.e., 8 state agencies and 4 tribal/local agencies) will upgrade their existing electronic document receiving systems or develop new electronic document receiving systems to comply with the CROMERR standards at 40 CFR 3.2000, and submit CROMERR applications each year.

EPA also estimates that, on average, 12 States/Tribes/Locals (i.e., 8 state agencies and 4 tribal/local agencies) will submit amendments to their original CROMERR applications each year. These agencies are expected to submit an amendment when receiving notice from EPA that their application is incomplete or does not satisfy the requirements at 40 CFR 3.2000.

In addition, EPA estimates that, on average, one State/Tribe/Local (i.e., 1 state agency and 0 tribal/local agencies) will submit notifications to EPA about changes to laws, policies, or electronic document receiving systems each year.

Based on the above information, EPA estimates that, each year, 25 State/Tribe/Local agencies will be regulated entities during the three-year period covered by this ICR.

**(2) Annual Respondent Burden**

In this section, EPA describes the assumptions used in estimating annual burden to respondents under the information collection requirements covered in this ICR. Refer to Appendix C (Exhibit C-1) for detailed information on respondent burden calculations.

**(a) Registering with EPA Electronic Document Receiving System – Direct Reporters**

EPA estimates that, on average, 89,679 direct reporters will register with EPA's electronic document receiving system each year (see Table 3). EPA also estimates that, of the 89,679 registrants, 1,140 will need to update their registration information each year.<sup>33</sup>

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<sup>33</sup> Based on data on the number of times CDX web pages related the update of registration information were visited (i.e., viewed) by unique users. Data current as of November 2020.

**(b) Compliance with Identity Proofing Requirements – Direct Reporters**

The following paragraphs discuss the assumptions associated with compliance with the identity proofing requirements by direct reporters.

Comply with Requirements for Identifier, Attribute, or Alternative Method

EPA estimates that, on average, 27,359 direct reporters will submit information on identifiers or attributes, or other identity-proofing information (e.g., CDX 20-5-1) each year (see Table 4).

Comply with Paper Subscriber Agreement or Electronic ESA Provisions

EPA assumes that direct reporters will comply with paper subscriber agreement or electronic ESA provisions, as applicable.

*Paper Subscriber Agreements.* EPA estimates that, on average, direct reporters will prepare, submit, and store a total of 3,752 paper subscriber agreements each year (see Table 5). EPA also estimates that, each year, one percent of these direct reporters (38) will submit paper subscriber agreements associated with a compromised electronic signature, which requires the submittal of a new paper subscriber agreement. EPA anticipates that all direct reporters preparing a paper subscriber agreement will contact the Help Desk for technical support.

*Electronic ESAs.* EPA estimates that, on average, direct reporters will submit and store a total of 19,110 electronic ESAs each year (see Table 5). EPA also estimates that, each year, one percent of these direct reporters (191) will submit electronic ESAs associated with a compromised electronic signature, which requires the submittal of a new electronic ESA. EPA anticipates that all direct reporters preparing an electronic ESA will contact the Help Desk for technical support.

Conduct On-Going Management

EPA assumes that, of the 22,862 direct reporters that submit paper subscriber agreements or electronic ESAs (see Table 5), three percent (686) will have to work with EPA to resolve problems involving their paper subscriber agreements or electronic ESAs each year.

**(c) Compliance with Identity Proofing Requirements – Indirect Reporters**

The following paragraphs discuss the assumptions associated with compliance with the identity proofing requirements by indirect reporters.

Comply with Requirements for Identifier, Attribute, or Alternative Method

EPA does not anticipate that indirect reporters will prepare and submit information on identifiers or attributes, or other identity-proofing information.

### Comply with Paper Subscriber Agreement or Electronic ESA Provisions

EPA assumes that indirect reporters will comply with paper subscriber agreement or electronic ESA provisions, as applicable.

*Paper Subscriber Agreements.* EPA estimates that, on average, indirect reporters will prepare, submit, and store a total of 16,701 paper subscriber agreements each year (see Table 6). EPA also estimates that, each year, one percent of these indirect reporters (167) will submit paper subscriber agreements associated with a compromised electronic signature, which requires the submittal of a new paper subscriber agreement. EPA anticipates that all indirect reporters preparing a paper subscriber agreement will contact the Help Desk for technical support.

*Electronic ESAs.* EPA estimates that, on average, indirect reporters will submit and store a total of 28,118 electronic ESAs each year (see Table 6). EPA also estimates that, each year, one percent of these indirect reporters (281) will submit electronic ESAs associated with a compromised electronic signature, which requires the submittal of a new electronic ESA. EPA anticipates that all indirect reporters preparing an electronic ESA will contact the Help Desk for technical support.

### Submit Paper Subscriber Agreements to Local Registration Authority

EPA estimates that, on average, indirect reporters will prepare and send to their LRA a total of 157 paper subscriber agreements each year. Of the 157 paper subscriber agreements prepared each year, 89 percent (139) will be from new employee registrants; 10 percent (16) will be associated with employee turnover, which requires the submittal of a new paper subscriber agreement by the employee replacement; and one percent (2) will be associated with a compromised electronic signature, which requires the submittal of a new paper subscriber agreement. Appendix B provides detailed information on the methodology used to estimate the total annual number of paper subscriber agreements to be submitted to LRAs.

### Conduct On-Going Management

EPA assumes that, of the 12,526 indirect reporters that will submit paper subscriber agreements and electronic ESAs directly to State/Tribal/Local electronic document receiving systems with non-SCS solutions (see Appendix B), three percent (376) will have to work with States/Tribes/Locals to resolve problems involving their paper subscriber agreements and electronic ESAs each year.

**(c) Implementation of Local Registration Authority Alternative – Indirect Reporting Firms and Local Registration Authorities**

The following paragraphs discuss the assumptions associated with implementation of the LRA alternative by indirect reporting *firms* and LRAs.

Designating a Local Registration Authority

EPA assumes that two percent of medium-size and large indirect reporting *firms* ( $333 \times 0.02 = 7$ ) will use the LRA alternative. These *firms* will develop a process or plan to implement the LRA alternative, designate the LRA, submit the LRA application to the agency, and register the LRA with the electronic document receiving system.

Of the 7 medium-size and large indirect reporting *firms* that will use the LRA alternative, two percent (1) will need to redesignate the LRA annually due to turnover, which requires registration of the new LRA with the electronic document receiving system.

Collect Paper Subscriber Agreements from Reporters

EPA estimates that, on average, LRAs will collect a total of 157 paper subscriber agreements each year. Of these 157 paper subscriber agreements, 139 will be from new employee registrants, 16 will be associated with employee turnover, and 2 will be associated with a compromised electronic signature. For each of these paper subscriber agreements, LRAs will need to prepare an agreement collection certification after securely storing the paper subscriber agreements, and submit a certification of receipt and secure storage.

**(d) Compliance with Identity Proofing Requirements – State/Tribe/Local Agencies Acting as Regulators**

Collect Identifier, Attribute, or Alternative Information

EPA does not anticipate that indirect reporters will prepare and submit information on identifiers or attributes, or other identity-proofing information.<sup>34</sup>

Collect Paper Subscriber Agreements and Electronic ESAs – Paper Subscriber Agreements

EPA estimates that, on average, indirect reporters will prepare, submit, and store a total of 16,701 paper subscriber agreements each year. In addition, indirect reporters will prepare, submit, and store 167 paper subscriber agreements associated with a compromised electronic signature. State/Tribe/Local agencies will receive, process, review, approve, and file all these paper subscriber agreements.

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<sup>34</sup> One method to determine the identity of an individual is by means of identifiers, attributes, or alternative methods that are verified (and that may be re-verified at any time) by attestation of disinterested individuals to be uniquely true of (or attributable to) the individual in whose name the application is submitted, based on information or objects of independent origin, at least one item of which is not subject to change without governmental action or authorization.

### Collect Paper Subscriber Agreements and Electronic ESAs – Electronic ESAs

EPA estimates that, on average, indirect reporters will prepare, submit, and store a total 28,118 electronic ESAs each year. In addition, indirect reporters will prepare, submit, and store 281 electronic ESAs associated with a compromised electronic signature. State/Tribe/Local agencies will receive, process, review, approve, and file all these electronic ESAs.

### Collect Submittals from Local Registration Authority

EPA estimates that, each year, indirect reporters will submit 157 paper subscriber agreements to their LRAs. This includes 139 paper subscriber agreements from new employee registrants, 16 paper subscriber agreements associated with employee turnover, and 2 paper subscriber agreements associated with a compromised electronic signature. State/Tribe/Local agencies will need to receive, process, review, and approve the certification of receipt and secure storage submitted by the LRAs.

### Collect Applications for Designation of Local Registration Authority

EPA estimates that, each year, 7 indirect reporting *firms* will use the LRA alternative. EPA also estimates that, each year, one of these firms will need to redesignate the LRA due to turnover. State/Tribe/Local agencies will need to receive and approve these LRA applications.

### Conduct On-Going Management

EPA estimates that, each year, State/Tribe/Local agencies will have to work with 376 indirect reporters to resolve problems involving their agreements or certifications and respond to information requests.

