

2022 CGP ICR - Agency Labor Burden

Activity	Hours Per Response			Number of Annual Reponses
	2017 NPDES Program ICR <sup>1</sup>	2022 CGP Incremental Change	2022 CGP Total Hours per Response	2022 CGP No. Annual Responses
NOI review	1	0	1	3,630
NOT review	0.25	0	0.25	3,631
Waiver Certification Review	1	0	1	182
SWPPP review	1	0	1	3,631
Standard/Other Reports	12	0	12	176
Turbidity Monitoring Report Review	NA	0.16	0.16	835
Turbidity Report Follow-up	NA	0.5	0.5	167
<b>Total Agency Activities</b>				<b>12,252</b>

**Table Endnotes**

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

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

Federal: Labor rate (2024)  
\$51.15

Annual Hours Burden		Annual Cost Burden <sup>2</sup>	
2022 CGP Incremental Change in Annual Burden (hrs)	2022 CGP Annual Burden (hrs)	2022 CGP Incremental Change in Annual Cost	2022 CGP Annual Cost
0	3,630	\$0	\$185,675
0	908	\$0	\$46,431
0	182	\$0	\$9,309
0	3,631	\$0	\$185,726
0	2,112	\$0	\$108,029
134	134	\$6,834	\$6,834
84	84	\$4,271	\$4,271
<b>217</b>	<b>10,680</b>	<b>\$11,105</b>	<b>\$546,275</b>

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2022 CGP ICR - Respondent Burden and Cost Table

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

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

**Table Endnotes**

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

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

<sup>3</sup> A subpopulation of respondents need to document their benchmark monitoring procedures in their SV

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

-0.4	1.1	980	1	0
-0.4	5.6	609	1	0
-0.4	19.6	44	1	0
-0.4	3.3	1997	1	0
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
0	1	182	1	0
0.7	1.2	3631	1	0
0.5	0.5	835	29	24215
0.75	0.75	835	4	3340

0	4	18	1	0
0	5	4	1	0
0	5	4	1	0
0	2	3	1	0
0	3	73	1	0
0	2	36	1	0
0	5	36	1	0
0	2	2	1	0
				27,555

0	36.4	1634	1	0
0	22.7	1997	1	0
4	4	835	Part of development	
-	-	-	-	-
0	0.5	1634	26	0
0	0.25	1997	26	0
0.25	0.25	3631	29	105299

-	-	-	-	-
				<b>105,299</b>
				<b>132,854</b>

ye is \$73.47.

vPPP. This is not considered a new response, as it is included in the overall SWPPP respons

Labor rate (2024)  
\$ 73.47

Responses	Annual Hours Burden		Annual Cost Burden	
	2022 CGP Incremental Change in Annual Burden (hrs)	2022 CGP Total Annual Burden (hrs)	2022 CGP Incremental Change in Annual Cost <sup>2</sup>	2022 CGP Total Annual Cost <sup>2</sup>
980	-392	1078	-\$28,800	\$79,201
609	-244	3,410	-\$17,927	\$250,533
44	-18	862	-\$1,322	\$63,331
1997	-799	6,590	-\$58,703	\$484,167
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
182	0	182	\$0	\$13,372
3631	2,542	4,357	\$186,761	\$320,109
24215	12,108	12,108	\$889,575	\$889,575
3340	2,505	2,505	\$184,042	\$184,042
18	0	72	\$0	\$5,290
4	0	20	\$0	\$1,469
4	0	20	\$0	\$1,469
3	0	6	\$0	\$441
73	0	219	\$0	\$16,090
36	0	72	\$0	\$5,290
36	0	180	\$0	\$13,225
2	0	4	\$0	\$294
<b>35,174</b>	<b>15,702</b>	<b>31,685</b>	<b>\$1,153,626</b>	<b>\$2,327,898</b>
1634	0	59,478	\$0	\$4,369,849
1997	0	45,332	\$0	\$3,330,542
oping a SWPPP	3,340	3,340	\$245,390	\$245,390
-	-	-	-	-
42,484	0	21,242	\$0	\$1,560,650
51,922	0	12,981	\$0	\$953,714
105,299	26,325	26,325	\$1,934,098	\$1,934,098

