

Information Collection Request Supporting Statement for the National Pollutant Discharge Elimination System Program (Renewal)

Title: National Pollutant Discharge Elimination System Program Information Collection Request

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Abstract: This Information Collection Request (ICR) renews the National Pollutant Discharge Elimination System (NPDES) Program ICR. It calculates the information collection burden and costs associated with the NPDES program, identifies the types of activities regulated under the NPDES program, describes the roles and responsibilities of state governments and the Agency, and presents the program areas that address the various types of regulated activities. This ICR renewal covers information collection burden and costs associated with activities previously reported in 22 NPDES program or NPDES-related ICRs. The Clean Water Act (CWA) provides that NPDES permits are required for the discharge of pollutants to waters of the United States. The CWA requires that EPA develop and implement the NPDES permit program. CWA section 402(b) allows states to acquire authority to administer the NPDES program, enabling them to issue NPDES permits for discharges within the state. At present, 47 states and the U.S. Virgin Islands are authorized to administer the NPDES permit program. In states that do not have authority for these programs, the Agency administers the program and issues NPDES permits. Because some permit applications are processed by states and some by EPA, this ICR calculates government burden and cost for both authorized states and EPA.

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Supporting Statement

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.

This consolidated Information Collection Request (ICR) renews the National Pollutant Discharge Elimination System (NPDES) Program ICR. It describes the information to be collected, gives the reason the information is needed, and estimates the time and cost for facilities subject to the NPDES program and authorized NPDES states (defined to include Indian tribes and U.S. territories) to answer the information request. This ICR being renewed consolidates the burden and costs associated with activities previously reported in 22 of the NPDES program or NPDES-related ICRs.

The Clean Water Act (CWA) prohibits the discharge of pollutants from a point source to waters of the United States unless authorized by an NPDES permit. Section 402(a) of the CWA authorizes EPA to issue permits for the discharge of pollutants provided the discharge meets either:

- All applicable requirements of CWA sections 301, 302, 306, 307, 308, and 403; or
- Any conditions the Administrator determines are necessary to carry out the provisions and objectives of the CWA.

Sections 204(b)(1)(C), 208(b)(2) (C)(iii), 301(b)(1)(A)(ii), 301(b)(2) (A)(ii), 301(h)(5) and 301(i)(2), 304 (e) and (g), 307, 308, 309, 402(b), 405, and 501(a) of the CWA establishes responsibilities of federal, state, and local government, industry and the public to implement National Pretreatment Standards to control pollutants which pass through or interfere with treatment processes in publicly owned treatment works (POTWs) or which may contaminate sewage sludge.

Section 316(a) of the CWA authorizes an NPDES permitting authority to impose alternative effluent limitations for the control of the thermal component of a discharge in lieu of the effluent limits that would otherwise be required under sections 301 or 306 of the CWA. Section 316(b) of the CWA requires EPA to issue regulations on the location, design and operation of cooling water intake structures, to minimize adverse environmental impacts.

Section 405 of the CWA prohibits the discharge of pollutants caused by the disposal of sewage sludge, except in accordance with an NPDES permit (or an authorized state permit issued to control such disposal of sewage sludge). It also establishes a comprehensive sewage sludge permitting program and requires EPA to develop technical criteria for controlling sewage sludge disposal and use. CWA section 405 allows states with sludge management authority to issue and modify permits that regulate the use and disposal of sewage sludge. EPA implements CWA section 405 through its NPDES biosolids program.

Section 401 of the CWA requires states to certify that EPA-issued NPDES permits establish “effluent limitations...and monitoring requirements necessary to assure that any applicant...will comply with any applicable effluent limitations and other limitations [pursuant to the CWA] and with any other appropriate requirement of state law...” (States, tribes, and U.S. territories may waive their right to certify permits). CWA section 510 provides that states, tribes, and territories may adopt requirements equal to or more stringent than standards established pursuant to CWA provisions.

Section 308 of the CWA grants EPA the authority to require the owner or operator of any point source to (i) establish and maintain records, (ii) install, use, and maintain monitoring equipment or methods (including where appropriate, biological monitoring methods), (iii) sample effluents (in accordance with such methods, at locations, at intervals, and in a manner as the Administrator shall prescribe, and (iv) provide other information as he may reasonably require to determine compliance with permits, effluent standards, and other CWA requirements.

Section 402(b) of the CWA allows states to submit a request to EPA to administer the NPDES program, enabling them to issue NPDES permits. At present, 47 states and the U.S. Virgin Islands are authorized to administer at least one component of the NPDES permit program. Authorized states are permitting authorities and are responsible for issuing, administering, and enforcing permits for most point source discharges. In states without authorized NPDES programs, EPA is the permitting authority and undertakes all permitting activities. In states that do not have authority for one or more components of the program, the Agency administers the program component and issues NPDES permits for discharges associated with the component.¹ Table 1-1 summarizes the number of states authorized for each major program component.

Table 1-1. States with Program Authorization as of November 2024

Type	Number
NPDES Base Permit Program	48
General Permits Program	48
Pretreatment Program	37
Pesticide Permitting Program	48
Biosolids Program	9
Federal Facilities	44

^a Includes the U.S. Virgin Islands.

The NPDES program procedures and requirements are codified in Title 40 of the *Code of Federal Regulations* (CFR) Parts 122, 123, 124, 125, 127, 129, 132 and in Parts 501 and 503 for biosolids, and Part 403 for pretreatment. The information collection provisions associated with the NPDES program are summarized in attached consolidated spreadsheets and include, but are limited to, the following:

- Activities directly related to individual permit applications or notices of intent (NOIs) for coverage under general permits;

¹ See Appendix A for a copy of the authorizing regulations.

- Monitoring data;
- Reports, including certifications;
- Recordkeeping;
- Public notice requirements;
- Activities associated with plan development or special studies;
- Activities associated with implementing the pretreatment program;
- Activities associated with implementing requirements for biosolids;
- Activities resulting from compliance assessments or enforcement actions;
- Activities associated with NPDES Program administration, including coordination between EPA and authorized states, building technical capacity and assistance with authorized NPDES programs; and
- Activities resulting from NPDES program authorization, including modifications, transfer, or withdrawal of authorized NPDES programs.

The NPDES program protects water quality by reducing pollution from point source discharges to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. Effective implementation of the NPDES program is critical to making progress towards meeting the CWA goals of making the Nation's waters fishable and swimmable and safe for the propagation of fish, shellfish and wildlife.

Some classes of NPDES discharges and program areas have specific components that require unique data. These are described in greater detail below.

Stormwater. Section 402(p) of the CWA requires that the NPDES program regulates specified stormwater discharges from municipal separate storm sewer systems (MS4s), construction activities, and industrial activities and other stormwater discharges designated by EPA or the permitting authority as needing an NPDES permit.