### **(e) Approval of State/Local Electronic Document Receiving System Applications – State/Tribe/Local Agencies that Are Regulated Entities**

#### Read the Regulations

EPA estimates that, on average, 25 States/Tribes/Locals will submit documentation to EPA associated with the approval of State/Tribe/Local electronic document receiving systems each year. These States/Tribes/Locals are expected to read the regulations at 40 CFR Part 3.

#### Submit Electronic Document Receiving System Application

EPA estimates that, on average, 12 States/Tribes/Locals will upgrade their existing electronic document receiving systems or develop new electronic document receiving systems and submit a CROMERR application each year. This includes eight state agencies and four tribal/local agencies. This ICR does not require or mandate any forms, however the Agency provides voluntary templates for guidance and to expedite submittal of all required documentation (See Appendix D).

### Submit Amendment to Original Application

EPA estimates that, on average, 12 States/Tribes/Locals will submit amendments to their original CROMERR application each year. This includes eight state agencies and four tribal/local agencies. This ICR does not require or mandate any forms, however the Agency provides voluntary templates for guidance and to expedite submittal of all required documentation (See Appendix D).

### Submit Notification on Changes to Laws, Policies, or Electronic Document Receiving System

EPA estimates that, on average, one state agency will submit a notification about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000. EPA does not anticipate that tribal or local agencies will submit this notification during the three-year period covered by this ICR. This ICR does not require or mandate any forms, however the Agency provides voluntary templates for guidance and to expedite submittal of all required documentation (See Appendix D).

## **6(e) 1BOTTOM LINE BURDEN HOUR AND COST TABLES**

### **(1) Respondent Tally**

Exhibits 1 and 2 summarize the total annual respondent hour and cost burden associated with all the requirements covered in this ICR. Exhibit 1 presents information on the total estimated respondent hour and cost burden for all respondents. Exhibit 2 presents information on the total estimated respondent hour and cost burden, by type of respondent. As used in this document, the term “respondent” includes private sector and State/Tribe/Local entities.<sup>35</sup> As shown in the exhibits, EPA estimates the annual respondent burden to be 81,985 hours and \$4,710,366. The bottom-line burden to respondents over three years is estimated to be 245,955 hours and \$14,131,098.

### **(2) Agency Tally**

Exhibit 3 summarizes the total annual EPA hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual agency burden to be 31,453 hours and \$1,754,666. The bottom-line burden to the agency over three years is estimated to be 94,359 hours and \$5,263,998.

## **6(f) REASONS FOR CHANGE IN BURDEN**

The annual respondent burden estimate in OMB’s inventory for the previously approved CROMERR ICR (EPA ICR Number 2002.07) was 86,554 hours. The annual respondent burden estimate for this ICR (EPA ICR Number 2002.08) is 81,985 hours. This represents a decrease of 4,569 hours.

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<sup>35</sup> Refer to Section 6(d) for additional clarification on the types of respondents examined in this ICR.

The decrease in respondent burden can be attributed primarily to two reasons. First, over the past three years, the Agency made improvements to CDX to enhance efficiencies in end-user registration, integration, and Help Desk support. These improvements resulted in reduced burden to respondents. Second, through technological improvements, the Agency now is able to obtain real world data via Google Analytics on the frequency and amount of time a respondent spends accessing CDX web pages and features. Based on this information, EPA has revised the burden estimates associated with some of the CDX registration and identity proofing activities. The Agency believes that these revised burden estimates more accurately reflect the resources spent by respondents conducting electronic reporting activities under CROMERR.

Note that the decrease in respondent burden described above was offset by an almost two-fold increase in the number of respondents that report to State/Tribal/Local electronic document receiving systems (i.e., indirect reporters). In developing this ICR, EPA revised the approach used to estimate the number of indirect reporters. The revised approach uses SCS data from CDX to supplement estimates obtained based on analysis of respondent universe growth rates in EPA program ICRs, which was the previous approach used to estimate number of indirect reporters.

The overall change in respondent burden is considered an “adjustment,” because it results from changes in the respondent universe and hourly burden estimates used in the development of the ICR.

## **6(g) BURDEN STATEMENT**

### **(1) Registering with EPA Electronic Document Receiving System – Direct Reporters**

The reporting burden is estimated to be 18 minutes for a facility employee to register with CDX. This includes time for preparing the on-line application and calling the CDX Help Desk. There are no recordkeeping requirements associated with registering with the CDX application.

### **(2) Compliance with Identity Proofing Requirements – Direct and Indirect Reporters**

The reporting burden is estimated to be about 3 minutes for a registrant to prepare and submit identifier, attribute, or alternative information. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden. Note that, in this ICR, the burden associated with preparing and submitting identifier, attribute, or alternative information is applicable to direct reporters only.

The reporting burden is estimated to range from 3 minutes to 7 minutes for a registrant to prepare and submit a paper subscriber agreement or electronic ESA. The recordkeeping burden is estimated to be about 7 minutes to store an agreement on site.

**(3) Implementation of Local Registration Authority Alternative – Indirect Reporting Firms and Local Registration Authorities**

The reporting burden is estimated to be 13 hours for a firm to develop a process or plan to use the LRA alternative, designate the LRA, submit the LRA application to the agency, and register the LRA with the electronic document receiving system. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 1 hour for a firm to redesignate the LRA, due to turnover; send the LRA application to the agency; and register the new LRA with the electronic document receiving system. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 10 minutes for a LRA to prepare and submit a certification of receipt and secure storage after receiving a paper subscriber agreement. The recordkeeping burden is estimated to be 10 minutes for a LRA to compile paper subscriber agreements from employee registrants within the LRA's firm and place them in secure storage.

**(4) Compliance with Identity Proofing Requirements – State/Tribe/Local Agencies Acting as Regulators**

The reporting burden is estimated to range from 7 minutes to 34 minutes for a State/Tribe/Local agency to receive, process, review, and approve paper subscriber agreements or electronic ESAs. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 30 minutes for a State/Tribe/Local agency to receive, process, review, and approve an LRA application. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The reporting burden is estimated to be 2.37 hours for a State/Tribe/Local agency to resolve problems involving paper subscriber agreements or certifications, and respond to information requests. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

**(5) Approval of State/Tribe/Local Electronic Document Receiving System Applications – State/Tribe/Local Agencies that Are Regulated Entities**

The reporting burden is estimated to range from 331 hours to 370 hours for a State/Tribe/Local agency to prepare and submit the CROMERR application to EPA, depending on whether the State/Tribe/Local agency is planning to use a commercial off-the-shelf [COTS] or shared CROMERR services [SCS] solution, or develops its own electronic document receiving system). The recordkeeping burden is estimated to be 9.13 hours to read the regulations.

The reporting burden is estimated to be 24 hours for a State/Tribe/Local agency to prepare and submit an amendment to its original CROMERR application to EPA. The recordkeeping burden is estimated to be 9.12 hours to read the regulations.

The reporting burden is estimated to be about 18.47 hours for a State/Tribe/Local agency to notify EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000. The recordkeeping burden is estimated to be 9.12 hours to read the regulations.

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-OEI-2011-0096, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Office of Environmental Information (OEI) 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 OEI Docket is (202) 566-1752. 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-OEI-2011-0096 and OMB Control Number 2025-0003 in any correspondence.

**EXHIBIT 1**  
**CROSS-MEDIA ELECTRONIC REPORTING**  
**TOTAL ESTIMATED RESPONDENT HOUR AND COST BURDEN SUMMARY <sup>a</sup>**

	Annual Number of Respondents <sup>b</sup>	Annual Burden Hours	Annual Labor Cost	Annual Capital/Startup Cost	Annual O&M Cost	Total Annual Cost
Registering with EPA Electronic Document Receiving System - Direct Reporters	89,679	27,167	\$1,227,303	\$0.00	\$0.00	\$1,227,302.82
Compliance with Identity Proofing Requirements - Direct Reporters	31,111	13,810	\$623,712	\$0.00	\$15,683.36	\$639,395.60
Compliance with Identity Proofing Requirements - Indirect Reporters	42,972	22,422	\$1,012,945	\$0.00	\$70,410.84	\$1,083,355.47
Compliance with Identity Proofing Requirements - State/Tribe/Local Agencies Acting as Regulators	48	13,768	\$573,154	\$0.00	\$0.00	\$573,154.13
Approval of State/Tribe/Local Electronic Document Receiving System Application - State/Tribe/Local Agencies that Are Regulated Entities	25	4,818	\$183,196	\$1,003,800.00	\$162.00	\$1,187,158.15
<b>Total Annual Estimate</b>	<b>132,724</b>	<b>81,985</b>	<b>\$3,620,310</b>	<b>\$1,003,800</b>	<b>\$86,256</b>	<b>\$4,710,366</b>

<sup>a</sup> Exhibit includes rounding error.

<sup>b</sup> The number of direct reporters presented in the exhibit is not additive. Direct reporters complying with identity proofing requirements are a subset of the direct reporters that register with EPA's electronic document receiving system.

