

Proposed 2022 CGP ICR - Agency Labor Burden

Activity	Hours Per Response			Number of Annual F
	2017 NPDES Program ICR <sup>1</sup>	Proposed 2022 CGP Incremental Change	Proposed 2022 CGP Total Hours per Response	2017 NPDES Program ICR Annual Reponses
NOI review	1	0	1	4227
NOT review	0.25	0	0.25	4227
Waiver Certification Review	1	0	1	211
SWPPP review	1	0	1	4227
Standard/Other Reports	12.0	0	12	203
<b>Total Agency Activities</b>				<b>13,095</b>

**Table Endnotes**

<sup>1</sup> NA indicates that the 2017 NPDES Programmatic ICR did not account for this burden item.

<sup>2</sup> In the 2017 NPDES Programmatic ICR, EPA assumed that the fully loaded cost of employment for a federal en

Federal: Labor rate (2017) Labor rate (2020)

\$42.82

\$45.63

**Responses**

Proposed 2022 CGP No. Annual Responses	Approximate 2017 NPDES Program Annual Burden (hrs)	2022 CGP Annual Burden (hrs)	Approximate 2017 NPDES Programmatic ICR Cost <sup>2</sup>	2022 CGP Annual Cost
2,600	4227	2600	\$181,000	\$118,638
2,600	1057	650	\$45,250	\$29,660
130	211	130	\$9,035	\$5,932
2,600	4227	2600	\$181,000	\$118,638
126	2436	1512	\$104,310	\$68,993
<b>8,056</b>	<b>12,158</b>	<b>7,492</b>	<b>\$ 520,595</b>	<b>\$ 341,860</b>

**Incremental change between 2017 NPDES Programmatic ICR and 2022 CGP**

**Change in Hours** -4,666

**Change in \$** -\$178,735

employee is \$42.82.

Proposed 2022 CGP ICR - Respondent Labor Burden

Activity	Hours 2017 NPDES Program ICR <sup>1</sup>
<b>Reporting Requirements</b>	
<i>NOI for Large Sites</i>	
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 E - Historic Property Screening Step 5 (Contact SHPO/THPO)	Included in NOI burden
Appendix L - Cationic Treatment Chemicals Notification	Included in NOI burden
Appendix C - Small Construction Waiver	1
NOT	0.5
<i>Standard/Other Reporting</i>	
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
<b>Reporting Subtotal</b>	
<b>Recordkeeping Requirements</b>	
Develop New SWPPP - Large Sites	36.4
Develop New SWPPP - Small Sites	22.7
Update SWPPP	Included in SWPPP development burden
Conduct Routine Inspections - Large Sites	0.5
Conduct Routine Inspections - Small Sites	0.25
Dewatering Inspections	NA
Corrective Action Records	Included in inspection burden
<b>Recordkeeping Subtotal</b>	
<b>Total Respondent Activities</b>	

Table Endnotes

<sup>1</sup> NA indicates that the 2017 NPDES Programmatic ICR did not account for this burden item.

<sup>2</sup> In the 2017 NPDES Program ICR, EPA assumed the average hourly rate in the private sector is \$57.42. 1

Hours Per Response				Number of Annual Repo	
Proposed 2022 CGP Incremental Change	Proposed 2022 CGP Total	2017 NPDES Program ICR # of Annual Respondents	Proposed 2022 CGP Number of Respondents	Number of Occurrences Per Year	2017 NPDES Program Number of Annual Responses

0.1	1.6	938	577	1	938
0.1	6.1	583	359	1	583
0.1	20.1	42	26	1	42
0.1	3.8	2663	1638	1	2,663
-	-	-	-	-	-
-	-	-	-	-	-
0	1	211	130	1	211
0.25	0.75	4227	2600	1	4,227

0	4	21	13	1	21
0	5	4	3	1	4
0	5	4	3	1	4
0	2	3	2	1	3
0	3	85	52	1	85
0	2	42	26	1	42
0	5	42	26	1	42
0	2	2	1	1	2
					<b>8,868</b>

0	36.4	1564	962	1	1,564
0	22.7	2663	1638	1	2,663
-	-	-	-	-	-
	0.5	1564	962	26	40,664
	0.25	2663	1638	26	69,238
0.25	0.25	NA	2600	29	NA
-	-	-	-	-	-
					<b>114,129</b>
					<b>122,997</b>

This was determined based on the U.S. Department of Labor, Bureau of Labor Statistics, Total Compensatio

Labor rate (2017)    Labor rate (2020)  
 \$                    57.42    \$                    62.45

nses	Annual Hours Burden		Annual Cost Burden	
	Approximate 2017 NPDES Program Annual Burden (hrs)	Proposed 2022 CGP Annual Burden (hrs)	Approximate 2017 NPDES Programmatic ICR Cost <sup>2</sup>	Proposed 2022 CGP Total Annual Cost

