

**SUPPORTING STATEMENT
U.S. ENVIRONMENTAL PROTECTION AGENCY**

Information Collection Request for Underground Storage Tank Finder Application

1. Identification of the Information Collection

1(a) Title of the Information Collection

This information collection is entitled “Underground Storage Tank Finder Application,” EPA ICR Number 2696.01, OMB Control Number 2080-NEW.

1(b) Short Characterization/Abstract

Subtitle I of the Solid Waste Disposal Act, as amended by the Superfund Amendments Reauthorization Act, the Energy Policy Act of 2005, and the American Recovery and Reinvestment Act of 2009, directs EPA to regulate underground storage tanks (USTs) and leaking underground storage tanks (LUSTs). EPA issued federal regulations, effective December 1988, at 40 CFR Part 280, 281, 282, and 302.4 that delegate federal UST regulatory authority to approved state programs. EPA amended the regulations at 40 CFR Parts 280 and 281 on July 15, 2015 (80 FR 41566) to add new UST requirements and to update state program approval requirements. States, as the primary implementers of the UST program¹, have programs to collect data on USTs and LUSTs. States may apply for approval to administer the program and may create requirements more stringent than the federal regulations. EPA also enters into grant or cooperative agreements with states without delegated authority. EPA collects UST and LUST data for sites in Indian country.

States currently collect data that characterize many features of UST/LUST sites, such as the number of active and closed tanks, the class of material stored in these tanks, confirmed releases, cleanups initiated and completed, and inspections conducted. These data may also include compliance information and details of operator training and financial responsibility. The number of data fields kept by states varies, with some states collecting more detailed information than others. EPA may request that states provide EPA with the information in state UST/LUST databases.

EPA recently developed the UST Finder application (hereafter “UST Finder”). UST Finder is a publicly available web map application containing a comprehensive, state-sourced national map of UST and LUST data.² UST Finder provides users access to information on the attributes and locations of active and closed USTs, UST facilities, and LUSTs in states. UST Finder incorporates UST data into a geographic information system (GIS) environment that stakeholders, decision-makers, and emergency responders can use to access UST information via the internet. The application provides users with geospatial information about UST facilities and LUST sites, resulting in better understanding and assessment of vulnerability to human health

¹ In this program “states” include the 50 states, the District of Columbia, and the five permanently inhabited territories (i.e., Puerto Rico, U.S. Virgin Islands, Guam, Commonwealth of the Northern Mariana Islands, and American Samoa).

² UST Finder is available via EPA’s GeoPlatform at <https://gispub.epa.gov/ustfinder>.

and the environment. UST Finder currently integrates static, state-sourced data as of 2018-2020. This state-sourced data was curated and standardized to create a national profile of the 2018-2020 UST/LUST universe. That work was completed by EPA's Office of Underground Storage Tanks (OUST) and EPA's Office of Research and Development (ORD), with support from the Association of State and Territorial Solid Waste Management Officials (ASTSWMO).

UST Finder also contains information about proximity of UST facilities and LUST sites to surface and groundwater public drinking water protection areas; the estimated number of private domestic wells and number of people living nearby; and areas prone to floods, wildfires, earthquakes, and other hazards. UST Finder may be used to import additional geospatial data layers of interest or to export UST facility and LUST site information for use by other software programs. The underlying data accessible in UST Finder are publicly available and free to use.

EPA anticipated many users of the UST Finder application. These include UST implementing partners, such as state, territorial, and tribal UST programs, EPA regional UST programs, and UST industry organization partners. Other federal-level users include EPA's Office of Emergency Management, the U.S. Department of Homeland Security, the National Oceanic and Atmospheric Administration, and EPA's Office of Water. State and local users include, but are not limited to, state water programs, local water utilities, state and local emergency management personnel, state and local fire marshals, and water stakeholders. Finally, UST Finder is accessible by the general public, who may be interested in information about UST facilities and LUST sites.

EPA is implementing this information collection to assist with updating the UST Finder application. To successfully implement, maintain, and improve the data quality and usability of UST Finder, the Agency seeks to gather, on a voluntary basis, location and other relevant data about USTs and LUSTs that is currently collected and managed by states and territories. The application may be used for many purposes, such as helping regulators, owners, and operators in decision-making; prioritizing site cleanups or inspections; triaging risk; and identifying sites that may be more likely to have a release based on UST age and substance stored. The application may also be used by emergency response personnel to protect UST facilities from extreme weather events. After disasters, the UST Finder can be used to rapidly identify LUST site cleanups impacted by natural disasters and assist in restarting cleanups after these events.

To have a dynamic database that provides more detailed and current data, EPA intends to request UST/LUST data from the States. EPA intends to implement four options for collecting the UST/LUST data from states: (1) by developing an Exchange server or other automated service through which states can "push" their data to EPA, (2) by developing a link to the state's pre-existing electronic service used to maintain public websites such that EPA can "pull" the data, (3) by allowing states to submit existing databases or spreadsheets through an approved file sharing method, or (4) for states that do not voluntarily submit data, obtain available data via public state websites. For all data transfer options, EPA will standardize, curate, and enter records into the UST Finder application.

The UST Finder information collection is expected to involve 56 respondents per year.

These include the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. Although the information collection is voluntary, we assume that 40 states and territories will participate. The total annual average estimated burden for the collection includes 3,470 hours and \$175,000. The total annual average burden per respondent is 62 hours and \$3,125.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

EPA recognizes the primary role of state agencies in regulating UST and LUST sources. EPA intends to collect the UST and LUST information from U.S. states to update UST Finder, which currently is based on publicly available static data from 2018-2020. It is well understood that working closely with government partners leads to better initiatives that are more effective and efficient. This information collection will assist EPA and the states in identifying and tracking location and additional information on active and closed USTs, UST facilities, and LUSTs across states and will improve the usability and data quality of UST Finder. The information within the tool may also improve implementation of the existing federal requirements by helping stakeholders to identify USTs that are at a higher risk of leaks and identify USTs or LUSTs that should be prioritized for site cleanups or inspections. Additionally, this dynamic and current data will assist in preparation, response, and recovery from extreme weather events, informing states and owner/operators of facilities at risk, providing information for evacuees in emergency situations, and providing time-critical information for emergency responders.

This information collection is voluntary and does not require states to collect additional data on USTs/LUSTs beyond the data elements that are already being collected through their previously implemented programs. States will decide the extent of information to be provided.

2(b) Practical Utility/Users of the Data

EPA developed UST Finder to provide users with a first-ever national picture of UST facilities and LUST sites and their relationship to: populations, potential flooding risks, and potential impacts to drinking water supplies. The data requested in this information collection will provide an accurate and accessible inventory of UST/LUST sources subject to federally enforceable regulations. The data assembled from this information request will also assist states, individually and collectively, to better assess their facilities.

EPA will use the information collected from the states to develop more detailed and current data on USTs, UST facilities, and LUSTs to be used in UST Finder. EPA will supplement the information provided by states with additional data layers. These additional data layers may include some combination of locations of floodplains, surface and groundwater public drinking water protection areas, private domestic wells, nearby land use types, and risks of flooding, wildfires, or other natural disasters. EPA will compile these additional data layers on its own—and these additional data layers are not part of this information collection.