-	-	-	-	-
<b>203,336</b>	<b>29,665</b>	<b>168,698</b>	<b>\$2,179,488</b>	<b>\$12,394,243</b>
<b>238,510</b>	<b>45,367</b>	<b>200,383</b>	<b>\$3,333,114</b>	<b>\$14,722,141</b>
			<b>\$888,440</b>	<b>\$888,440</b>
			<b>\$4,221,554</b>	<b>\$15,610,581</b>

Hours (respondent + agency)	211,063
Responses (respondent + agency)	250,762
hours per response	0.8416859413

e. The burden is calculated in a separate line because the burden applies to a subset of the respondent population



\$296,146.67

on

Calculations for Turbidity Monitoring Requirements

*Dewatering Turbidity Monitoring Reports*

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

*Turbidity Meter Capital and Operation & Maintenance Costs*

Monitoring Device	Capital/ Startup Cost for One Respondent <sup>1</sup>	Number of Respondents	Total Capital/ Startup Cost
Turbidity Meter	\$1,064	835	\$888,440

<sup>a</sup> EPA surveyed publicly available price information from a variety of analytical instrument retailers for price information.

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

\$296,146.67



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

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

act Analysis for the 2022 CGP.

	Respondent Percentage
# of NOIs (including Idaho)	-
# of NOIs (excluding Idaho)	-
Operators with Large Sites	45%
NOI - Large Sites (ESA Criterion A, B)	60%
NOI - Large Sites (ESA Criterion C, D, E - Informal Eval)	37.3%
NOI - Large Sites (ESA Criterion F - Formal Eval)	2.7%
Operators with Small Sites	55%
Operators that discharge into Sensitive Water	23%
Waivers (5%)	5%
# NOTs	100%
Planned Facility Changes	0.50%
Anticipated Noncompliance	0.10%
24hr reporting - Unanticipated Bypass or Upset (Verbal)	0.10%
24hr reporting - Unanticipated Bypass or Upset (Written)	0.08%
24hr reporting - Violation of Maximum Daily Discharge (Verbal)	2%
24hr reporting - Violation of Maximum Daily Discharge (Written)	1%
Other Noncompliance reporting	1%
Other Info - Permittee Report of Inaccurate Previous Information	0.05%

Proposed 2022 CGP ICR	Notes
NA	<a href="https://permitsearch.epa.gov/epermit-search/ui/search">https://permitsearch.epa.gov/epermit-search/ui/search</a>
3631	2022 CGP NOI Data (Years 1 and 2 of 2022 CGP NOI Data)
1634	37% used in 2017 NPDES Program ICR, updated to 41% using 2017 CGP NOI Data (2017-2020), and updated to 45% using the first two years of the 2022 CGP NOI data for 2022 CGP ICR (sites greater than 5 acres)
980	Same assumption made in 2017 NPDES Program ICR: 60% of large sites
609	Same assumption made in 2017 NPDES Program ICR: 37.3% of large sites
44	Same assumption made in 2017 NPDES Program ICR: 2.7% of large sites
1997	63% used in 2017 NPDES Program ICR, updated to 59% using 2017 CGP NOI Data (2017-2020). Updated to 55% in 2024 using the first two years of 2022 CGP NOI Data for the 2022 CGP ICR (sites less than 5 acres)
835	Based on analysis of the first two years of 2022 CGP NOI data , where impairment or TMDL was listed in NOI form based on the following search terms: sediment, turbidity, TSS, solids, or transparency or the water was Tier 2, 2.5, or 3.
182	Same assumption made in 2017 NPDES Program ICR: 5% on top of the total number of NOIs submitted each year
3631	Same number as number of NOIs
18	Same assumption made in 2017 NPDES Program ICR
4	Same assumption made in 2017 NPDES Program ICR
4	Same assumption made in 2017 NPDES Program ICR
3	Same assumption made in 2017 NPDES Program ICR
73	Same assumption made in 2017 NPDES Program ICR
36	Same assumption made in 2017 NPDES Program ICR
36	Same assumption made in 2017 NPDES Program ICR
2	Same assumption made in 2017 NPDES Program ICR