

U.S. Environmental Protection Agency Information Collection Request

TITLE: CROSS-MEDIA ELECTRONIC REPORTING RULE

OMB CONTROL NUMBER: 2025-0003

EPA ICR NUMBER: 2002.09

ABSTRACT: The legal framework for electronic reporting to EPA's regulatory programs is established under Title 40 of the Code of Federal Regulations (CFR) Part 3, the Cross-Media Electronic Reporting Rule (CROMERR).¹ U.S. Environmental Protection Agency (EPA) allows regulated entities, required by statutory and regulatory authorities, to submit digital data or documents electronically, in lieu of a paper document, provided specified conditions are met under 40 CFR 3.2.

CROMERR requires state, local and tribal governments implementing authorized or delegated environmental programs (40 CFR) to seek EPA approval, under 40 CFR 3.1000, and satisfy reporting requirements electronically. In seeking EPA approval, these state, local, and tribal governments must upgrade existing electronic document receiving systems or develop new receiving systems to satisfy the criteria laid out at 40 CFR 3.2000. Throughout this document, we refer to state, local, and tribal governments as "States/ Locals/Tribes." Currently, EPA is aware of only one tribal government planning to develop such a system during the next three years.

CROMERR does not require regulated entities to report electronically. CROMERR establishes requirements for utilizing electronic reporting as an alternative to paper-based reporting. It does not require States/Locals/Tribes to implement electronic reporting, it establishes the framework for implementing the electronic reporting alternative for Federal laws they administer. Regulated entities are affected as follows:

- Regulated entities reporting electronically to EPA are required to register with EPA's electronic document receiving system known as the Central Data Exchange (CDX) They must log on to the [EPA's CDX Web site](#), enter requested information, comply with the identity proofing provisions, and commence with electronic reporting. These entities are known as "direct reporters."
- States/Locals/Tribes must ensure that their electronic document receiving systems meet the CROMERR requirements at 40 CFR 3.2000 prior to allowing electronic reporting under an authorized program. These States/Locals/Tribes must apply for EPA program modification approval under 40 CFR 3.1000. They also must implement the identity proofing requirements at 40 CFR 3.2000(b)(5).
- Regulated entities reporting electronically to States/Locals/Tribes must comply with the identity proofing requirements at 40 CFR 3.2000(b)(5). These entities are known as "indirect reporters."

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

- Regulated entities opting to implement a Local Registration Authority (LRA) alternative for identity proofing must identify the individual collecting paper subscriber agreements from anyone intending to use electronic signature devices in a States/Locals/Tribes electronic document receiving system. These entities are known as “indirect reporting firms.”
- The LRA must collect and store paper subscriber agreements from individuals in indirect reporting firms. The LRA must also prepare an agreement collection certification, submit a certification of receipt, and ensure secure storage² to the corresponding State/Local/Tribal agency.

Regulated entities submitting electronic documents, using an electronic signature device, to EPA or a State/Local/Tribal receiving system must comply with identity proofing requirements in CROMERR. There are two ways to do this.

1. Establish identity through verification by, and attestation of, a disinterested individual³, based on identifiers.
2. Include the user’s handwritten signature as part of the electronic signature agreement (ESA) process. An ESA executed on paper with a handwritten signature is called a “subscriber agreement.”

CROMERR establishes requirements applicable to electronic reporting and receiving systems. Many activities conducted by direct reporters are determined by instructions associated with CDX which guides direct reporters through the registration and reporting processes and procedures. In this ICR, EPA refers to the regulatory text and CDX to describe direct reporters’ activities and associated burden.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION:

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

EPA established the CROMERR requirements to ensure compliance with the Government Paperwork Elimination Act (GPEA) by October 21, 2003.⁴ GPEA mandates Federal agencies allow persons required to maintain, submit, or disclose information the option of doing so electronically, when practicable, as a substitute for paper. It includes use of electronic authentication methods to verify the identity of the sender and the integrity of electronic content. GPEA specifically provides that electronic records, and

² In this context, “secure storage” means that the paper subscriber agreements have been stored in a manner that prevents unauthorized access to these agreements by anyone other than the local registration authority.

³ Per 40 CFR 3.2, a “disinterested individual” means an individual who is not connected with the person in whose name the electronic signature device is issued. A disinterested individual is not any of the following: The person's employer or employer's corporate parent, subsidiary, or affiliate; the person's contracting agent; member of the person's household; or relative with whom the person has a personal relationship.

⁴ Title XVII of Pub. L. 105 277.

their related electronic signatures, are not to be denied legal effect, validity, or enforceability merely because they are in electronic form.

(1) Registering with EPA Electronic Document Receiving System

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

(2) Compliance with Identity Proofing Requirements

The identity proofing provisions in 40 CFR 3.2000(b)(5) are needed to strengthen the non-repudiation provisions of CROMERR. The paper subscriber agreement or ESA⁵, required in Section 3.2000(b)(5)(v), establishes that the signatory was informed of their obligation to keep the signature device uncompromised and secure, (e.g., not made available to anyone else.) These provisions intend to ensure that the Federal laws, regarding the falsification of information submitted to the government, still apply to any and all electronic transactions, and fraudulent electronic submissions will be prosecuted to the fullest extent of the law. CROMERR establishes clear electronic reporting requirements for to minimize fraud by assuring responsible individuals can be readily identified.

(3) Approval of States/Locals/Tribes Electronic Document Receiving System Applications

EPA needs information submitted by States/Locals/Tribes in their program modification applications to evaluate their States/Locals/Tribes electronic document receiving systems and ensure they satisfy the criteria at 40 CFR 3.2000 (b) (1).

(b) Electronic reporting under an EPA-authorized state, tribe, or local program.

(1) An authorized program may allow any document submission requirement under that program to be satisfied with an electronic document provided that the state, tribe, or local government seeks and obtains revision or modification of that program in accordance with § 3.1000 and meets the requirements of § 3.2000 for such electronic reporting.

Information contained in the program modification application is used by EPA to evaluate whether the States/Locals/Tribes 's modified program has been satisfactorily revised or modified regarding CROMERR requirements on their electronic document receiving system.

Specifically, the application must include a certification of sufficient legal authority, provided by lawfully enacted or promulgated statutes or regulations, to implement the electronic reporting component of its authorized program covered by the application and to enforce the affected programs using electronic.

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

The certification must be signed by the governmental official who is legally competent to certify with respect to legal authority on behalf of their government.

In the case of a state, this official must be the Attorney General or designee. In the case of a tribe or local government, this official must be the chief administrative official or officer or designee. EPA requires an Attorney General, or their designee, to certify their states' legal authority. Where there are substantial obstacles to Attorney General certifications, EPA requires the Attorney General to provide a legally competent designee to participate in the submission of the state's application.

2. PRACTICAL UTILITY/USERS OF THE DATA:

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

(1) Registering with EPA Electronic Document Receiving System

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

(2) Compliance with Identity Proofing Requirements

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

When EPA or States/Locals/Tribes agency receives a paper subscriber agreement, an ESA, a certification of receipt and secure storage⁶, or other identity-proofing information, the agency will review, process, and file the submittal. EPA or States/Locals/Tribes agency would then provide the registrant with access to the electronic document receiving system (e.g., open its account) so that it may begin using the electronic signature device in reporting electronically.

(3) Approval of States/Locals/Tribes Electronic Document Receiving System Applications

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

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

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

3. USE OF TECHNOLOGY:

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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

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

4. EFFORTS TO IDENTIFY DUPLICATION:

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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

5. MINIMIZING BURDEN ON SMALL ENTITIES:

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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

6. EFFECTS OF LESS FREQUENT COLLECTION:

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

(1) Registering with EPA Electronic Document Receiving System

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

(2) Compliance with Identity Proofing Requirements

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

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

(3) Approval of States/Locals/Tribes Electronic Document Receiving System Applications

CROMERR sets forth timeframes for EPA receipt, review, and approval of States/Locals/Tribes program modification applications to implement electronic document receiving systems. States/Locals/Tribes that did not have an electronic document receiving system in use or substantially developed on or before October 13, 2005, must apply to EPA for program modification approval before receiving

electronic documents (40 CFR 3.10000(a)(2)). If this frequency were not specified, EPA would not have assurance that States/Locals/Tribes are developing and using electronic document receiving systems that comply with CROMERR's provisions at 40 CFR 3.2000.

7. GENERAL GUIDELINES:

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

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

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

8. PUBLIC COMMENT AND CONSULTATIONS:

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

In compliance with the Paperwork Reduction Act of 1995 (PRA), EPA issued a public notice in the *Federal Register* on September 30, 2024 (89 FR 79583). The notice indicates EPA's plan to submit an ICR, "Cross-Media Electronic Reporting Rule" (EPA ICR No. 2002.09, OMB Control No. 2025-0003), to the Office of Management and Budget (OMB) for review and approval in accordance with the PRA. The notice requested comments on the information collection and burden estimates covered in the ICR. The public comment period extended through November 29, 2024. No public comments were received in response to the notice.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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

Table 1 identifies the organizations contacted.

Table 1
Organizations EPA Contacted during the Development of this ICR

Organization	Contact Name	Phone Number
State/Local Agencies		
City of O'Fallon, Missouri	Marshall Suddarth	(636) 379-2212
Maine Department of Environmental Protection (ME DEP)	Stacy Knapp	(207) 287-2235
Tennessee Department of Environmental Conservation (TDEC)	Trevor Jackson	(615) 913-0133
	Angela J. Hall	(615) 306-3045
	Erin McComas	(615) 289-168
Washington DC Department of Energy and Environment (DC DOE)	Phill Fianna	(202) 535-2326

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

(1) Identity Proofing Activities

- **Receive, process, review, approve and file a non-electronic (paper) subscriber agreement.** EPA was informed by the four State/Local/Tribal agencies contacted that the ICR's draft burden for receiving, processing, reviewing, approving, and filing a non-electronic (paper) subscriber agreement (i.e., 34 minutes per subscriber agreement) was a realistic national average. Based on the consultation information, the average burden for receiving, processing, reviewing, approving, and filing a non-electronic (paper) subscriber agreement was not revised and thus, remained at 34 minutes per subscriber agreement.
- **Receive, process, review, approve, and file an electronic subscriber agreement.** EPA was informed by three of the four State/Local/Tribal agencies contacted that the ICR's draft burden for receiving, processing, reviewing, approving, and filing an electronic subscriber agreement (i.e., 7 minutes per subscriber agreement) was a realistic national average. One State/Local/Tribal agency disagreed with the draft burden estimate because, at their agency, the subscriber agreements are automatically processed. Based on the consultation information, the average burden for receiving, processing, reviewing, approving, and filing an electronic subscriber agreement was not revised and thus, remained at 7 minutes per subscriber agreement.