UST Finder is available for use by and will benefit regulators, owners and operators of USTs, a broad range of stakeholders, and the general public. The tool may be used to prioritize site cleanups and inspections; identify sites that may be more likely to have a release based on UST age and substance stored; assist in locating UST facilities and responding to emergencies, such as floods, wildfires, and earthquakes; and identify and triage potential risks to public and private drinking water supplies.

3. Nonduplication, Consultations, and Other Collection Criteria

3(a) Nonduplication

This ICR relates to information that state and territorial agencies already collect from UST owners and operators as part of their customary business practice to manage their compliance and enforcement programs. The requested information is already collected under approved state programs for which EPA has previously delegated UST regulatory authority at 40 CFR Parts 280, 281, 282, and 302.4.

A previously approved ICR (No. 1360.17; OMB No. 2050-0068) addresses the burden for owners and operators of USTs to meet the federal requirements and the burden for states to obtain approval for state delegated programs, to maintain files related to the federal information collection requirements, and to verify adequate enforcement and compliance of the state programs. This ICR does not duplicate any data collection requirements for states or territories in ICR No. 1360.17. Rather, this ICR simply requests that states voluntarily provide their assembled UST/LUST databases (or excerpts of those databases) to EPA on a periodic basis.

Two previously approved ICRs address the registration of fuel and fuel additives by manufacturers of motor vehicle gasoline, diesel fuel, and additives for those fuels. This includes ICR No. 0369.16 (OMB No. 2060-0150), which applies to product registration of fuels and additives and reporting of production and related information, and ICR No. 1696.10 (OMB No. 2060-0297), which requires reporting of health effects research requirements for manufacturers of motor vehicle gasoline, diesel fuel, and additives for those fuels. This ICR does not duplicate any data collection requirements for manufacturers in ICR No. 0369.16 or ICR No. 1696.10, because this ICR does not include requirements related to fuels or fuel additives and does not apply to private manufacturers.

A separate ICR (No. 2650.02) recently submitted to OMB requests collection of data from private companies providing regular servicing and maintenance to owners of federally regulated USTs, and addresses the burden for collection and assimilation of testing data from several UST servicing companies where UST testing was required by the 2015 UST regulation. This ICR does not duplicate any data collection requirements for states or territories in ICR No. 2650.02, because this ICR does not include requirements related to UST test data and does not apply to private testing companies.

Currently, EPA collects summary level data from states regarding UST performance

measures, and EPA makes those summary level data publicly available. These summary level data include various aggregate statistics, such as the total number of active and closed petroleum tanks and hazardous substance tanks, the total amount of confirmed releases, the number of cleanups initiated and completed, and the number of inspections conducted. The summary level data also include the percentage of facilities in significant operational compliance and those in compliance with UST technical requirements, operator training, financial responsibility, and walk-through requirements. However, because EPA has delegated UST regulatory authority to the states, EPA does not directly receive the raw locational data or additional information for individual USTs or LUSTs.

In order to reduce burden on states, EPA intends to request that states voluntarily submit to EPA their UST/LUST databases containing the minimum locational data, plus any optional data elements that are already available. States will be able to provide data in the formats in which they customarily collect their data. States would not be required to gather additional data elements beyond what they currently collect. EPA (not the states or territories) will be responsible for reviewing, standardizing, curating, and transferring the data into UST Finder.

This information collection does not request UST/LUST data from sites in Indian country, because EPA currently implements the UST/LUST regulatory programs in Indian country and therefore already has access to those records.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the implementation of this ICR was published in the *Federal Register* (87 FR 56656) on September 15, 2022. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The EPA consulted with nine states regarding the burden of this information collection, specifically in regards to the options for which EPA is developing to collect the information, the likelihood of states' adopting a specific option, and the activities and burden required for the initial implementation of each option and for semiannual submittals. The data may be obtained through one of four scenarios:

- Option 1: Providing the data directly to EPA through the use of the Exchange Network or other automated service;
- Option 2: Providing the data to EPA by submitting a link to the state's pre-existing electronic service used to maintain public websites that EPA can retrieve;
- Option 3: Providing the data to EPA by submitting an electronic database or spreadsheet through an approved EPA electronic file sharing method or email address; and
- Option 4: Data not provided to EPA, therefore EPA will obtain available data via public websites.

Of the nine states, four currently maintain state websites and would prefer to submit data using option 2, and five states maintain background databases that they would prefer to submit using option 3. Of these states, four states expressed interest in adopting option 1 in a future year. The agency responses are summarized as follows:

- California Environmental Protection Agency State Water Resources Control Board, Matthew Cohen, Phone Number: (916) 341-5455. The agency provided that they would initially prefer to use Option 2 and provided an estimate of burden totaling 50 hours for the initial set-up and compilation of data for Option 2, and an estimate of burden totaling 1 hour for subsequent submittal of data on a semiannual or more frequent basis. The agency indicated that they would have an interest in adopting Option 1 in the future.
- Indiana Department of Environmental Management, Jason Goulet and Greg Overtoom, Phone Number: (317) 232-8603. The agency provided that they would initially prefer to use Option 3 and provided an estimate of burden totaling 80 hours for the initial compilation of a subset of their data for Option 3 (1 full-time equivalent (FTE) employee for 2 weeks for compilation of data). The agency provided an estimate of burden totaling 40 hours for subsequent submittal of data on a semiannual or more frequent basis and to account for quality assurance/quality control.
- Nebraska State Fire Marshall's Fuel Safety Division, David Levering, Phone Number: (402) 471-2027. The agency provided that they would initially prefer to use Option 2 and provided an estimate of burden totaling 1 hour for the initial set-up and compilation of data for Option 2, and an estimate of burden totaling 1 hour for subsequent submittal of data on a semiannual or more frequent basis. The agency indicated that they would have an interest in adopting Option 1 in the future.
- North Carolina Department of Environmental Quality, Ruth Strauss, Phone Number: (919) 707-8200. The agency provided that they would initially prefer to use Option 3 and provided an estimate of burden totaling 320 hours for the initial set-up and compilation of data for Option 3 (1 FTE for 8 weeks), and an estimate of burden totaling 1 hour for subsequent submittal of data on a semiannual or more frequent basis. The agency indicated that they would have an interest in adopting Option 1 in the future.
- Oregon Department of Environment Quality, Diana Foss, Phone Number: (503) 229-5696. The agency provided that they would initially prefer to use Option 3 and provided an estimate of burden totaling 40 hours for the initial set-up and compilation of data for Option 3, and an estimate of burden totaling 1 hour for subsequent submittal of data on a semiannual or more frequent basis.
- South Carolina Department of Health and Environmental Control, Stephanie Briney, Phone Number: (803) 898-3432. The agency provided that they would initially prefer to use Option 3 and provided an estimate of burden totaling 240 hours for the initial set-up and compilation of data for Option 3, and an estimate of burden totaling 10 hours for subsequent submittal of data on a semiannual or more frequent basis.

