

# U.S. Environmental Protection Agency

## Information Collection Request

**Title:** Brownfields Program – Accomplishment Reporting in Assessment, Cleanup and Redevelopment Exchange System (ACRES) (Revision)

**OMB Control Number:** 2050-0192

**EPA ICR Number:** 2104.10

**Abstract:** EPA's Office of Brownfields and Land Revitalization (OBLR) seeks authorization to collect information from contract and cooperative agreement recipients (recipients) using standard forms that will streamline the data collection effort and improve the quality of information collected and stored in the ACRES database. The initial Information Collection Request (ICR) for forms in the ACRES database was completed in 2003, with the last ICR renewal occurring in 2023. Due to the need for new forms and modifications to existing forms in the ACRES database since then, OBLR is requesting renewed ICR approval for the following 12 forms:

- Six existing forms:
  - o Property Profile Form (PPF)
  - o Program Activity Levels (PALs) Form
  - o Grantee Reported K7 Technical Assistance (K7 TA) Form
  - o Contractor Technical Assistance (CTA) Form
  - o Job Training (JT) Form
  - o Brownfields Revolving Loan Fund (RLF) Form
- Six new forms:
  - o Cleanup Quarterly Report (QR) Form
  - o Assessment QR Form
  - o Multipurpose QR Form
  - o JT QR Form
  - o RLF QR Form
  - o RLF Annual Post-Closeout Report (APCR) Form

Eleven of the 12 forms are completed by cooperative agreement recipients. The 12<sup>th</sup> form (CTA Form) is completed by less than 10 contractors; although ICR approval is not required, CTA Form is included for consistency as part of the complete ACRES package of forms.

### **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.*

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This is a request to revise and renew an existing Information Collection Request (ICR). This ICR covers the collection of information from those organizations that receive cooperative agreements and contract funding from EPA under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Brownfields Utilization, Investment, and Local Development (BUILD) Act (P.L. 115-141). Subtitle A of CERCLA, as amended, authorizes EPA to award grants or cooperative agreements to states, Tribal Nations, local governments, and other eligible entities to support the assessment and cleanup of brownfields properties. Contract funds can be awarded for training, technical assistance, and research related to brownfields. Subtitle C authorizes a noncompetitive \$50 million program to establish and enhance state and Tribal Nation response programs. The authority for these financial assistance programs is codified at CERCLA 104(k) and CERCLA 128(a) respectively. Congress appropriates specific amounts of funding for both programs in EPA's State and Tribal Assistance Grant account.

With this ICR, OBLR seeks authorization to collect information from contract and cooperative agreement recipients (recipients) using standard forms that will simplify the data collection process and enhance the quality of information collected. The information collected under this ICR supplements the minimum reporting and record keeping requirements that cooperative agreement recipients are subject to under [2 CFR Part 200](#) and [2 CFR Part 1500](#) (e.g., [2 CFR 200.328](#), [2 CFR 200.333](#), and [2 CFR 200.335](#)). EPA estimates that all respondents who voluntarily respond to this information collection by electing to participate in the Brownfields program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

## **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.*

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Under CERCLA 104(k), States, Tribal Nations, local governments, and other eligible entities may receive cooperative agreements to:

- (1) inventory, characterize, assess, and conduct planning and community involvement related to brownfields sites;
- (2) carry out cleanup activities at brownfields sites;
- (3) capitalize revolving loan funds and provide subawards for cleanup activities; and
- (4) support the research, technical assistance, and training including the creation and implementation of environmental job training and placement programs.

CERCLA 104(k) also authorizes contract funding to provide training, technical assistance, and research related to brownfields.

Under CERCLA 128(a), States and Tribal Nations may receive cooperative agreements to:

- (1) establish or enhance a response program that includes elements such as:
  - a. Surveys and inventories of brownfield sites.

- b. Oversight and enforcement authorities including legislation, regulations, procedures, or guidance that would establish or enhance the legal structure of the program.
- c. Opportunities for public participation in the process of developing a public record for cleanup decisions and other site activities.
- d. Approval of cleanup plans and verifications that response actions are complete.
- e. Site-specific assessment and cleanup activities at brownfield sites.

(2) capitalize a revolving loan fund for brownfields remediation under CERCLA 104(k)(3); and

(3) purchase environmental insurance, develop a risk sharing or indemnity pool, or other insurance mechanisms for the response program.

Under CERCLA 101(39), a brownfields site means real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Brownfields sites may also include property contaminated with petroleum. For funding purposes, EPA uses the term “brownfields property(ies)” synonymously with the term “brownfields site(s).”

While the Agency collects basic cooperative agreement information as part of its Federal stewardship responsibilities to manage and oversee recipient activities and expenditures under 2 CFR Part 200, OBLR needs additional information from recipients to be reported in a consistent manner to evaluate the effectiveness of the program and to report on program activities and accomplishments to Congress and other program stakeholders. Cooperative agreement recipients and contractors are given access to the ACRES database to electronically enter form information for immediate submission to the Brownfields Program. OBLR has used and will continue to use the information collected from recipients to oversee the activities carried out using Brownfields’ funds, to evaluate program implementation and effectiveness, and to meet the Agency’s responsibilities under the Government Performance and Results Act (GPRA) to report on OBLR’s accomplishments. The information collection activities covered by this renewed ICR are intended to: (1) continue to improve the alignment of reporting requirements with programmatic performance measures; and (2) simplify and standardize reporting requirements to reduce uncertainty and burden imposed on recipients. Without the information collection, OBLR would have limited access to information needed to effectively assess the relationship between those activities funded by EPA’s Brownfields contracts and cooperative agreements and the intent of Congress with the passage of the Brownfields Amendments.