(2) Local Registration Authority Activities

- **Receive, process, review, and approve certification of receipt and secure storage.** EPA was informed by two of the four State/Local/Tribal agencies contacted that the ICR's draft burden for receiving, processing, reviewing, and approving a certification of receipt and secure storage (i.e., 10 minutes per certification) was a realistic national average. The remaining two State/Local/Tribal agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving, processing, reviewing, and approving a certification of receipt and secure storage was not revised and thus, remained at 10 minutes per certification.
- **Receive notification of breach of security or compromised/surrendered electronic signature device and take action.** EPA was informed by two of the four State/Local/Tribal agencies contacted that the ICR's draft burden for receiving a notification of breach of security or compromised/surrendered electronic signature device, and taking action (i.e., 1 hour and 23 minutes per notification) was a realistic national average. The remaining two State/Local/Tribal agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving a notification of breach of security or compromised/surrendered electronic signature device, and taking action was not revised and thus, remained at 1 hour and 23 minutes per notification.
- **Receive application to designate LRA.** EPA was informed by one of the four State/Local/Tribal agencies contacted that the ICR's draft burden for receiving an application to designate an LRA (i.e., 30 minutes per reporting firm) was a realistic national average. The remaining three State/Local/Tribal agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for receiving an application to designate an LRA was not revised and thus, remained at 30 minutes per reporting firm.

(3) On-Going Management Activities

- **Identify and resolve problems related to completing the registration and identity proofing processes.** EPA was informed by three of the four State/Local/Tribal agencies contacted that the ICR's draft burden for identifying and resolving problems related to completing the registration and identity proofing processes (i.e., 1 hour and 15 minutes per problem) was a realistic national average. One State/Local/Tribal agency indicated that the burden for this activity should be revised to 30 minutes. Based on the consultation information, the average burden for identifying and resolving problems was estimated to be 1 hour and 10 minutes per problem.
- **Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes.** EPA was informed by three of the four State/Local/Tribal agencies contacted that the ICR's draft burden for responding to information requests (i.e., 1 hour and 7 minutes per request) was a realistic national average. One State/Local/Tribal agency indicated that the burden for this activity should be revised to 20 minutes. Based on the consultation information, the average burden for responding to information requests was estimated to be 1 hour and 2 minutes per request.

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

- **Read the CROMERR regulations.** EPA was informed by three of the four State/Local/Tribal agencies contacted that the ICR's draft burden for reading the regulations (i.e., 9 hours and 7 minutes per State/Local/Tribal agency) was a realistic national average. One State/Local/Tribal agency did not provide feedback on this information collection activity. Based on the consultation information, the average burden for reading the regulations was not revised and thus, remained at 9 hours and 7 minutes per State/Local/Tribal agency.
- **Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 and apply for EPA program modification approval under 40 CFR 3.1000 (State agencies).** EPA was informed by two of the four State/Local/Tribal agencies contacted that the ICR's draft burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval (i.e., 370 hours per state agency) was a realistic national average. One State/Local/Tribal agency indicated that they agreed with the draft burden as it relates to upgrading the system but that the burden for developing a new system should be revised to 700 hours. The remaining State/Local/Tribal agency did not provide feedback on this information collection activity. Based on the consultation information, the average burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval was estimated to be 426 hours and 20 minutes per State agency.
- **Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 and apply for EPA program modification approval under 40 CFR 3.1000 (Tribal/Local agencies).** EPA was informed by one of the four State/Local/Tribal agencies contacted that the ICR's draft burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval (i.e., 331 hours per tribal/local agency) was a realistic national average. The remaining three State/Local/Tribal agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for upgrading an existing electronic document receiving system or developing a new electronic document receiving system to meet 40 CFR 3.2000 and applying for EPA program modification approval was not revised and thus, remained at 331 hours per tribal/local agency.
- **Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000 (when receiving notice from EPA that the application is incomplete or does not satisfy the requirements at 40 CFR 3.2000).** EPA was informed by two of the four State/Local/Tribal agencies contacted that the ICR's draft burden for submitting an amendment to the original application for EPA program modification approval under 40 CFR 3.1000 (i.e., 24 hours per State/Local/Tribal agency) was a realistic national average. The remaining two State/Local/Tribal agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for submitting an amendment to the original application for EPA program modification approval under 40 CFR 3.1000 was not revised and thus, remained at 24 hours per State/Local/Tribal agency.

- **Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (State/Local/Tribal agencies with approved applications).** EPA was informed by one of the four State/Local/Tribal agencies contacted that the ICR's draft burden for submitting a notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (i.e., 18 hours and 28 minutes per State/Local/Tribal agency) was a realistic national average. The remaining three State/Local/Tribal agencies did not provide feedback on this information collection activity. Based on the consultation information, the average burden for submitting a notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 was not revised and thus, remained at 18 hours and 28 minutes per State/Local/Tribal agency.

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

9. PAYMENTS OR GIFTS TO RESPONDENTS:

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. PROVISIONS FOR PROTECTION OF INFORMATION:

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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

11. JUSTIFICATION FOR SENSITIVE QUESTIONS:

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. RESPONDENT BURDEN HOURS AND LABOR COSTS:

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.
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12a. RESPONDENTS/NAICS CODES

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

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

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

- Direct reporters, indirect reporters, indirect reporting firms, and LRAs complying with the registration and identity proofing requirements covered in this ICR, as applicable. This includes:
- Private sector entities; and
- States/Locals/Tribes agencies that are regulated entities⁷.
- States/Locals/Tribes agencies administering electronic document receiving systems subject to CROMERR standards⁸. In this document, we refer to these respondents as “States/Locals/Tribes agencies acting as regulators.”
- States/Locals/Tribes agencies seeking EPA approval to allow electronic reporting under CROMERR⁹. In this document, we refer to these respondents as “States/Locals/Tribes agencies that are regulated entities.”

EPA estimates that, in total, 77,716 respondents will be subject to the information collection requirements covered in this ICR. This includes 51,211 direct reporters, 26,434 indirect reporters, 48 States/Locals/Tribes agencies acting as regulators, and 23 States/Locals/Tribes agencies that are regulated entities. The following paragraphs provide additional information on how these respondent universe estimates were derived.

⁷ Addressing States/Locals/Tribes agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the PRA.

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⁹ Addressing States/Locals/Tribes agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the PRA.

(a) Direct Reporters

PA estimates that, each year, 51,211 direct reporters will be subject to the information collection requirements covered in this ICR. This includes the 51,211 direct reporters expected to register with CDX. Of these 51,211 direct reporters, 21,258 direct reporters are expected to comply with identifier, attribute, or alternative method requirements (e.g., CDX 20-5-1); 2,838 direct reporters are expected to submit paper subscriber agreements, and 17,909 direct reporters are expected to submit ESAs.

Table 2 presents information on the annual number of direct reporters expected to register with CDX during the three-year period covered by the ICR. To estimate the annual number of direct reporters expected to register with CDX, EPA used historical information on the annual number of registrants for years 2021 through 2023. In particular, EPA used the average annual number of registrants for the 2021-2023 period. As shown in Table 2, EPA estimates that, on average, 51,211 direct reporters will register with CDX each year.

Table 2
Annual Number of Direct Reporters Expected to Register with EPA's CDX during the Three-Year Period Covered by the ICR ^a

Respondent Universe	Average Annual Number of Registrants ^{b, c}
Private Sector Entities	44,758
States/Locals/Tribes Agencies that are Regulated Entities	6,453
Total	51,211

^a Table includes rounding error.

^b Table contains data current as of July 2024.

^c Federal government direct reporters are not reflected in the table because they are exempt from ICR requirements.

Table 3 presents information on the annual number of direct reporters expected to comply with identifier, attribute, or alternative method requirements (e.g., CDX 20-5-1) during the three-year period covered by the ICR.¹⁰ To estimate the annual number of direct reporters expected to comply with identifier, attribute, or alternative method requirements, EPA referred to user data from the CDX web site. In particular, EPA used data on the number of times CDX web pages related to the use of identifier, attribute, or alternative method requirements were visited (i.e., viewed) by unique users. As shown in Table 3, EPA estimates that, on average, 21,258 direct reporters will comply with identifier, attribute, or alternative method requirements each year.

¹⁰ One method to determine the identity of an individual is by means of identifiers, attributes, or alternative methods that are verified (and that may be re-verified at any time) by attestation of disinterested individuals to be uniquely true of (or attributable to) the individual in whose name the application is submitted, based on information or objects of independent origin, at least one item of which is not subject to change without governmental action or authorization.

Table 3
Annual Number of Direct Reporters Expected to Comply with
with Identifier, Attribute, or Alternative Method Requirements
during the Three-Year Period Covered by the ICR ^{a, b}

Respondent Universe	Average Annual Number of Direct Reporters ^c
Private Sector Entities	18,579
States/Locals/Tribes Agencies that are Regulated Entities	2,679
Total	21,258

^a Table includes rounding error.

^b Table contains data current as of February 2024.

^c Federal government direct reporters are not reflected in the table because they are exempt from ICR requirements.

Table 4 presents information on the estimated annual number of paper subscriber agreements and ESAs to be submitted to EPA during the three-year period covered by the ICR. To estimate the annual number of paper subscriber agreements and ESAs, EPA referred to data from the CDX web site. EPA used data on the number of times CDX web pages related to paper subscriber agreements and ESAs were visited (i.e., viewed) by unique users. As shown in Table 4, EPA estimates that, on average, direct reporters will submit 2,838 paper subscriber agreements and 17,909 ESAs.

Table 4
Annual Number of Paper Subscriber Agreements
and ESAs to be Submitted to EPA
during the Three-Year Period Covered by the ICR ^{a, b}

Type of Submission	Annual Number of Submissions ^c
Private Sector Entities	
Paper Subscriber Agreements	2,480
ESAs	15,652
<i>Subtotal</i>	18,132
States/Locals/Tribes Agencies that Are Regulated Entities	
Paper Subscriber Agreements	358
ESAs	2,257
<i>Subtotal</i>	2,615
Total	
Paper Subscriber Agreements	2,838
ESAs	17,909
Total	20,747

^a Table includes rounding error.

^b Table contains data current as of February 2024.

^c Federal government direct reporters are not reflected in the table because they are exempt from ICR requirements.

(b) Indirect Reporters

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

Table 5 presents information on the estimated annual number of paper subscriber agreements and ESAs to be submitted to State/Tribes/Locals during the three-year period covered by the ICR. As shown in the table, EPA estimates that, on average, indirect reporters will submit 24,399 paper subscriber agreements and 5,441 ESAs each year.