- South Dakota Department of Environmental and Natural Resources, Terry Florentz, Phone Number: (605) 773-3296. The agency provided that they would initially prefer to use Option 3 and provided an estimate of burden totaling 80 hours for the initial set-up and compilation of data for Option 3, and an estimate of burden totaling 4 hours for subsequent submittal of data on a semiannual or more frequent basis.
- Tennessee Department of Environment and Conservation, Michelle Pruett, Phone Number: (615) 532-0945. The agency provided that they would initially prefer to use Option 2 and provided an estimate of burden totaling 80 hours for the initial set-up and compilation of data for Option 2, and an estimate of burden totaling 10 hours for subsequent submittal of data on a semiannual or more frequent basis.
- Virginia Department of Environmental Quality: Betty Lamp, Phone Number: (804) 698-4000. The agency provided that they would initially prefer to use Option 2 and provided an estimate of burden totaling 100 hours for the initial compilation of data for Option 2, and an estimate of 0 burden for subsequent submittal of data on a semiannual or more frequent basis. The agency also provided burden estimates on the use of Option 1, which they indicated could be an option in the future. The agency provided an estimate of burden totaling 200-340 hours for the initial compilation of data for Option 1, and an estimate of 0 burden for subsequent submittal of data under Option 1 on a semiannual or more frequent basis.

The agency reviewed the consultation responses to develop initial average costs and annual average costs for each of the four submittal options. The burden estimates provided by the consulted agencies was used to extrapolate burden for the remaining respondents. Based on the data provided, the annual average burden per respondent is 62 hours.

3(d) Effects of Less Frequent Collection

This information collection requests states to voluntarily submit their UST/LUST databases. Currently, EPA collects UST summary level data from states twice each year and makes the summary level data publicly available at <https://www.epa.gov/ust/ust-performance-measures>. To allow EPA to remain current on the nationwide UST/LUST inventory, states who choose to participate will be asked to provide their dataset semiannually, although participants will have the option to voluntarily submit data more frequently. It is important to receive the data updates semiannually. If EPA received data less frequently, the data in the UST Finder Tool might not be timely, and those who use the data might make decisions based on outdated information.

3(e) General Guidelines

This information collection contains no special circumstances that would violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

3(f) Confidentiality

EPA does not intend to collect any data that would be considered confidential business information. Some datasets could include UST/LUST owner contact information or information collected related to the required financial responsibility requirements that could be considered sensitive. EPA will not make the sensitive data fields public and will not disclose personal or organizational contact information (beyond the name of the UST/LUST owner) or financial responsibility requirements in UST Finder.

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The information requested does not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents for the information collection activity are state and territorial delegated agencies. The United States Standard Industrial Classification (SIC) code for the respondents is SIC 9511, which corresponds to the North American Industry Classification System (NAICS) 924110 for Administration of Air and Water Resource and Solid Waste Management Programs. Source compliance data assembled by delegated agencies covers numerous NAICS categories. The total number of respondents is 56 (i.e., the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands).

4(b) Information Requested

(i) Data Items

This information collection seeks to collect data from states that is currently collected through their existing UST/LUST programs. EPA is requesting all information on a voluntary basis. The information will be collected through semiannual requests to state and territory UST/LUST program contacts. States may also submit data to EPA more frequently through voluntary periodic updates. States have the option to provide these data elements and are not required to collect information beyond what is already included in their existing databases. States that choose to participate would voluntarily provide the following data elements:

Data elements for UST facilities, USTs, and LUSTs:

- UST facility and tank locational data, including either address, zip code, county, and state, or latitudinal and longitudinal coordinates and the coordinate source (e.g., map interpolation, GPS, PLSS, Geocoded Address, etc.).
- LUST facility and tank locational data, including either address, zip code, county, and state, or latitudinal and longitudinal coordinates and the coordinate source (e.g., map interpolation, GPS, PLSS, Geocoded Address, etc.).
- Link to UST/LUST tank database website, if applicable.
- General facility information, including owner type, facility type (e.g., residential, commercial, etc.), and facility ID.
- Number of USTs at the facility.
- Contact information for persons responsible for tank(s), including name, address, phone, or e-mail.
- Mechanism used to meet financial responsibility requirements, if applicable.
- General tank information, including tank ID; whether the tank is federally regulated; tank use/closed status; identification of manifolded or interconnected tanks treated as one system; closure dates; and identification of compartmentalized USTs and number of compartments.
- Substance stored information, including the fuel or other liquid stored (by compartment, if applicable); tank capacity (by compartment, if applicable); use of an excavation line, wall type (i.e., single, double, triple) and material; and identification of whether the tank or tank liner has been repaired and repair date.
- Piping information, including material description of piping; use of a flex connector; and style (e.g., suction or pressure).
- Tank corrosion protection information, including use of cathodic protection (sacrificial anode or impressed current) systems, interior lining, and whether the tank was lined post-installation.
- Piping corrosion protection information, including use of cathodic protection (sacrificial anode or impressed current) systems and external coating.
- Tank overflow protection information, including use of automatic shutoff device, overflow alarm, ball float valve, and primary means of protection.
- Tank spill protection information, including use of spill bucket, drain, and pump.
- Tank release detection information, including use of interstitial monitoring (continuous/electronic or manual); use of internal release detection including automatic or manual tank gauging, manual sticking, or tank tightness testing; or use of external release detection such as groundwater or vapor monitoring.
- Piping release detection information, including use of electronic or mechanical line leak detectors, use of safe-suction or non-safe suction, and release detection type.
- Identification of releases at the UST facility or Tank, and associated LUST ID.

Data elements for LUSTs:

- General identification information, including Site Name, Facility ID, Tank ID associated with the release, and LUST ID.
- Whether the release is federally reportable.
- LUST status (e.g., active or no further action).

- Reported date of release.
- No further action date.
- Media impacted (e.g., soil, groundwater, surface water).
- Fuels or substances released, quantity released, and units of measure.
- Whether fuel additives are present or were released.
- Whether the UST was in use or active at the time of release.
- Whether the tank was removed following the release.
- Causes of the release.
- How the release was detected (e.g., vapor monitoring, overfill alarm, inspection, etc.).
- Whether the release requires remediation.
- For LUSTs requiring remediation, the “shovel-in-ground” date, remediation strategies used and start date, and clean-up priority.
- Whether the site was closed with contamination present.