Combined Sewer Overflows (CSOs). Section 402(q) of the CWA requires that permits, orders, and decrees that include discharges from combined sewer systems shall conform to the 1994 Combined Sewer Overflow Control Policy (59 FR 18688, April 19, 1994).

On January 8, 2018, EPA finalized a rule [82 FR 4233] to establish public notification requirements for CSO discharges to the Great Lakes, as required by Section 425 of the Consolidated Appropriations Act of 2016 (Pub. L. 114-113). These requirements address: 1) signage; 2) notification to local public health department and other potentially affected public entities; 3) notification to the public; and 4) annual notice.

Great Lakes. Section 118(c)(2) of the CWA (33 U.S.C. 1251 et seq.) as amended by the Great Lakes Critical Programs Act of 1990 (Pub. L. 101-596, 104 Stat. 3000 et seq.) directed EPA to publish water quality guidance for the Great Lakes System (found at 40 CFR 132). The Guidance establishes minimum water quality criteria, implementation procedures, and antidegradation provisions for the Great Lakes System.

Pesticides. Point source discharges of biological pesticides and chemical pesticides that leave a residue in waters of the United States are required to comply with NPDES requirements.

Vessels. The NPDES Vessel General Permit (VGP) covers discharges incidental to the normal operation of a vessel operating as a means of transportation (“incidental discharges”). Specifically, the VGP is available for (1) incidental discharges from vessels longer than 79 feet and (2) ballast water discharges from vessels of any size. The VGP defines effluent limits for multiple discharge categories and specifies certain practices for various vessel categories. The types of vessels eligible for coverage under the VGP include, but are not limited to: cruise ships; ferries; barges; oil, petroleum, and chemical tankers; bulk carriers, container ships, and other cargo ships; refrigerant ships; research vessels; commercial fishing vessels; and emergency response vessels.

On December 4, 2018, the Vessel Incidental Discharge Act (VIDA) was signed, which requires EPA to develop national standards of performance for incidental discharges and subsequently for the U.S. Coast Guard (USGC) to develop corresponding implementation, compliance, and enforcement regulations for those standards. The VIDA specifies that conditions of the 2013 VGP remain in effect until both EPA and the USCG regulations are effective. Until the new EPA and USCG incidental discharge regulations are final, collection burden associated with the VGP remains in this ICR.

Effluent limitations guidelines and standards (ELGs). ELGs are national wastewater limitations that apply to specific categories of industrial dischargers. The regulations are promulgated by EPA under the authority of CWA sections 301, 304, 306, and 307 and implemented through NPDES permits. In some instances, EPA establishes requirements for permittees to provide certification to the permitting authority or develop pollution prevention plans to demonstrate compliance with certain aspects of the ELGs, often in lieu of monitoring for one or more pollutants. This ICR also integrates those certifications and planning documents.

Pretreatment. Sections 204(b)(1)(C), 208(b)(2) (C)(iii), 301(b)(1)(A)(ii), 301(b)(2) (A)(ii), 301(h)(5) and 301(i)(2), 304 (e) and (g), 307, 308, 309, 402(b), 405, and 501(a) of the Federal Water Pollution Control Act as amended by the CWA (Pub. L. 95-217) requires EPA to develop regulations to establish responsibilities among federal, state, and local government; industry; and the public to implement pretreatment standards to control pollutants that pass through or interfere with the treatment processes of POTWs or that might contaminate sewage sludge. EPA and authorized 37 states implement the National Pretreatment Program.

Consolidated animals sector. For the purposes of this analysis, the consolidated animals sector is comprised of two types of facilities, concentrated animal feeding operations (CAFOs) as defined by 40 CFR 122.23 and aquaculture projects as defined by 40 CFR 122.25.

Cooling water intake structures. Section 316(b) of the CWA provides that “any standard established pursuant to [CWA section 301] or [CWA section 306] and applicable to a point source shall require that the location, design, construction, and capacity of cooling water intake

structures reflect the best technology available for minimizing adverse environmental impact.” Rules establishing authority to regulate cooling water intake structures (CWISs) include:

- The 316(b) New Facilities Final Rule (66 FR 65256; December 18, 2001) and minor amendments (68 FR 36749; June 19, 2003) implement section 316(b) as it applies to new facilities that use CWISs.
- The 316(b) Phase III Facilities Final Rule (71 FR 35006; June 16, 2006) establishes requirements under Part 125, Subpart N, for new offshore oil and gas facilities that use CWISs.
- The 316(b) Existing Facilities Final Rule (79 FR 48300; August 15, 2014) implements section 316(b) as it applies to existing power generating and manufacturing facilities that use CWISs.

Electronic reporting. 40 CFR 127 establishes phased requirements for NPDES authorities and NPDES regulated entities to use electronic reporting in lieu of submitting paper-based reports. Appendix A of 40 CFR 127 identifies data elements that are to be submitted by NPDES regulated entities and NPDES permitting authorities. Phase 1 of the rules, which is currently in place, converted the following paper reports to electronic: (1) DMRs; (2) general permit reports (e.g., Notices of Intent to discharge in compliance with a general permit); and (3) other specified program reports. In accordance with the NPDES eRule, EPA approved alternative compliance deadline of December 21, 2028, for Phase 2 state NPDES general permits and program reports in 34 states. These approvals are posted on the following website: <https://www.epa.gov/compliance/approved-alternate-phase-2-compliance-deadlines>.

These extensions do not cover NPDES general permits and program reports that are already using EPA or state electronic reporting tools and the related data sharing requirements (see 40 CFR 127.23). These extensions also do not cover NPDES program data that are collected by individual NPDES permit applications or are generated by the EPA Regions and authorized states (e.g., data related to core NPDES permitting, compliance, and enforcement) and the related data sharing requirements (see 40 CFR 127.23). See Tables 1 and 2 in Appendix A, 40 CFR part 127, where the “NPDES data group” field is set to “1 - Core NPDES Permitting, Compliance, and Enforcement Data [40 CFR parts 122, 123, 403, 503].”

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.

This ICR addresses information and data used primarily by EPA, permitting authorities, and permittees. EPA anticipates that other government agencies, as well as public interest groups, private companies, and individuals, will also use the data. Most data must be submitted to permitting authorities, while other information must be maintained on-site by the permittee.

EPA will either submit separate ICRs for any regulatory or permitting changes requiring ICR approval that occur during this ICR's coverage period or revise this ICR, as appropriate.