Table 5
Annual Number of Paper Subscriber Agreements and ESAs
Expected to be Submitted to State/Local/Tribal Systems
during the Three-Year Period Covered by the ICR

Type of Submission	Systems with Non-SCS Solutions	Systems with SCS Solutions	Total
Private Sector Entities			
Paper Subscriber Agreements	20,986	339	21,325
ESAs	2,332	2,424	4,756
<i>Subtotal</i>	23,318	2,763	26,081
States/Locals/Tribes Agencies that Are Regulated Entities			
Paper Subscriber Agreements	3,025	49	3,074
ESAs	336	349	685
<i>Subtotal</i>	3,361	398	3,759
Total			
Paper Subscriber Agreements	24,011	388	24,399
ESAs	2,668	2,773	5,441
Total	26,679	3,161	29,840

^a Table includes rounding error.

^b Table contains SCS data from CDX, and are current as of July 2024.

^c Federal government indirect reporters are not reflected in the table because they are exempt from ICR requirements.

As shown in Table 5, for purposes of this ICR, paper subscriber agreements and ESAs submitted by indirect reporters are categorized into two groups based on the State/Local/Tribal electronic document receiving system: (1) systems with non-SCS solutions and (2) systems with SCS solutions. Appendix B provides detailed information on the methodology used to estimate the annual number of paper subscriber agreements and ESAs to be submitted to systems with non-SCS solutions. The annual number of paper subscriber agreements and ESAs to be submitted to systems with SCS solutions is based on data from CDX.

(c) Indirect Reporting Firms

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

EPA estimates that 4,774 indirect reporting *firms* will use the LRA alternative. This includes 4,177 small *firms* and 597 medium-size and large *firms*.

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

(d) States/Locals/Tribes Agencies Acting as Regulators

EPA estimates that, currently, 48 States/Locals/Tribes agencies administer electronic document receiving systems subject to CROMERR.

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

Based on information currently available to EPA on the submission and approval of program modification applications under 40 CFR 3.1000 (i.e., CROMERR applications), EPA estimates that, on average, 13 States/Locals/Tribes (i.e., 6 state agencies and 7 tribal/local agencies) will upgrade their existing electronic document receiving systems or develop new electronic document receiving systems to comply with the CROMERR standards at 40 CFR 3.2000, and submit CROMERR applications each year.

EPA also estimates that, on average, 9 States/Locals/Tribes (i.e., 4 state agencies and 5 tribal/local agencies) will submit amendments to their original CROMERR applications each year. These agencies are expected to submit an amendment when receiving notice from EPA that their application is incomplete or does not satisfy the requirements at 40 CFR 3.2000.

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

Based on the above information, EPA estimates that, each year, 23 States/Locals/Tribes agencies will be regulated entities during the three-year period covered by this ICR.

12b. INFORMATION REQUESTED & RESPONDENT ACTIVITIES

Following is a description of the data items and activities associated with the information collection requirements covered in this ICR.

(1) Registering with EPA Electronic Document Receiving System

Employees reporting information electronically to EPA for regulated entities must register with EPA's electronic document receiving system (CDX) before submitting reports electronically. The employees must update their registration information if it changes.

(i) Data Items:

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

(ii) Respondent Activities:

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

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

(2) Compliance with Identity Proofing Requirements

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

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

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

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

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

The term “Local Registration Authority” means an individual who is authorized by a States/Locals/Tribes to issue an agreement collection certification, whose identity has been established by notarized affidavit, and who is authorized in writing by a regulated entity to issue agreement collection certifications on its behalf. Once approved by EPA or States/Locals/Tribes, the LRA would collect paper subscriber agreements from each individual in the regulated entity that intends to use an electronic signature device in reporting electronically to EPA or States/Locals/Tribes electronic document receiving

system. The LRA would collect and store the paper subscriber agreements in a manner that prevents authorized or unauthorized access to these agreements by anyone other than the LRA. The LRA would prepare an agreement collection certification and submit a certification of receipt and secure storage to EPA or States/Locals/Tribes.

i) Data Items:

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

(ii) Respondent Activities:

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

- Comply with requirements for identifier, attribute, or alternative method:
 - Prepare and submit information on identifiers, attributes, or other identity-proofing information.
- Comply with paper subscriber agreement or ESA provisions:

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

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

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

States/Locals/Tribes agencies acting as regulators must perform the following activities:

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

(3) Approval of States/Locals/Tribes Electronic Document Receiving System Applications

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

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

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

A States/Locals/Tribes that accepts electronic documents, in lieu of paper documents, under an authorized program for which EPA has approved program revisions or modifications under the procedures provided in 40 CFR 3.2000(a)(1) must keep EPA apprised of those changes to laws, policies, or the electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000.

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

(i) Data Items:

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

- o Other such information as the Administrator may request to fully evaluate the application.
- Appraisals to EPA of changes to laws, policies, or electronic document receiving systems.

(ii) Respondent Activities:

State/Locals/Tribes agencies that are regulated entities must perform the following activities:

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

12c. COLLECTION SCHEDULE

The collection frequencies associated with CDX include the following:

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

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

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

Except where an opportunity for public hearing is required, if the Administrator does not take any action on a specific request for revision or modification of a specific authorized program addressed by an

application submitted within 180 calendar days of notifying the States/Locals/Tribes that the application is complete, the specific request for program revision or modification for the specific authorized program is considered automatically approved by EPA at the end of the 180 calendar days unless the review period is extended at the request of the States/Locals/Tribes submitting the application.

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

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

This ICR estimates the total annual respondent hourly burden associated with the information collection requirements under CROMERR. Most of the hour estimates are based on the Agency's cost benefit analysis developed as part of the CROMERR rulemaking process¹¹, and consultations with industry and States/Locals/Tribes. Appendix C (Exhibit C-1) includes detailed information on the burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents. The total annual respondent costs associated with the information collection requirements under CROMERR. These costs are based on the cost of labor, capital, and operation and maintenance (O&M). Appendix C (Exhibit C-1) includes detailed information on respondent costs.

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

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

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$82.74 for legal staff, \$53.03 for managerial staff, \$52.59 for technical staff, and \$23.14 for clerical staff. These respondent labor costs were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.08, dated April 28, 2021), and adjusted to 2024 levels using Employment Cost Indexes developed by the Bureau of Labor Statistics.¹²

(b) States/Locals/Tribes Agencies

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$55.07 for legal staff, \$55.07 for managerial staff, \$41.71 for technical staff, and \$19.80 for clerical staff. These respondent labor costs were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.08, dated April 28, 2021), and adjusted to 2024 levels using Employment Cost Indexes developed by the Bureau of Labor Statistics.¹³

¹¹ U.S. Environmental Protection Agency (EPA). *Cross-Media Electronic Reporting Rule (CROMERR) Cost Benefit Analysis – Final*, November 17, 2004. Available at <https://www.regulations.gov/document/EPA-HQ-OEI-2003-0001-0248>.

¹² U.S. Bureau of Labor Statistics. "Supplemental News Release Tables; Historical Datasets; Continuous Data 1975 - Present;" July 31, 2024. Available at <https://www.bls.gov/eci/tables.htm>. Civilian Workers, All Industries, All Occupations, Total Compensation, Current dollar index number. December 2020=142.2 and June 2024=165.5.

13. RESPONDENT CAPITAL AND O&M COSTS:

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Capital Costs

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

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

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

(b) States/Locals/Tribes

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

To estimate the average capital cost per agency for upgrading existing electronic document receiving systems or developing new electronic document receiving systems that satisfy the CROMERR standards at 40 CFR 3.2000, EPA used the weighted-average calculations in Table 6. EPA multiplied the percentage of State/Local/Tribal agencies that, in their program modification applications, indicated that they would opt for a custom, commercial off-the-shelf (COTS), core shared CROMERR services (SCS), or advanced SCS solution by the capital cost associated with

¹³ U.S. Bureau of Labor Statistics, "Supplemental News Release Tables; Historical Datasets; Continuous Data 1975 - Present;" July 31, 2024. Available at <https://www.bls.gov/eci/tables.htm>. State and local government workers, All Industries, All Occupations, Total Compensation, Current dollar index number. December 2020=144.9 and June 2024=165.9.

each solution type. Then, EPA added the products for each solution type to calculate an overall weighted-average capital cost.

Table 6
Assumptions and Weighted-Average Equations Used in Estimating Capital Cost to States/Locals/Tribes for Upgrading Existing Electronic Document Receiving Systems or Developing New Electronic Document Receiving Systems

Solution Type	State Agencies			Tribal/Local Agencies		
	Capital Cost for Solution Type	Program Modification Applications		Capital Cost for Solution Type	Program Modification Applications	
		Number	Percent		Number	Percent
Custom	\$222,300	3	0.500	\$85,000	1	0.143
Commercial off-the-shelf (COTS) or Core shared CROMERR services (SCS)	\$85,000	1	0.167	\$85,000	3	0.429
Advanced SCS	\$12,100	1	0.167	\$12,100	2	0.286
Weighted Average Capital Cost	$(\$222,300 \times 0.500) + (\$85,000 \times 0.167) + (\$12,100 \times 0.167) =$ \$127,366			$(\$85,000 \times 0.143) + (\$85,000 \times 0.429) + (\$12,100 \times 0.286) =$ \$52,081		

For state and tribal/local agencies, the capital costs for custom, COTS, core SCS, and advanced SCS solutions were obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.08, dated April 28, 2021), and adjusted to 2024 levels using Consumer Price Indices developed by the U.S. Bureau of Labor Statistics.¹⁴

As shown in Table 6, EPA estimates that each state agency will incur a capital cost of \$127,366, and that each tribal/local agency will incur a capital cost of \$52,081. EPA notes that capital costs for tribal/local agencies are estimated to be lower than the capital costs for state agencies because tribal/local agencies are expected to have simpler electronic document receiving systems that cover fewer programs and fewer electronic reports than state systems.

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

(3) Operation and Maintenance Costs

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

¹⁴ U.S. Bureau of Labor Statistics. "All items in U.S. city average, all urban consumers, not seasonally adjusted, U.S. City Average, 1982-84=100;" September 9, 2024. Available at https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true. December 2020=260.474 and July 2024=314.540. Capital cost was rounded to the nearest hundred.

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

O&M costs include:

- EPA estimates that registrants that submit paper subscriber agreements to EPA or States/Locals/Tribes will incur a cost of \$5.62 to mail a one-ounce letter by certified mail (i.e., \$0.73 for first-class letter postage, \$4.85 for the certified-mail fee, and \$0.04 for standard business envelope).^{15, 16, 17}
- EPA estimates that registrants that submit paper subscriber agreements to their LRA will incur a cost of \$0.77 to mail a one-ounce letter using first-class mail (i.e., \$0.73 for first-class letter postage and \$0.04 for standard business envelope).^{18, 19}
- EPA estimates that indirect reporting firms that implement the LRA alternative and submit an LRA application to the Agency will incur a cost of \$9.24. This cost includes:
 - \$3.62 for obtaining a notarized affidavit to establish the identity of an LRA. This O&M cost was obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.08, dated April 28, 2021), and adjusted to 2024 levels using Consumer Price Indexes developed by the U.S. Bureau of Labor Statistics.²⁰
 - \$5.62 to mail a one-ounce letter by certified mail (i.e., \$0.73 for first-class letter postage, \$4.85 for the certified-mail fee, and \$0.04 for standard business envelope).^{21, 22, 23}

¹⁵ U.S. Postal Service; "First-Class Mail Prices." Available at https://pe.usps.com/text/dmm300/Notice123.htm#_c037.