(ii) Respondent Activities

EPA is requesting that states submit or make available their existing UST/LUST data elements listed in section 4(b)(i) of this document. States will provide data in the formats in which they currently collect their data, and no additional changes to the data are required. The data will be provided through one of four approaches:

- Option 1: States will provide the data to EPA through an EPA-maintained Virtual Exchange Service (VES) or other automated service. The VES allows states to “push” data to EPA directly as they update their internal UST/LUST databases. To use this submission method, respondents will need to:
 - Call the Node Help Desk to obtain a Node administration account and to set up a “Getting Started” meeting with the VES Team.
 - Establish a secure connection to VES.
 - Import a Data Exchange.
 - Map data to a staging database that is accessible to VES.
 - Preview and approve the information in UST Finder prior to publication.
- Option 2: States with existing websites or web services will share data with EPA by providing a link to the state’s pre-existing electronic service used to maintain the website or web services. To complete the request, respondents will:
 - Verify and update data to ensure it contains the minimum data elements requested in section 4(b)(i) of this document.
 - Save database into one of the preferred EPA file formats (e.g., MS Access, Excel and/or comma-separated value format (.CSV), Shapefile, ESRI file GeoDatabase or OGC GeoPackage format).
 - If the website/service requires authentication, login information needs to be shared with EPA.
 - Notify EPA when there is an update to the data or its format. Respondent can

- o also work with EPA to set up a recurring update schedule.
 - o Preview and approve the information in UST Finder prior to publication.
- Option 3: States or territories without existing websites or webservices will provide the data to EPA by sending their internal UST/LUST electronic databases (e.g., MS Excel/.CSV, Access Databases, Shapefile) through an approved EPA-maintained electronic file-sharing method or email address. To complete the request, respondents will:
 - o Verify and update data to ensure it contains the required data elements.
 - o Save database into one of the preferred EPA file formats.
 - o Work with EPA to use an approved electronic file sharing method (e.g., e-mail, EPA GoAnywhere/FTP, EPA SharePoint site).
 - o Notify EPA when there is an update to the data or its format.
 - o Preview and approve the information in UST Finder prior to publication.
- Option 4: Data not provided to EPA. Therefore, EPA will obtain available data via public websites.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA will conduct the following activities when acquiring, analyzing, storing, and distributing the UST/LUST data provided by states.

- Option 1: For states or territories that provide their UST/LUST data to EPA through Virtual Exchange Service (VES), EPA will:
 - o Perform quality control checks on submitted data.
 - o Conduct geocoding of data that only includes textual address information and not latitude and longitude data.
 - o Provide helpdesk support throughout the VES registration process.
 - o Participate in a “Getting Started” meeting.
 - o Provide ongoing communication around changes to the Exchange Network hosted schema and/or EPA Central Data Exchange dataflow.
- Option 2: For states or territories that share UST/LUST data with EPA via publicly accessible websites or web services, EPA will:
 - o Develop a method for downloading the data.
 - o Develop a customized Extract, Transform, Load (ETL) script that translates data to the required format.
 - o Perform quality control checks on submitted data.
 - o Perform geocoding of data that only includes textual address information and

not latitude and longitude data.

- Option 3: For states or territories that submit UST/LUST databases (e.g., MS Excel/.CSV, Access Databases, Shapefile), EPA will:
 - Provide instructions for how to use approved data submission methods (e.g., e-mail, SharePoint, GoAnywhere).
 - Provide instructions for how to notify EPA when a data submission has been updated.
 - Develop a customized Extract, Transform, Load (ETL) script that translates data to the required format.
 - Perform quality control checks on submitted data.
 - Perform geocoding of data that only includes textual address information and not latitude and longitude data.

- Option 4: Data not provided to EPA. EPA obtains available data via public websites. EPA will:
 - Develop a customized Extract, Transform, Load (ETL) script that downloads data from the state agency website and translates data to the required format.
 - Perform quality control checks on submitted data.
 - Perform geocoding of data that only includes textual address information and not latitude and longitude data.

5(b) Collection Methodology and Management

The data transfer methodology for this collection was chosen based on efficiency and minimization of burden for respondents. All UST and LUST data updates received from states will be reviewed by EPA to verify that geocoded addresses appear to be correct.

UST Finder resides within EPA's GeoPlatform, which is accessible to all delegated agency users via the internet. EPA will add the data provided by respondents to UST Finder, which is accessible to all public users at <https://www.epa.gov/ust/ust-finder>.

- EPA will verify the data quality of all submissions by:
- Validating the accuracy of textual address geocode activities by ensuring they map into in the corresponding state or territory.
 - Validating that all submitted latitude/longitude coordinates map within the corresponding state or territory boundary.
 - Verifying that data elements are of the correct type (e.g., alphanumeric, numeric) and format.
 - Confirming that data values fall within reasonable and accepted ranges.
 - Verifying that that the amount of data is similar to prior submissions.
 - Providing states the opportunity to review their data after curation by EPA and prior to the data being publicly available.

The EPA will store the updated data to an EPA approved location. The public will access the data at the public website <https://www.epa.gov/ust/ust-finder>.

5(c) Small Entity Flexibility

Small entity flexibility need not be addressed in this information collection, because all state and territory governments, which represent states, are not classified as small entities. That is, each state or territory population is greater than 50,000. However, EPA has designed its approach for this information collection to minimize burden for all respondents while obtaining sufficient and accurate information. For example, states' participation in UST Finder is voluntary; states need not collect additional data elements or manipulate their data; and states may choose to participate by providing only the minimum required data elements.

5(d) Collection Schedule

The frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of states' burdens for the information collection requirements. The individual burdens are expressed under standardized headings consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are voluntary.

The 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.

6(a) Estimating Respondent Burden

The average annual burden to states over the next three years associated with the proposed information collection is estimated to be 3,470 (Total Labor Hours from Tables 1, 2, and 3 at the end of this document). These hours are based on EPA studies and background documents from the development of the original UST Finder application, consultation with affected entities, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial \$69.04 (GS-13, Step 5, \$43.15 x 1.6)

Technical	\$51.23 (GS-12, Step 1, \$32.02 x 1.6)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 x 1.6)
Subcontractor	\$122.66 (\$58.41 x 2.1)

The raw hourly rates for managerial, technical, and clerical labor are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to state government employees. The raw hourly rate for subcontractors is from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Workers, by occupational and industry group.” The rate is from column 1, “Total compensation.” The subcontractor raw hourly rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

No capital costs are expected to be incurred under this information collection, because this information collection only requires respondents to provide information that is already available to them (i.e., respondents will not need to acquire specialized equipment to sustain their existing data collection). Similarly, EPA does not expect any operations and maintenance (O&M) costs for postage under this information collection as all responses will be submitted electronically.

6(c) Estimating Agency Burden and Cost

The only costs to EPA are those costs associated with compiling, processing, and posting the reported information.

The average annual EPA cost during the three years of the ICR is estimated to be \$33,600.

This cost is based on the average hourly labor rate as follows:

Managerial	\$69.04 (GS-13, Step 5, \$43.15 x 1.6)
Technical	\$51.23 (GS-12, Step 1, \$32.02 x 1.6)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 x 1.6)

The raw hourly rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. These rates were then increased by 60 percent to account for the benefit packages available to federal government employees. Details upon which this estimate is based appear at the end of this document in Table 4: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 1, Table 5: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 2, and Table 6: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 3.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, 40 existing respondents will submit data to EPA for the UST Finder application, and EPA will gather data for an additional 16 respondents.