**EXHIBIT 2**  
**CROSS-MEDIA ELECTRONIC REPORTING**  
**TOTAL ESTIMATED RESPONDENT HOUR AND COST BURDEN SUMMARY, BY TYPE OF RESPONDENT <sup>a</sup>**

	Annual Number of Respondents <sup>b</sup>	Annual Burden Hours	Annual Labor Cost	Annual Capital/Startup Cost	Annual O&M Cost	Total Annual Cost
<b>Private Sector Respondents</b>						
Registering with EPA Electronic Document Receiving System - Direct Reporters	77,639	23,635.23	\$1,067,753.45	\$0.00	\$0.00	\$1,067,753.45
Compliance with Identity Proofing Requirements - Direct Reporters	26,934	12,014.72	\$542,629.65	\$0.00	\$13,644.52	\$556,274.17
Compliance with Identity Proofing Requirements - Indirect Reporters	37,202	19,507.18	\$881,261.83	\$0.00	\$61,257.43	\$942,519.26
<i>Subtotal for Private Sector Respondents</i>	114,841	55,157.13	\$2,491,644.93	\$0.00	\$74,901.95	\$2,566,546.88
<b>State/Tribe/Local Respondents</b>						
Reporting to EPA Electronic Document Receiving System - Direct Reporters	12,040	3,531.70	\$159,549.37	\$0.00	\$0.00	\$159,549.37
Compliance with Identity Proofing Requirements - Direct Reporters	4,177	1,795.30	\$81,082.59	\$0.00	\$2,038.84	\$83,121.43
Compliance with Identity Proofing Requirements - Indirect Reporters	5,770	2,914.87	\$131,682.80	\$0.00	\$9,153.41	\$140,836.21
Compliance with Identity Proofing Requirements - State/Tribe/Local Agencies Acting as Regulators	48	13,767.57	\$573,154.13	\$0.00	\$0.00	\$573,154.13
Approval of State/Tribe/Local Electronic Document Receiving System Application - State/Tribe/Local Agencies that Are Regulated Entities	25	4,818.41	\$183,196.15	\$1,003,800.00	\$162.00	\$1,187,158.15
<i>Subtotal for State/Tribe/Local Respondents</i>	17,883	26,827.85	\$1,128,665.04	\$1,003,800.00	\$11,354.25	\$2,143,819.29
<b>Total Annual Estimate for All Respondents (i.e., Private Sector and State/Tribe/Local)</b>	<b>132,724</b>	<b>81,985</b>	<b>\$3,620,310</b>	<b>\$1,003,800</b>	<b>\$86,256</b>	<b>\$4,710,366</b>

<sup>a</sup> Exhibit includes rounding error.

<sup>b</sup> The number of direct reporters presented in each section of the exhibit is not additive. Direct reporters complying with identity proofing requirements are a subset of the direct reporters that register with EPA's electronic document receiving system.

**EXHIBIT 3**  
**CROSS-MEDIA ELECTRONIC REPORTING**  
**TOTAL ESTIMATED EPA HOUR AND COST BURDEN SUMMARY <sup>a</sup>**

	<b>Annual Number of Respondents <sup>b</sup></b>	<b>Annual Burden Hours</b>	<b>Annual Labor Cost</b>	<b>Annual Capital/ Startup Cost</b>	<b>Annual O&amp;M Cost</b>	<b>Total Annual Cost</b>
Registering with EPA Electronic Document Receiving System - Direct Reporters	89,679	14,120.00	\$726,568.60	\$140,000.00	\$0.00	\$866,568.60
Compliance with Identity Proofing Requirements - Direct Reporters	31,111	15,432.75	\$790,760.70	\$0.00	\$0.00	\$790,760.70
Approval of State/Tribe/Local Electronic Document Receiving System Application - State/Tribe/Local Agencies that Are Regulated Entities	25	1,900.00	\$97,337.00	\$0.00	\$0.00	\$97,337.00
<b>Total Annual Estimate</b>	<b>89,704</b>	<b>31,453</b>	<b>\$1,614,666</b>	<b>\$140,000</b>	<b>\$0</b>	<b>\$1,754,666</b>

<sup>a</sup> Exhibit includes rounding error.

<sup>b</sup> The number of direct reporters presented in the exhibit is not additive. Direct reporters complying with identity proofing requirements are a subset of the direct reporters that register with EPA's electronic document receiving system.

**Appendix A**  
**List of North American Industry Classification System (NAICS)**  
**Codes Associated with Industries Most Likely Affected by the**  
**Information Collection Requirements Covered in this ICR**

11	Agriculture, Forestry, Fishing and Hunting	42	Wholesale Trade
111	Crop Production	421	Wholesale Trade, Durable Goods
112	Animal Production	422	Wholesale Trade, Nondurable Goods
113	Forestry and Logging		
114	Fishing, Hunting and Trapping	44-45	Retail Trade
115	Support Activities for Agriculture and Forestry	441	Motor Vehicle and Parts Dealers
		442	Furniture and Home Furnishings Stores
		443	Electronics and Appliance Stores
21	Mining	444	Building Material and Garden Equipment and Supplies Dealers
211	Oil and Gas Extraction		
212	Mining (except Oil and Gas)	445	Food and Beverage Stores
213	Support Activities for Mining	446	Health and Personal Care Stores
		447	Gasoline Stations
22	Utilities	448	Clothing and Clothing Accessories Stores
221	Utilities		
		451	Sporting Goods, Hobby, Book, and Music Stores
23	Construction	452	General Merchandise Stores
233	Building, Developing, and General Contracting	453	Miscellaneous Store Retailers
234	Heavy Construction	454	Nonstore Retailers
235	Special Trade Contractors		
		48-49	Transportation and Warehousing
31	Manufacturing	481	Air Transportation
311	Food Manufacturing	482	Rail Transportation
312	Beverage and Tobacco Product Manufacturing	483	Water Transportation
		484	Truck Transportation
313	Textile Mills	485	Transit and Ground Passenger Transportation
314	Textile Product Mills		
315	Apparel Manufacturing	486	Pipeline Transportation
316	Leather and Allied Product Manufacturing	487	Scenic and Sightseeing Transportation
		488	Support Activities for Transportation
321	Wood Product Manufacturing	491	Postal Service
322	Paper Manufacturing	492	Couriers and Messengers
323	Printing and Related Support Activities	493	Warehousing and Storage
324	Petroleum and Coal Products Manufacturing		
325	Chemical Manufacturing	51	Information
326	Plastics and Rubber Products Manufacturing	511	Publishing Industries
327	Nonmetallic Mineral Product Manufacturing	512	Motion Picture and Sound Recording Industries
		513	Broadcasting and Telecommunications
331	Primary Metal Manufacturing	514	Information Services and Data Processing Services
332	Fabricated Metal Product Manufacturing		
333	Machinery Manufacturing		
334	Computer and Electronic Product Manufacturing	52	Finance and Insurance
335	Electrical Equipment, Appliance, and Component Manufacturing	521	Monetary Authorities Central Bank
		522	Credit Intermediation and Related Activities
336	Transportation Equipment Manufacturing	523	Securities, Commodity Contracts, and Other Financial Investments and Related Activities
337	Furniture and Related Product Manufacturing	524	Insurance Carriers and Related Activities
339	Miscellaneous Manufacturing	525	Funds, Trusts, and Other Financial Vehicles

53	Real Estate and Rental and Leasing	924	Administration of Environmental Quality Programs
531	Real Estate	925	Administration of Housing Programs, Urban Planning, and C
532	Rental and Leasing Services	926	Administration of Economic Programs
533	Lessors of Nonfinancial Intangible Assets (except Copyrighted Works)	927	Space Research and Technology
		928	National Security and International Affairs
54	Professional, Scientific, and Technical Services		
541	Professional, Scientific, and Technical Services		
55	Management of Companies and Enterprises		
551	Management of Companies and Enterprises		
56	Administrative and Support and Waste Management and Remediation Services		
561	Administrative and Support Services		
562	Waste Management and Remediation Services		
61	Educational Services		
611	Educational Services		
62	Health Care and Social Assistance		
621	Ambulatory Health Care Services		
622	Hospitals		
623	Nursing and Residential Care Facilities		
624	Social Assistance		
71	Arts, Entertainment, and Recreation		
711	Performing Arts, Spectator Sports, and Related Industries		
712	Museums, Historical Sites, and Similar Institutions		
713	Amusement, Gambling, and Recreation Industries		
72	Accommodation and Food Services		
721	Accommodation		
722	Food Services and Drinking Places		
81	Other Services (except Public Administration)		
811	Repair and Maintenance		
812	Personal and Laundry Services		
813	Religious, Grantmaking, Civic, Professional, and Similar		
814	Private Households		
92	Public Administration		
921	Executive, Legislative, and Other General Government Support		
922	Justice, Public Order, and Safety Activities		
923	Administration of Human Resource Programs		

## **Appendix B**

### **Methodology for Estimating the Annual Number of Indirect Reporters, Paper Subscriber Agreements, Electronic ESAs, and Indirect Reporting Firms Associated with State/Tribe/Local Electronic Document Receiving Systems with Non-Shared CROMERR Services Solutions during the Three-Year Period Covered by the ICR**

This appendix describes the methodology for estimating the annual number of indirect reporters, paper subscriber agreements, electronic signature agreements (electronic ESAs), and indirect reporting firms associated with State/Tribal/Local electronic document receiving systems with non-shared CROMERR services (SCS) solutions during the three-year period covered by the Information Collection Request (ICR).

Section 1 of this document describes the methodology used to estimate the annual number of indirect reporters. Section 2 describes the methodology used to estimate the annual number of paper subscriber agreements and electronic ESAs. Section 3 describes the methodology for estimating number of indirect reporting firms. Section 4 describes the methodology for estimating the number of paper subscriber agreements submitted to Local Registration Authorities (LRAs).