577	1,408	924	\$80,824	\$57,674
359	3,500	2,189	\$200,983	\$136,693
26	845	522	\$48,495	\$32,604
1638	9,853	6,224	\$565,765	\$388,714
-	-	-	-	-
-	-	-	-	-
130	211	130	\$12,116	\$8,119
2600	2,114	1,950	\$121,357	\$121,778

13	84	52	\$4,823	\$3,247
3	20	15	\$1,148	\$937
3	20	15	\$1,148	\$937
2	6	4	\$345	\$250
52	255	156	\$14,642	\$9,742
26	84	52	\$4,823	\$3,247
26	210	130	\$12,058	\$8,119
1	4	2	\$230	\$125
<b>5,456</b>	<b>18,613</b>	<b>12,365</b>	<b>1,068,758</b>	<b>772,184</b>

962	56,930	35,017	\$3,268,898	\$2,186,799
1638	60,450	37,183	\$3,471,045	\$2,322,053
-	-	-	-	-
25,012	20,332	12,506	\$1,167,463	\$781,000
42,588	17,310	10,647	\$993,911	\$664,905
75,400	NA	18,850	NA	\$1,177,183
-	-	-	-	-
<b>145,600</b>	<b>155,021</b>	<b>114,202</b>	<b>\$8,901,317</b>	<b>\$7,131,940</b>
<b>151,056</b>	<b>173,634</b>	<b>126,567</b>	<b>\$9,970,075</b>	<b>\$7,904,124</b>

Incremental change between 2017 NPDES Programmatic ICR and 2022 CGP

Change in Hours                    -47,067 annually

Change in \$                    -\$2,065,951 annually

on for Management, professional, and related; Table 5. Employer costs per hour worked for employee coi



mpensation and costs as a percent of total compensation: Private industry workers, by major occupational gr

oup and bargaining unit status, June 2016.

	Respondent Percentage
# of NOIs (including Idaho)	
# of NOIs (excluding Idaho)	
Large Sites (37%)	37%
NOI - Large Sites (ESA Criterion A, B)	60%
NOI - Large Sites (ESA Criterion C, D, E - Informal Eval)	37%
NOI - Large Sites (ESA Criterion F - Formal Eval)	3%
Small Sites (63%)	63%
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%

2017 NPDES Program ICR (0229.23)	Proposed 2021 CGP ICR	Notes
4227		<a href="https://permitsearch.epa.gov/epermit-search/ui/search">https://permitsearch.epa.gov/epermit-search/ui/search</a>
NA	2600	2017 CGP NOI Data
1564	962	Same assumption made in 2017 NPDES Program ICR
938	577	Same assumption made in 2017 NPDES Program ICR: 60% of large sites
583	359	Same assumption made in 2017 NPDES Program ICR: 37.3% of large sites
42	26	Same assumption made in 2017 NPDES Program ICR: 2.7% of large sites
2663	1638	Same assumption made in 2017 NPDES Program ICR
211	130	Same assumption made in 2017 NPDES Program ICR: 5% on top of the total number of NOIs submitted each year
4227	2600	
21	13	Same assumption made in 2017 NPDES Program ICR
4	3	Same assumption made in 2017 NPDES Program ICR
4	3	Same assumption made in 2017 NPDES Program ICR
3	2	Same assumption made in 2017 NPDES Program ICR
85	52	Same assumption made in 2017 NPDES Program ICR
42	26	Same assumption made in 2017 NPDES Program ICR
42	26	Same assumption made in 2017 NPDES Program ICR
2	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

**Table 1 - Estimated Annual Burden for the Proposed 2022 CGP**

Burden Category	NPDES Program ICR (2017) Burden for EPA CGP		Proposed Incremental Burden
	Labor Burden (hours)	Labor Cost (\$)	Labor Burden (hours)
Total for Respondents	173,634	\$9,970,075	-47,067
Total for Agency	12,158	\$520,595	-4,666

**Table 3 - Estimated Agency Burden and Cost**

Activity	Hours Per Response		
	2017 NPDES Program ICR <sup>1</sup>	Proposed 2022 CGP Incremental Change	Proposed 2022 CGP Total Hours per Response
NOI review	1	0	1
NOT review	0.25	0	0.25
Waiver Certification Review	1	0	1
SWPPP review	1	0	1
Standard/Other Reports	12	0	12
<b>Total Agency Activities</b>			

**Table 4 - Estimated Respondent Burden and Cost**

Activity	Hours Per Response		
	2017 NPDES Program ICR <sup>1</sup>	Proposed 2022 CGP Incremental Change	Proposed 2022 CGP Total
<b>Reporting Requirements</b>			
<i>NOI for Large Sites</i>			
With ESA Evaluation and No Consultation	1.5	0.1	1.6
With ESA Evaluation and Informal Consultation	6	0.1	6.1
With ESA Evaluation and Formal Consultation	20	0.1	20.1
NOI - Small Sites with ESA Evaluation and Consultation	3.7	0.1	3.8
Appendix E - Historic Property Screening Step 5 (Contact SHPO/THPO)	Included in NOI burden	-	-
Appendix L - Cationic Treatment Chemicals Notification	Included in NOI burden	-	-
Appendix C - Small Construction Waiver	1	0	1
NOT	0.5	0.25	0.75
<i>Standard/Other Reporting</i>			
Planned Facility Changes	4	0	4
Anticipated Noncompliance	5	0	5