The average number of annual responses per year is calculated using the following table:

Average Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Year 1				
Option 1	0	2	0	0
Option 2	18	2	0	36
Option 3	22	2	0	44
Option 4	16	0	0	0
Year 2				
Option 1	6	2	0	12
Option 2	15	2	0	30
Option 3	19	2	0	38
Option 4	16	0	0	0
Year 3				
Option 1	12	2	0	24
Option 2	12	2	0	24
Option 3	16	2	0	32
Option 4	16	0	0	0
			Average	80

Because the 40 respondents are expected to submit their UST/LUST data semiannually, the number of Average Annual Responses is 80 (i.e., 40 respondents x 2 responses per year). The remaining 16 states are not anticipated to submit their UST/LUST data.

The total average annual labor cost for respondents is \$175,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 1, Table 2: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 2, Table 3: Annual

Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 3, and Table 7: Summary of Annual Respondent and Agency Burden and Cost – Underground Storage Tank Finder Application.

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1, 2, 3, 4, 5, 6, and 7 at the end of this document and summarized below.

(i) Respondent Tally

The total average annual labor hours are 3,470. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 1, Table 2: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 2, and Table 3: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 3, and Table 7: Summary of Annual Respondent and Agency Burden and Cost – Underground Storage Tank Finder Application.

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 62 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 680 labor hours at a cost of \$33,600. See Table 4: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 1, Table 5: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 2, Table 6: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 3, and Table 7: Summary of Annual Respondent and Agency Burden and Cost – Underground Storage Tank Finder Application.

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

6(f) Reasons for Change in Burden

This is a new information collection, therefore, there are no previous burden estimates. The burden estimated reflects assumptions based on Agency experience from the development of the UST Finder application, consultation with affected entities, and any comments received. Should EPA request to extend this information collection 3 years from now, changes in burden will be evaluated at that time.

6(g) Burden Statement

As noted above, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 62 hours per response. 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 valid OMB Control Number.

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-ORD-2021-0601. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then enter the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-ORD-2021-0601 and OMB Control Number 2050-NEW in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 1

Burden Item	A	B	C	D	E	F	G	H	I
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Subcontractor hours per year	Annual cost (\$) ^{b, c}
A. Option 1: Push UST/LUST data to EPA's Virtual Exchange Server									
1. Initial program set-up ^d									
a. Set up Node Administration account.	48	1	48	0	0	0	0		\$0
b. Review data, develop data query to match EPA schema	192	1	192	0	0	0	0		\$0
c. Subcontractor technical assistance ^e	38	1	38	0	0	0	0	0	\$0
2. Sending data semiannually ^f									
a. Verify, quality check, and gather state agency data	1	2	1	0	0	0	0		\$0
b. Establish connection to VES	0.25	2	1	0	0	0	0		\$0
c. Import data exchange and map data	0.25	2	1	0	0	0	0		\$0
B. Option 2: Share UST/LUST data with EPA via link to existing state agency website									
1. Initial program set-up ^d									
a. Set up approved file sharing method with EPA	8	1	8	18	144	7	14		\$8,274
b. Review and compile minimum data elements from existing databases; verify and update data	50	1	50	18	900	45	90		\$51,710
c. Subcontractor technical assistance ^e	10	1	10	0.9	0	0	0	9	\$1,104

2. Sending data semiannually ^f									
a. Verify, quality check, and gather state agency data	1.5	2	3	18	54	3	5		\$3,103
b. Save database(s) in preferred file format on state agency website	1	2	2	18	36	2	4		\$2,068
c. Notify EPA that data is available	0.5	2	1	18	18	1	2		\$1,034
C. Option 3: Send UST/LUST data to EPA file sharing site									
1. Initial program set-up ^d									
a. Set up approved file sharing method with EPA	8	1	8	22	176	9	18		\$10,112
b. Review and compile minimum data elements from existing databases; verify and update data	144	1	144	22	3,168	158	317		\$182,017
c. Subcontractor technical assistance ^e	29	1	29	1.1	0	0	0	32	\$3,886
2. Sending data semiannually ^f									
a. Verify, quality check, and gather state agency data	9.5	2	19	22	418	21	42		\$24,016
b. Save database(s) in preferred file format	0.5	2	1	22	22	1	2		\$1,264
c. Send UST/LUST data to EPA	0.5	2	1	22	22	1	2		\$1,264
d. Notify EPA that data has been sent	0.5	2	1	22	22	1	2		\$1,264
D. Option 4: EPA pulls existing UST/LUST data from existing state agency website									
1. No respondent action required ^g	0	0	0	16	0	0	0		\$0
Reporting Subtotal						5,727		41	\$291,116
E. Recordkeeping requirements ^h									
a. Plan activities	1	1	1	40	40	2	4	0	\$2,298
b. Record activities	0.5	2	1	40	40	2	4	0	\$2,298
Recordkeeping Subtotal						92			\$4,596
TOTAL LABOR BURDEN AND						5,819			\$295,700

COSTS (rounded) ⁱ									
TOTAL CAPITAL AND O&M COST (rounded) ⁱ									\$0
GRAND TOTAL (rounded) ⁱ									\$295,700

Assumptions:

^a EPA estimates an average of 40 states/territories will comply voluntarily with EPA's request for data in year 1 of the program, using Options 2 or 3. EPA estimates that, beginning in year 2, 6 states per year will transition to using Option 1. EPA assumes it will retrieve data for the remaining 16 states that do not submit data using Options 1 through 3.

^b This ICR uses the following labor rate for subcontractors: \$122.66 per hour for Technical labor. This rate is from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "Table 2. Civilian Workers, by occupational and industry group." The rate is from column 1, "Total compensation." The BLS rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. This ICR uses a Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

^d EPA assumes that, in the first year of the program, each respondent will require time to set up their systems to accommodate the data exchange. This involves assessing which data is desired by EPA, re-writing database queries, verifying that queries are correct, and obtaining management permission to share data. As states transition to using Option 1, they will incur burden only once for the initial set-up to implement this Option.

^e Based on interview responses, EPA assumes that 5% of states will use outside contractors to initially set up their processes to accommodate the data exchange. This initial set-up will begin in year 1 for states choosing Options 2 and 3 and year 2 for states choosing Option 1. EPA also assumes that subcontractor labor for the initial set-up will be an additional 20% of state agency hours.

^f Based on interview responses, EPA assumes that, on average, each respondent will share their UST/LUST data on a semiannual basis.

^g Respondents choosing Option 4 will have no initial burden in Year 1 or recurring burden in subsequent years.

^h EPA assumes that respondents will keep records of all data made available to the Agency. Planning will occur in year 1 and recordkeeping will occur semiannually.