#### **1. Annual Number of Indirect Reporters**

This section describes the methodology for estimating the annual number of indirect reporters expected to report to State/Tribe/Local electronic document receiving systems with non-SCS solutions during the three-year period covered by the ICR. Section 1.1 provides an overview of the methodology, Section 1.2 provides a detailed discussion of the methodology, and Section 1.3 presents the results.

##### **1.1. Overview**

EPA estimated the number of facilities reporting to State/Tribe/Local electronic document receiving systems by first identifying states with existing and new systems and compiling them into a table (referred to as the “Master Table” in this analysis).<sup>36, 37</sup> We then referred to survey data compiled by EPA in 2002 from states that estimated the number of facilities subject to their respective receiving systems by environmental program. We updated

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<sup>36</sup> “Existing electronic document receiving system” means an electronic document receiving system that is being used to receive electronic documents, in lieu of paper documents, to satisfy requirements under an authorized program on October 13, 2005 or the system, if not in use, has been substantially developed on or before that date as evidenced by the establishment of system services or specifications by contract or other binding agreement (40 CFR 3.3). Pursuant to 40 CFR 3.1000(a)(3), States/Tribes/Locals with an existing electronic document receiving system for an authorized program must submit an application to revise or modify such authorized program in compliance with 40 CFR 3.1000(a)(1) no later than January 13, 2010.

<sup>37</sup> “New electronic document receiving system” refers to an electronic document receiving system that was not being used to receive electronic documents, in lieu of paper documents, to satisfy requirements under an authorized program on October 13, 2005 or the system, if not in use, that had not been substantially developed on or before that date. Pursuant to 40 CFR 3.1000(a)(2), States/Tribes/Locals with new electronic document receiving systems must receive EPA approval of revisions or modifications to the authorized program before the program may receive electronic documents, in lieu of paper documents, to satisfy program requirements.

these state estimates to current (2021) levels based on analysis of respondent universe growth rates in EPA program ICRs. We then extrapolated the updated survey data to the states in the Master Table to estimate their number of facilities. The extrapolation was performed by first finding the total number of commercial establishments in each state based on U.S. Census data, comparing the number of establishments in the survey states to the states in the Master Table, and using a scaling factor to extrapolate the number of facilities in the survey states to the states in the Master Table based on their respective number of commercial establishments. We performed this extrapolation by environmental program for all states in the Master Table. Finally, we estimated the number of employees (i.e., indirect reporters) based on the number of facilities.

## 1.2. Detailed Discussion

EPA took the following steps to carry out the methodology.

### Find the Number of States with Receiving Systems, by State Environmental Program

- A. *Identify states with existing and new electronic document receiving systems.* To identify states with existing and new electronic document receiving systems, we referred to EPA’s CROMERR Program and Stakeholder Management (PSM) System.

For purposes of this analysis, EPA categorized systems based on the following criteria:

Existing Electronic Document Receiving Systems		New Electronic Document Receiving Systems	
System Type	System Stage	System Type	System Stage
- Existing - New	- Approval Review - Completeness Review - Draft Received - EPA Approved - Incomplete - TRC Approved	- New	- Pending Receipt - Scoping

- B. *Estimate the number of existing and new state receiving systems, by environmental program (e.g., air, water).* Existing and new receiving systems were categorized into state environmental programs based on the statute associated with the authorized program (e.g., Clean Air Act (CAA), Clean Water Act (CWA)). Attachment B-1 presents a table of the states with existing and new receiving systems, by state environmental program. This table is called the “Master Table” in this appendix.

Estimate the **Number of Facilities**, by State Environmental Program

- C. *Estimate number of facilities by state environmental program, based on CROMERR cost-benefit analysis (CBA) survey data.* To obtain information on the number of facilities by state environmental program, we referred to “Table V-2. Existing State Receiving Systems” of *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis - Final*; dated November 17, 2004. This table contains information on the number of facilities associated with state receiving systems reported in a survey conducted by EPA during the summer of 2002. Attachment B-2 shows the number of facilities by state environmental program based on CBA survey data.
- D. *Update CBA’s facility estimate for each state environmental program, based on ICR respondent data.* The data on number of facilities developed under Step C are based on 2002 data. To bring these numbers to the present (2021), we took the following steps:
- Obtained data on annual number of respondents in the ICRs listed in Attachment B-3. For each ICR, we obtained respondent universe estimates for at least two different years to enable us to estimate the annual percent change in the universe.
  - Estimated the annual percent change in number of respondents for each ICR.
  - Multiplied the annual percent change by 19 to estimate percent change over the 2002-2021 period (i.e., 2021 – 2002 = 19).
  - Applied the 2002-2021 percent change to facility estimates to update the number of facilities for each environmental program.

Attachment B-4 shows the ICR data used to update the CBA’s facility estimates, by state environmental program.

Extrapolate Updated State Survey Data on Number of Facilities to All States in Master Table

- E. *Develop a scaling factor for use in extrapolation.* We referred to U.S. Census Bureau data on number of establishments (i.e., facilities) by employment size for states.<sup>38</sup> Based on these data, which are presented in Attachment B-5, we obtained the following information for each environmental program:
- Number of commercial establishments in the survey states for which respondent data were available; and
  - Number of commercial establishments in states in the Master Table with existing and/or planned receiving systems.
- We then used these data to derive a scaling factor to be used in Step F. This scaling factor was derived using the following equation:

$$\text{Scaling Factor} = \frac{\text{Number of establishments in states in Master Table}}{\text{Number of establishments in survey states}}$$

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<sup>38</sup> U.S. Census Bureau, “Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States and States, Totals: 2017,” March 6, 2020. Available at <https://www.census.gov/data/tables/2017/econ/susb/2017-susb-annual.html>. These are the latest Statistics of U.S. Businesses (SUSB) annual data.

- F. *Extrapolate the CBA's updated facility estimates to states with existing and new receiving systems.* In deriving the total number of facilities in all states in the Master Table, we first estimated the total number of facilities associated with each environmental program. To do this, we multiplied the updated survey data (Step D) by the corresponding scaling factor derived in Step E. This gave us the total number of facilities reporting to the receiving systems of states in the Master Table, by environmental program. We then added up the total number of facilities in states in the Master Table across all environmental programs.
- G. *Estimate annual number of facilities subject to the ICR requirements.* In estimating the annual number of facilities subject to the ICR requirements, we made the following assumptions:
- Existing receiving systems: For purposes of this analysis, we assume that existing systems have been in operation since 2005. EPA estimates that 30 percent of facilities began to use the receiving system in the first year (i.e., 2005) and 10 percent in each subsequent year.
  - New receiving systems: We assume that one third of facilities will begin reporting in each year of the three-year period covered by the ICR. In each year of the ICR, EPA estimates that 30 percent of facilities will begin to use the receiving system in the first year and 10 percent in each subsequent year.
- The above implementation rates for use of an electronic receiving system were taken from the CBA (Exhibit 2-5).
- H. *Estimate average annual number of facilities subject to the ICR requirements, by employment size.* In estimating the average annual number of facilities by employment size, we referred to the U.S. Census Bureau data presented in Attachment B-5. Based on these data, in the U.S., 69 percent of establishments have less than 20 employees and 31 percent of establishments have 20 or more employees. We applied these percentages to the annual number of facilities in Step G. Once we estimated the annual number of facilities for each year from 2021 through 2023 (i.e., the three-year period covered by the ICR), we obtained the average over three years.
- I. *Estimate average annual **number of facility employees (i.e., indirect reporters)** subject to the ICR requirements.* In estimating the average annual number of facility employees, we assumed that small firm facilities have three employees and that medium/large firm facilities have six employees. These estimates were taken from the CBA (Section 2.3.3, "Facilities;" page 26).
- J. *Estimate average annual number of facility employees subject to the ICR requirements by type of ownership (i.e., private sector vs. State/Tribe/Local) and remove Federal government facilities from this analysis.* In estimating the average annual number of facility employees by type of ownership, we referred to data published by the Bureau of Labor Statistics on the number of employees in the U.S.<sup>39</sup> These data indicate that

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<sup>39</sup> Bureau of Labor Statistics; Quarterly Census of Employment and Wages; Number of Employees (US Total, All Industries, All Establishment Sizes, All Employees); 2016 (Annual). Available at <http://data.bls.gov/pdq/querytool.jsp?survey=en>.

84.73 percent of U.S. employees work for the private sector, 13.14 percent of employees work for States/Locals, and 2.13 percent of employees work for the Federal government. We applied these percentages to the annual number of facility employees in Step I. We then excluded Federal government employees from the analysis because they are exempt from ICR requirements.

Attachments B-6 and B-7 present details on the application of the above methodology to existing and new receiving systems, respectively.

### 1.3. Results

Exhibit B-1 presents information on the average annual number of facility employees expected to register and comply with identity proofing requirements of State/Tribe/Local electronic document receiving systems.