Data use. EPA also uses data to respond to public and congressional inquiries, develop and guide its policies, support enforcement action, and manage its programs to ensure national consistency in permitting. EPA, states, and territories incur similar types of burdens associated with data collection and management. Data reported electronically is available to the public via the Enforcement and Compliance History Online (ECHO) system. Major data uses are described in more detail below:

- Individual Permit Applications – Facilities seeking or renewing an individual NPDES permit for their discharge are required to submit a permit application. EPA has developed eight permit application forms for different classes of discharges. Information in the permit application gives the permit writer an understanding of the circumstances of the discharge and the characteristics of the proposed effluent, which is necessary to develop appropriate permit limitations and conditions. The permit writer uses the application data to develop the draft permit and either the fact sheet or statement of basis that explains the rationale behind the draft permit provisions.
- NOIs/NOTs – General permits typically require facilities seeking permit coverage to submit a notice of intent (NOI) to be covered, the contents of which are described in the general permit. The information in a NOI is used by the NPDES authority to determine if the discharge meets the permit applicability criteria. NOIs for some general permit require additional information to determine applicability of specific permit conditions or to provide information to evaluate permit compliance. Notices of termination (NOTs) are used to terminate permit coverage.
- Discharge Monitoring Reports – EPA and authorized NPDES states analyze monitoring data from individual permits when determining monitoring requirements, if water quality-based effluent limitations are necessary, to support development of water quality-based effluent limitations, and to evaluate compliance with permit terms. Variability and the quality of the data reported in a DMR is evaluated when establishing monitoring frequency and other monitoring parameters. DMR data on pollutants are used by EPA and authorized states to evaluate the potential water quality impacts of point source dischargers and develop total maximum daily loads. Monitoring data are also used to identify and evaluate pollutant discharges to streams, lakes, oceans, and estuaries.
- Reports and certifications – Permits may require various types of reports and certifications, such as, site inspections, corrective actions, and dewatering activities, special studies, and/or certifications of no exposure to stormwater. These reports are used in a variety of ways, depending on the report, including evaluating compliance and applicability of permit conditions or coverage.
- Recordkeeping – Permits require recordkeeping for information submitted to the NPDES authority and other information needed to determine compliance.

- Public notice – Public notice requirements protect public health by ensuring timely notification to the public and to public health departments, public drinking water facilities and other potentially affected public entities, including Indian tribes. Timely notice may allow the public and affected public entities to take steps to reduce the public's potential exposure to pathogens associated with human sewage, which can cause a wide variety of health effects, including gastrointestinal, skin, ear, respiratory, eye, neurologic, and wound infections.
- Special studies or plans – Special studies are useful for collecting data that were not available to the permit writer for consideration during permit development. Special studies generally are used to supplement numeric effluent limitations or support future permit development activities. Examples of the types of special studies that could be required in an NPDES permit include treatability studies; toxicity identification evaluation/toxicity reduction evaluation (TIE/TRE), mixing or mixing zone studies, sediment monitoring, bioaccumulation studies.
- Pretreatment program – The pretreatment regulations at § 403.8(c), 403.8(d) and 403.8(e) and the NPDES regulations at § 122.44(j)(2), provide for the development and implementation of pretreatment programs by requiring the following:
 - Adequate legal authority
 - Maintenance of an industrial user inventory.
 - Development and implementation of local limits.
 - Control mechanisms issued to significant industrial users (SIUs).
 - Compliance monitoring activities.
 - Data management and recordkeeping.
 - Reporting to the approval authority (EPA or state).
 - Public participation.
- Biosolids – The requirements for biosolids include applications; annual reports; and permit monitoring requirements such as pollutants to be monitored, sampling locations, frequency, and sample collection and analytical methods.
- Compliance assessments or enforcement actions – Information collected through 308 requests provides data to help permittees and the public understand and meet environmental regulations. Key components include compliance assistance to help businesses meet permit conditions, compliance monitoring through inspections and data review, and in some cases enforcement actions.
- Technical capacity and oversight of authorized NPDES programs – EPA helps authorized States build technical capacity by conducting trainings, real time review of permits and conducting permit quality reviews.
- Program authorization, and modifications – 40 CFR 123 Subpart B identifies the requirements for submissions for program authorizations and modifications.

Variance requests – Variances allow effluent limitation requirements or time deadlines to be modified or waived. During the permit development process, the permitting authority collects information from facilities to evaluate variance requests. In each case, the information collected is used to update or supplement permit application data. Use of the data provided in each type of modification or variance request varies greatly because the information requirements of these items are so diverse.

- CSO Control – Reporting by municipalities under the CSO Control Policy gives NPDES permitting authorities the information they need to determine whether a municipality's CSO control program is adequate to achieve compliance with CWA requirements and applicable state WQS, to establish permit terms and conditions for CSOs, to track performance, to identify and assess violations, and to target inspection and enforcement actions. The information is also used by EPA Regions and states to develop and evaluate the success of their CSO Control Strategies. EPA will also use the data to measure its performance in achieving the goals of the CSO Control Policy.

Data Transfer from states – Data transfers from states to EPA are required for EPA to fulfill Agency oversight responsibilities. Information collected by EPA is used to fulfill its statutory function of ensuring state program performance and permit actions are consistent with the CWA. EPA uses information from states to evaluate requests for full or partial NPDES program authorization and program modifications. Memorandums of Agreement between EPA Regions and authorized states identify which permits the state is to submit to the Region. States typically provide the Regions with all permits for major facilities, all general permits, and a small percentage of permits for minor facilities. The information submitted by states includes application forms, fact sheets, draft permits, and other supporting documentation. EPA uses the information submitted by states to review state-issued permits for compliance with federal laws.

Other Federal Requirements. EPA-issued NPDES permits must comply with other applicable federal statutes, including:

- Endangered Species Act (ESA);
- National Environmental Policy Act (NEPA);
- National Historic Preservation Act (NHPA);
- Coastal Zone Management Act (CZMA);
- Wild and Scenic Rivers Act;
- Fish and Wildlife Coordination Act; and
- Essential Fish Habitat Provisions.

To meet its obligations under these statutes, EPA must ensure that discharges covered under EPA-issued NPDES permits are protective of historic properties, endangered and threatened species, and critical habitat. Applicants are required to assess the effects of their discharges on historic properties, federally listed endangered and threatened species, and designated critical

habitat. Authorized states are not required to meet the obligations of these federal statutes, and therefore no information collection burden is associated with state-issued permits.

Public Notification Requirements for CSOs in the Great Lakes Basin. 40 CFR 122.38 establishes public notification requirements for CSO discharges in the Great Lakes Basin. The regulations are intended to alert the public, local public health departments, and other potentially affected public entities to the public health and environmental hazards associated with CSO discharges.

Specific Provisions Affecting Applications and Program Updates. The use of this information is the same as for other NPDES activities directly related to individual NPDES permit applications, as the specific provisions affect the NPDES program requirements and application forms mentioned above.

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.

The regulations at 40 CFR 127 establish phased requirements for NPDES authorities and NPDES regulated entities to use electronic reporting in lieu of submitting paper-based reports. (See section A.1.8.4 for details.) Appendix A of 40 CFR 127 identifies data elements that are to be submitted by NPDES regulated entities and NPDES permitting authorities. Proper collection, management, and sharing of the data and information listed in Appendix A ensures that there is timely, complete, accurate, and nationally consistent set of data about the NPDES program.