### **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.*

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For ease, recipients enter the information into the Agency’s ACRES database. ACRES was developed to fulfill the requirements under the Government Paperwork Elimination Act (Public Law 105-277). This electronic reporting process is integrated with EPA’s Enterprise Architecture to further streamline the

Agency's data management and reporting responsibilities. EPA released the electronic reporting process in January 2007 and all Brownfields recipients starting from FY 2003 have been given access. EPA has modified its reporting guidance and provides training on the electronic reporting process. The database is consistently updated, with the latest interface overhaul occurring in 2025. EPA has achieved positive returns in user acceptance of the electronic reporting process since its release and the electronic reporting process reduces the burden placed on recipients.

EPA uses ACRES to maintain information on specific activities for all Brownfields cooperative agreement types, as well as quarterly and annual progress reporting per recipient terms and conditions. ACRES is also used to develop reports to support management and program evaluation activities, and to report accomplishments achieved as part of the Agency's responsibilities under GPRA.

#### 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.*

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There is no other known source for the information that EPA seeks under this ICR. Moreover, this ICR supplements, and does not duplicate, the information that EPA collects as part of its reporting and record keeping provisions under the Agency's general assistance regulations at UGG 2 CFR Part 200 which became effective December 26, 2014. Exhibit 1 identifies the tasks and burdens of recipients that are covered under other OMB-approved ICRs. This ICR addresses the burden imposed on recipients and EPA associated with the reporting requirements that are unique to cooperative agreements awarded by EPA under authority of CERCLA 104k and CERCLA 128(a).

**Exhibit 1: Grant Burdens Covered Under Other Agency ICRs**

Task/Burden	Authority	Agency Approved ICR
Preliminary Grant Proposal	2 CFR Part 200	OMB 2030-0020
Final Grant Proposal	2 CFR Part 200	OMB 2030-0020
Budget Sheets	2 CFR Part 200	OMB 2030-0020
Quarterly Progress Reports	2 CFR Part 200	OMB 2030-0020
Notification of Significant Developments	2 CFR Part 200	OMB 2030-0020
Procurement Reports	2 CFR Part 200	OMB 2030-0020
Financial Reports	2 CFR Part 200	OMB 2030-0020
Project Records	2 CFR Part 200	OMB 2030-0020

## **5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES**

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

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This information collection request is expected to affect small governmental jurisdictions, which are defined as governments of cities, counties, towns, townships, villages, school districts, or special districts with populations of less than 50,000. This definition may also include Indian Tribes, in keeping with the President's Federal Indian Policy. EPA has considered whether to establish different reporting requirements for small entities and has determined that: (1) different reporting requirements among recipients will result in inconsistent data that may lessen the Agency's ability to oversee and report on program activities and accomplishments; (2) the burden imposed by this information collection is relatively small and small entities should not be unduly burdened by the reporting requirement; and (3) the Brownfields program is voluntary and respondents who elect to participate in this program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

## **6. CONSEQUENCES 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.*

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The information collection schedule is consistent with the Agency's reporting schedule for general assistance agreements. Less frequent collection may not enable EPA to oversee and manage Brownfields cooperative agreements effectively and would lessen OBLR's ability to report up-to-date and accurate information on program activities and accomplishments. In consideration of the burden imposed on recipients, EPA has adopted less frequent reporting for the Property Profile Form (PPF) in which recipients are required to update and submit the form as notable activities or changes occur at a particular property. EPA anticipates that recipients of CERCLA 104(k) Assessment, Cleanup, Revolving Loan Fund (RLF), and Multipurpose cooperative agreements will submit an updated PPF to EPA at least twice but not more than four times per property over the life of the cooperative agreement. For CERCLA 128(a) state and Tribal Nation response program cooperative agreements, EPA anticipates that recipients will submit a PPF to EPA twice a year in line with the bi-annual reporting guidelines. 128(a) recipients will also submit the Program Activity Levels (PALs) Form once a year in line with their end-of-year reporting. EPA anticipates technical assistance grant recipients and contractors will submit the Grantee Reported K7 Technical Assistance (K7 TA) Form or Contractor Technical Assistance (CTA) Form quarterly, in line with their terms and conditions. Less than 10 contractors use the CTA Form so ICR approval is not required for this form, but it is included as part of the overall package of ACRES forms. For the new progress reports, EPA anticipates that Assessment, Cleanup, RLF, Multipurpose, and Job Training (JT) recipients will submit their respective Quarterly Report (QR) Form no more than four times annually, as required by their cooperative agreements. Instead of a QR, recipients of an RLF grant in post-closeout status are anticipated to submit an Annual Post-Closeout Report (APCR) Form, as required by their closeout agreements. Note that burden will be reduced for JT and RLF recipients who submit their respective progress reports in ACRES since they will no longer need to complete the previously approved JT Form and Brownfields RLF Form (however these two forms will remain available in ACRES for those recipients who do not choose to use ACRES for submittal of their progress reports).

