

2022 CGP ICR - Agency Labor Burden

Activity	Hours Per Response			Number of Annual Responses
	2017 NPDES Program ICR ¹	2022 CGP Incremental Change	2022 CGP Total Hours per Response	2022 CGP No. Annual Responses
NOI review	1	0	1	2,600
NOT review	0.25	0	0.25	2,600
Waiver Certification Review	1	0	1	130
SWPPP review	1	0	1	2,600
Standard/Other Reports	12	0	12	126
Turbidity Monitoring Report Review	NA	0.16	0.16	650
Turbidity Report Follow-up	NA	0.5	0.5	130
Total Agency Activities				8,836

Table Endnotes

¹ NA indicates that the 2017 NPDES Programmatic ICR did not account for this new burden item.

² In the 2022 CGP ICR, EPA assumed that the fully loaded cost of employment for a federal employee is \$.

Federal: Labor rate (2021)

\$46.02

Annual Hours Burden		Annual Cost Burden ²	
2022 CGP Incremental Change in Annual Burden (hrs)	2022 CGP Annual Burden (hrs)	2022 CGP Incremental Change in Annual Cost	2022 CGP Annual Cost
0	2,600	\$0	\$119,652
0	650	\$0	\$29,913
0	130	\$0	\$5,983
0	2,600	\$0	\$119,652
0	1,512	\$0	\$69,582
104	104	\$4,786	\$4,786
65	65	\$2,991	\$2,991
169	7,661	\$7,777	\$352,559

46.02.

2022 CGP ICR - Respondent Burden and Cost Table

Activity	Hours 2017 NPDES Program ICR ¹
Reporting Requirements	
NOI - Large Sites	
With ESA Evaluation and No Consultation	1.5
With ESA Evaluation and Informal Consultation	6
With ESA Evaluation and Formal Consultation	20
NOI - Small Sites with ESA Evaluation and Consultation	3.7
Appendix D - Eligibility Procedures Relating to Threatened and Endangered Species Protection	Included in NOI burden
Appendix E - Historic Property Screening Step 5 (Contact SHPO/THPO)	Included in NOI burden
Appendix L - Request for Chemical Treatment	Included in NOI burden
Appendix C - Small Construction Waiver	1
NOT	0.5
Turbidity Benchmark Monitoring - Sampling	NA
Turbidity Benchmark Monitoring - Reporting	NA
<u>Standard/Other Reporting</u>	
Planned Facility Changes	4
Anticipated Noncompliance	5
24hr reporting - Unanticipated Bypass or Upset (Verbal)	5
24hr reporting - Unanticipated Bypass or Upset (Written)	2
24hr reporting - Violation of Maximum Daily Discharge (Verbal)	3
24hr reporting - Violation of Maximum Daily Discharge (Written)	2
Other Noncompliance reporting	5
Other Info - Permittee Report of Inaccurate Previous Information	2
Reporting Subtotal	
Recordkeeping Requirements	
Develop New SWPPP - Large Sites	36.4
Develop New SWPPP - Small Sites	22.7
SWPPP Benchmark Monitoring Procedure ³	NA
Update SWPPP	Included in SWPPP development burden
Site Inspections - Large Sites	0.5
Site Inspections - Small Sites	0.25
Dewatering Inspections	NA

Corrective Action Records	Included in burden estimate for site inspections, dewatering inspections, and turbidity monitoring
Recordkeeping Subtotal	
Total Labor Burden and Cost	
Total Capital and O&M	
Grand Total	

Table Endnotes

¹ NA indicates that the 2017 NPDES Programmatic ICR did not account for this new burden item.

² In the 2022 CGP ICR, EPA assumed that the fully loaded cost of employment for a private sector emplo

³ A subpopulation of respondents need to document their benchmark monitoring procedures in their SV

Costs Per Response		Number of Annual Responses			
2022 CGP Incremental Change	2022 CGP Total	2022 CGP Number of Respondents	Number of Occurrences Per Year	2022 CGP Incremental Change in Annual Responses	2022 CGP Number of Annual Responses

-0.4	1.1	640	1	0	640
-0.4	5.6	397	1	0	397
-0.4	19.6	29	1	0	29
-0.4	3.3	1534	1	0	1534
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
0	1	130	1	0	130
0.7	1.2	2600	1	0	2600
0.5	0.5	650	29	18850	18850
0.75	0.75	650	4	2600	2600

0	4	13	1	0	13
0	5	3	1	0	3
0	5	3	1	0	3
0	2	2	1	0	2
0	3	52	1	0	52
0	2	26	1	0	26
0	5	26	1	0	26
0	2	1	1	0	1
				21,450	26,906

0	36.4	1066	1	0	1066
0	22.7	1534	1	0	1534
4	4	650	Part of developing a SWPPP		
-	-	-	-	-	-
0	0.5	1066	26	0	27,716
0	0.25	1534	26	0	39,884
0.25	0.25	2600	29	75400	75,400

-	-	-	-	-	-
				75,400	145,600
				96,850	172,506

year is \$62.77.