As stated above, permittees are already required to submit DMRs, general permit reports (such as Notices of Intent), and other specified program reports electronically.

The Integrated Compliance Information System (ICIS-NPDES) is a national system for managing NPDES-related data. ICIS-NPDES is used to track permit limits, permit expiration dates, monitoring data, enforcement and compliance data, and other data. It provides EPA with a nationwide inventory of permit holders. EPA and most states store basic information for stormwater permittees in databases separate from ICIS-NPDES. EPA uses ICIS-NPDES information to develop reports on permit issuance, backlog, and compliance rates.

Currently, EPA maintains some general permit data in ICIS-NPDES. EPA will use ICIS-NPDES to ultimately store the relevant facility and individual permit information. EPA and the states will ensure accuracy and completeness of the information and are responsible for ensuring that applicable data are entered into ICIS-NPDES.

The public may access certain information via Enforcement and Compliance History Online (ECHO). Some of the information is available to the public through Web-based interfaces that pull data from ICIS-NPDES and other EPA data systems.

For compliance reports, EPA and states are moving toward greater automation. For example, system-generated noncompliance reports can be used in place of Quarterly Noncompliance Reports. This advancement in information technology allows states to efficiently provide a consistent and more accurate set of data while using fewer resources and time.

Electronic submission of all other reports and notices covered by 40 CFR 127 are part of Phase 2 implementation. EPA has established an alternative compliance deadline for implementation of Phase 2 requirements for state NPDES general permits and program reports in 34 states to December 21, 2028.

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.

All information collection is authorized by the CWA and its implementing regulations. EPA has examined all reporting and recordkeeping requirements in the CWA and 40 CFR Parts 122, 123, 124, 125, 403, 501, and 503. In prior versions of this ICR, EPA also consulted the following sources of information to determine if similar or duplicate information is available elsewhere:

- The EPA inventory of ICRs;
- The Government Information Locator Service;
- The Toxics Release Inventory;
- Resource Conservation and Recovery Act (RCRA); and
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

Examination of these databases and discussions with other federal Agencies did not identify any application requirements that were duplicative with existing requirements.

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.

Of the small businesses that discharge pollutants, many discharge indirectly to POTWs rather than directly to waters of the U.S. Indirect dischargers are not required to have NPDES permits and thus are subject only to the pollution control and reporting requirements associated with the Pretreatment Program. Although small businesses that are direct dischargers are not treated as a separate class under the NPDES program, efforts to minimize the burdens imposed on them by NPDES information collection activities are implicit in the existing monitoring/reporting framework. Monitoring and reporting requirements are based on many factors, including volume and environmental significance of a wastewater discharge. If a small permittee discharges a small volume of wastewater, their monitoring and reporting burdens tend to be less than larger discharges.

Generally, as the size of a facility increases, the amount of required information increases correspondingly. EPA has regularly looked for ways to reduce reporting burdens on businesses of all sizes; approaches used to minimize the burden to small entities include the following:

- EPA's Form 1 application and NOIs for coverage under general permits generally request minimal information. Facilities that are reapplying for permit authorization often use monitoring data and other information collected during permit issuance to satisfy information needs in the application.
- EPA and authorized NPDES states issue general permits that reduce information collection burdens associated with the application for coverage and administration of large numbers of dischargers. EPA and states have made extensive use of general permits, which tend to have less burdensome monitoring and reporting requirements than individual permits. The majority of stormwater and pesticide applicator permittees, which compose more than 90 percent of all NPDES permittees, are covered under general permits.
- EPA's NOIs for permit coverage for stormwater discharges from construction sites contain minimal information required to characterize the site and activity. Construction sites typically submit an NOI, once for each construction activity or twice if the construction activity continues beyond the expiration date of the general permit, and a Notice of Termination (NOT). Most site-related information is contained in the stormwater pollution prevention plans (SWPPP) which is submitted to EPA through NOI. The CGP NOI (EPA Form 3510-9) was developed specifically to reduce the burden for construction activities.
- EPA's pesticide general permit (PGP) authorizes certain discharges without the submittal of an NOI. Small entities under the PGP are not obligated to develop a pesticide discharge management plan or submit annual reports.
- Most discharges from small MS4s are regulated under general permits. The NOI requirements for small MS4s are substantially less than those for medium and large MS4s. The application requirements for the small subset of discharges from small MS4s requiring an individual permit are substantially reduced as well.
- An industrial facility with its industrial materials and activities protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff is eligible to submit a No Exposure Certification, which results in an exemption from NPDES permit requirements.
- A facility that qualifies as a small business under the following criteria is exempt from submitting quantitative data for the organic toxic pollutants on Form 2C: (i) Coal mines with a probable total annual production of less than 100,000 tons; or (ii) all other applicants with average gross annual sales of less than \$100,000 in second quarter 1980 dollars (40 CFR 122.21(g)(8)).

- EPA developed Form 2E to reduce the reporting burden for certain small businesses such as new or existing manufacturing, mining, and silviculture NPDES permit applicants that do not discharge process wastewater.
- The CSO Control Policy provides that at the discretion of the permitting authority, the long-term control plan (LTCP) developed by communities with combined sewer systems that serve populations of fewer than 75,000 does not have to include all of the components of a LTCP for larger communities. The intent of this recommendation is to focus the limited resources of smaller communities on controlling CSO discharges. Compliance monitoring should be less extensive for small entities than large entities because the small systems are expected to have fewer CSOs. EPA developed an LTCP Template (LTCP EZ) to help small communities develop LTCPs. LTCP EZ builds on NMC implementation and provides step-by-step instructions for completing the simple forms.

The 316(b) existing CWIS rule facility applicability requirements in 40 CFR section 125.91 exclude most existing small entities from the rule. The 316(b) Phase III Rule applies to new offshore oil and gas facilities, and the minimum design intake flow requirements exclude all but one small entity from the compliance requirements.

- The Dental Office Category (40 CFR Part 441) regulation significantly reduces and streamlines the reporting requirements by requiring dental dischargers to submit a One-Time Compliance Report rather than biannual reporting and wastewater sampling required of Categorical Industrial Users (CIUs).
- The public notification requirements for CSOs to the Great Lakes Basin apply to an estimated 122 small municipalities, which have aggregate populations of less than 50,000. EPA evaluated the impact of this regulation on these small entities in relation to available financial data and concluded that this information collection will not have a significant impact on a substantial number of small entities.

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.

EPA recognizes the importance of balancing the need for data collection efforts against respondent burden and costs. The information needed to meet permitting, monitoring, reporting, and information collection requirements related to the NPDES program is submitted either once, regularly, or as needed. EPA and authorized states need current information about permittees, discharge characteristics, enforcement actions, and program performance to comply with the CWA.