¹⁶ U.S. Postal Service; "Extra Services Prices." Available at https://pe.usps.com/text/dmm300/Notice123.htm#_c191.

¹⁷ Standard business envelope cost based on current market price, as of September 2024 (i.e., box of 500 standard business envelopes with gummed closure at \$20.49).

¹⁸ U.S. Postal Service; "First-Class Mail Prices." Available at https://pe.usps.com/text/dmm300/Notice123.htm#_c037.

¹⁹ Standard business envelope cost based on current market price, as of September 2024 (i.e., box of 500 standard business envelopes with gummed closure at \$20.49).

²⁰ U.S. Bureau of Labor Statistics. "All items in U.S. city average, all urban consumers, not seasonally adjusted, U.S. City Average, 1982-84=100;" September 9, 2024. Available at https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true. December 2020=260.474 and July 2024=314.540. Capital cost was rounded to the nearest hundred.

²¹ U.S. Postal Service; "First-Class Mail Prices." Available at https://pe.usps.com/text/dmm300/Notice123.htm#_c037.

²² U.S. Postal Service; "Extra Services Prices." Available at https://pe.usps.com/text/dmm300/Notice123.htm#_c191.

²³ Standard business envelope cost based on current market price, as of September 2024 (i.e., box of 500 standard business envelopes with gummed closure at \$20.49).

- EPA estimates that, in submitting a certification of receipt and secure storage, the LRA will incur a cost of \$4.04 to mail a first-class large envelope (i.e., \$3.71 for first-class large envelope (not more than nine ounces) postage and \$0.33 for catalog envelope).^{24, 25}

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

14. AGENCY COSTS:

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

(1) Registering with EPA Electronic Document Receiving System

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

- Develop, operate, and maintain CDX.

(2) Compliance with Identity Proofing Requirements

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

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

(3) Approval of States/Locals/Tribes Electronic Document Receiving System Applications

EPA activities associated with the approval of States/Locals/Tribes electronic document receiving systems include:

- Process and file applications submitted by States/Locals/Tribes seeking to modify their programs, as required by 40 CFR 3.1000.

²⁴ U.S. Postal Service; "First-Class Mail Prices." Available at https://pe.usps.com/text/dmm300/Notice123.htm#_c037.

²⁵ Catalog envelope cost based on current market price, as of September 2024 (i.e., 6 x 9 brown kraft catalog envelopes, box of 100, at \$33.19).

- Process and file amendment to original application for EPA program modification approval under 40 CFR 3.1000.
- Process and file appraisals of changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000.

14b. Agency Burden and Labor Cost

This ICR estimates the total annual Agency hour and cost burden associated with the information collection requirements under CROMERR (see Exhibit C-2 in Appendix C). EPA estimates an average hourly labor cost of \$80.19 for legal staff (GS-14, Step 1), \$67.86 for managerial staff (GS-13, Step 1), \$57.07 for technical staff (GS-12, Step 1), and \$28.96 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2024.²⁶ This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates.

14c. Agency Non-Labor Costs

EPA estimates that, each year, the Agency will incur a capital cost of \$169,200 in CDX development, operation, and maintenance activities. This capital cost was obtained from the previously approved CROMERR ICR (i.e., EPA ICR Number 2002.08, dated April 28, 2021), and adjusted to 2024 levels using Consumer Price Indexes developed by the U.S. Bureau of Labor Statistics.²⁷

15. CHANGE IN BURDEN:

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

The annual respondent burden estimate in OMB's inventory for the previously approved CROMERR ICR (EPA ICR Number 2002.08) was 81,985 hours. The annual respondent burden estimate for this ICR (EPA ICR Number 2002.09) is 65,320 hours. This represents a decrease of 16,665 hours.

The decrease in respondent burden can be attributed primarily to two reasons. First, a decrease in the number of direct reporters that will register with EPA's electronic document receiving system. Second, a decrease in the number of indirect reporters that will comply with paper subscriber agreement and ESA provisions associated with systems with SCS solutions. Both estimates are based on data from CDX. Thus, the Agency believes that the revised estimates accurately reflect the number of respondents.

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

16. PUBLICATION OF DATA:

²⁶ US Office of Personnel Management, "Base Hourly Rate," *2024 General Schedule (Base)*, January 2024. Available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule>.

²⁷ U.S. Bureau of Labor Statistics. "All items in U.S. city average, all urban consumers, not seasonally adjusted, U.S. City Average, 1982-84=100;" September 9, 2024. Available at https://data.bls.gov/timeseries/CUUR0000SA0?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true. December 2020=260.474 and July 2024=314.540. Capital cost was rounded to the nearest hundred.

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This collection does not specifically involve the publication of data.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. CERTIFICATION STATEMENT:

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

BURDEN STATEMENT

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

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

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

The reporting burden is estimated to be about 2 minutes for a registrant to prepare and submit identifier, attribute, or alternative information. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden. Note that, in this ICR, the burden associated with preparing and submitting identifier, attribute, or alternative information is applicable to direct reporters only.

The reporting burden is estimated to range from 5 minutes to 6 minutes for a registrant to prepare and submit a paper subscriber agreement or ESA. The recordkeeping burden is estimated to be about 7 minutes to store an agreement on site.

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

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

The reporting burden is estimated to be 1 hour for a firm to redesignate the LRA, due to turnover; send the LRA application to the agency; and register the new LRA with the electronic document receiving

system. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

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

(4) Compliance with Identity Proofing Requirements - States/Locals/Tribes Agencies Acting as Regulators

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

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

The reporting burden is estimated to be 2.20 hours for a States/Locals/Tribes agency to resolve problems involving paper subscriber agreements or certifications and respond to information requests. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

(5) Approval of States/Locals/Tribes Electronic Document Receiving System Applications - States/Locals/Tribes Agencies that Are Regulated Entities

The reporting burden is estimated to range from 331 hours to 426 hours for a States/Locals/Tribes agency to prepare and submit the CROMERR application to EPA, depending on whether the States/Locals/Tribes agency is planning to use a commercial off-the-shelf [COTS] or shared CROMERR services [SCS] solution, or develops its own electronic document receiving system). The recordkeeping burden is estimated to be 9.12 hours to read the regulations.

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

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

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information;

search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

ATTACHMENTS

None

ADDITIONAL TABLES AND APPENDICES

See following pages.

EXHIBIT 2
 CROSS-MEDIA ELECTRONIC REPORTING
 TOTAL ESTIMATED RESPONDENT HOUR AND COST BURDEN SUMMARY, BY TYPE OF RESPONDENT ^a

	Annual Number of Respondents ^b	Annual Burden Hours	Annual Labor Cost	Annual Capital/Startup Cost	Annual O&M Cost	Total Annual Cost
Private Sector Respondents						
Registering with EPA Electronic Document Receiving System - Direct Reporters	44,758	13,480.80	\$709,021.83	\$0.00	\$0.00	\$709,021.83
Compliance with Identity Proofing Requirements - Direct Reporters	21,059	10,597.23	\$557,414.40	\$0.00	\$13,876.12	\$571,290.52
Compliance with Identity Proofing Requirements - Indirect Reporters	23,104	14,098.47	\$741,781.21	\$0.00	\$120,572.69	\$862,353.90
<i>Subtotal for Private Sector Respondents</i>	67,862	38,176.50	\$2,008,217.44	\$0.00	\$134,448.81	\$2,142,666.25
State/Tribe/Local Respondents						
Reporting to EPA Electronic Document Receiving System - Direct Reporters	6,453	2,014.37	\$105,945.79	\$0.00	\$0.00	\$105,945.79
Compliance with Identity Proofing Requirements - Direct Reporters	3,037	1,583.49	\$83,291.81	\$0.00	\$2,073.44	\$85,365.25
Compliance with Identity Proofing Requirements - Indirect Reporters	3,330	2,106.67	\$110,840.87	\$0.00	\$18,016.61	\$128,857.48
Compliance with Identity Proofing Requirements - State/Tribe/Local Agencies Acting as Regulators	48	16,119.65	\$792,104.28	\$0.00	\$0.00	\$792,104.28
Approval of State/Tribe/Local Electronic Document Receiving System Application - State/Tribe/Local Agencies that Are Regulated Entities	23	5,319.18	\$230,810.52	\$1,128,763.00	\$204.47	\$1,359,777.99
<i>Subtotal for State/Tribe/Local Respondents</i>	9,854	27,143.36	\$1,322,993.27	\$1,128,763.00	\$20,294.52	\$2,472,050.79
Total Annual Estimate for All Respondents (i.e., Private Sector and State/Tribe/Local)	77,716	65,320	\$3,331,211	\$1,128,763	\$154,743	\$4,614,717

^a Exhibit includes rounding error.

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

EXHIBIT 3
 CROSS-MEDIA ELECTRONIC REPORTING
 TOTAL ESTIMATED EPA HOUR AND COST BURDEN SUMMARY ^a

	Annual Number of Respondents ^b	Annual Burden Hours	Annual Labor Cost	Annual Capital/Startup Cost	Annual O&M Cost	Total Annual Cost
Registering with EPA Electronic Document Receiving System - Direct Reporters	51,211	14,120.00	\$809,389.10	\$169,200.00	\$0.00	\$978,589.10
Compliance with Identity Proofing Requirements - Direct Reporters	24,096	12,218.57	\$697,422.99	\$0.00	\$0.00	\$697,422.99
Approval of State/Tribe/Local Electronic Document Receiving System Application - State/Tribe/Local Agencies that Are Regulated Entities	23	1,748.00	\$99,758.36	\$0.00	\$0.00	\$99,758.36
Total Annual Estimate	51,234	28,087	\$1,606,570	\$169,200	\$0	\$1,775,770

^a Exhibit includes rounding error.