VPPP. This is not considered a new response, as it is included in the overall SWPPP response. The burden is

Labor rate (2021)
\$ 62.77

Annual Hours Burden		Annual Cost Burden	
2022 CGP Incremental Change in Annual Burden (hrs)	2022 CGP Total Annual Burden (hrs)	2022 CGP Incremental Change in Annual Cost ²	2022 CGP Total Annual Cost ²
-256	704	-\$16,069	\$44,190
-159	2,223	-\$9,980	\$139,538
-12	568	-\$753	\$35,653
-614	5,062	-\$38,541	\$317,742
-	-	-	-
-	-	-	-
-	-	-	-
0	130	\$0	\$8,160
1,820	3,120	\$114,241	\$195,842
9,425	9,425	\$591,607	\$591,607
1,950	1,950	\$122,402	\$122,402
0	52	\$0	\$3,264
0	15	\$0	\$942
0	15	\$0	\$942
0	4	\$0	\$251
0	156	\$0	\$9,792
0	52	\$0	\$3,264
0	130	\$0	\$8,160
0	2	\$0	\$126
12,154	23,608	\$762,907	\$1,481,875
0	38,802	\$0	\$2,435,602
0	34,822	\$0	\$2,185,777
2,600	2,600	\$163,202	\$163,202
-	-	-	-
0	13,858	\$0	\$869,867
0	9,971	\$0	\$625,880
18,850	18,850	\$1,183,215	\$1,183,215

-	-	-	-
21,450	118,903	\$1,346,417	\$7,463,543
33,604	142,511	\$2,109,324	\$8,945,418
		\$691,600	\$691,600
		\$2,800,924	\$9,637,018

calculated in a separate line because the burden applies to a subset of the respondent population

Calculations for Turbidity Monitoring Requirements

Dewatering Turbidity Monitoring Reports

Activity	Estimate	
Average data entry time per element ¹ (hours)	0.06	This average is based on burden rep Electronic Reporting Final Rule (9/2010) https://www.epa.gov/sites/products/content/documents/epa-823-r-10-001.pdf
No. of elements to report per DMR	13	Respondents need to fill in either "n" which is 13 weeks.
Hours per Response	0.75	

Turbidity Meter Capital and Operation & Maintenance Costs

Monitoring Device	Capital/ Startup Cost for One Respondent ¹	Number of Respondents	Total Capital/ Startup Cost
Turbidity Meter	\$1,064	650	\$691,600

^a EPA surveyed publicly available price information from a variety of analytical instrument retailers for price information.

^b EPA assumes that calibration standards are included with the purchase of a turbidity meter, and thus the cost of calibration standards is not included in the total cost.

sed as able to comply with EPA analytical method standards for turbidity, prices ranged from \$970 - \$1,870

with a median price of \$1,043. Further information on this survey can be found in the Incremental Cost Imp.

act Analysis for the 2022 CGP.

	Respondent Percentage
# of NOIs (including Idaho)	-
# of NOIs (excluding Idaho)	-
Operators with Large Sites	41%
NOI - Large Sites (ESA Criterion A, B)	60%
NOI - Large Sites (ESA Criterion C, D, E - Informal Eval)	37.3%
NOI - Large Sites (ESA Criterion F - Formal Eval)	2.7%
Operators with Small Sites	59%
Operators that discharge into Sensitive Water	25%
Waivers (5%)	5%
# NOTs	100%
Planned Facility Changes	0.50%
Anticipated Noncompliance	0.10%
24hr reporting - Unanticipated Bypass or Upset (Verbal)	0.10%
24hr reporting - Unanticipated Bypass or Upset (Written)	0.08%
24hr reporting - Violation of Maximum Daily Discharge (Verbal)	2%
24hr reporting - Violation of Maximum Daily Discharge (Written)	1%
Other Noncompliance reporting	1%
Other Info - Permittee Report of Inaccurate Previous Information	0.05%

Proposed 2022 CGP ICR	Notes
NA	https://permitsearch.epa.gov/epermit-search/ui/search
2600	2017 CGP NOI Data (Calendar Year 2020)
1066	37% used in 2017 NPDES Program ICR, updated to 41% using 2017 CGP NOI Data (2017-2020) for 2022 CGP ICR
640	Same assumption made in 2017 NPDES Program ICR: 60% of large sites
397	Same assumption made in 2017 NPDES Program ICR: 37.3% of large sites
29	Same assumption made in 2017 NPDES Program ICR: 2.7% of large sites
1534	63% used in 2017 NPDES Program ICR, updated to 59% using 2017 CGP NOI Data (2017-2020) for 2022 CGP ICR
650	Based on analysis of 2017 CGP NOI data from 2017-2020, where impairment or TMDL was listed in NOI form based on the following search terms: sediment, turbidity, TSS, solids, or transparency.
130	Same assumption made in 2017 NPDES Program ICR: 5% on top of the total number of NOIs submitted each year
2600	Same number as number of NOIs
13	Same assumption made in 2017 NPDES Program ICR
3	Same assumption made in 2017 NPDES Program ICR
3	Same assumption made in 2017 NPDES Program ICR
2	Same assumption made in 2017 NPDES Program ICR
52	Same assumption made in 2017 NPDES Program ICR
26	Same assumption made in 2017 NPDES Program ICR
26	Same assumption made in 2017 NPDES Program ICR
1	Same assumption made in 2017 NPDES Program ICR

3926 start - 2020 NOIs w/o Idaho

2561 1,365 remove Texas sites (oil & gas)

2571 10 add back Idaho Tribal land

2571 end - estimated 2021 NOIs

2600 rounded - proposed 2021 NOIs