**Exhibit B-1**  
**Average Annual Number of Facility Employees**  
**Expected to Register and Comply with Identity Proofing Requirements of**  
**State/Tribe/Local Electronic Document Receiving Systems**  
**during the Three-Year Period Covered by the ICR <sup>a</sup>**

Type of Firm	Average Annual Number of Facility Employees <sup>b</sup>		
	Existing Receiving Systems	New Receiving System	All Receiving Systems (i.e., Existing and New)
<b>Private Sector</b>			
Small Firms	2,201	3,566	5,767
Medium-Size and Large Firms	1,978	3,203	5,181
<i>Subtotal</i>	<i>4,179</i>	<i>6,769</i>	<i>10,948</i>
<b>States/Locals</b>			
Small Firms	341	553	894
Medium-Size and Large Firms	307	497	804
<i>Subtotal</i>	<i>648</i>	<i>1,050</i>	<i>1,698</i>
<b>All (Private Sector and States/Locals)</b>			
Small Firms	2,542	4,119	6,661
Medium-Size and Large Firms	2,285	3,700	5,985
<b>Total</b>	<b>4,827</b>	<b>7,819</b>	<b>12,646</b>

<sup>a</sup> Exhibit includes rounding error.

<sup>b</sup> Federal government employees are not reflected in the table because they are exempt from ICR requirements.

## 2. Annual Number of Paper Subscriber Agreements and Electronic ESAs

For facility employees that report to State/Tribe/Local electronic document receiving systems with non-SCS solutions, EPA assumes that all *facility employees* (i.e., indirect reporters) from small firms and 98 percent of *facility employees* from medium-size and large firms will comply with the paper subscriber agreement or electronic ESA requirements. (Refer to Exhibit B-1 for number of facility employees by firm size.) In addition, EPA estimates that indirect reporting facilities submit information to 1.3 State/Tribe/Local electronic document receiving systems, on average; hence, their employees must submit paper subscriber agreements or electronic ESAs for 1.3 receiving systems, on average.<sup>40</sup> EPA assumes that 90 percent of employees from indirect reporting facilities will submit paper subscriber agreements and the remaining 10 percent will submit electronic ESAs. EPA further assumes that 89 percent of the paper subscriber agreements and electronic ESAs will be new submissions. Exhibit B-2 summarizes these assumptions and presents sample calculations.

### Exhibit B-2 Assumptions and Equations Used in Estimating Annual Number of Paper Subscriber Agreements and Electronic ESAs Associated with State/Tribal/Local Electronic Document Receiving Systems with Non-SCS Solutions

Type of Firm	Annual Number of Paper Subscriber Agreements	Annual Number of Electronic ESAs
Small Firms	$\begin{aligned} & ([\text{Annual Number of Facility Employees}] \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times \\ & 0.90) \times 0.89 \\ & = (6,661 \times 1.3 \times 0.90) \times 0.89 \\ & = 6,936 \end{aligned}$	$\begin{aligned} & ([\text{Annual Number of Facility Employees}] \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times \\ & 0.10) \times 0.89 \\ & = (6,661 \times 1.3 \times 0.10) \times 0.89 \\ & = 771 \end{aligned}$
Medium-Size and Large Firms	$\begin{aligned} & (([\text{Annual Number of Facility Employees}] \times 0.98) \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times \\ & 0.90) \times 0.89 \\ & = (5,985 \times 0.98) \times 1.3 \times 0.90) \times 0.89 \\ & = 6,108 \end{aligned}$	$\begin{aligned} & (([\text{Annual Number of Facility Employees}] \times 0.98) \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times \\ & 0.10) \times 0.89 \\ & = (5,985 \times 0.98) \times 1.3 \times 0.10) \times 0.89 \\ & = 679 \end{aligned}$
All Firms	$\begin{aligned} & = 6,936 + 6,108 \\ & = \mathbf{13,044} \end{aligned}$	$\begin{aligned} & = 771 + 679 \\ & = \mathbf{1,450} \end{aligned}$

Based on the above assumptions, EPA estimates that, on average, facility employees that report to State/Tribe/Local electronic document receiving systems with non-SCS solutions will prepare 13,044 paper subscriber agreements and 1,450 electronic ESAs each year.

<sup>40</sup> This assumption was taken from *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final*, dated November 17, 2004.

### 3. Indirect Reporting Firms

EPA estimates that, on average, 6,661 reporters from small indirect reporting firms will register and comply with identify proofing requirements of State/Tribe/Local electronic document receiving systems with non-SCS solutions each year (see Exhibit B-1). Each small firm is expected to have an average of three employees<sup>41</sup>, for a total of 2,220 small *firms* (i.e., 6,661 reporters ÷ 3 employees/firm).

EPA also estimates that, on average, 5,985 reporters from medium-size and large indirect reporting firms will register with State/Tribe/Local electronic document receiving systems each year (see Exhibit B-1). Each medium-size and large firm is expected to have an average of 18 employees<sup>42</sup>, for a total of 333 medium-size and large *firms* (i.e., 5,985 reporters ÷ 18 employees/firm).

### 4. Paper Subscriber Agreements Submitted to Local Registration Authorities

EPA assumes that two percent of medium-size and large firms will use the LRA alternative. EPA also assumes that indirect reporting firms submit information to 1.3 State/Tribe/Local electronic document receiving systems, on average; hence, their employees must submit paper subscriber agreements for 1.3 receiving systems, on average.<sup>43</sup> Based on these assumptions, EPA estimates that, on average, *employees* from indirect reporting firms will prepare and send to their LRA a total of 157 paper subscriber agreements each year (i.e., [5,985 medium-size and large firm employees x 0.02] x 1.3 paper subscriber agreements/employee).

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<sup>41</sup> This assumption was taken from Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final, dated November 17, 2004.

<sup>42</sup> This assumption was taken from Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final, dated November 17, 2004.

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**Attachment B-1**  
**Number of Existing and New State/Tribe/Local Electronic Document**  
**Receiving Systems, by State Environmental Program**  
**(also referred to as the “Master Table”)**

State	Existing Systems			New Systems		
	Air	Water	Waste	Air	Water	Waste
Alabama		X				
Alaska	X	X				
American Samoa						
Arizona		X		X		
Arkansas	X	X	X			
California	X	X			X	
Colorado		X				
Connecticut		X			X	
Delaware	X	X	X			
District of Columbia	X	X	X	X		
Florida	X	X	X			
Georgia	X	X				
Guam						
Hawaii		X			X	
Idaho	X					
Illinois	X	X				
Indiana	X	X	X			
Iowa	X	X				
Kansas	X	X	X			
Kentucky	X	X	X			
Louisiana		X				
Maine		X				
Maryland		X				
Massachusetts	X	X	X			X
Michigan	X	X	X			
Minnesota	X	X	X			
Mississippi	X	X	X			
Missouri <sup>b</sup>	X	X	X		X	
Montana		X				
Nebraska				X	X	
Nevada		X	X			
New Hampshire				X		
New Jersey	X	X	X			
New Mexico	X					

**Attachment B-1 (continued)**  
**Number of Existing and New State/Local/Tribe Electronic Document**  
**Receiving Systems, by State Environmental Program**  
**(also referred to as the “Master Table”)**

State	Existing Systems			New Systems		
	Air	Water	Waste	Air	Water	Waste
New York	X	X	X			
North Carolina	X	X		X	X	
North Dakota		X				
Northern Mariana Islands						
Ohio	X	X	X			
Oklahoma	X	X	X			
Oregon		X				
Pennsylvania						
Puerto Rico						
Rhode Island		X				
South Carolina		X				
South Dakota	X	X	X			
Tennessee		X		X		
Texas	X	X	X			
U.S. Virgin Islands						
Utah		X				
Vermont	X	X	X			
Virginia		X			X	X
Washington	X	X	X			
West Virginia		X				
Wisconsin	X	X	X			
Wyoming	X	X	X			

Source: U.S. Environmental Protection Agency (USEPA), CROMERR Program and Stakeholder Management (PSM) System, data current as of October 9, 2014.

**Attachment B-2**  
**Number of Facilities Associated with Existing State Electronic Document Receiving Systems**  
**in the CROMERR Cost-Benefit Analysis Survey, by State Environmental Program**  
**(Data Current as of Summer 2002)**

State	Air								Water				Waste, USTs, Emergency Planning		
	Air (CEM)	Air Permits	Air (NEI)	Air Title V Emissions	Emission Reports (Non-Title V)	Air Quality	PTO Applications	Asbestos Notification	EDMR	Drinking/ Ground Water	Wastewater	UIC	HW Annual Report	UST	Risk Management
Florida									3						
New Jersey	12	1,500												1,000	
New Mexico			200												
North Dakota												250			
Ohio		200		780	2,400		780			5,700	1,550		480		500
Pennsylvania						125		6,000							
Wisconsin					5,200				22				600		

<sup>a</sup> For purposes of this analysis, data for Wisconsin’s “Consolidated (air, haz waste)” program was divided among the “Air” and “HW Annual Report” categories. Specifically, 90 percent of the facilities were allocated to the “Air” category and the remaining 10 percent were allocated to the “HW Annual Report” category. This allocation was based on Ohio’s data and available information on the number of hazardous waste handlers that reported to the 2007 Hazardous Waste Report.

Source: U.S. Environmental Protection Agency (USEPA), “Table V-2. Existing State Receiving Systems” of Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final; November 17, 2004.