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

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

11	Agriculture, Forestry, Fishing and Hunting	441	Motor Vehicle and Parts Dealers
111	Crop Production	442	Furniture and Home Furnishings Stores
112	Animal Production	443	Electronics and Appliance Stores
113	Forestry and Logging	444	Building Material and Garden Equipment and Supplies Dealers
114	Fishing, Hunting and Trapping	445	Food and Beverage Stores
115	Support Activities for Agriculture and Forestry	446	Health and Personal Care Stores
21	Mining	447	Gasoline Stations
211	Oil and Gas Extraction	448	Clothing and Clothing Accessories Stores
212	Mining (except Oil and Gas)	451	Sporting Goods, Hobby, Book, and Music Stores
213	Support Activities for Mining	452	General Merchandise Stores
22	Utilities	453	Miscellaneous Store Retailers
221	Utilities	454	Nonstore Retailers
23	Construction	48-49	Transportation and Warehousing
233	Building, Developing, and General Contracting	481	Air Transportation
234	Heavy Construction	482	Rail Transportation
235	Special Trade Contractors	483	Water Transportation
31	Manufacturing	484	Truck Transportation
311	Food Manufacturing	485	Transit and Ground Passenger Transportation
312	Beverage and Tobacco Product Manufacturing	486	Pipeline Transportation
313	Textile Mills	487	Scenic and Sightseeing Transportation
314	Textile Product Mills	488	Support Activities for Transportation
315	Apparel Manufacturing	491	Postal Service
316	Leather and Allied Product Manufacturing	492	Couriers and Messengers
321	Wood Product Manufacturing	493	Warehousing and Storage
322	Paper Manufacturing	51	Information
323	Printing and Related Support Activities	511	Publishing Industries
324	Petroleum and Coal Products Manufacturing	512	Motion Picture and Sound Recording Industries
325	Chemical Manufacturing	513	Broadcasting and Telecommunications
326	Plastics and Rubber Products Manufacturing	514	Information Services and Data Processing Services
327	Nonmetallic Mineral Product Manufacturing		
331	Primary Metal Manufacturing	52	Finance and Insurance
332	Fabricated Metal Product Manufacturing	521	Monetary Authorities Central Bank
333	Machinery Manufacturing	522	Credit Intermediation and Related Activities
334	Computer and Electronic Product Manufacturing	523	Securities, Commodity Contracts, and Other Financial Investments and Related Activities
335	Electrical Equipment, Appliance, and Component Manufacturing	524	Insurance Carriers and Related Activities
336	Transportation Equipment Manufacturing	525	Funds, Trusts, and Other Financial Vehicles
337	Furniture and Related Product Manufacturing		
339	Miscellaneous Manufacturing		
42	Wholesale Trade	53	Real Estate and Rental and Leasing
421	Wholesale Trade, Durable Goods	531	Real Estate
422	Wholesale Trade, Nondurable Goods	532	Rental and Leasing Services
44-45	Retail Trade	533	Lessors of Nonfinancial Intangible Assets (except Copyrighted Works)

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

Appendix B

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

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

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

1. Annual Number of Indirect Reporters

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

1.1. Overview

EPA estimated the number of regulated entities reporting to States/Locals/Tribes electronic document receiving systems by first identifying states with existing and new systems and compiling them into a table (referred to as the “Master Table” in this analysis).^{28, 29} We then referred to survey data compiled by EPA in 2002 from states that estimated the number of regulated entities subject to their respective receiving systems by environmental program. We updated these state estimates to current (2024) levels based on analysis of respondent universe growth rates in EPA program ICRs. We then extrapolated the updated survey data to the states in the Master Table to estimate their number of regulated entities. The extrapolation was performed by first finding the total number of commercial establishments in each state based on U.S. Census data, comparing the number of establishments in the survey states to the states in the Master Table, and using a scaling factor to extrapolate the number of regulated entities in the survey states to the states in the Master Table based on their respective number of commercial establishments. We performed this extrapolation by environmental

²⁸ “Existing electronic document receiving system” means an electronic document receiving system that is being used to receive electronic documents, in lieu of paper documents, to satisfy requirements under an authorized program on October 13, 2005 or the system, if not in use, has been substantially developed on or before that date as evidenced by the establishment of system services or specifications by contract or other binding agreement (40 CFR 3.3). Pursuant to 40 CFR 3.1000(a)(3), States/Tribes/Locals with an existing electronic document receiving system for an authorized program must submit an application to revise or modify such authorized program in compliance with 40 CFR 3.1000(a)(1) no later than January 13, 2010.

²⁹ “New electronic document receiving system” refers to an electronic document receiving system that was not being used to receive electronic documents, in lieu of paper documents, to satisfy requirements under an authorized program on October 13, 2005 or the system, if not in use, that had not been substantially developed on or before that date. Pursuant to 40 CFR 3.1000(a)(2), States/Tribes/Locals with new electronic document receiving systems must receive EPA approval of revisions or modifications to the authorized program before the program may receive electronic documents, in lieu of paper documents, to satisfy program requirements.

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

program for all states in the Master Table. Finally, we estimated the number of employees (i.e., indirect reporters) based on the number of regulated entities.

1.2. Detailed Discussion

EPA took the following steps to carry out the methodology.

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

- A. *Identify states with existing and new electronic document receiving systems.* To identify states with existing electronic document receiving systems, we referred to data on states that have received EPA's approval of the to revise/modify its program to allow electronic reporting. To identify states with new electronic document receiving systems, we referred to data on states that have submitted applications to revise/modify their program to allow electronic reporting.
- B. *Estimate the number of existing and new state receiving systems, by environmental program (e.g., air, water).* Existing and new receiving systems were categorized into state environmental programs based on the statute associated with the authorized program (e.g., Clean Air Act (CAA), Clean Water Act (CWA)). Attachment B-1 presents a table of the states with existing and new receiving systems, by state environmental program. This table is called the “Master Table” in this appendix.

Estimate the Number of Regulated entities, by State Environmental Program

- C. *Estimate number of regulated entities by state environmental program, based on CROMERR cost-benefit analysis (CBA) survey data.* To obtain information on the number of regulated entities by state environmental program, we referred to “Table V-2. Existing State Receiving Systems” of *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis - Final*; dated November 17, 2004. This table contains information on the number of regulated entities associated with state receiving systems reported in a survey conducted by EPA during the summer of 2002. Attachment B-2 shows the number of regulated entities by state environmental program based on CBA survey data.
- D. *Update CBA’s facility estimate for each state environmental program, based on ICR respondent data.* The data on number of regulated entities developed under Step C are based on 2002 data. To bring these numbers to the present (2024), we took the following steps:
- Obtained data on annual number of respondents in the ICRs listed in Attachment B-3. For each ICR, we obtained respondent universe estimates for at least two different years to enable us to estimate the annual percent change in the universe.
 - Estimated the annual percent change in number of respondents for each ICR.
 - Multiplied the annual percent change by 22 to estimate percent change over the 2002-2024 period (i.e., $2024 - 2002 = 22$).
 - Applied the 2002-2024 percent change to facility estimates to update the number of regulated entities for each environmental program.

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

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

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

- E. *Develop a scaling factor for use in extrapolation.* We referred to U.S. Census Bureau data on number of establishments (i.e., regulated entities) by employment size for states.³⁰ Based on these data, which are presented in Attachment B-5, we obtained the following information for each environmental program:
- Number of commercial establishments in the survey states for which respondent data were available; and
 - Number of commercial establishments in states in the Master Table with existing and/or planned receiving systems.

We then used these data to derive a scaling factor to be used in Step F. This scaling factor was derived using the following equation:

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

- F. *Extrapolate the CBA’s updated facility estimates to states with existing and new receiving systems.* In deriving the total number of regulated entities in all states in the Master Table, we first estimated the total number of regulated entities associated with each environmental program. To do this, we multiplied the updated survey data (Step D) by the corresponding scaling factor derived in Step E. This gave us the total number of regulated entities reporting to the receiving systems of states in the Master Table, by environmental program. We then added up the total number of regulated entities in states in the Master Table across all environmental programs.
- G. *Estimate annual number of regulated entities subject to the ICR requirements.* In estimating the annual number of regulated entities subject to the ICR requirements, we made the following assumptions:
- Existing receiving systems: For purposes of this analysis, we assume that existing systems have been in operation since 2005. EPA estimates that 30 percent of regulated entities began to use the receiving system in the first year (i.e., 2005) and 10 percent in each subsequent year.
 - New receiving systems: We assume that one third of regulated entities will begin reporting in each year of the three-year period covered by the ICR. In each year of the ICR, EPA estimates that 30 percent of regulated entities will begin to use the receiving system in the first year and 10 percent in each subsequent year.
- The above implementation rates for use of an electronic receiving system were taken from the CBA (Exhibit 2-5).
- H. *Estimate average annual number of regulated entities subject to the ICR requirements, by employment size.* In estimating the average annual number of regulated entities by employment size, we referred to the U.S. Census Bureau data presented in Attachment B-5. Based on these data, in the U.S., 70 percent of establishments have less than 20 employees and 30 percent of establishments have 20 or more employees. We applied these percentages to the annual number of regulated entities in Step G. Once we estimated the annual number of regulated entities for each year from 2024 through 2026 (i.e., the three-year period covered by the ICR), we obtained the average over three years.

³⁰ U.S. Census Bureau, “Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States and States, Totals: 2021,” December 21, 2023. Available at <https://www.census.gov/data/tables/2021/econ/susb/2021-susb-annual.html>. These are the latest Statistics of U.S. Businesses (SUSB) annual data.

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

- I. *Estimate average annual number of facility employees (i.e., indirect reporters) subject to the ICR requirements.* In estimating the average annual number of facility employees, we assumed that small firm regulated entities have three employees and that medium/large firm regulated entities have six employees. These estimates were taken from the CBA (Section 2.3.3, “Facilities;” page 26).
- J. *Estimate average annual number of facility employees subject to the ICR requirements by type of ownership (i.e., private sector vs. States/Locals/Tribes) and remove Federal government entities from this analysis.* In estimating the average annual number of facility employees by type of ownership, we referred to data published by the U.S. Bureau of Labor Statistics on the number of employees in the U.S.³¹ These data indicate that 85.73 percent of U.S. employees work for the private sector, 12.36 percent of employees work for States/Locals, and 1.91 percent of employees work for the Federal government. We applied these percentages to the annual number of facility employees in Step I. We then excluded Federal government employees from the analysis because they are exempt from ICR requirements.

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

1.3. Results

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

Exhibit B-1
Average Annual Number of Facility Employees
Expected to Register and Comply with Identity Proofing Requirements of States/Locals/Tribes Electronic
Document Receiving Systems
during the Three-Year Period Covered by the ICR ^a

Type of Firm	Average Annual Number of Facility Employees ^b		
	Existing Receiving Systems	New Receiving System	All Receiving Systems (i.e., Existing and New)
Private Sector			
Small Firms	3,621	7,332	10,953
Medium-Size and Large Firms	3,102	6,286	9,388
<i>Subtotal</i>	6,723	13,618	20,341
States/Locals			
Small Firms	522	1,057	1,579
Medium-Size and Large Firms	447	906	1,353

³¹ U.S. Bureau of Labor Statistics. “Quarterly Census of Employment and Wages; Number of Employees (US Total, All Industries, All Establishment Sizes, All Employees); 2023 (Annual).” Available online at: <http://data.bls.gov/pdq/querytool.jsp?survey=en>.