The NPDES program largely relies on self-monitoring and reporting by permittees that:

- Demonstrates compliance with permit conditions;

- Provides data for evaluating treatment efficiencies;
- Improves characterization of effluent during permit reissuance;
- Provides data for assessment of NPDES program implementation; and
- Promotes transparency.

Failure to collect the necessary data to implement these regulations could result in significant adverse impacts to the environment and public health. Regulated facilities and/or control authorities that do not collect the data would be failing to comply with the NPDES regulations, which could result in citizen suits that either appeal or challenge the permits or address permit violations or other enforcement actions.

EPA has determined that the frequency of data collection described in this ICR is necessary to provide sufficient data for EPA and authorized states to effectively implement the NPDES program.

The NPDES regulations provide that a facility with a new discharge or sewage sludge management system are required to submit an application 180 days before the discharge is to commence. Facilities with NPDES permits are to submit an application 180 days prior to the expiration date of their permit. Requiring a permit application to be submitted once, before a permit is issued, and then once every five years, prior to the permit expiration date, aids the timely issuance and re-issuance of NPDES permits and reduce permit backlog.

The NPDES regulations provide that NPDES permits are to contain monitoring provisions that assure compliance with permit limitations. EPA recommends that the frequency of monitoring requirements in NPDES permits be established based on the minimum frequency for monitoring that can support NPDES program implementation. Less frequent reporting would preclude equitable compliance determinations and hamper permit reissuance.

EPA considers the reporting requirements associated with the pretreatment program to be the minimum necessary for effective administration of the pretreatment program as well as to ensure effective control of hazardous wastes and to implement RCRA section 3018(b). EPA considers the specific requirements for significant industrial users (SIUs) and for reporting the discharge of RCRA hazardous substances preferable to repealing the domestic sewage exclusion. The domestic sewage exclusion is a RCRA provision that excludes domestic sewage and any mixture of domestic sewage and other wastes that pass through a sewer system to a POTW for treatment from being classified as a RCRA hazardous waste.

Some of the information in this ICR that is required to be submitted is collected only after the permittee violates a permit condition or after a certain condition occurs. For example, noncompliance reports are submitted when the facility experiences a bypass, an upset, or a violation of a permit limit. Responses to section 308(a) letters are submitted only when requested by the Administrator in response to events such as a spill of oil or a hazardous substance, or whenever EPA has reason to believe it needs more information to determine compliance. Compliance schedule reports are submitted only when a permit contains a compliance schedule, and it is necessary to ascertain a permittee's compliance with a milestone

in the compliance schedule. Also, alternate level reports are submitted only when there is an expected change in the production level at the facility.

In certain instances, a permittee may choose to submit information when requesting a modification or variance from otherwise applicable requirements. The information collection and reporting requirements associated with NPDES permit modifications and variances are specific, would not be supplied in any other report or application, and are submitted as needed. Because information is submitted only when needed, less frequent data collection would not give the permitting authority enough information to meet its responsibilities under the CWA.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

No special circumstances place “extraordinary burden” on respondents. Information is collected in a manner consistent with the Paperwork Reduction Act (PRA) guidelines at 5 CFR 1320.5(d)(2). Requests for supplemental information for emergency response or enforcement are exempt from the PRA requirements.

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 1995 Paperwork Reduction Act, EPA solicited public comments for a 60-day period in part to determine realistic burden estimates for respondents. During this public comment period, EPA received one comment, which recommended utilizing technology, including artificial intelligence, to support NPDES data collection and analysis, and reduce estimated total burden while maintaining water quality.

The EPA published the National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule ("NPDES eRule") on October 22, 2015. The goal of this rule is to modernize Clean Water Act (CWA) reporting for municipalities, industries and other facilities by replacing most paper-based NPDES reporting requirements with electronic reporting and require states and other regulatory authorities to share data electronically with EPA. EPA and states are working collaboratively through the eRule to strategically address water pollution problems while using resources efficiently, save time and resources for permittees, states, tribes, territories, and the U.S. Government, take advantage of advances in information technology, such as artificial intelligence, increase data accuracy, improve compliance, and support the goal of providing better protection of the nation's waters. Implementation of the NPDES eRule has increased the accuracy of the estimate of the number of facilities, leading to an increase in the costs and

burden hours associated with the (16%) higher number of respondents. Reduced paper-based requirements led to a decrease in burden hours associated with data and information collection and reporting.

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.

In October 2025, EPA initiated a consultation with stakeholders in the National Association of Clean Water Agencies (NACWA), the Association of Clean Water Administrators (ACWA), and the Federal Water Quality Coalition (FWQC), representing municipal, state, and industrial respondents (respectively) for this ICR. With the consultation, EPA requested input on changes to estimated information collection burden due to program changes.

EPA did not receive any comments.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

No payments or gifts are provided 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.

Permit applications and other respondent reports may contain confidential business information. If this is the case, the respondent may request that such information be treated as confidential. All confidential data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's *Security Manual* Part III, Chapter 9, dated August 9, 1976. Any claim of confidentiality must be asserted at the time of submission. However, CWA section 308(b) specifically states that effluent data may not be treated as confidential.

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.

Questions of a sensitive nature (including personally identifiable information) are not found in this information collection.

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 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.*
-

12a. Respondents/NAICS Codes

This section describes the methodology for estimating respondent burden for the information requests. Facilities subject to NPDES program requirements (also referred to as permit holders or permittees) and authorized states are included as respondents in this section. Methodologies that apply to NPDES-authorized states also apply to federal burden associated with EPA Regions acting as permitting authority in non-NPDES-authorized states. However, the EPA permitting authority burden and costs are not included in the respondent burden and cost estimates.

This ICR calculates annual burden and costs to respondents. There are two types of permittee respondents discussed in this section: permittees renewing existing permits and applicants for new permits. Applications for NPDES permit renewals must be submitted every five years. For these respondents, the ICR assumes that the number of applicants renewing per year equals one-fifth of the total number of existing permitted facilities. For new permits, respondents will apply for each type of new permit only once and the annual number is estimated based on the expected average number of new permit applications that will be submitted over the three-year period covered by this ICR. In subsequent ICRs, new permits will transition to renewal permits.