Acronyms

- CEM      Continuous Emissions Monitoring
- EDMR    Electronic Discharge Monitoring Report
- HW       Hazardous Waste
- NEI      National Emission Inventory
- PTO      Permit to Operate
- UIC      Underground Injection Control
- UST      Underground Storage Tank

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**Attachment B-3**  
**List of ICRs Used in Analysis, by Environmental Program**

ICR Numbers	ICR Name
<b>Air</b>	
1587.13 1587.14	State Operating Permit Regulations
<b>Water</b>	
270.46 270.47	Public Water System Supervision Program
<b>Waste, USTs, Emergency Planning</b>	
976.18 976.19	Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification
1360.15 1360.17	Underground Storage Tanks: Technical and Financial Requirements, and State Program Approval Procedures

Source: Office of Management and Budget (OMB). Information Collection Review Data on RegInfo.gov. Data current as of February 24, 2021. Available at <https://www.reginfo.gov/public/do/PRAMain>.

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**Attachment B-4a**  
**ICR Data Used to Update Number of Facilities Obtained from CROMERR CBA**  
**Air Program**

**Attachment B-4b**  
**ICR Data Used to Update Number of Facilities Obtained from CROMERR CBA**  
**Water Program**

**Attachment B-4c**  
**ICR Data Used to Update Number of Facilities Obtained from CROMERR CBA**  
**Waste, USTs, Emergency Planning Programs**






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**Attachment B-5**  
**Number of Establishments (Facilities) by Employment Size, 2017**

<b>STATE</b>	<b>Less than 20 Employees</b>	<b>20 or More Employees</b>	<b>Total</b>
United States	5,392,516	2,468,158	7,860,674
Alabama	62,513	37,906	100,419
Alaska	15,174	6,105	21,279
Arizona	94,116	49,190	143,306
Arkansas	43,453	23,333	66,786
California	682,756	258,621	941,377
Colorado	122,687	47,155	169,842
Connecticut	60,341	29,233	89,574
Delaware	16,529	8,923	25,452
District of Columbia	13,390	10,195	23,585
Florida	412,197	145,111	557,308
Georgia	156,617	76,883	233,500
Hawaii	21,554	11,246	32,800
Idaho	34,684	12,890	47,574
Illinois	223,570	97,565	321,135
Indiana	92,317	56,060	148,377
Iowa	54,292	28,393	82,685
Kansas	48,793	26,154	74,947
Kentucky	56,517	34,724	91,241
Louisiana	68,946	37,653	106,599
Maine	29,972	11,650	41,622
Maryland	93,429	46,017	139,446
Massachusetts	124,060	55,768	179,828
Michigan	150,463	72,090	222,553
Minnesota	102,358	49,458	151,816
Mississippi	37,830	21,464	59,294
Missouri	98,854	52,028	150,882
Montana	29,314	8,878	38,192
Nebraska	37,356	17,598	54,954
Nevada	43,927	22,503	66,430
New Hampshire	25,721	12,650	38,371
New Jersey	170,737	63,170	233,907
New Mexico	28,772	15,267	44,039
New York	418,633	128,401	547,034
North Carolina	154,298	79,065	233,363
North Dakota	16,581	8,015	24,596
Ohio	155,730	97,271	253,001
Oklahoma	62,844	30,830	93,674
Oregon	83,011	34,346	117,357

**Attachment B-5 (continued)**  
**Number of Establishments (Facilities) by Employment Size, 2017**

STATE	Less than 20 Employees	20 or More Employees	Total
Pennsylvania	198,304	104,468	302,772
Rhode Island	20,343	8,440	28,783
South Carolina	70,859	38,379	109,238
South Dakota	19,099	8,000	27,099
Tennessee	82,799	55,119	137,918
Texas	384,832	207,845	592,677
Utah	57,603	22,537	80,140
Vermont	15,483	5,675	21,158
Virginia	131,724	70,169	201,893
Washington	136,920	54,125	191,045
West Virginia	22,359	14,163	36,522
Wisconsin	92,084	50,052	142,136
Wyoming	15,771	5,377	21,148

Source: U.S. Census Bureau, "Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States and States, Totals: 2017," March 6, 2020. Available at <https://www.census.gov/data/tables/2017/econ/susb/2017-susb-annual.html>. These are the latest Statistics of U.S. Businesses (SUSB) annual data.

**Attachment B-6  
Application of Methodology to Existing Receiving Systems**

Environmental Program	States with Facility Data in CBA (from Exhibit B-2)  A	Total Number of Facilities in CBA (from Exhibit B-2)  B	Average Annual Percent Change for Environmental Program (from Exhibit B-4)  C	2002-2021 Percent Change for Environmental Program  $D = C \times 19$	Updated Total Number of Facilities in CBA  $E = B + (D \times B)$
Air	NJ, NM, OH, PA, WI	17,197	-3.7%	-70.3%	5,108
Water	FL, ND, OH, WI	7,525	-0.5%	-9.5%	6,810
Waste, USTs, Emergency Planning	NJ, OH, WI	2,580	-0.5%	-9.5%	2,335

Environmental Program	Number of Establishments for States with Facility Data in CBA (from Exhibit B-5)  F	Number of Establishments for States with Existing Receiving Systems (from Exhibits B-1 and B-5)  G	Scaling Factor  $H = G / F$
Air	975,855	5,799,900	5.94
Water	977,041	7,372,964	7.55
Waste, USTs, Emergency Planning	629,044	3,941,378	6.27

Environmental Program	Updated Total Number of Facilities in CBA  $I = E$	Scaling Factor  $J = H$	Total Number of Facilities for States with Existing Receiving Systems  $K = I \times J$
Air	5,108	5.94	30,342
Water	6,810	7.55	51,416
Waste, USTs, Emergency Planning	2,335	6.27	14,640
<b>Total Number of Facilities for All Environmental Programs</b>			<b>96,398</b>

### Attachment B-6 (continued) Application of Methodology to Existing Receiving Systems

Year	Number of Facilities
2005	28,919
2006	6,748
2007	6,073
2008	5,466
2009	4,919
2010	4,427
2011	3,985
2012	3,586
2013	3,228
2014	2,905
2015	2,614
2016	2,353
2017	2,118
2018	1,906
2019	1,715
2020	1,544
2021	1,389
2022	1,250
2023	1,125

Legend:

Years Covered in the ICR
--------------------------

Type of Firm	Number of Facilities per Year Covered in the ICR			Average Annual Number of Facilities $D = (A + B + C) / 3$	Average Annual Number of Facility Employees $E = D \times 3$ (small) $E = D \times 6$ (medium/large)
	2021 $A = 1,389 \times 0.69$ (small) $A = 1,389 \times 0.31$ (medium/large)	2022 $B = 1,250 \times 0.69$ (small) $B = 1,250 \times 0.31$ (medium/large)	2023 $C = 1,125 \times 0.69$ (small) $C = 1,125 \times 0.31$ (medium/large)		
Small Firms	958	863	776	866	2,598
Medium-Size and Large Firms	431	388	349	389	2,334
<b>Total</b>	<b>1,389</b>	<b>1,251</b>	<b>1,125</b>	<b>1,255</b>	<b>4,932</b>

**Attachment B-7  
Application of Methodology to New Receiving Systems**

Environmental Program	States with Facility Data in CBA (from Exhibit B-2)	Total Number of Facilities in CBA (from Exhibit B-2)	Average Annual Percent Change for Environmental Program (from Exhibit B-4)	2002-2021 Percent Change for Environmental Program	Updated Total Number of Facilities in CBA
	A	B	C	$D = C \times 19$	$E = B + (D \times B)$
Air	NJ, NM, OH, PA, WI	17,197	-3.7%	-70.3%	5,108
Water	FL, ND, OH, WI	7,525	-0.5%	-9.5%	6,810
Waste, USTs, Emergency Planning	NJ, OH, WI	2,580	-0.5%	-9.5%	2,335

Environmental Program	Number of Establishments for States with Facility Data in CBA (from Exhibit B-5)	Number of Establishments for States with <u>New</u> Receiving Systems (from Exhibits B-1 and B-5)	Scaling Factor
	F	G	$H = G / F$
Air	975,855	631,497	0.65
Water	977,041	1,704,843	1.74
Waste, USTs, Emergency Planning	629,044	381,721	0.61

Environmental Program	Updated Total Number of Facilities in CBA	Scaling Factor	Total Number of Facilities for States with <u>New</u> Receiving Systems
	$I = E$	$J = H$	$K = I \times J$
Air	5,108	0.65	3,320
Water	6,810	1.74	11,849
Waste, USTs, Emergency Planning	2,335	0.61	1,424
<b>Total Number of Facilities for All Environmental Programs</b>			16,593
<b>Annual Number of Facilities that Will Come Online</b>			5,531

**Attachment B-7 (continued)**  
**Application of Methodology to New Receiving Systems**

Year System Will Come Online	Number of Facilities per Year Covered in the ICR		
	2021 <i>A = 5,531 x 0.30 (Year 1)</i> <i>A = 5,531 x 0 (Years 2 and 3)</i>	2022 <i>B = (5,531 - 1,659) x 0.10 (Year 1)</i> <i>B = 5,531 x 0.30 (Year 2)</i> <i>B = 5,531 x 0 (Year 3)</i>	2023 <i>C = (5,531 - 1,659 - 387) x 0.10 (Year 1)</i> <i>C = (5,531 - 1,659) x 0.10 (Year 2)</i> <i>C = 5,531 x 0.30 (Year 3)</i>
Year 1	1,659	387	349
Year 2	0	1,659	387
Year 3	0	0	1,659
<b>Total</b>	<b>1,659</b>	<b>2,046</b>	<b>2,395</b>