Attachment B-1 (continued)
Number of Existing and New States/Locals/Tribes Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the "Master Table")

<i>Subtotal</i>	969	1,963	2,932
All (Private Sector and States/Locals)			
Small Firms	4,143	8,389	12,532
Medium-Size and Large Firms	3,549	7,192	10,741
Total	7,692	15,581	23,273

^a Exhibit includes rounding error.

^b Federal government employees are not reflected in the table because they are exempt from ICR requirements.

Attachment B-1 (continued)
Number of Existing and New States/Locals/Tribes Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the "Master Table")

2. Annual Number of Paper Subscriber Agreements and ESAs

For facility employees that report to States/Locals/Tribes electronic document receiving systems with non-SCS solutions, EPA assumes that all *facility employees* (i.e., indirect reporters) from small firms and 98 percent of *facility employees* from medium-size and large firms will comply with the paper subscriber agreement or ESA requirements. (Refer to Exhibit B-1 for number of facility employees by firm size.) In addition, EPA estimates that indirect reporting regulated entities submit information to 1.3 States/Locals/Tribes electronic document receiving systems, on average; hence, their employees must submit paper subscriber agreements or ESAs for 1.3 receiving systems, on average.³² EPA assumes that 90 percent of employees from indirect reporting regulated entities will submit paper subscriber agreements and the remaining 10 percent will submit ESAs. EPA further assumes that 89 percent of the paper subscriber agreements and ESAs will be new submissions. Exhibit B-2 summarizes these assumptions and presents sample calculations.

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

Type of Firm	Annual Number of Paper Subscriber Agreements	Annual Number of ESAs
Small Firms	$\begin{aligned} & ([\text{Annual Number of Facility Employees}] \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times 0.90 \\ &) \times 0.89 \\ & = (12,532 \times 1.3 \times 0.90) \times 0.89 \\ & = 13,050 \end{aligned}$	$\begin{aligned} & ([\text{Annual Number of Facility Employees}] \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times 0.10 \\ &) \times 0.89 \\ & = (12,532 \times 1.3 \times 0.10) \times 0.89 \\ & = 1,450 \end{aligned}$
Medium-Size and Large Firms	$\begin{aligned} & (([\text{Annual Number of Facility Employees}] \times 0.98) \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times \\ & 0.90) \times 0.89 \\ & = ((10,741 \times 0.98) \times 1.3 \times 0.90) \times 0.89 \\ & = 10,961 \end{aligned}$	$\begin{aligned} & (([\text{Annual Number of Facility Employees}] \times 0.98) \times \\ & [1.3 \text{ Receiving Systems per Facility Employee}] \times \\ & 0.10) \times 0.89 \\ & = ((10,741 \times 0.98) \times 1.3 \times 0.10) \times 0.89 \\ & = 1,218 \end{aligned}$
All Firms	$\begin{aligned} & = 13,050 + 10,961 \\ & = \mathbf{24,011} \end{aligned}$	$\begin{aligned} & = 1,450 + 1,218 \\ & = \mathbf{2,668} \end{aligned}$

Based on the above assumptions, EPA estimates that, on average, facility employees that report to States/Locals/Tribes electronic document receiving systems with non-SCS solutions will prepare 21,008 paper subscriber agreements and 2,335 electronic subscriber agreements each year.

³² This assumption was taken from *Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final*, dated November 17, 2004.

Attachment B-1 (continued)
Number of Existing and New States/Locals/Tribes Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the "Master Table")

3. Indirect Reporting Firms

EPA estimates that, on average, 12,532 reporters from small indirect reporting firms will register and comply with identify proofing requirements of States/Locals/Tribes electronic document receiving systems with non-SCS solutions each year (see Exhibit B-1). Each small firm is expected to have an average of three employees³³, for a total of 4,177 small *firms* (i.e., 12,532 reporters ÷ 3 employees/firm).

EPA also estimates that, on average, 10,741 reporters from medium-size and large indirect reporting firms will register with States/Locals/Tribes electronic document receiving systems each year (see Exhibit B-1). Each medium-size and large firm is expected to have an average of 18 employees³⁴, for a total of 597 medium-size and large *firms* (i.e., 10,741 reporters ÷ 18 employees/firm).

4. Paper Subscriber Agreements Submitted to Local Registration Authorities

EPA assumes that two percent of medium-size and large firms will use the LRA alternative. EPA also assumes that indirect reporting firms submit information to 1.3 States/Locals/Tribes electronic document receiving systems, on average; hence, their employees must submit paper subscriber agreements for 1.3 receiving systems, on average.³⁵ Based on these assumptions, EPA estimates that, on average, *employees* from indirect reporting firms will prepare and send to their LRA a total of 280 paper subscriber agreements each year (i.e., [10,741 medium-size and large firm employees x 0.02] x 1.3 paper subscriber agreements/employee).

³³ This assumption was taken from Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final, dated November 17, 2004.

³⁴ This assumption was taken from Cross-Media Electronic Reporting and Records Rule (CROMERRR) Cost Benefit Analysis, Final, dated November 17, 2004.

³⁵

Attachment B-1 (continued)
Number of Existing and New States/Locals/Tribes Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the "Master Table")

Attachment B-1
Number of Existing and New States/Locals/Tribes Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the "Master Table")

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

Attachment B-1 (continued)
Number of Existing and New States/Locals/Tribes Electronic Document
Receiving Systems, by State Environmental Program
(also referred to as the "Master Table")

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

Data current as of September 2024.

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

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

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

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

Acronyms

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

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

ICR Numbers	ICR Name
Air	
1587.14 1587.15	State Operating Permit Regulations
Water	
270.47 270.48	Public Water System Supervision Program
Waste, USTs, Emergency Planning	
976.18 976.19	Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification
1360.15 1360.17	Underground Storage Tanks: Technical and Financial Requirements, and State Program Approval Procedures

Source: Office of Management and Budget (OMB). Information Collection Review Data on RegInfo.gov. Data current as of September 9, 2024. Available at <https://www.reginfo.gov/public/do/PRAMain>.

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

State Operating Permit Regulations

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number 1587.14 2018	EPA ICR Number 1587.15 2021
	Permitting Authorities and Sources Subject to Permitting under 40 CFR Part 70	14,129

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
3.5%	3	1.2%	1.00	1.2%

Average Annual Percent Change for Environmental Program
1.2%

Total Number Respondents for All ICRs 14,618

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

Public Water System Supervision Program

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number	EPA ICR Number
	2018	2022
Existing PWSs, Primary Agencies, and Laboratories	148,674	146,099

Total Number Respondents for All ICRs 146,099

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
-1.7%	4	-0.4%	1.00	-0.4%

Average Annual Percent Change for Environmental Program
-0.4%

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

Hazardous Waste Report, Notification, and Part A Permit Application

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number 976.18	EPA ICR Number 976.19
	2016	2020
Respondents to the Hazardous Waste Report	13,095	13,156

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
0.5%	4	0.1%	0.06	0.000%

Average Annual Percent Change for Environmental Program
-0.5%

Underground Storage Tanks: Technical and Financial Requirements, and State Program Approval Procedures

Respondent Universe	Annual Number of Respondents	
	EPA ICR Number 1360.15	EPA ICR Number 1360.17
	2014	2019
Private and Governments	211,154	205,725

Percent Change in Number of Respondents	Number of Years	Annual Percent Change in Number of Respondents	Weight	Weighted Annual Percent Change in Number of Respondents
-2.6%	5	-0.5%	0.94	-0.5%

Total Number Respondents for All ICRs 218,881

Attachment B-5
Number of Establishments (Regulated entities) by Employment Size, 2021

STATE	Less than 20 Employees	20 or More Employees	Total
United States	5,727,696	2,420,910	8,148,606
Alabama	65,680	37,834	103,514
Alaska	15,748	5,893	21,641
Arizona	105,285	49,474	154,759
Arkansas	45,099	23,473	68,572
California	750,890	247,692	998,582
Colorado	133,189	46,638	179,827
Connecticut	60,512	27,997	88,509
Delaware	19,667	8,886	28,553
District of Columbia	14,366	9,723	24,089
Florida	468,608	148,353	616,961
Georgia	176,518	77,211	253,729
Hawaii	22,040	10,448	32,488
Idaho	40,873	13,991	54,864
Illinois	227,764	93,031	320,795
Indiana	95,443	55,469	150,912
Iowa	55,289	27,708	82,997
Kansas	49,488	25,569	75,057
Kentucky	57,380	34,750	92,130
Louisiana	71,227	36,237	107,464
Maine	31,077	11,442	42,519
Maryland	96,862	44,355	141,217
Massachusetts	126,919	53,169	180,088
Michigan	152,730	71,946	224,676
Minnesota	104,832	48,004	152,836
Mississippi	38,475	21,330	59,805
Missouri	101,443	50,843	152,286
Montana	31,607	9,109	40,716
Nebraska	38,381	17,161	55,542
Nevada	50,350	23,155	73,505
New Hampshire	26,542	12,283	38,825
New Jersey	173,167	60,783	233,950

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

STATE	Less than 20 Employees	20 or More Employees	Total
New Mexico	29,168	14,785	43,953
New York	416,539	119,219	535,758
North Carolina	168,656	78,802	247,458
North Dakota	16,888	7,928	24,816
Ohio	159,130	93,111	252,241
Oklahoma	64,293	30,458	94,751
Oregon	87,232	33,472	120,704
Pennsylvania	202,625	102,008	304,633
Rhode Island	21,021	7,968	28,989
South Carolina	78,071	38,825	116,896
South Dakota	19,853	8,098	27,951
Tennessee	88,553	55,904	144,457
Texas	429,328	208,855	638,183
Utah	66,988	23,313	90,301
Vermont	15,308	5,388	20,696
Virginia	138,860	67,411	206,271
Washington	145,690	53,164	198,854
West Virginia	21,482	13,834	35,316
Wisconsin	93,382	49,114	142,496
Wyoming	17,178	5,296	22,474

Source: U.S. Census Bureau, "The Number of Firms and Establishments, Employment, and Annual Payroll by State, Industry, and Enterprise Employment Size: 2021," December 21, 2023. Available online at: <https://www.census.gov/data/tables/2021/econ/susb/2021-susb-annual.html>. These are the latest Statistics of U.S. Businesses (SUSB) annual data.