## 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).*

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The information collection is consistent with the guidelines set forth in 5 CFR 1320.5(d)(2) of the Paperwork Reduction Act.

## 8. PUBLIC COMMENT AND CONSULTATIONS

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### 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.*

60-Day FR Notice: Published October 25, 2024. No comments were received. This was the first notification of the Agency's request for the revision of this ICR.

### 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.*

#### Background on consultations for previously approved ICRs for ACRES:

EPA has more than 25 years of experience managing Brownfields cooperative agreement programs that awarded more than 6,600 cooperative agreements to state, local, and Tribal Nation governments to address brownfields properties. For these Brownfields cooperative agreements, EPA staff have worked closely with the recipients to help them participate in the program and address their brownfields properties. As such, EPA has a detailed understanding of the activities that recipients undertake and the burden they incur for voluntarily participating in EPA's cooperative agreement programs. In addition, during the preparation of the initial ICR in 2003 and the reporting forms that are included, EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft forms included in this ICR. Recipient responses form the basis of EPA's initial calculations of the burden hours and costs.

Since the initial ICR, there have been several revisions to help improve the original PPF and JT Form to ensure they are as efficient as possible for cooperative agreement recipients. For the first renewal in 2006, the ICR was expanded to include reporting from CERCLA 128(a) recipients. To do so, EPA consulted with several State and Tribal Nation representatives when working on modifications to the PPF. For the second renewal in 2009, EPA added additional fields to the PPF. EPA contacted eight Brownfields recipients to ask them specific questions about the burden associated with completing the draft new fields for the PPF included in the renewal. In 2012, EPA made no changes to the PPF and JT Form. In

2015, EPA made changes to streamline some questions on the PPF, including making it easier to identify the correct geographical location of a property, and avoid duplicate property records in ACRES. Additionally, EPA created a new form for the Area-Wide Planning recipients to make it easier for them to report their accomplishments to EPA.

For the 2019 renewal of the ICR, EPA shortened the PPF, eliminating questions that were not resulting in regular responses from recipients, while also clarifying past questions that caused confusion. EPA also added the PALs Form, a new form for CERCLA 128(a) recipients to update annually. This allowed a much more streamlined approach for 128(a) recipients than the previous technique for gathering the needed information. No changes were made to the JT Form and Area-Wide Planning Reporting Form. For the 2021 renewal, no changes were made.

For the 2023 renewal, questions were added to the PPF to capture site-specific activities addressing resiliency strategies for extreme weather events and natural disasters. Questions specific to RLF recipients were clarified to better track program income and post-closeout status. Nine different cooperative agreement recipients were contacted to discuss the clarity, format and increased burden estimate from the additional questions. The PALs Form was updated to clarify questions, as this was the first full ICR update since its initial implementation in 2019. Four current grantees were contacted regarding the PALs changes. The JT Form added a question to clarify the number of training cycles offered by grantees; four current grantees were consulted on this change. As a result of increased funding from the Bipartisan Infrastructure Law, two additional reporting forms were submitted in that ICR package to capture work done by technical assistance grantees and contractors. Technical assistance activities had not previously been captured in ACRES. The addition of these reporting forms helped the Brownfields Program demonstrate its impact through activities that are not site-specific. Five different grantees and contractors collaborated on the creation of these forms to ensure they accurately captured the outputs and outcomes of such projects.

#### Consultations for current revision of ICR for ACRES:

The following updates and consultations were made in the current revision:

- **SIX NEW FORMS:** Five new forms that are referred to as QR Forms were added to address unique grant-specific quarterly progress reporting for Cleanup, Assessment, Multipurpose, RLF, and JT grants. A sixth new form, the RLF APCR Form, was added for annual progress reporting for RLF grants in post-closeout status. In 2024, three different cooperative agreement recipients were contacted for each of these six new forms to discuss clarity, format, and the burden for completion (total of 18 recipients for the five QR Forms and APCR Form).
- **SIX EXISTING FORMS:** Changes were made to five of the six existing forms in ACRES that had previous ICR approval.
  - PPF, PALs, and JT Forms: The PPF was updated to include additional information related to RLFs, engineering and institutional controls, leveraged dollars/jobs, and resiliency strategies for extreme weather events and natural disasters. The PALs Form was updated with four new questions, as well as further clarity on definitions and instructions, in accordance with feedback and requests from State and Tribal recipients who completed the form in 2023. The JT Form was updated to match some changes made in the JT QR (note that the JT Form will only be used by those who don't use the JT QR). In 2024, three different cooperative agreement recipients were contacted for each of these three forms to discuss clarity,

format, and the burden for completion (total of nine recipients for the PPF, PALs Form, and JT Form).