Type of Firm	Number of Facilities per Year Covered in the ICR			Average Annual Number of Facilities <i>D = (A + B + C) / 3</i>	Average Annual Number of Facility Employees <i>E = D x 3 (small)</i> <i>E = D x 6 (medium/large)</i>
	2021 <i>A = 1,389 x 0.69 (small)</i> <i>A = 1,389 x 0.31 (medium/large)</i>	2022 <i>B = 1,250 x 0.69 (small)</i> <i>B = 1,250 x 0.31 (medium/large)</i>	2023 <i>C = 1,125 x 0.69 (small)</i> <i>C = 1,125 x 0.31 (medium/large)</i>		
Small Firms	1,145	1,412	1,653	1,403	4,209
Medium-Size and Large Firms	514	634	742	630	3,780
<b>Total</b>	<b>1,659</b>	<b>2,046</b>	<b>2,395</b>	<b>2,033</b>	<b>7,989</b>

## Appendix C Respondent and EPA Burden Calculation Exhibits

EXHIBIT C-1  
CROSS-MEDIA ELECTRONIC REPORTING RULE  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$71.08/ Hour	Mgr. \$45.56/ Hour	Tech. \$45.18/ Hour	Cler. \$19.88/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Registering with EPA Electronic Document Receiving System - Direct Reporters</b>											
Log on to the receiving system site and enter requested information (e.g., registrant name)	0.0000	0.0000	0.3006	0.0000	0.3006	\$13.58	\$0.00	\$0.00	89,679	26,957.51	\$1,217,840.82
Update the information as needed	0.0000	0.0000	0.1837	0.0000	0.1837	\$8.30	\$0.00	\$0.00	1,140	209.42	\$9,462.00
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	27,166.93	\$1,227,302.82
<b>Compliance with Identity Proofing Requirements - Direct Reporters</b>											
<b>Comply with Requirements for Identifier, Attribute, or Alternative Method</b>											
Prepare and submit information on identifiers, attributes, or other identity-proofing information (CDX 20-5-1 Challenge Question Setup)	0.0000	0.0000	0.0501	0.0000	0.0501	\$2.26	\$0.00	\$0.00	27,359	1,370.69	\$61,831.34
<b>Comply with Subscriber Agreement or ESA Provisions - Paper Subscriber Agreements</b>											
Prepare and submit a subscriber agreement	0.0000	0.0000	0.0501	0.0000	0.0501	\$2.26	\$0.00	\$4.18	3,752	187.98	\$24,162.88
Store subscriber agreement	0.0000	0.0000	0.1169	0.0000	0.1169	\$5.28	\$0.00	\$0.00	3,752	438.61	\$19,810.56
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$15.09	\$0.00	\$0.00	38	12.69	\$573.42
Contact the Help Desk for technical support	0.0000	0.0000	0.2672	0.0000	0.2672	\$12.07	\$0.00	\$0.00	3,790	1,012.69	\$45,745.30
<b>Comply with Subscriber Agreement or ESA Provisions - Electronic Subscriber Agreements</b>											
Prepare and submit an ESA	0.0000	0.0000	0.1169	0.0000	0.1169	\$5.28	\$0.00	\$0.00	19,110	2,233.96	\$100,900.80
Store ESA	0.0000	0.0000	0.1169	0.0000	0.1169	\$5.28	\$0.00	\$0.00	19,110	2,233.96	\$100,900.80
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$15.09	\$0.00	\$0.00	191	63.79	\$2,882.19
Contact the Help Desk for technical support	0.0000	0.0000	0.2672	0.0000	0.2672	\$12.07	\$0.00	\$0.00	19,301	5,157.23	\$232,963.07
<b>Conduct On-Going Management</b>											
Identify and resolve problems related to completing the identity proofing processes	0.0000	0.0000	1.6012	0.0000	1.6012	\$72.34	\$0.00	\$0.00	686	1,098.42	\$49,625.24
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	13,810.02	\$639,395.60

<sup>a</sup> Exhibit includes rounding error.

## Appendix C (continued) Respondent and EPA Burden Calculation Exhibits

EXHIBIT C-1 (CONTINUED)  
CROSS-MEDIA ELECTRONIC REPORTING RULE  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$71.08/ Hour	Mgr. \$45.56/ Hour	Tech. \$45.18/ Hour	Cler. \$19.88/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Compliance with Identity Proofing Requirements - Indirect Reporters</b>											
<b>Comply with Requirements for Identifier, Attribute, or Alternative Method</b>											
Prepare and submit information on identifiers, attributes, or other identity-proofing information	0.0000	0.0000	0.0501	0.0000	0.0501	\$2.26	\$0.00	\$0.00	0	0.00	\$0.00
<b>Comply with Subscriber Agreement or ESA Provisions - Paper Subscriber Agreements</b>											
Prepare and submit a subscriber agreement	0.0000	0.0000	0.0501	0.0000	0.0501	\$2.26	\$0.00	\$4.18	16,701	836.72	\$107,554.44
Store subscriber agreement	0.0000	0.0000	0.1169	0.0000	0.1169	\$5.28	\$0.00	\$0.00	16,701	1,952.35	\$88,181.28
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$15.09	\$0.00	\$0.00	167	55.78	\$2,520.03
Contact the Help Desk for technical support	0.0000	0.0000	0.2672	0.0000	0.2672	\$12.07	\$0.00	\$0.00	16,868	4,507.13	\$203,596.76
<b>Comply with Subscriber Agreement or ESA Provisions - Electronic Subscriber Agreements</b>											
Prepare and submit an ESA	0.0000	0.0000	0.1169	0.0000	0.1169	\$5.28	\$0.00	\$0.00	28,118	3,286.99	\$148,463.04
Store ESA	0.0000	0.0000	0.1169	0.0000	0.1169	\$5.28	\$0.00	\$0.00	28,118	3,286.99	\$148,463.04
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$15.09	\$0.00	\$0.00	281	93.85	\$4,240.29
Contact the Help Desk for technical support	0.0000	0.0000	0.2672	0.0000	0.2672	\$12.07	\$0.00	\$0.00	28,399	7,588.21	\$342,775.93
<b>Submit Subscriber Agreement to Local Registration Authority</b>											
Prepare subscriber agreement and send to LRA	0.0000	0.0000	0.4175	0.0000	0.4175	\$18.86	\$0.00	\$0.58	139	58.03	\$2,702.16
Prepare new subscriber agreement and send to LRA, for employee turnover	0.0000	0.0000	0.4175	0.0000	0.4175	\$18.86	\$0.00	\$0.58	16	6.68	\$311.04
Report breach of security or compromise/surrender of electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$15.09	\$0.00	\$0.00	2	0.67	\$30.18
Prepare new subscriber agreement and send to LRA subsequent to breach of security/compromise of electronic signature device	0.0000	0.0000	0.4175	0.0000	0.4175	\$18.86	\$0.00	\$0.58	2	0.84	\$38.88
<b>Conduct On-Going Management</b>											
Identify and resolve problems related to completing the registration and identity proofing processes	0.0000	0.0000	1.6012	0.0000	1.6012	\$72.34	\$0.00	\$0.00	376	602.05	\$27,199.84
<b>Implementation of Local Registration Authority Alternative - Indirect Reporting Firms and Local Registration Authorities</b>											
<b>Designating a Local Registration Authority</b>											
Develop a process or plan to implement the requirement, designate the LRA, and submit LRA application to agency	1.0000	0.0000	12.0000	0.0000	13.0000	\$613.24	\$0.00	\$7.18	7	91.00	\$4,342.94
Register LRA with the electronic document receiving system	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$0.00	7	1.17	\$52.85
Redesignate LRA, due to turnover, and send application materials	0.0000	0.0000	1.0000	0.0000	1.0000	\$45.18	\$0.00	\$7.18	1	1.00	\$52.36
Register new LRA with electronic document receiving system	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$0.00	1	0.17	\$7.55
<b>Collect Subscriber Agreements from Reporters</b>											
Collect and securely store subscriber agreements	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$0.00	139	23.21	\$1,049.45
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$2.88	139	23.21	\$1,449.77
Collect and securely store subscriber agreements, for employee turnover	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$0.00	16	2.67	\$120.80
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for employee turnover	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$2.88	16	2.67	\$166.88
Collect and securely store subscriber agreements, for breach of security/compromise of electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$0.00	2	0.33	\$15.10
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for breach of security/compromise of electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$7.55	\$0.00	\$2.88	2	0.33	\$20.86