This section summarizes the input data and assumptions for each category of respondent activity. In some cases, the “total number of respondents” and “annual number of respondents” may reflect double-counting of individual respondents because the respondent values are summed values within the category which may include multiple activities for the same respondent. For example, a permittee may be required to submit different types of

notices to the permitting authority. This is particularly true for recordkeeping, which can involve multiple types of recordkeeping activities.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-2 presents the number of respondents in each respondent input category. These values were used to derive the adjusted burden estimates to account for changes in the number of respondents from the previous ICR. Estimates for the number of respondents for each type of permit are based on data from either queries to the ICIS-NPDES database conducted in November 2024, EPA estimates, or values from previous ICRs.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-2. Number of Respondents in Each Respondent Category

Respondent Type	2024 Estimate
States, Tribes, territories and DC*	637
Municipal and Non-municipal	
Total Existing Major NPDES Permits – Municipal	4,516
Total Existing Minor NPDES Permits – Municipal	13,019
Total Existing NPDES Permits – Municipal	17,535
Total Existing Sludge Only NPDES Permits - Municipal	1,053
Total Existing Major NPDES Permits - Non-Municipal	1,817
Total Existing Minor NPDES Permits - Non-Municipal	24,238
Total Existing Individual NPDES Permits - Non-Municipal	26,055
Total Existing Individual Sludge Only NPDES Permits - Non-Municipal	1,157
Annual New Permits-Major	23
Annual New Permits-Minor	1,804
Authorized NPDES States (includes Virgin Islands)	48
Non-authorized NPDES States	3
Total Existing POTWs	17,625
Total POTW Sludge Mgmt Facilities	12,203
Total POTW Sludge Mgmt Facilities	2,871
Total Domestic Septage Haulers	4,784
Total Municipalities with Combined Sewer Systems	692
Authorized CSO Program, with CSO	28
Great Lakes CSO Public Notification	157
Pesticides Packaging & Repacking with Certification Potential	235
Pretreatment	
Growth-adjusted total No. of SIUs	29,956
Growth-adjusted No. of CIUs	9,541
Total No. of Approved Programs	1,593
Number of States Approved	37
Estimated new pretreatment programs per year	7
POTWs in 403.10(e) States	1,067

Respondent Type	2024 Estimate
Dental Amalgam - Private Offices	131,134
Dental Amalgam - Schools and Clinics	415
Dental Amalgam - States and POTWs	1,635
Stormwater	
Total Phase I (Medium/Large) MS4s	966
Total Existing Nonmunicipal Stormwater (Individual Permit)	519
Total Industrial Facilities eligible for the "no exposure" to stormwater waiver from Phase I	38,233
Total Phase II (Small) MS4s	6,042
General Permittees Stormwater - Industrial	93,250
General Permittees Stormwater - Construction	86,721
Non-Stormwater General Permits	
General Permittees Other - Non-stormwater	84,698
Total Non-Stormwater General Permittees (State-issued)	83,529
Total Non-Stormwater General Permittees (EPA-issued)	1,169
Total Pesticides General Permittees	365,000
Total Large Vessels VGP	85,070
Animal Sector	
Authorized States for CAFOs	47
Total Number of CAFO Facilities that discharge via general permits	11,967
New CAFOs per Year	0
Authorized States for CAAP	48
Concentrated Aquatic Animal Production (CAAP) facilities	423
Total Number of CAFOs	21,370
CWIS	
Average annual CWIS permit renewals	14
Average annual number of New CWIS facilities	98
Average annual number of new CWIS permits	6
Average annual new offshore Oil & Gas facilities applying for an NPDES permit	6
Average annual new offshore Oil & Gas re-applying for an NPDES permit	6
Average Annual new offshore Oil & Gas facilities performing annual activities	43
Total Power plants	544
Total Power plants with DIF greater than 50 MGD	442
Total power plants with AIF greater than 125 MGD	354
Total Manufacturers with cooling water	521
Total Manufacturers with AIF greater than 125 MGD	26
Annual new power plant units	1
Annual new manufacturer units	1

*590 of these 637 are not states and respond to only one information item (certification of EPA-issued permits)

12b. Information Requested

This ICR addresses information requested from facilities subject to NPDES program requirements and from authorized NPDES states. Facilities subject to the NPDES program include facilities subject to pretreatment requirements, non-permitted facilities submitting a no-exposure certification, and facilities subject to biosolids requirements.

The information requested from facilities subject to the NPDES program depends on the nature of the discharge, the regulatory status of the discharge and receiving waters. This information includes identification information and information related to the facility's discharges or practices. Identification information is primarily collected through permit application forms, NOIs, certifications, and other application requirements. Information related to the facility's discharges or practices is most often collected through DMRs but can also be included with submissions of application information, plans and studies, certification requests, inspection results, and other reports. 40 CFR 403.12 establishes reporting requirements for industrial users subject to categorical pretreatment standards. These include baseline reports, reports on progress in meeting compliance schedules, reports on compliance with meeting categorical pretreatment standards, and periodic reports on continued compliance. In addition, all industrial uses must provide notice of a slug loading.

Table 12-2 lists the application forms and other information requests to permittees and pretreatment facilities.

Table 12-2. Application Forms and Information Requests

Form/Request	Respondent Type
Form 1 ^a	Nonmunicipal NPDES applicants not covered under Form 2A
Form 2A ^a	All POTWs
Additional NPDES Application Requirements for Municipal Dischargers (Section 308 Request)	Municipal facilities (i.e., POTWs)
Additional NPDES Application Requirements for Nonmunicipal Dischargers (Section 308 Requests)	Nonmunicipal facilities
Form 2B ^a	CAFOs and CAAP facilities
Form 2C ^a	Existing manufacturing, commercial, mining, and silvicultural operations that discharge process wastewater
Form 2D ^a	New manufacturing and commercial facilities that discharge process wastewater
Form 2E ^a	New or existing nonmunicipal facilities that discharge only non-process wastewater
Form 2F ^a	Industrial stormwater dischargers applying for an individual permit
Form 2S ^a	POTWs and other treatment works treating domestic sewage (covers sludge)
NOI—Industrial Activity (NOI—Stormwater) ^a	Industrial stormwater dischargers applying for the Multi-Sector General Permit (MSGP)