- CTA and K7 TA Forms: The previous technical assistance forms were renamed the CTA Form (previously called the Technical Assistance to Brownfields) and K7 TA Form (previously called the Grantee Reported Technical Assistance to Brownfields or TAB Form) in order to better reflect who completes the forms (i.e., contractors versus K7 grant recipients). Both forms also had a few other minor revisions that were based on requests received from recipients during meetings held in 2024 to discuss their feedback on the forms.
- Brownfields RLF Form: No changes were made to the Brownfields RLF Form (note that questions from this form are also in RLF QR and RLF APCR, but this form will only be used by those who don't use the RLF QR or RLF APCR).

See 12d below for additional details related to interviews conducted for the current revision.

## **9. PAYMENTS OR GIFTS TO RESPONDENTS**

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

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No payments or gifts are given to respondents.

## **10. ASSURANCE OF CONFIDENTIALITY**

*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.*

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EPA will use information from this ICR as part of program-wide public reporting, except to the extent such information includes CBI or PII pursuant to 2 CFR § 200.338. Information claimed as CBI will be disclosed only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B.

All data systems used to store data collected via these reports will be stored in IT systems that meet or exceed EPA's current policies and guidelines regarding security and privacy. Additionally, personal identifiers will not be used to retrieve specific information in these systems.

## **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.*

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Questions about sensitive issues that are normally considered private (e.g., religious beliefs, sexual attitudes, and behavior) will not be included in the information collections covered by this ICR.

## **12. RESPONDENT BURDEN HOURS & 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. Generally, estimates should not include burden hours for customary and usual business practices.*
  - *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 ACRES database currently has 2,697 users who could be respondents. Most users will only be responding to a couple of the forms, depending on which type of cooperative agreement or contract they have received.

Respondents under this ICR are those entities who voluntarily elect to participate in the Brownfields cooperative agreement programs and receive funding from EPA under the authority of CERCLA 104(k) and CERCLA 128(a). Specifically, respondents to this information collection include: general purpose units of local government (NAICS Code: 92411); land clearance authorities or other quasi-governmental entities that operate under the supervision and control of, or as an agent of, a general purpose unit of local government (NAICS Code: 92411); government entities created by State legislature (NAICS Code: 92411); regional councils or groups of general purpose units of local government (NAICS Code: 92411); redevelopment agencies that are chartered or otherwise sanctioned by the State (NAICS Code: 92411); States (NAICS Code: 92411); Indian Tribes other than in Alaska (NAICS Code: 92115); Alaska Native Regional Corporations, Alaska Native Village Corporations, and Metlakatla Indian Communities (NAICS Code: 92115); and non-profit organizations (NAICS Code: 81331). For the less than 10 contractors using CTA Form, NAICS Codes that are within 541 (Professional, Scientific, and Technical Services) are applicable.

## **12b. Information Requested**

The information requested is all related to EPA's Brownfields program, but specific information requested varies depending on which cooperative agreement or contract each form addresses.

## **12c. Respondent Activities**

A "unit" burden is the burden incurred by a respondent for performing a specific activity that is not covered by another ICR (such as 2 CFR Part 200). The estimated burden is incurred by the following activities:

- PPF: Initial completion and periodic updating to report progress on specific properties undergoing assessment, cleanup, or redevelopment
- PALs Form: Completed annually
- JT Form: Initial completion and periodic updating to report progress on cooperative agreement deliverables; will not be used if the recipient submits the JT QR
- CTA Form: Initial completion and periodic updating to report progress on contract deliverables

- K7 TA Form: Initial completion and periodic updating to report progress on cooperative agreement deliverables
- Brownfields RLF Form: Completed quarterly for recipients with open RLF grants and annually for recipients with post-closeout RLF grants; will not be used if the recipient submits the RLF QR or RLF APCR
- Cleanup QR Form: Completed quarterly to report progress on cooperative agreement deliverables
- Assessment QR Form: Completed quarterly to report progress on cooperative agreement deliverables
- Multipurpose QR Form: Completed quarterly to report progress on cooperative agreement deliverables
- JT QR Form: Completed quarterly to report progress on cooperative agreement deliverables
- RLF QR Form: Completed quarterly to report progress on cooperative agreement deliverables for open RLF grants
- RLF APCR Form: Completed annually to report progress on closeout agreement deliverables for post-closeout RLF grants

#### 12d. Respondent Burden Hours and Labor Costs

The estimated burden for respondents is presented in Exhibit 2.

**Exhibit 2 - Annual Respondent Burden and Cost**

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year**	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
Initial Completion of PPF (Subtitle A)	0.91	\$145.03	\$131.98	2,233	2,032	\$294,711
Initial Completion of PPF (Subtitle C)	0.91	\$145.03	\$131.98	1,760	1602	\$232,285
Update of PPF (Subtitle A)	0.60	\$145.03	\$87.02	1,563	938	\$136,012
Update of PPF (Subtitle C)	0.60	\$145.03	\$87.02	880	528	\$76,578
JT Form	2.41	\$143.01	\$344.66	35***	84	\$12,063