## Appendix C (continued) Respondent and EPA Burden Calculation Exhibits

EXHIBIT C-1 (CONTINUED)  
CROSS-MEDIA ELECTRONIC REPORTING RULE  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$48.10/ Hour	Mgr. \$48.10/ Hour	Tech. \$36.43/ Hour	Cler. \$17.29/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Compliance with Identity Proofing Requirements - State/Tribe/Local Agencies Acting as Regulators</b>											
<b>Collect Identifier, Attribute, or Alternative Information</b>											
Receive, process, review and approve identifier, attribute, or alternative information	0.0000	0.0000	0.5000	0.0000	0.5000	\$18.22	\$0.00	\$0.00	0	0.00	\$0.00
<b>Collect Subscriber Agreements and ESAs - Paper Subscriber Agreements</b>											
Receive, process, review, approve and file new subscriber agreements	0.0000	0.3674	0.2004	0.0000	0.5678	\$24.97	\$0.00	\$0.00	16,701	9,482.83	\$417,023.97
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.08	\$0.00	\$0.00	167	27.89	\$1,015.36
<b>Collect Subscriber Agreements and ESAs - Electronic Subscriber Agreements</b>											
Receive, process, review, approve and file new ESAs	0.0000	0.0000	0.1169	0.0000	0.1169	\$4.26	\$0.00	\$0.00	28,118	3,286.99	\$119,782.68
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.08	\$0.00	\$0.00	281	46.93	\$1,708.48
<b>Collect Submittals from Local Registration Authority</b>											
Receive, process, review, and approve certification of receipt and secure storage	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.08	\$0.00	\$0.00	139	23.21	\$845.12
Receive, process, review and approve updated certification of receipt and secure storage, for employee turnover	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.08	\$0.00	\$0.00	16	2.67	\$97.28
Receive notification of breach of security or compromise/surrender of electronic signature device and take action	0.0000	0.0000	1.3841	0.0000	1.3841	\$50.42	\$0.00	\$0.00	2	2.77	\$100.84
Receive, process, review and approve certification of receipt and secure storage, for breach of security or compromise/surrender of electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.08	\$0.00	\$0.00	2	0.33	\$12.16
<b>Collect Applications for Designation of Local Registration Authority</b>											
Receive application to designate first-time LRA	0.0000	0.0000	0.5000	0.0000	0.5000	\$18.22	\$0.00	\$0.00	7	3.50	\$127.54
Receive application to designate LRA, for LRA turnover	0.0000	0.0000	0.5000	0.0000	0.5000	\$18.22	\$0.00	\$0.00	1	0.50	\$18.22
<b>Conduct On-Going Management</b>											
Identify and resolve problems related to completing the registration and identity proofing processes	0.0000	0.0000	1.2500	0.0000	1.2500	\$45.54	\$0.00	\$0.00	376	470.00	\$17,123.04
Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes	0.0000	0.0000	1.1169	0.0000	1.1169	\$40.69	\$0.00	\$0.00	376	419.95	\$15,299.44
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	13,767.57	\$573,154.13

<sup>a</sup> Exhibit includes rounding error.

## Appendix C (continued) Respondent and EPA Burden Calculation Exhibits

EXHIBIT C-1 (CONTINUED)  
CROSS-MEDIA ELECTRONIC REPORTING RULE  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg.	Mgr.	Tech.	Cler.	Respon.	Labor	Capital/	Number of	Total	Total	
	\$48.10/ Hour	\$48.10/ Hour	\$36.43/ Hour	\$17.29/ Hour	Hours/ Activity	Cost/ Activity	Startup Cost				O&M Cost
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Approval of State/Tribe/Local Electronic Document Receiving System Application - State/Tribe/Local Agencies that Are Regulated Entities</b>											
<b>Read the Regulations</b>											
Read the regulations	0.0000	4.0668	5.0501	0.0000	9.1169	\$379.59	\$0.00	\$0.00	25	227.92	\$9,489.75
<b>Submit Electronic Document Receiving System Application</b>											
Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 requirements and apply for EPA program modification approval under 40 CFR 3.1000 <i>(State agencies)</i>	0.0000	36.6680	333.3340	0.0000	370.0020	\$13,907.09	\$105,400.00	\$6.48	8	2,960.02	\$954,508.56
Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 requirements and apply for EPA program modification approval under 40 CFR 3.1000 <i>(Tribal and Local agencies)</i>	0.0000	31.0000	300.0000	0.0000	331.0000	\$12,420.10	\$40,150.00	\$6.48	4	1,324.00	\$210,306.32
<b>Submit Amendment to Original Application</b>											
Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000 (States/Tribes/Locals)	0.0000	11.0000	13.0000	0.0000	24.0000	\$1,002.69	\$0.00	\$6.48	12	288.00	\$12,110.04
<b>Submit Notification on Changes to Laws, Policies, or Electronic Document Receiving System</b>											
Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (States/Tribes/Locals with approved applications)	0.0000	5.5000	12.9686	0.0000	18.4686	\$737.00	\$0.00	\$6.48	1	18.47	\$743.48
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	4,818.41	\$1,187,158.15
<b>TOTAL</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>81,984.98</b>	<b>\$4,710,366.17</b>

<sup>a</sup> Exhibit includes rounding error.

## Appendix C (continued) Respondent and EPA Burden Calculation Exhibits

EXHIBIT C-2  
CROSS-MEDIA ELECTRONIC REPORTING RULE  
ESTIMATED ANNUAL EPA HOUR AND COST BURDEN <sup>a</sup>

	Hours and Labor Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$72.00/ Hour	Mgr. \$60.93/ Hour	Tech. \$51.23/ Hour	Cler. \$25.98/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Registering with EPA Electronic Document Receiving System</b>											
Develop, operate, and maintain CDX	0.00	330.00	13,790.00	0.00	14,120.00	\$726,568.60	\$140,000.00	\$0.00	1	14,120.00	\$866,568.60
Subtotal	0.00	330.00	13,790.00	0.00	14,120.00	\$726,568.60	\$140,000.00	\$0.00	1	14,120.00	\$866,568.60
<b>Compliance with Identity Proofing Requirements</b>											
<b>Collect Identifier, Attribute, or Alternative Information</b>											
Receive, process, review and approve identifier, attribute, or alternative information	0.0000	0.0000	0.5000	0.0000	0.5000	\$25.62	\$0.00	\$0.00	27,359	13,679.50	\$700,937.58
<b>Collect Subscriber Agreements or ESAs - Subscriber Agreements</b>											
Receive, process, review, approve and file subscriber agreements <sup>b</sup>	0.0000	0.0000	0.0000	0.0000	0.0000	\$0.00	\$0.00	\$0.00	3,752	0.00	\$0.00
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.56	\$0.00	\$0.00	38	6.35	\$325.28
<b>Collect Subscriber Agreements or ESAs - Electronic Subscriber Agreements</b>											
Receive, process, review, approve and file subscriber agreements <sup>c</sup>	0.0000	0.0000	0.0000	0.0000	0.0000	\$0.00	\$0.00	\$0.00	19,110	0.00	\$0.00
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.56	\$0.00	\$0.00	191	31.90	\$1,634.96
<b>Conduct On-Going Management</b>											
Identify and resolve problems related to completing the registration and identity proofing processes	0.0000	0.0000	1.0000	0.0000	1.0000	\$51.23	\$0.00	\$0.00	686	686.00	\$35,143.78
Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes	0.0000	0.0000	1.5000	0.0000	1.5000	\$76.85	\$0.00	\$0.00	686	1,029.00	\$52,719.10
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	15,432.75	\$790,760.70

<sup>a</sup> Exhibit includes rounding error.

<sup>b</sup> Labor cost associated with the collection of subscriber agreements is equal to \$0.00 because it is included in the registration costs covered under "Reporting to EPA Electronic Document Receiving System."

<sup>c</sup> Labor cost associated with the collection of ESAs is equal to \$0.00 because, under this option, registrants can use their existing CDX credential. As a result, EPA does not need to receive, process, review, approve, and file new ESA from these

## Appendix C (continued) Respondent and EPA Burden Calculation Exhibits

EXHIBIT C-2 (CONTINUED)  
CROSS-MEDIA ELECTRONIC REPORTING RULE  
ESTIMATED ANNUAL EPA HOUR AND COST BURDEN <sup>a</sup>

INFORMATION COLLECTION ACTIVITY	Hours and Labor Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$72.00/ Hour	Mgr. \$60.93/ Hour	Tech. \$51.23/ Hour	Cler. \$25.98/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
<b>Approval of State/Tribe/Local Electronic Document Receiving System Applications</b>											
Process and file receiving system documentation submitted by State/Local/Tribe seeking to modify their programs, as required by 40 CFR 3.1000 ( <i>State agencies</i> )	0.00	0.00	160.00	0.00	160.00	\$8,196.80	\$0.00	\$0.00	8	1,280.00	\$65,574.40
Process and file receiving system documentation submitted by State/Local/Tribe seeking to modify their programs, as required by 40 CFR 3.1000 ( <i>Tribal/Local agencies</i> )	0.00	0.00	80.00	0.00	80.00	\$4,098.40	\$0.00	\$0.00	4	320.00	\$16,393.60
Process and file amendment to original application for EPA program modification approval under 40 CFR 3.1000 ( <i>State/Tribal/Local agencies</i> )	0.00	0.00	24.00	0.00	24.00	\$1,229.52	\$0.00	\$0.00	12	288.00	\$14,754.24
Process and file notifications about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 ( <i>State/Tribal/Local agencies with approved applications</i> )	0.00	0.00	12.00	0.00	12.00	\$614.76	\$0.00	\$0.00	1	12.00	\$614.76
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	1,900.00	\$97,337.00
<b>TOTAL</b>	<b>0.00</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>31,452.75</b>	<b>\$1,754,666.30</b>

<sup>a</sup> Exhibit includes rounding error.