Form/Request	Respondent Type
Application for Transportation and Utility Systems and Facilities on Federal Lands (Alaskan Lands Application) ^a	Builders and operators of transportation and utility projects on Alaskan public lands (substitutes for Forms 1, 2B, and 2C)
Application for Phase I Municipal Separate Storm Sewer Systems (MS4s)	Phase I MS4s
Petitions for Stormwater Individual Permit Coverage	Small MS4 operators or any person requesting that an industrial facility discharging through an MS4 to obtain coverage under an individual permit
NOI—State General Permits	Facility owners/operators applying under various state- or federally-issued general permits (e.g., CAFOs, CAAPs)
NOI—Pesticide General Permit (PGP) ^a	Certain pesticide operators applying under the PGP
NOI—Vessels General Permit (VGP) ^a	Vessels applying under the VGP
NOI—Construction General Permit (CGP) ^a	Construction site owners/operators applying under the construction general permit
NOI—MSGP ^a	Industrial facility owners/operators applying under the MSGP
Permit Consolidation Request	Facilities with multiple permits
Notification of Construction	Facilities classified as new sources
Ocean Discharge Information	Ocean dischargers
Notice of Termination (NOT)—PGP ^a	Certain pesticide operators applying under the PGP
NOT—VGP ^a	Vessels covered under the VGP
NOT—CGP ^a	Construction permittees covered under the CGP
NOT—MSGP ^a	Industrial permittees covered under the MSGP
No Exposure Certification (NOE)	Industrial stormwater dischargers
Low Erosivity Waiver Certification	Construction stormwater dischargers
Annual Report	Vessels under the VGP; and certain pesticide operators applying under the PGP
Permit Authorization and Record of Inspection (PARI) ^a	Vessels under the VGP
Adverse Incident Report	Pesticide operators applying under the PGP
Nutrient Management Plan	CAFOs covered by an individual permit or general permit
Pesticide Discharge Management Plan	Certain pesticide operators applying under the PGP
Cooling Water Intake Structures 122.21(r)(2)–4	Facilities with CWISs (Phase I, Phase III, and Existing)
Cooling Water Intake Structures 122.21(r)(5)–(8)	Existing facilities CWISs
Cooling Water Intake Structures 122.21(r)(9)–(13)	Existing facilities with CWISs with average intake flow greater than 125 million gallons per day
Cooling Water Intake Structures 122.21(r)(14)	New units at existing facilities with CWISs
One-Time Compliance Report for Dental Dischargers ^a	Dental offices that place or remove amalgam
Alternative Phase 2 Compliance Deadline Request ^a	States - 48 authorized NPDES programs
General Permit and Program Report Inventory Update ^a	States - 48 authorized NPDES programs

^a These forms are included in Attachment B.

Permitting authorities gather information from the applications, permits reporting and requests for supplemental information, about industrial processes, treatment systems, pollutant characteristics, discharge rates and volumes, sewage sludge use and disposal practices, sewage sludge quality, and other data such as pollution prevention practices. At times, permitting authorities require additional information, such as more detailed production information or maintenance and operating data for a treatment system, or additional monitoring data to characterize a discharge or receiving water quality, to inform the permitting process. Additional information collection requirements that might be necessary to implement state-, tribal-, or EPA-promulgated provisions consistent with the CWA, the Great Lakes Guidance, and other EPA regulatory requirements include monitoring data (e.g., pollutant-specific and whole effluent toxicity), pollutant minimization programs, bioassays to support the development of site specific water quality criteria, antidegradation policy/demonstrations, and regulatory relief options (e.g., variances from water quality criteria).

The information in applications is used to develop effluent limitations, compliance schedules, and other routine and special conditions in permits. EPA may also use these data to reevaluate testing requirements or to develop or revise effluent standards on a national basis. Permitting authorities may also use data from NOIs, Nutrient Management Plans (NMPs), Pesticide Discharge Management Plans (PDMPs), stormwater pollution prevention plans (SWPPPs), etc., as part of an evaluation to determine whether the permittee adheres to procedures laid out in the documents.

NPDES permits may not be issued for a period of more than five years. The reapplication process is the primary mechanism for obtaining up-to-date information on discharges and sewage sludge quality, particularly for new or revised water quality standards or TMDL wasteload allocations. Permitting authorities may use reapplication data to identify pollutants at levels of concern or other information that could lead them to specify additional permit limitations, assess compliance with applicable effluent and sewage sludge limits, and develop appropriate special conditions in permits.

Routine data collection. Permittees use discharge monitoring data or sewage sludge quality data to support routine operations at their facilities and evaluate facility performance. In addition, they might need to collect this information to comply with state-specific program requirements or, in the case of POTWs, to administer pretreatment programs.

A permittee generally informs the permitting authority about its discharge through a DMR. The DMR lists the results from the permittee's required self-monitoring of pollutants. The permitting authority reviews this information and compares it with permit limits to determine compliance and if there is a need to develop additional limits. In addition to DMRs, permittees may be required to submit reports on violations of certain discharge limitations (e.g., maximum daily), as specifically required in their permits. This latter reporting requirement is intended to alert the permitting authority to potential health or environmental risks that could require a timely response. Data collected by this requirement are more incident-specific than the summary information provided on the DMR.

Permitting authorities may also require other types of monitoring data, such as influent monitoring data to evaluate a plant's operational aspects, ambient stream monitoring data to measure a permit's effectiveness in protecting water quality, internal waste stream data when monitoring at the point of discharge is impractical or infeasible, or visual monitoring (including underwater surveys) that might be necessary to determine compliance with permit limits.

NPDES authorities review information submitted by regulated facilities. Authorized NPDES states provide EPA with programmatic information and, in some cases, ensure facility electronic data is transferred to EPA.

12c. Respondent Activities

Municipal and Non-Municipal Discharges (Individual Permits)

Application Forms

Below are NPDES application forms that are submitted initially for new permits and resubmitted upon permit renewal every five years. NPDES regulations at 40 CFR 122.21(a) require that any person, except those covered by general permits, who discharges pollutants or proposes to discharge pollutants to waters of the United States must apply for a permit. Further, 40 CFR 122.21(e) prohibits the permitting authority from issuing an individual permit until and unless a prospective discharger provided a complete application. These forms and the facilities that submit them are included in Table 12-2. Error: Reference source not found. 40 CFR 122, Subpart B establishes NPDES permit application requirements which are specific to the type of facility and discharge.

Due to the Specific Provisions Affecting Applications and Program Updates regulation, application Forms 1 through 2S and the accompanying instructions for each form have been updated to reflect revised regulations and enhanced for improved readability and clarity. The revised burdens for different types of application forms can be found in Table RESPONDENT BURDEN HOURS & LABOR COSTS-3 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-4.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-3. Permittee Application Form Burden

Activity Description	Hours per Response
Form 1: Existing	0.9
Form 1: New	2.9
Form 2A: Basic, POTWs >1.0 MGD	13
Form 2A: Basic, POTWs 0.1-1.0 MGD	10
Form 2A: Basic, POTWs <0.1 MGD	8
Form 2A: Part D, POTWs >1.0 MGD	12
Form 2A: Part D, POTWs 0.1-1.0 & <1.0 MGD	7
Form 2A: Part E	9
Form 2A: Part F, POTWs >1.0 MGD	10
Form 2A: Part F, POTWs 0.1-1.0 & <1.0 MGD	4
Form 2A: Part G, POTWs >1.0 MGD	18
Form 2A: Part G, POTWs 0.1-1.0 & <1.0 MGD	14
Form 2B: CAFO	8.5

Activity Description	Hours per Response
Form 2B: CAAP	5.5
Form 2C	32.5
Form 2D: Major	45.5
Form 2D: Minor	31.5
Form 2E	13.5
Form 2S	18.2

Table RESPONDENT BURDEN HOURS & LABOR COSTS-4. Agency and State Application Review Burden

Activity Description	Hours per Response
Form 1	0.25-0.5
Form 2A	0.67-8
Form 2B	0.5
Form 2C	2
Form 2D	0.5
Form 2E	0.5
Form 2S	0.84-2.34

Ocean Discharge Initial Application

Permittees. The estimated total hours per permittee respondent for applications for ocean discharges is 1,556 hours but no applications are anticipated for the three year-period for this ICR renewal.