Activity	Unit Burden (Hours )	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year**	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
PALs Form	4.66	\$121.36	\$565.53	210	979	\$118,761
Initial Completion of CTA Form	1.33	\$138.91	\$184.75	40	53	\$7,390
Update of CTA Form	0.66	\$138.91	\$91.68	120	79	\$11,002
Initial Completion of K7 TA Form	3.66	\$136.74	\$500.45	15	55	\$7,507
Update of K7 TA Form	2.60	\$136.74	\$355.51	45	117	\$15,998
Brownfields RLF Form	0.75	\$146.45	\$109.84	30***	23	\$3,295
Initial Completion of Cleanup QR Form	1.50	\$136.99	\$205.49	100	150	\$20,549
Update of Cleanup QR Form	1.25	\$136.99	\$171.24	300	375	\$51,372
Initial Completion of Assessment QR Form	2.33	\$133.54	\$311.16	150	350	\$46,674
Update of Assessment QR Form	1.08	\$133.54	\$144.23	450	486	\$64,904
Initial Completion of Multipurpose QR Form	2.33	\$142.23	\$331.39	30	70	\$9,942
Update of Multipurpose QR Form	2.06	\$142.23	\$292.99	90	185	\$26,369
Initial Completion of JT QR Form	2.83	\$141.42	\$400.23	50	142	\$20,012
Update of JT QR Form	2.00	\$141.42	\$282.85	150	300	\$42,428
Initial Completion of RLF QR Form	5.66	\$146.68	\$830.18	150	849	\$124,527
Update of RLF QR Form	2.58	\$146.68	\$378.42	450	1,161	\$170,289
RLF APCR Form	6.60	\$131.62	\$868.66	150	990	\$130,299
TOTAL				9,001	11,546	\$1,622,965

\* Unit Labor Cost in Dollars reflects a “loaded” rate (base hourly wage x 2.1) for benefits and overhead.

\*\* Figures may not sum due to rounding.

\*\*\* Assumes most JT CARs will use the JT QR and most RLF CARs will use the RLF QR or RLF APCR, and therefore will not need to use the JT Form and Brownfields RLF Form, respectively.

Estimating respondent costs - To estimate the unit burden (hours) and hourly rate for this information collection activity, EPA relied on its extensive experience working closely with Brownfields recipients, as well as in-depth interviews with three current cooperative agreement recipients submitting the PPF, three job training recipients submitting the JT Form, three 128(a) recipients submitting the PALs Form, five CERCLA 104(k) technical assistance recipients submitting the CTA Form and/or K7 TA Form, four RLF recipients completing the Brownfields RLF Form, three recipients submitting the Cleanup QR Form, three recipients submitting the Assessment QR Form, three recipients submitting the Multipurpose QR Form, three recipients submitting JT QR Form, three recipients submitting the RLF QR Form, and three recipients submitting the RLF APCR Form. Except where noted below, all interviews took place in 2024. Those interviewed were shown draft copies of all forms and accompanying instructions and guidance that would be used for reporting and asked to estimate: (1) the number of hours that would be required to perform each task; and (2) the labor mix required to perform each task (e.g., percentage of management, technical, clerical). The data gathered from these interviews were then analyzed to estimate the unit burden and labor mix. For all form types, the unit labor cost (dollars) for this burden estimate is a weighted hourly rate based upon the estimated labor mix and wage rates gathered from the U.S. Bureau of Labor Statistics (BLS).

On the PPF, consultations indicate that the average recipient will incur 55 percent of its burden with executive/managerial staff labor, 10 percent of its burden with technical staff labor, 10 percent of its burden with administrative staff, and 25 percent with program participants and partners. This labor mix was applied to BLS National Compensation Survey (NCS) data issued in June 2024 for a weighted hourly rate of \$69.06 and an estimated fully loaded rate of \$145.03.

On the JT Form, consultations indicate that the average recipient will incur 5 percent of its burden with executive/managerial staff labor, 54 percent with professional specialty staff labor, 16 percent with finance labor, or clerical labor, and 25 percent with program participants and partners. This labor mix was applied to BLS NCS data issued in June 2024 for a weighted hourly rate of \$68.10 and an estimated fully loaded rate of \$143.01.

On the PALs Form, consultations indicate that the average recipient will incur 18 percent of its burden with executive/managerial staff labor, 50 percent of its burden with professional specialty staff labor, and 32 percent of its burden with administrative staff. This labor mix was applied to BLS NCS data issued in June 2024 for a weighted hourly rate of \$57.79 and an estimated fully loaded rate of \$121.36.

On the CTA Form, consultations indicate that the average recipient will incur 42 percent of its burden with the executive/managerial staff labor, 50 percent with technical labor, and 8 percent with administrative support or clerical labor. The labor mix was applied to the BLS NCS data issued in June 2024 for a weighted hourly rate of \$66.15 and an estimated loaded rate of \$138.91. Note that the unit burden from 2022 interviews was used for CTA Form because the changes were so minor and a 2024 consultation with a CTA recipient confirmed this unit burden was still reasonable and representative of the burden.

On the K7 TA Form, consultations indicate the average recipient will incur 64 percent of its burden with executive/managerial staff labor, 24 percent with technical labor, and 13 percent with administrative or

clerical labor. The labor mix was applied to the BLA NCS data issued in June 2024 for a weighted hourly rate of \$65.11 and an estimated fully loaded rate of \$136.74. Note that the unit burden from 2022 interviews was used for K7 TA Form because the changes were so minor and a 2024 consultation with a K7 TA recipient confirmed this unit burden was still reasonable and representative of the burden.