24hr reporting - Unanticipated Bypass or Upset (Verbal)	5	0	5
24hr reporting - Unanticipated Bypass or Upset (Written)	2	0	2
24hr reporting - Violation of Maximum Daily Discharge (Verbal)	3	0	3
24hr reporting - Violation of Maximum Daily Discharge (Written)	2	0	2
Other Noncompliance reporting	5	0	5
Other Info - Permittee Report of Inaccurate Previous Information	2	0	2
<b>Reporting Subtotal</b>			
<b>Recordkeeping Requirements</b>			
Develop New SWPPP - Large Sites	36.4	0	36.4
Develop New SWPPP - Small Sites	22.7	0	22.7
Update SWPPP	Included in SWPPP development burden	-	-
Conduct Routine Inspections - Large Sites	0.5	0	0.5
Conduct Routine Inspections - Small Sites	0.25	0	0.25
Dewatering Inspections	NA	0.25	0.25
Corrective Action Records	Included in inspection burden	-	-
<b>Recordkeeping Subtotal</b>			
<b>Total Respondent Activities</b>			

**Table 5 - Bottom line respondent burden hours and cost**

	<b>Total</b>	<b>Incremental Change</b>
Unique Respondents (number)	2600	-1627
Responses (number)	151,056	28,059
Burden (hours)	126,567	-47,067
Costs (labor)	\$7,904,124	-\$2,065,951
Costs (capital)	None	None
Costs (O&M)	None	None
<b>Total costs</b>	<b>\$7,904,124</b>	<b>-\$2,065,951</b>

**Table 6 - Bottom line Agency burden hours and cost**

	<b>Total</b>	<b>Incremental Change</b>
Responses (number)	8,056	-5,039
Burden (hours)	7,492	-4,666

Costs (labor)	\$341,860	-\$178,735
Costs (capital)	None	None
Costs (O&M)	None	None
Total costs	\$341,860	-\$178,735

Respondent Summary Calcs	Total	Incremental
Hours per respondent	48.68	28.93
Hours per response	0.84	-1.68



2022 CGP Net Change in Burden	Proposed 2022 CGP Total Burden	
Labor Cost (\$)	Labor Burden (hours)	Labor Cost (\$)
-\$2,065,951	126,567	\$7,904,124
-\$178,735	7,492	\$341,860

Annual Hours Burden		Annual Cost Burden	
Approximate 2017 NPDES Program Annual Burden (hrs)	2022 CGP Annual Burden (hrs)	Approximate 2017 NPDES Programmatic ICR Cost <sup>2</sup>	2022 CGP Annual Cost
4,227	2600	\$181,000	\$118,638
1,057	650	\$45,250	\$29,660
211	130	\$9,035	\$5,932
4,227	2600	\$181,000	\$118,638
2,436	1512	\$104,310	\$68,993
<b>12,158</b>	<b>7,492</b>	<b>\$520,595</b>	<b>\$341,860</b>

Annual Hours Burden		Annual Cost Burden	
Approximate 2017 NPDES Program Annual Burden (hrs)	Proposed 2022 CGP Annual Burden (hrs)	Approximate 2017 NPDES Programmatic ICR Cost <sup>2</sup>	Proposed 2022 CGP Total Annual Cost
1,408	924	\$80,824	\$57,674
3,500	2,189	\$200,983	\$136,693
845	522	\$48,495	\$32,604
9,853	6,224	\$565,765	\$388,714
-	-	-	-
-	-	-	-
211	130	\$12,116	\$8,119
2,114	1,950	\$121,357	\$121,778
84	52	\$4,823	\$3,247
20	15	\$1,148	\$937

20	15	\$1,148	\$937
6	4	\$345	\$250
255	156	\$14,642	\$9,742
84	52	\$4,823	\$3,247
210	130	\$12,058	\$8,119
4	2	\$230	\$125
<b>18,613</b>	<b>12,365</b>	<b>1,068,758</b>	<b>772,184</b>
56,930	35,017	\$3,268,898	\$2,186,799
60,450	37,183	\$3,471,045	\$2,322,053
-	-	-	-
20,332	12,506	\$1,167,463	\$781,000
17,310	10,647	\$993,911	\$664,905
NA	18,850	NA	\$1,177,183
-	-	-	-
<b>155,021</b>	<b>114,202</b>	<b>\$8,901,317</b>	<b>\$7,131,940</b>
<b>173,634</b>	<b>126,567</b>	<b>\$9,970,075</b>	<b>\$7,904,124</b>