Attachment B-6 Application of Methodology to Existing Receiving Systems

Environmental Program	States with Facility Data in CBA (from Exhibit B-2) A	Total Number of Facilities in CBA (from Exhibit B-2) B	Average Annual Percent Change for Environmental Program (from Exhibit B-4) C	2002-2024 Percent Change for Environmental Program $D = C \times 22$	Updated Total Number of Facilities in CBA $E = B + (D \times B)$
Air	NJ, NM, OH, PA, WI	17,197	1.2%	26.4%	21,737
Water	FL, ND, OH, WI	7,525	-0.4%	-8.8%	6,863
Waste, USTs, Emergency Planning	NJ, OH, WI	2,580	-0.5%	-11.0%	2,296

Environmental Program	Number of Establishments for States with Facility Data in CBA (from Exhibit B-5) F	Number of Establishments for States with Existing Receiving Systems (from Exhibits B-1 and B-5) G	Scaling Factor $H = G / F$
Air	977,273	5,981,720	6.12
Water	1,036,514	7,465,439	7.2
Waste, USTs, Emergency Planning	628,687	8,065,609	12.83

Environmental Program	Updated Total Number of Facilities in CBA $I = E$	Scaling Factor $J = H$	Total Number of Facilities for States with Existing Receiving Systems $K = I \times J$
Air	21,737	6.12	133,030
Water	6,863	7.20	49,414
Waste, USTs, Emergency Planning	2,296	12.83	29,458
Total Number of Facilities for All Environmental Programs			211,902

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

Year	Number of Facilities
2005	63,571
2006	14,833
2007	13,350
2008	12,015
2009	10,813
2010	9,732
2011	8,759
2012	7,883
2013	7,095
2014	6,385
2015	5,747
2016	5,172
2017	4,655
2018	4,189
2019	3,770
2020	3,393
2021	3,054
2022	2,749
2023	2,474
2024	2,226
2025	2,004
2026	1,803

Legend:

Years Covered in the ICR

Type of Firm	Number of Facilities per Year Covered in the ICR			Average Annual Number of Facilities $D = (A + B + C) / 3$	Average Annual Number of Facility Employees $E = D \times 3$ (small) $E = D \times 6$ (medium/large)
	2024 $A = 2,226 \times 0.70$ (small) $A = 2,226 \times 0.30$ (medium/large)	2025 $B = 2,004 \times 0.70$ (small) $B = 2,004 \times 0.30$ (medium/large)	2026 $C = 1,803 \times 0.70$ (small) $C = 1,803 \times 0.30$ (medium/large)		
Small Firms	1,558	1,403	1,262	1,408	4,224
Medium-Size and Large Firms	668	601	541	603	3,618
Total	2,226	2,004	1,803	2,011	7,842

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

Environmental Program	States with Facility Data in CBA (from Exhibit B-2) A	Total Number of Facilities in CBA (from Exhibit B-2) B	Average Annual Percent Change for Environmental Program (from Exhibit B-4) C	2002-2024 Percent Change for Environmental Program $D = C \times 22$	Updated Total Number of Facilities in CBA $E = B + (D \times B)$
Air	NJ, NM, OH, PA, WI	17,197	1.2%	26.4%	21,737
Water	FL, ND, OH, WI	7,525	-0.4%	-8.8%	6,863
Waste, USTs, Emergency Planning	NJ, OH, WI	2,580	-0.5%	-11.0%	2,296

Environmental Program	Number of Establishments for States with Facility Data in CBA (from Exhibit B-5) F	Number of Establishments for States with New Receiving Systems (from Exhibits B-1 and B-5) G	Scaling Factor $H = G / F$
Air	977,273	413,093	0.42
Water	1,036,514	3,086,468	2.98
Waste, USTs, Emergency Planning	628,687	998,582	1.59

Environmental Program	Updated Total Number of Facilities in CBA $I = E$	Scaling Factor $J = H$	Total Number of Facilities for States with New Receiving Systems $K = I \times J$
Air	21,737	0.42	9,130
Water	6,863	2.98	20,452
Waste, USTs, Emergency Planning	2,296	1.59	3,651
Total Number of Facilities for All Environmental Programs			33,233
Annual Number of Facilities that Will Come Online			11,078

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

Year System Will Come Online	Number of Facilities per Year Covered in the ICR		
	2024 <i>A = 11,078 x 0.30 (Year 1) A = 11,078 x 0 (Years 2 and 3)</i>	2025 <i>B = (11,078 - 3,323) x 0.10 (Year 1) B = 11,078 x 0.30 (Year 2) B = 11,078 x 0 (Year 3)</i>	2026 <i>C = (11,078 - 3,323 - 776) x 0.10 (Year 1) C = (11,078 - 3,323) x 0.10 (Year 2) C = 11,078 x 0.30 (Year 3)</i>
Year 1	3,323	776	698
Year 2	0	3,323	776
Year 3	0	0	3,323
Total	3,323	4,099	4,797

Type of Firm	Number of Facilities per Year Covered in the ICR			Average Annual Number of Facilities <i>D = (A + B + C) / 3</i>	Average Annual Number of Facility Employees <i>E = D x 3 (small) E = D x 6 (medium/large)</i>
	2024 <i>A = 3,323 x 0.70 (small) A = 3,323 x 0.30 (medium/large)</i>	2025 <i>B = 4,099 x 0.70 (small) B = 4,099 x 0.30 (medium/large)</i>	2026 <i>C = 4,797 x 0.70 (small) C = 4,797 x 0.30 (medium/large)</i>		
Small Firms	2,326	2,869	3,358	2,851	8,553
Medium-Size and Large Firms	997	1,230	1,439	1,222	7,332
Total	3,323	4,099	4,797	4,073	15,885

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

**Appendix C
Respondent and EPA Burden Calculation Exhibits**

EXHIBIT C-1

CROSS-MEDIA ELECTRONIC REPORTING RULE

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$82.74/ Hour	Mgr. \$53.03/ Hour	Tech. \$52.59/ Hour	Cler. \$23.14/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Registering with EPA Electronic Document Receiving System - Direct Reporters											
Log on to the receiving system site and enter requested information (e.g., registrant name)	0.0000	0.0000	0.3006	0.0000	0.3006	\$15.81	\$0.00	\$0.00	51,211	15,394.03	\$809,645.91
Update the information as needed	0.0000	0.0000	0.1336	0.0000	0.1336	\$7.03	\$0.00	\$0.00	757	101.14	\$5,321.71
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	15,495.17	\$814,967.62
Compliance with Identity Proofing Requirements - Direct Reporters											
Comply with Requirements for Identifier, Attribute, or Alternative Method											
Prepare and submit information on identifiers, attributes, or other identity-proofing information (CDX 20-5-1 Challenge Question Setup)	0.0000	0.0000	0.0334	0.0000	0.0334	\$1.76	\$0.00	\$0.00	21,258	710.02	\$37,414.08
Comply with Subscriber Agreement or ESA Provisions - Paper Subscriber Agreements											
Prepare and submit a subscriber agreement	0.0000	0.0000	0.0835	0.0000	0.0835	\$4.39	\$0.00	\$5.62	2,838	236.97	\$28,408.38
Store subscriber agreement	0.0000	0.0000	0.1169	0.0000	0.1169	\$6.15	\$0.00	\$0.00	2,838	331.76	\$17,453.70
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$17.57	\$0.00	\$0.00	28	9.35	\$491.96
Contact the Help Desk for technical support	0.0000	0.0000	0.2839	0.0000	0.2839	\$14.93	\$0.00	\$0.00	2,866	813.66	\$42,789.38
Comply with Subscriber Agreement or ESA Provisions - Electronic Subscriber Agreements											
Prepare and submit an ESA	0.0000	0.0000	0.1002	0.0000	0.1002	\$5.27	\$0.00	\$0.00	17,909	1,794.48	\$94,380.43
Store ESA	0.0000	0.0000	0.1169	0.0000	0.1169	\$6.15	\$0.00	\$0.00	17,909	2,093.56	\$110,140.35
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$17.57	\$0.00	\$0.00	179	59.79	\$3,145.03
Contact the Help Desk for technical support	0.0000	0.0000	0.2839	0.0000	0.2839	\$14.93	\$0.00	\$0.00	18,088	5,135.18	\$270,053.84
Conduct On-Going Management											
Identify and resolve problems related to completing the identity proofing processes	0.0000	0.0000	1.6012	0.0000	1.6012	\$84.21	\$0.00	\$0.00	622	995.95	\$52,378.62
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	12,180.72	\$656,655.77

^a Exhibit includes rounding error.

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

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

	Hours and Costs Per Respondent Per Activity									Total Hours and Costs		
	Leg. \$82.74/ Hour	Mgr. \$53.03/ Hour	Tech. \$52.59/ Hour	Cler. \$23.14/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year	
INFORMATION COLLECTION ACTIVITY												
Compliance with Identity Proofing Requirements - Indirect Reporters												
Comply with Requirements for Identifier, Attribute, or Alternative Method												
Prepare and submit information on identifiers, attributes, or other identity-proofing information	0.0000	0.0000	0.0334	0.0000	0.0334	\$1.76	\$0.00	\$0.00	0	0.00	\$0.00	
Comply with Subscriber Agreement or ESA Provisions - Paper Subscriber Agreements												
Prepare and submit a subscriber agreement	0.0000	0.0000	0.0835	0.0000	0.0835	\$4.39	\$0.00	\$5.62	24,399	2,037.32	\$244,233.99	
Store subscriber agreement	0.0000	0.0000	0.1169	0.0000	0.1169	\$6.15	\$0.00	\$0.00	24,399	2,852.24	\$150,053.85	
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$17.57	\$0.00	\$0.00	244	81.50	\$4,287.08	
Contact the Help Desk for technical support	0.0000	0.0000	0.2839	0.0000	0.2839	\$14.93	\$0.00	\$0.00	24,643	6,996.15	\$367,919.99	
Comply with Subscriber Agreement or ESA Provisions - Electronic Subscriber Agreements												
Prepare and submit an ESA	0.0000	0.0000	0.1002	0.0000	0.1002	\$5.27	\$0.00	\$0.00	5,441	545.19	\$28,674.07	
Store ESA	0.0000	0.0000	0.1169	0.0000	0.1169	\$6.15	\$0.00	\$0.00	5,441	636.05	\$33,462.15	
Report compromised or surrendered electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$17.57	\$0.00	\$0.00	54	18.04	\$948.78	
Contact the Help Desk for technical support	0.0000	0.0000	0.2839	0.0000	0.2839	\$14.93	\$0.00	\$0.00	5,495	1,560.03	\$82,040.35	
Submit Subscriber Agreement to Local Registration Authority												
Prepare subscriber agreement and send to LRA	0.0000	0.0000	0.4175	0.0000	0.4175	\$21.96	\$0.00	\$0.77	249	103.96	\$5,659.77	
Prepare new subscriber agreement and send to LRA, for employee turnover	0.0000	0.0000	0.4175	0.0000	0.4175	\$21.96	\$0.00	\$0.77	28	11.69	\$636.44	
Report breach of security or compromise/surrender of electronic signature device	0.0000	0.0000	0.3340	0.0000	0.3340	\$17.57	\$0.00	\$0.00	3	1.00	\$52.71	
Prepare new subscriber agreement and send to LRA subsequent to breach of security/compromise of electronic signature device	0.0000	0.0000	0.4175	0.0000	0.4175	\$21.96	\$0.00	\$0.77	3	1.25	\$68.19	
Conduct On-Going Management												
Identify and resolve problems related to completing the registration and identity proofing processes	0.0000	0.0000	1.6012	0.0000	1.6012	\$84.21	\$0.00	\$0.00	692	1,108.03	\$58,273.32	
Implementation of Local Registration Authority Alternative - Indirect Reporting Firms and Local Registration Authorities												
Designating a Local Registration Authority												
Develop a process or plan to implement the requirement, designate the LRA, and submit LRA application to agency	1.0000	0.0000	12.0000	0.0000	13.0000	\$713.82	\$0.00	\$9.24	12	156.00	\$8,676.72	
Register LRA with the electronic document receiving system	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$0.00	12	2.00	\$105.36	
Redesignate LRA, due to turnover, and send application materials	0.0000	0.0000	1.0000	0.0000	1.0000	\$52.59	\$0.00	\$9.24	1	1.00	\$61.83	
Register new LRA with electronic document receiving system	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$0.00	1	0.17	\$8.78	
Collect Subscriber Agreements from Reporters												
Collect and securely store subscriber agreements	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$0.00	249	41.58	\$2,186.22	
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$4.04	249	41.58	\$3,192.18	
Collect and securely store subscriber agreements, for employee turnover	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$0.00	28	4.68	\$245.84	
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for employee turnover	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$4.04	28	4.68	\$358.96	
Collect and securely store subscriber agreements, for breach of security/compromise of electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$0.00	3	0.50	\$26.34	
Prepare agreement collection certification after securely storing subscriber agreements, and submit certification of receipt and secure storage, for breach of security/compromise of electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$8.78	\$0.00	\$4.04	3	0.50	\$38.46	
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	16,205.14	\$991,211.38	