On the Brownfields RLF Form, consultations indicate that the average recipient will incur 33 percent of its burden with executive/managerial staff labor, 33 percent with professional specialty staff labor, and 33 percent with finance labor. This labor mix was applied to BLS NCS data issued in June 2024 for a weighted hourly rate of \$69.74 and an estimated fully loaded rate of \$146.45. Note that the unit burden from 2022 interviews was used for Brownfields RLF Form because these same questions were covered in 2024 interviews for RLF QR and RLF APCR (as previously stated, the recipient will not complete Brownfields RLF Form if using the QR or APCR).

On the Brownfields Cleanup Quarterly Report Form, consultations indicate the average recipient will incur 30 percent of its burden with executive/managerial staff labor, 36 percent of its burden with professional specialty staff labor, 4 percent with technical labor, 15 percent of its burden with administrative staff, and 15 percent of its burden with program participants and partners. The labor mix was applied to the BLS NCS data issued in June 2024 for a weighted hourly rate of \$65.23 and an estimated fully loaded rate of \$136.99.

On the Brownfields Assessment Quarterly Report Form, consultations indicate the average recipient will incur 34 percent of its burden with executive/managerial staff labor, 26 percent of its burden with professional specialty staff labor, 6 percent of its burden with technical labor, 20 percent of its burden with administrative staff, and 14 percent of its burden with program participants and partners. The labor mix was applied to the BLS NCS data issued in June 2024 for a weighted hourly rate of \$63.59 and estimated fully loaded rate of \$133.54.

On the Brownfields Multipurpose Quarterly Report Form, consultations indicate the average recipient will incur 36 percent of its burden with executive/managerial staff labor, 20 percent of its burden with professional specialty staff labor, 25 percent of its burden with technical labor, 10 percent of its burden with administrative staff, and 9 percent of its burden with program partners and participants. The labor mix was applied to the BLS NCS data issued in June 2024 for a weighted hourly rate of \$67.73 and estimated fully loaded rate of \$142.23.

On the Brownfields Job Training Quarterly Report Form, consultations indicate the average recipient will incur 11 percent of its burden with executive/managerial staff labor, 72 percent of its burden with professional specialty staff labor, 5 percent of its burden with administrative staff and 11 percent of its burden with program participants and partners. The labor mix was applied to the BLS NCS data issued in June 2024 for a weighted hourly rate of \$67.34 and an estimated fully loaded rate of \$141.42.

On the Brownfields Revolving Loan Fund Quarterly Report Form, consultations indicate the average recipient will incur 66 percent of its burden with executive/managerial staff labor, 19 percent of its burden with professional specialty staff labor, 7 percent of its burden with technical labor, 5 percent of its burden with administrative staff, and 3 percent program partners and participants. The labor mix was applied to the BLS NCS data issued in June 2024 for a weighted hourly rate of \$69.85 and estimated fully loaded rate of \$146.68.

On the Brownfields Revolving Loan Fund Annual Post-Closeout Report Form, consultations indicate the average recipient will incur 34 percent of its burden with executive/managerial staff labor, 44 percent of its burden with professional specialty staff labor, 21 percent of its burden with administrative staff, and 2 percent program partners and participants. The labor mix was applied to the BLS NCS data issued in June 2024 for a weighted hourly rate of \$62.67 and estimated fully loaded rate of \$131.62.

CERCLA 104(k) assessment, cleanup, RLF, and multipurpose recipients, and CERCLA 128(a) recipients that conduct property specific activities will be required to report progress with the PPF. EPA anticipates that the initial completion of this form will require approximately 0.91 hours for a unit burden of \$131.98. Recipients will be required to update this form as milestones are achieved, though not more frequently than quarterly. It is estimated that each update will require approximately 0.6 hours for a unit burden of \$131.98. It is estimated that each form will be updated an average of twice per year.

If not using the RLF QR or RLF APCR, some RLF recipients report on the Brownfields RLF Form either quarterly or annually (assumed quarterly for 5 open grants and annually for 10 post-closeout grants). It is estimated this update will require 0.75 hours for a unit burden of \$146.45.

If not using the JT QR, some JT recipients will be required to report progress on a quarterly basis using EPA's JT Form. Recipients will be required to report progress on a quarterly basis, with each update requiring approximately 4 hours for a unit burden of \$571.73. Most of this burden stems from the activities associated with the collection of salary or wage information from JT program participants who find employment.

CERCLA 128(a) recipients will be required to report progress on an annual basis using EPA's PALs Form. Recipients will be required to report progress on an annual basis, with each update requiring approximately 4.66 hours for a unit burden of \$565.53. Most of this burden stems from the activities associated with the collection of the overall activities conducted by the response program to establish or enhance their program, and the number of sites that are currently enrolled in their response program, or otherwise supported by their response program.

CERCLA 104(k) technical assistance recipients will be required to report progress with the appropriate CTA or K7 TA Form. EPA anticipates that the initial completion of the CTA Form will require approximately 1.33 hours for a unit burden of \$184.75. It is estimated that each update will require approximately 0.66 hours for a unit burden of \$97.86. EPA anticipates that the initial completion of the K7 TA Form will require approximately 3.66 hours for a unit burden of \$500.45. It is estimated that each update will require approximately 2.6 hours for a unit burden of \$355.51. Recipients will be required to update this form as milestones are achieved, though not more frequently than quarterly.