ⁱ Total+A3:J53s have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 2

Burden Item	A	B	C	D	E	F	G	H	I
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Subcontractor hours per year	Annual cost (\$) ^{b,c}
A. Option 1: Push UST/LUST data to EPA's Virtual Exchange Server									
1. Initial program set-up ^d									
a. Set up Node Administration account.	48	1	48	6	288	14	29		\$16,547
b. Review data, develop data query to match EPA schema	192	1	192	6	1,152	58	115		\$66,188
c. Subcontractor technical assistance ^e	38	1	38	0.3	0	0	0	12	\$1,413
2. Sending data semiannually ^f									
a. Verify, quality check, and gather state agency data	1	2	1	6	6	0	1		\$345
b. Establish connection to VES	0.25	2	1	6	3	0	0		\$172
c. Import data exchange and map data	0.25	2	1	6	3	0	0		\$172
B. Option 2: Share UST/LUST data with EPA via link to existing state agency website									
1. Initial program set-up ^d									
a. Set up approved file sharing method with EPA	8	1	8	0	0	0	0		\$0
b. Review and compile minimum data elements from existing databases; verify and update data	50	1	50	0	0	0	0		\$0
c. Subcontractor technical assistance ^e	10	1	10	0	0	0	0	0	\$0
2. Sending data semiannually ^f									

a. Verify, quality check, and gather state agency data	2	2	3	15	45	2	5		\$2,585
b. Save database(s) in preferred file format on state agency website	1	2	2	15	30	2	3		\$1,724
c. Notify EPA that data is available	0.5	2	1	15	15	1	2		\$862
C. Option 3: Send UST/LUST data to EPA file sharing site									
1. Initial program set-up ^d									
a. Set up approved file sharing method with EPA	8	1	8	0	0	0	0		\$0
b. Review and compile minimum data elements from existing databases; verify and update data	144	1	144	0	0	0	0		\$0
c. Subcontractor technical assistance ^e	29	1	29	0	0	0	0	0	\$0
2. Sending data semiannually ^f									
a. Verify, quality check, and gather state agency data	9.5	2	19	19	361	18	36		\$20,741
b. Save database(s) in preferred file format	0.5	2	1	19	19	1	2		\$1,092
c. Send UST/LUST data to EPA	0.5	2	1	19	19	1	2		\$1,092
d. Notify EPA that data has been sent	0.5	2	1	19	19	1	2		\$1,092
D. Option 4: EPA pulls existing UST/LUST data from existing state agency website									
1. No respondent action required ^g	0	0	0	16	0	0	0		\$0
Reporting Subtotal					2,254		12		\$114,025
E. Recordkeeping requirements ^h									
a. Plan activities	1	1	1	0	0	0	0	0	\$0
b. Record activities	0.5	2	1	40	40	2	4	0	\$2,298
Recordkeeping Subtotal					46				\$2,298

TOTAL LABOR BURDEN AND COSTS (rounded) ⁱ						2,300			\$116,300
TOTAL CAPITAL AND O&M COST (rounded) ⁱ									\$0
GRAND TOTAL (rounded) ⁱ									\$116,300

Assumptions:

^a EPA estimates an average of 40 states/territories will comply voluntarily with EPA's request for data in year 1 of the program, using Options 2 or 3. EPA estimates that, beginning in year 2, 6 states per year will transition to using Option 1. EPA assumes it will retrieve data for the remaining 16 states that do not submit data using Options 1 through 3.

^b This ICR uses the following labor rate for subcontractors: \$122.66 per hour for Technical labor. This rate is from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "Table 2. Civilian Workers, by occupational and industry group." The rate is from column 1, "Total compensation." The BLS rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. This ICR uses a Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

^d EPA assumes that, in the first year of the program, each respondent will require time to set up their systems to accommodate the data exchange. This involves assessing which data is desired by EPA, re-writing database queries, verifying that queries are correct, and obtaining management permission to share data. As states transition to using Option 1, they will incur burden only once for the initial set-up to implement this Option.

^e Based on interview responses, EPA assumes that 5% of states will use outside contractors to initially set up their processes to accommodate the data exchange. This initial set-up will begin in year 1 for states choosing Options 2 and 3 and year 2 for states choosing Option 1. EPA also assumes that subcontractor labor for the initial set-up will be an additional 20% of state agency hours.

^f Based on interview responses, EPA assumes that, on average, each respondent will share their UST/LUST data on a semiannual basis.

^g Respondents choosing Option 4 will have no initial burden in Year 1 or recurring burden in subsequent years.

^h EPA assumes that respondents will keep records of all data made available to the Agency. Planning will occur in year 1 and recordkeeping will occur semiannually.

ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 3: Annual Respondent Burden and Cost – Underground Storage Tank Finder Application – Year 3

Burden Item	A	B	C	D	E	F	G	H	I
	Person-hours per occurrence ^e	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Subcontractor hours per year	Annual cost (\$) ^{b, c}
A. Option 1: Push UST/LUST data to EPA's Virtual Exchange Server									
1. Initial program set-up ^d									
a. Set up Node Administration account.	48	1	48	6	288	14	29		\$16,547
b. Review data, develop data query to match EPA schema	192	1	192	6	1,152	58	115		\$66,188
c. Subcontractor technical assistance ^e	38	1	38	0.3	0	0	0	12	\$1,413
2. Sending data semiannually ^f									
a. Verify, quality check, and gather state agency data	1	2	1	12	12	1	1		\$689
b. Establish connection to VES	0.25	2	1	12	6	0	1		\$345
c. Import data exchange and map data	0.25	2	1	12	6	0	1		\$345
B. Option 2: Share UST/LUST data with EPA via link to existing state agency website									
1. Initial program set-up ^d									
a. Set up approved file sharing method with EPA	8	1	8	0	0	0	0		\$0
b. Review and compile minimum data elements from existing databases; verify and update data	50	1	50	0	0	0	0		\$0
c. Subcontractor technical assistance ^e	10	1	10	0	0	0	0	0	\$0
2. Sending data semiannually ^f									

a. Verify, quality check, and gather state agency data	2	2	3	12	36	2	4		\$2,068
b. Save database(s) in preferred file format on state agency website	1	2	2	12	24	1	2		\$1,379
c. Notify EPA that data is available	0.5	2	1	12	12	1	1		\$689
C. Option 3: Send UST/LUST data to EPA file sharing site									
1. Initial program set-up ^d									
a. Set up approved file sharing method with EPA	8	1	8	0	0	0	0		\$0
b. Review and compile minimum data elements from existing databases; verify and update data	144	1	144	0	0	0	0		\$0
c. Subcontractor technical assistance ^e	29	1	29	0	0	0	0	0	\$0
2. Sending data semiannually ^f									
a. Verify, quality check, and gather state agency data	9.5	2	19	16	304	15	30		\$17,466
b. Save database(s) in preferred file format	0.5	2	1	16	16	1	2		\$919
c. Send UST/LUST data to EPA	0.5	2	1	16	16	1	2		\$919
d. Notify EPA that data has been sent	0.5	2	1	16	16	1	2		\$919
D. Option 4: EPA pulls existing UST/LUST data from existing state agency website									
1. No respondent action required ^g	0	0	0	16	0	0	0		\$0
Reporting Subtotal						2,171		12	\$109,888
E. Recordkeeping requirements ^h									
a. Plan activities	1	1	1	0	0	0	0	0	\$0
b. Record activities	0.5	2	1	40	40	2	4	0	\$2,298
Recordkeeping Subtotal						46			\$2,298
TOTAL LABOR BURDEN AND						2,217			\$112,200

COSTS (rounded) ⁱ									
TOTAL CAPITAL AND O&M COST (rounded) ⁱ									\$0
GRAND TOTAL (rounded) ⁱ									\$112,200

Assumptions:

^a EPA estimates an average of 40 states/territories will comply voluntarily with EPA's request for data in year 1 of the program, using Options 2 or 3. EPA estimates that, beginning in year 2, 6 states per year will transition to using Option 1. EPA assumes it will retrieve data for the remaining 16 states that do not submit data using Options 1 through 3.