* Exhibit includes rounding error.

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

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

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$55.07/ Hour	Mgr. \$55.07/ Hour	Tech. \$41.71/ Hour	Cler. \$19.80/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Compliance with Identity Proofing Requirements - State/Tribe/Local Agencies Acting as Regulators											
Collect Identifier, Attribute, or Alternative Information											
Receive, process, review and approve identifier, attribute, or alternative information	0.0000	0.0000	0.5000	0.0000	0.5000	\$20.86	\$0.00	\$0.00	0	0.00	\$0.00
Collect Subscriber Agreements and ESAs - Paper Subscriber Agreements											
Receive, process, review, approve and file new subscriber agreements	0.0000	0.3674	0.2004	0.0000	0.5678	\$28.59	\$0.00	\$0.00	24,399	13,853.75	\$697,567.41
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.97	\$0.00	\$0.00	244	40.75	\$1,700.68
Collect Subscriber Agreements and ESAs - Electronic Subscriber Agreements											
Receive, process, review, approve and file new ESAs	0.0000	0.0000	0.1169	0.0000	0.1169	\$4.88	\$0.00	\$0.00	5,441	636.05	\$26,552.08
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.97	\$0.00	\$0.00	54	9.02	\$376.38
Collect Submittals from Local Registration Authority											
Receive, process, review, and approve certification of receipt and secure storage	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.97	\$0.00	\$0.00	249	41.58	\$1,735.53
Receive, process, review and approve updated certification of receipt and secure storage, for employee turnover	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.97	\$0.00	\$0.00	28	4.68	\$195.16
Receive notification of breach of security or compromise/surrender of electronic signature device and take action	0.0000	0.0000	1.3841	0.0000	1.3841	\$57.73	\$0.00	\$0.00	3	4.15	\$173.19
Receive, process, review and approve certification of receipt and secure storage, for breach of security or compromise/surrender of electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$6.97	\$0.00	\$0.00	3	0.50	\$20.91
Collect Applications for Designation of Local Registration Authority											
Receive application to designate first-time LRA	0.0000	0.0000	0.5000	0.0000	0.5000	\$20.86	\$0.00	\$0.00	12	6.00	\$250.32
Receive application to designate LRA, for LRA turnover	0.0000	0.0000	0.5000	0.0000	0.5000	\$20.86	\$0.00	\$0.00	1	0.50	\$20.86
Conduct On-Going Management											
Identify and resolve problems related to completing the registration and identity proofing processes	0.0000	0.0000	1.1670	0.0000	1.1670	\$48.68	\$0.00	\$0.00	692	807.56	\$33,686.56
Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes	0.0000	0.0000	1.0334	0.0000	1.0334	\$43.10	\$0.00	\$0.00	692	715.11	\$29,825.20
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	16,119.65	\$792,104.28

^a Exhibit includes rounding error.

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

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

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$55.07/ Hour	Mgr. \$55.07/ Hour	Tech. \$41.71/ Hour	Cler. \$19.80/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Approval of State/Tribe/Local Electronic Document Receiving System Application - State/Tribe/Local Agencies that Are Regulated Entities											
Read the Regulations											
Read the regulations	0.0000	4.0668	5.0501	0.0000	9.1169	\$434.60	\$0.00	\$0.00	23	209.69	\$9,995.80
Submit Electronic Document Receiving System Application											
Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 requirements and apply for EPA program modification approval under 40 CFR 3.1000 <i>(State agencies)</i>	0.0000	42.4509	383.8851	0.0000	426.3360	\$18,349.62	\$127,366.00	\$8.89	6	2,558.02	\$874,347.06
Upgrade existing electronic document receiving system or develop new electronic document receiving system to meet 40 CFR 3.2000 requirements and apply for EPA program modification approval under 40 CFR 3.1000 <i>(Tribal and Local agencies)</i>	0.0000	31.0000	300.0000	0.0000	331.0000	\$14,220.17	\$52,081.00	\$8.89	7	2,317.00	\$464,170.42
Submit Amendment to Original Application											
Submit amendment to original application for EPA program modification approval under 40 CFR 3.1000 <i>(States/Tribes/Locals)</i>	0.0000	11.0000	13.0000	0.0000	24.0000	\$1,148.00	\$0.00	\$8.89	9	216.00	\$10,412.01
Submit Notification on Changes to Laws, Policies, or Electronic Document Receiving System											
Submit notification to EPA about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 <i>(States/Tribes/Locals with approved applications)</i>	0.0000	5.5000	12.9686	0.0000	18.4686	\$843.81	\$0.00	\$8.89	1	18.47	\$852.70
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	5,319.18	\$1,359,777.99
TOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	65,319.86	\$4,614,717.04

^a Exhibit includes rounding error.

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

EXHIBIT C-2
CROSS-MEDIA ELECTRONIC REPORTING RULE
ESTIMATED ANNUAL EPA HOUR AND COST BURDEN ^a

	Hours and Labor Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$80.19/ Hour	Mgr. \$67.86/ Hour	Tech. \$57.07/ Hour	Cler. \$28.96/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Registering with EPA Electronic Document Receiving System											
Develop, operate, and maintain CDX	0.00	330.00	13,790.00	0.00	14,120.00	\$809,389.10	\$169,200.00	\$0.00	1	14,120.00	\$978,589.10
Subtotal	0.00	330.00	13,790.00	0.00	14,120.00	\$809,389.10	\$169,200.00	\$0.00	1	14,120.00	\$978,589.10
Compliance with Identity Proofing Requirements											
Collect Identifier, Attribute, or Alternative Information											
Receive, process, review and approve identifier, attribute, or alternative information	0.0000	0.0000	0.5000	0.0000	0.5000	\$28.54	\$0.00	\$0.00	21,258	10,629.00	\$606,703.32
Collect Subscriber Agreements or ESAs - Subscriber Agreements											
Receive, process, review, approve and file subscriber agreements ^b	0.0000	0.0000	0.0000	0.0000	0.0000	\$0.00	\$0.00	\$0.00	2,838	0.00	\$0.00
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$9.53	\$0.00	\$0.00	28	4.68	\$266.84
Collect Subscriber Agreements or ESAs - Electronic Subscriber Agreements											
Receive, process, review, approve and file subscriber agreements ^c	0.0000	0.0000	0.0000	0.0000	0.0000	\$0.00	\$0.00	\$0.00	17,909	0.00	\$0.00
Receive, process, review, approve report compromise/surrender electronic signature device	0.0000	0.0000	0.1670	0.0000	0.1670	\$9.53	\$0.00	\$0.00	179	29.89	\$1,705.87
Conduct On-Going Management											
Identify and resolve problems related to completing the registration and identity proofing processes	0.0000	0.0000	1.0000	0.0000	1.0000	\$57.07	\$0.00	\$0.00	622	622.00	\$35,497.54
Respond to information requests related to understanding/other questions regarding the registration and identity proofing processes	0.0000	0.0000	1.5000	0.0000	1.5000	\$85.61	\$0.00	\$0.00	622	933.00	\$53,249.42
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	12,218.57	\$697,422.99

^a Exhibit includes rounding error.

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

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

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

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

INFORMATION COLLECTION ACTIVITY	Hours and Labor Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$80.19/ Hour	Mgr. \$67.86/ Hour	Tech. \$57.07/ Hour	Cler. \$28.96/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
Approval of State/Tribe/Local Electronic Document Receiving System Applications											
Process and file receiving system documentation submitted by State/Local/Tribe seeking to modify their programs, as required by 40 CFR 3.1000 (<i>State agencies</i>)	0.00	0.00	160.00	0.00	160.00	\$9,131.20	\$0.00	\$0.00	6	960.00	\$54,787.20
Process and file receiving system documentation submitted by State/Local/Tribe seeking to modify their programs, as required by 40 CFR 3.1000 (<i>Tribal/Local agencies</i>)	0.00	0.00	80.00	0.00	80.00	\$4,565.60	\$0.00	\$0.00	7	560.00	\$31,959.20
Process and file amendment to original application for EPA program modification approval under 40 CFR 3.1000 (<i>State/Tribal/Local agencies</i>)	0.00	0.00	24.00	0.00	24.00	\$1,369.68	\$0.00	\$0.00	9	216.00	\$12,327.12
Process and file notifications about changes to laws, policies, or electronic document receiving systems that have the potential to affect program conformance with 40 CFR 3.2000 (<i>State/Tribal/Local agencies with approved applications</i>)	0.00	0.00	12.00	0.00	12.00	\$684.84	\$0.00	\$0.00	1	12.00	\$684.84
Subtotal	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	1,748.00	\$99,758.36
TOTAL	0.00	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	28,086.57	\$1,775,770.45

^a Exhibit includes rounding error.