Assessment, Cleanup, and Multipurpose cooperative agreements awarded under CERCLA 104(k) cover a period of performance of up to four years, and RLF and JT cooperative agreements cover a period of performance up to five years. Based on the Agency's experience under its program, EPA estimates that at the end of two years, approximately 75 percent of cooperative agreements will receive a no-cost extension, approximately 20 percent of recipients will receive supplemental awards, and 5 percent of cooperative agreements will close out. Recipients that receive either a no-cost extension or a supplemental award will be required to continue to report on their activities using the forms authorized under this ICR. In addition, cooperative agreements that have closed out may undergo a five-year review conducted five years after close out. The five-year review gathers data on the status of properties that

benefited from EPA funding while the cooperative agreement was active using the forms authorized under this ICR. This burden is included in the estimated number of responses per year and, therefore, the overall burden calculation estimated for this ICR.

All awards made under CERCLA 128(a) have at least a one-year period of performance or can be a multi-year award depending on the State's financial need for continued funding. Based on the Agency's understanding of State response programs, EPA estimates that one-half of the State recipients have sophisticated response programs and can complete property specific activities within one year, therefore submitting a total of two responses. EPA further estimates that the remaining States, Tribal Nations, and US territories that receive funding take two years to complete property specific activities therefore submitting a total of four responses.

All technical assistance cooperative agreements awarded under CERCLA 104(k) cover a period of performance of up to five years. Rarely are these cooperative agreements extended, and all required reporting will be completed within the initial award period. Technical assistance contracts awarded under CERCLA 104(k) are also rarely extended. The burden estimated by the number of responses per year is based on forms anticipated to be submitted over the original timeframe of the associated cooperative agreement or contract.

### **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.*

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Start-up costs to meet the Brownfields reporting requirements are minimal and are a part of the customary and usual expenses incurred by recipients. There are no capital costs related to Brownfields reporting requirements. Therefore, total start-up and capital costs are zero. There are no operation and maintenance costs required.

### **14. AGENCY COSTS**

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*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.*

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#### **14a. Agency Activities**

Agency burden and costs - EPA incurs a burden in the process of requesting, reviewing and processing the information covered by this ICR. This burden includes:

- Reviewing and processing initial PPFs
- Reviewing and processing updates of PPFs
- Reviewing and processing JT Forms
- Reviewing and processing PALs Forms
- Reviewing and processing initial CTA Forms
- Reviewing and processing updates to CTA Forms
- Reviewing and processing initial K7 TA Forms
- Reviewing and processing updates to K7 TA Forms
- Reviewing and processing Brownfields RLF Form
- Reviewing and processing QR Forms for Cleanup, Assessment, Multipurpose, RLF, and Job Training
- Reviewing and processing the APCR Form

#### **14b. Agency Labor Cost**

The estimated average annual burden per year associated with EPA activities is 2,687 hours equating to \$199,187 in labor costs. Details are presented in Exhibit 3.

**Exhibit 3 - Annual Agency Burden and Cost**

<b>Activity</b>	<b>Unit Burden (Hours)</b>	<b>Unit Labor Cost (Dollars)*</b>	<b>Total Unit Cost (Dollars)*</b>	<b>Average Number of Responses/Year*</b>	<b>Total Burden Hours/Year**</b>	<b>Total Cost/Year (Dollars)**</b>
Review and Process Initial Completion of PPF (Subtitle A)	0.25	\$74.14	\$18.53	2,233	558.25	\$41,388
Review and Process Initial Completion PPF (Subtitle C)	0.25	\$74.14	\$18.53	1,760	440	\$32,621
Review and Process Update to PPF (Subtitle A)	0.25	\$74.14	\$18.53	1,563	390.75	\$28,970
Review and Process Update to PPF (Subtitle C)	0.25	\$74.14	\$18.53	880	220	\$16,311



<b>Activity</b>	<b>Unit Burden (Hours)</b>	<b>Unit Labor Cost (Dollars)*</b>	<b>Total Unit Cost (Dollars)*</b>	<b>Average Number of Responses/Year* *</b>	<b>Total Burden Hours/Year**</b>	<b>Total Cost/Year (Dollars)**</b>
Review and Process JT Form	0.66	\$74.14	\$48.93	35***	23.1	\$1,713
Review and Process PALS Form	0.25	\$74.14	\$18.53	210	52.5	\$3,892
Review and Process Initial CTA Form	0.5	\$74.14	\$37.07	40	20	\$1,483
Review and Process Update of CTA Form	0.25	\$74.14	\$18.53	120	30	\$2,224
Review and Process Initial K7 TA Form	0.5	\$74.14	\$37.07	15	7.5	\$556
Review and Process Update of K7 TA Form	0.33	\$74.14	\$24.47	45	14.85	\$1,101
Review and process Brownfields RLF Form	0.25	\$74.14	\$18.53	30***	7.5	\$556
Review and Process Initial Cleanup QR Form	0.52	\$74.14	\$38.55	100	52	\$3,855
Review and Process Update of Cleanup QR Form	0.5	\$74.14	\$37.07	300	150	\$11,121
Review and Process Initial Assessment QR Form	0.43	\$74.14	\$31.88	150	64.5	\$4,782
Review and Process Update of Assessment QR Form	0.43	\$74.14	\$31.88	450	193.5	\$14,346
Review and Process Initial Multipurpose QR Form	0.76	\$74.14	\$56.35	30	22.8	\$1,690