^b This ICR uses the following labor rate for subcontractors: \$122.66 per hour for Technical labor. This rate is from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "Table 2. Civilian Workers, by occupational and industry group." The rate is from column 1, "Total compensation." The BLS rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. This ICR uses a Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

^d EPA assumes that, in the first year of the program, each respondent will require time to set up their systems to accommodate the data exchange. This involves assessing which data is desired by EPA, re-writing database queries, verifying that queries are correct, and obtaining management permission to share data. As states transition to using Option 1, they will incur burden only once for the initial set-up to implement this Option.

^e Based on interview responses, EPA assumes that 5% of states will use outside contractors to initially set up their processes to accommodate the data exchange. This initial set-up will begin in year 1 for states choosing Options 2 and 3 and year 2 for states choosing Option 1. EPA also assumes that subcontractor labor for the initial set-up will be an additional 20% of state agency hours.

^f Based on interview responses, EPA assumes that, on average, each respondent will share their UST/LUST data on a semiannual basis.

^g Respondents choosing Option 4 will have no initial burden in Year 1 or recurring burden in subsequent years.

^h EPA assumes that respondents will keep records of all data made available to the Agency. Planning will occur in year 1 and recordkeeping will occur semiannually.

ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 4: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 1

Burden Item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
A. Option 1: Push UST/LUST data to EPA's Virtual Exchange Server ^c								
1. Participate in meetings with state agency ^d	2	1	2	0	0	0	0	\$0
2. Provide support throughout the Virtual Exchange Server registration and set-up process ^d	4	1	4	0	0	0	0	\$0
3. Review and perform quality control checks on submitted data ^e	1.9	2	3.8	0	0	0	0	\$0
4. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	0	0	0	0	\$0
B. Option 2: Share UST/LUST data with EPA via link to existing state agency website ^c								
1. Set up approved file sharing method with state agency ^d	1	1	1	18	18	1	2	\$1,034
2. Develop an extraction script for downloading the data from state agency website ^f	3.5	1	3.5	18	63	3	6	\$3,620
3. Develop a transform script that translates data to the required format ^g	3.5	1	3.5	18	63	3	6	\$3,620
4. Review and perform quality control checks on submitted data ^e	1.9	2	3.8	18	68	3	7	\$3,930
5. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	18	68	3	7	\$3,930

C. Option 3: Send UST/LUST data to EPA file sharing site ^c								
1. Provide instructions for how to use approved data submission methods (e.g., e-mail, SharePoint, GoAnywhere) ^d	1	1	1	22	22	1	2	\$1,264
2. Provide instructions for how to notify EPA when a data submission has been updated ^d	0.5	1	0.5	22	11	1	1	\$632
3. Develop a customized Extract, Transform, Load (ETL) script that translates data to the required format ^g	5.5	1	5.5	22	121	6	12	\$6,952
4. Perform quality control checks on submitted data ^e	1.9	2	3.8	22	84	4	8	\$4,803
5. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	22	84	4	8	\$4,803
D. Option 4: EPA pulls existing UST/LUST data from existing state agency website ^c								
1. Extract data from agency website and transform data to the required format ^g	8	1	8	16	128	6	13	\$7,354
2. Perform quality control checks on submitted data ^e	1.9	2	3.8	16	61	3	6	\$3,493
3. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	16	61	3	6	\$3,493
TOTAL (rounded) ^h						979		\$48,900

Assumptions:

^a EPA estimates an average of 40 states/territories will comply voluntarily with EPA's request for data in year 1 of the program, using Options 2 or 3. EPA estimates that, beginning in year 2, 6 states per year will transition to using Option 1. EPA assumes it will retrieve data for the remaining 16 states that do not submit data using Options 1 through 3.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. This ICR uses a Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

^c In the first year of the program, EPA will review its own existing UST database, develop a schema for a revised version, and configure the central database.

^d In the first year of the program, EPA will assist each respondent in setting up their systems to accommodate the data exchange. This involves assessing which data is desired by EPA, agreeing on a schema and file format, obtaining the permissions required on both sides of the exchange, and other administrative burden. As states transition to using Option 1 in years 2 and 3, the Agency will incur burden for assisting states in implementing Option 1.

^e EPA will gather the UST/LUST data from the states/territories on a semiannual basis. The Agency will review and perform quality control checks on submitted data, and provide geocoding for data submitted as addresses. EPA will communicate with states regarding problems and provide ongoing support as needed.

^f In the first year of the program, for states utilizing Option 2, EPA will develop an extraction script for downloading the data from the state agency website.

^g In the first year of the program, for states utilizing Options 2, 3, and 4, EPA will develop a customized Extract, Transform, Load (ETL) script that translates data to the required format.

^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 5: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 2

Burden Item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
A. Option 1: Push UST/LUST data to EPA's Virtual Exchange Server ^c								
1. Participate in meetings with state agency ^d	2	1	2	6	12	1	1	\$689
2. Provide support throughout the Virtual Exchange Server registration and set-up process ^d	4	1	4	6	24	1	2	\$1,379
3. Review and perform quality control checks on submitted data ^e	1.9	2	3.8	6	23	1	2	\$1,310
4. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	6	23	1	2	\$1,310
B. Option 2: Share UST/LUST data with EPA via link to existing state agency website ^c								
1. Set up approved file sharing method with state agency ^d	1	0	0	0	0	0	0	\$0
2. Develop an extraction script for downloading the data from state agency website ^f	3.5	1	3.5	0	0	0	0	\$0
3. Develop a transform script that translates data to the required format ^g	3.5	1	3.5	0	0	0	0	\$0
4. Review and perform quality control checks on submitted data ^e	1.9	2	3.8	15	57	3	6	\$3,275
5. Perform geocoding of data that only includes textual address information and not	1.9	2	3.8	15	57	3	6	\$3,275

latitude and longitude data ^e								
C. Option 3: Send UST/LUST data to EPA file sharing site ^c								
1. Provide instructions for how to use approved data submission methods (e.g., e-mail, SharePoint, GoAnywhere) ^d	1	1	1	0	0	0	0	\$0
2. Provide instructions for how to notify EPA when a data submission has been updated ^d	0.5	1	0.5	0	0	0	0	\$0
3. Develop a customized Extract, Transform, Load (ETL) script that translates data to the required format ^g	5.5	1	5.5	0	0	0	0	\$0
4. Perform quality control checks on submitted data ^e	1.9	2	3.8	19	72	4	7	\$4,148
5. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	19	72	4	7	\$4,148
D. Option 4: EPA pulls existing UST/LUST data from existing state agency website ^c								
1. Extract data from agency website and transform data to the required format ^g	8	1	8	0	0	0	0	\$0
2. Perform quality control checks on submitted data ^e	1.9	2	3.8	16	61	3	6	\$3,493
3. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	16	61	3	6	\$3,493
TOTAL (rounded) ^h						531		\$26,500

Assumptions:

^a EPA estimates an average of 40 states/territories will comply voluntarily with EPA's request for data in year 1 of the program, using Options 2 or 3. EPA estimates that, beginning in year 2, 6 states per year will transition to using Option 1. EPA assumes it will retrieve data for the remaining 16 states that do not submit data using Options 1 through 3.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. This ICR uses a Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 +

60%). These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

^c In the first year of the program, EPA will review its own existing UST database, develop a schema for a revised version, and configure the central database.

^d In the first year of the program, EPA will assist each respondent in setting up their systems to accommodate the data exchange. This involves assessing which data is desired by EPA, agreeing on a schema and file format, obtaining the permissions required on both sides of the exchange, and other administrative burden. As states transition to using Option 1 in years 2 and 3, the Agency will incur burden for assisting states in implementing Option 1.

^e EPA will gather the UST/LUST data from the states/territories on a semiannual basis. The Agency will review and perform quality control checks on submitted data, and provide geocoding for data submitted as addresses. EPA will communicate with states regarding problems and provide ongoing support as needed.

^f In the first year of the program, for states utilizing Option 2, EPA will develop an extraction script for downloading the data from the state agency website.

^g In the first year of the program, for states utilizing Options 2, 3, and 4, EPA will develop a customized Extract, Transform, Load (ETL) script that translates data to the required format.

^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 6: Average Annual EPA Burden and Cost – Underground Storage Tank Finder Application – Year 3

Burden Item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
A. Option 1: Push UST/LUST data to EPA's Virtual Exchange Server ^c								
1. Participate in meetings with state agency ^d	2	1	2	6	12	1	1	\$689
2. Provide support throughout the Virtual Exchange Server registration and set-up process ^d	4	1	4	6	24	1	2	\$1,379
3. Review and perform quality control checks on submitted data ^e	1.9	2	3.8	12	46	2	5	\$2,620
4. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	12	46	2	5	\$2,620
B. Option 2: Share UST/LUST data with EPA via link to existing state agency website ^c								
1. Set up approved file sharing method with state agency ^d	1	0	0	0	0	0	0	\$0
2. Develop an extraction script for downloading the data from state agency website ^f	3.5	1	3.5	0	0	0	0	\$0
3. Develop a transform script that translates data to the required format ^g	3.5	1	3.5	0	0	0	0	\$0
4. Review and perform quality control checks on submitted data ^e	1.9	2	3.8	12	46	2	5	\$2,620
5. Perform geocoding of data that only includes textual address information and not	1.9	2	3.8	12	46	2	5	\$2,620

latitude and longitude data ^e								
C. Option 3: Send UST/LUST data to EPA file sharing site ^c								
1. Provide instructions for how to use approved data submission methods (e.g., e-mail, SharePoint, GoAnywhere) ^d	1	1	1	0	0	0	0	\$0
2. Provide instructions for how to notify EPA when a data submission has been updated ^d	0.5	1	0.5	0	0	0	0	\$0
3. Develop a customized Extract, Transform, Load (ETL) script that translates data to the required format ^g	5.5	1	5.5	0	0	0	0	\$0
4. Perform quality control checks on submitted data ^e	1.9	2	3.8	16	61	3	6	\$3,493
5. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	16	61	3	6	\$3,493
D. Option 4: EPA pulls existing UST/LUST data from existing state agency website ^c								
1. Extract data from agency website and transform data to the required format ^g	8	1	8	0	0	0	0	\$0
2. Perform quality control checks on submitted data ^e	1.9	2	3.8	16	61	3	6	\$3,493
3. Perform geocoding of data that only includes textual address information and not latitude and longitude data ^e	1.9	2	3.8	16	61	3	6	\$3,493
TOTAL (rounded) ^h						531		\$26,500

Assumptions:

^a EPA estimates an average of 40 states/territories will comply voluntarily with EPA's request for data in year 1 of the program, using Options 2 or 3. EPA estimates that, beginning in year 2, 6 states per year will transition to using Option 1. EPA assumes it will retrieve data for the remaining 16 states that do not submit data using Options 1 through 3.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. This ICR uses a Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 +

60%). These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

^c In the first year of the program, EPA will review its own existing UST database, develop a schema for a revised version, and configure the central database.

^d In the first year of the program, EPA will assist each respondent in setting up their systems to accommodate the data exchange. This involves assessing which data is desired by EPA, agreeing on a schema and file format, obtaining the permissions required on both sides of the exchange, and other administrative burden. As states transition to using Option 1 in years 2 and 3, the Agency will incur burden for assisting states in implementing Option 1.

^e EPA will gather the UST/LUST data from the states/territories on a semiannual basis. The Agency will review and perform quality control checks on submitted data, and provide geocoding for data submitted as addresses. EPA will communicate with states regarding problems and provide ongoing support as needed.

^f In the first year of the program, for states utilizing Option 2, EPA will develop an extraction script for downloading the data from the state agency website.

^g In the first year of the program, for states utilizing Options 2, 3, and 4, EPA will develop a customized Extract, Transform, Load (ETL) script that translates data to the required format.

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Table 7: Summary of Annual Respondent and Agency Burden and Cost – Underground Storage Tank Finder Application – Years 1 – 3

Respondent Burden	COSTS				HOURS			
	Year 1	Year 2	Year 3	\$ Total	Year 1	Year 2	Year 3	Total
Option 1	\$0	\$84,838	\$85,527	\$170,365	0	1,681	1,695	3,376
Option 2	\$67,292	\$5,171	\$4,137	\$76,600	1,334	104	83	1,520
Option 3	\$223,824	\$24,016	\$20,224	\$268,064	4,434	481	405	5,319
Option 4	\$0	\$0	\$0	\$0	0	0	0	0
Recordkeeping	\$4,596	\$2,298	\$2,298	\$9,193	92	46	46	184
Total	\$295,712	\$116,323	\$112,186		5,860	2,312	2,229	10,400
			Average (rounded)	\$175,000			Average (rounded)	3,470

Agency Burden	COSTS				HOURS			
	Year 1	Year 2	Year 3	\$ Total	Year 1	Year 2	Year 3	Total
Option 1	\$0	\$4,688	\$7,308	\$11,997	0	94	146	240
Option 2	\$15,099	\$6,550	\$5,240	\$26,889	323	131	105	559
Option 3	\$18,455	\$8,297	\$6,987	\$33,738	369	166	140	675
Option 4	\$14,341	\$6,987	\$6,987	\$28,314	287	140	140	567
Total	\$47,895	\$26,521	\$26,521		979	531	531	2,041
			Average (rounded)	\$33,600			Average (rounded)	680