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year*	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
Review and Process Update of Multipurpose QR Form	0.66	\$74.14	\$48.93	90	59.4	\$4,404
Review and Process Initial JT QR Form	1.03	\$74.14	\$76.36	50	51.5	\$3,818
Review and Process Update of JT QR Form	0.48	\$74.14	\$35.59	150	72	\$5,338
Review and Process Initial RLF QR Form	0.46	\$74.14	\$34.10	150	69	\$5,116
Review and Process Update of RLF QR Form	0.3	\$74.14	\$22.24	450	135	\$10,009
RLF APCR Form	0.35	\$74.14	\$25.95	150	52.5	\$3,892
<b>TOTAL</b>				<b>9,001</b>	<b>2,687</b>	<b>\$ 199,187</b>

\* Unit Labor Cost in Dollars reflects a "loaded" rate (base wage rate x 1.6) for benefits and overhead.

\*\* Figures may not sum due to rounding.

\*\*\* Assumes most JT CARs will use the JT QR and most RLF CARs will use the RLF QR or RLF APCR, and therefore will not need to use the JT Form and Brownfields RLF Form, respectively

The burden imposed upon EPA was estimated by: (1) interviewing EPA Regional and Headquarters staff to gather individual estimates of the time required to perform each activity and the GS level of the staff performing those tasks; (2) averaging the time data to estimate the number of hours required for each burden element; (3) averaging the data on the percentage of time performed by particular staff GS levels; (4) developing a weighted hourly wage rate based upon percentage of staff labor at different GS levels devoted to each task; (5) "loading" the weighted hourly wage rate to reflect benefits and overhead using a multiplier of 1.6; and (6) determining the product of the weighted hourly rate and the number of hours required per activity.

GS Level	Percent	Hourly Wage Rate*
GS 4, Step 1	8%	\$16.95

GS Level	Percent	Hourly Wage Rate*
GS 11, Step 1	12%	\$34.76
GS 13, Step 1	67%	\$49.55
GS 14, Step 1	13%	\$58.55
<b>Weighted Rate</b>		<b>\$46.34</b>
<b>Loaded Weighted Rate</b>		<b>\$74.14</b>

\*Rates for 2024 General Schedule including locality pay for "Rest of U.S." ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/RUS_h.aspx))

#### 14c. Agency Non-Labor Costs

No agency non-labor costs are associated with this ICR.

#### 15) REASONS FOR CHANGE IN BURDEN

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

The burden hours estimate increased from 3,808 hours in the 2022 ICR request to 11,546, an increase of 7,738 hours. However, 5,057 hours of this increase can be attributed to the addition of six new forms for quarterly and annual progress reporting which was previously reported under general grants ICR 2030-0020. Recipients have always been required to submit quarterly and annual progress reports per their cooperative agreement terms and conditions, but this is the first time an electronic form option is available in ACRES for five cooperative agreement types and so those hours have now moved to this ICR. Including these forms in ACRES enables several fields to be prefilled with existing ACRES data, saving the recipient significant time compared to completing progress reporting outside of ACRES. This reporting enhancement will enable a larger number of respondents to use forms in ACRES under this ICR (rather than separate reporting under ICR 2030-0020), resulting in an increase in this ICR's total burden hours. Yet the electronic forms are anticipated to result in an overall decrease in burden hours per individual respondent over time due to eliminating duplication of effort across multiple forms.

The remaining 2,681 hours of the total 7,738 hour increase is associated with ACRES forms previously submitted as part of this ICR. This increase is primarily due to increased burden reported by recipients during consultations on the revised PPF Form and PALs Form. For the PPF Form, the new burden may be artificially inflated due to more RLF cooperative agreement recipients being interviewed for this ICR compared to previous ICRs. That is, the most extensive changes in the PPF Form were in the RLF section, and yet less than 5% of properties require that section be completed, which implies our interviews with primarily RLF recipients may have skewed the burden too high for the great majority of the over 6,000 PPF Form responses. For the PALs Form, additional questions and instructions were added, but much of the reformatting and clarifying was done in response to respondent feedback which shows EPA's willingness to consider and implement changes. We expect in future years as recipients grow accustomed to the changes in the PALs Form that the burden will decrease. Overall, respondents have

indicated there have been tremendous improvements in the ACRES database to streamline reporting requirements over the past several years. The new quarterly and annual reporting forms continue such efforts and will help ensure recipients comply with their cooperative agreement terms and conditions.

#### **16) PUBLICATION OF DATA**

*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.*

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Results from this ICR are not published formally. They are used to calculate agency-level accomplishments and site-specific impacts on publicly available EPA websites.

#### **17) DISPLAY OF EXPIRATION DATE**

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

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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."*

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