States/Federal. Estimated burden hours for state/federal respondents to review applications for ocean discharges is 176 hours per application. As stated above, no applications are anticipated for the three years covered by this ICR renewal.

Discharge Monitoring Reports (DMR)

Permittees. NPDES regulations at 40 CFR 122.41(l)(4)(i) require that monitoring results must be reported on a DMR. In addition, regulations at 40 CFR 122.44(i)(2) require permittees to submit reports (on discharges and sludge use or disposal) at least annually; however, because NPDES regulations state that monitoring and reporting frequencies should be dependent on the nature of the discharge, reporting may be more frequent than annually. DMR preparation is expected to require about 2 hours per outfall. Some permittees, especially industrial facilities, have multiple outfalls. The required frequency of DMR reporting (monthly, bimonthly, quarterly, semi-annually, or yearly) depends on facility type and permit type.

Discharge monitoring data provide permitting authorities with the information necessary to assess permittee compliance. Self-monitoring data also help the permitting authority modify or develop permit limits. Permitting authorities may also require other types of monitoring data, such as influent monitoring data to evaluate a plant's operational aspects, ambient stream monitoring data to measure a permit's effectiveness in protecting water quality, internal waste

stream data when monitoring at the point of discharge is impractical or infeasible, or visual monitoring (including underwater surveys) that might be necessary to determine compliance with permit limits.

States/Federal. The implementation of the eRule eliminated the processing burden of receiving DMRs for state and federal respondents.

Other Reports/Information

NPDES permits may require the submittal of other reports or required information, e.g., notices and permit documents (aside from reports on discharge and sludge use/disposal). Report activities in this category can include submission of notices to the permitting authority concerning the following:

- Facility and Permit Transfer Report;
- Permittee Report of Inaccurate Previous Information;
- Alternate Level Reports;
- Permittee Report of Planned Facility Changes;
- Request for Water Quality-Based Effluent Limitations Modification;
- Non-compliance Reports;
- Compliance Schedule Reports; and
- Unanticipated Bypass/Upset Reports.

Permittees. In general, the estimated time required per response for these activities ranges from 1 to 5 hours. There is no set frequency because these activities are often triggered by unplanned events. The frequencies used to derive the burden estimates are based on experience and assumptions regarding expected occurrence of each. The estimated time required per respondent for preparing and submitting compliance schedule reports is 0.75 hours and occurs on an annual basis.

States/Federal. The estimated time required for state/federal respondents to review and process notifications is typically 4 hours per notification but can take up to 20 hours for Permittee Report of Planned Facility Changes. The estimated time required for state/federal respondents to review and process compliance schedule reports is 0.25 hours for municipal and 4 hours for nonmunicipal permits.

Permittee Monitoring

Permittees must perform monitoring by sampling and analyzing their data. Burden associated with the activities below can be found in Table RESPONDENT BURDEN HOURS & LABOR COSTS-5 and in Table RESPONDENT BURDEN HOURS & LABOR COSTS-6.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-5. Permittee Monitoring Burden

Activity Description	Hours per Response
Permittee DMR sampling	2 to 2.75
In-house chemical analysis	0.5 ^a

Activity Description	Hours per Response
CSO monitoring – sampling	27
CSO monitoring – analysis	18
CSO monitoring – estimate flow parameters	20
CSO monitoring – reporting	2

^a Per parameter

Table RESPONDENT BURDEN HOURS & LABOR COSTS-6. Agency and State Monitoring Report Burden

Activity Description	Hours per Response
State post-baseline monitoring data review for coal remining permits	10

Sampling

Permittees. NPDES regulations at 40 CFR 122.44(i) and 122.48 require facilities discharging pollutants to periodically evaluate compliance with the effluent limitations established in their permits and provide the results to the permitting authority. Estimates of the total hours per response for DMR sampling are generally based on number of outfalls, reporting frequency, and duration and number of sampling episodes per reporting period.

States. Any state activities related to monitoring data are covered under the analyses section below.

In-House Analyses

Permittees. This category refers to chemical analyses that are conducted in-house. Estimates of the hours per response for DMR analyses are generally based on hours per parameter analyzed multiplied by the estimated number of outfalls, number of samples per response and number of parameters per sample.

States/Federal. State respondents review post-baseline monitoring data for coal remining permits.

CSO Permittee Monitoring

Permittees. EPA's CSO Policy requires monitoring to characterize the combined sewer system, support development of a long-term control plan, and demonstrate compliance with permit requirements.

States. Any state activities related to CSO monitoring data are covered under DMRs.

General CSO Public Notification

Permittees. The estimated time required per respondent for CSO notification is 0.5 hours per sign for inspection and maintenance of notification signs and 5 hours for public advisories with a frequency of 10 times per year for public advisories.

States. The estimated time for state oversight of CSO notification is 4 hours per permit every 5 years.

CSO Notification for Overflows to the Great Lakes Basin

Permittees. The estimated time required per respondent is 2 hours for the initial and supplemental notifications through public alerts per event. Maintenance of the alert system is estimated at 24 hours a year per permittee. Preparation and release of the annual notices is estimated to be 8, 16, and 24 hours for very small, small, and large facilities, respectively.

States. The estimated time for state review of the annual notice is 1 hour per notice.

Other Requests, Notifications, Certifications and Plans

Activities in this category include:

- Request for Modification, Revocation and Reissuance, or Termination;
- Section 308(a) letters;
- New Introduction of Pollutants to POTWs;
- Notification of new or increased discharge;
- Permittee notice of regulated discharge cessation;
- Variance request;
- Certifications;
- Documenting nine minimum control measures;
- Writing long-term control plans;
- Part 435 certification oil and gas extraction; and
- BMP development.

Request for Modification, Revocation and Reissuance, or Termination

Permittees may make a request for modification, revocation and reissuance, or termination of the NPDES permit. Preparing and submitting such a request occurs on an as-needed basis.

Section 308 Requests

Section 308 of the CWA authorizes EPA to require the owner or operator of any point source to make reports and provide information as may be reasonably required to carry out the objectives of the CWA, including but not limited to developing effluent limitations, determining compliance with any such effluent limitation or standard on an as-needed basis.

New Introduction of Pollutants to POTWs

NPDES regulations at 40 CFR 122.42(b)(1) require notification of any new introduction of pollutants into the POTW. Preparing and submitting to the permitting authority a notice of substantial change in the volume or character of pollutants being introduced into that POTW occurs at an approximate frequency of 200 per year.

Notification of New or Increased Discharge

NPDES regulations at 40 CFR 122.41(l) require permittees to provide notification of a new or increased discharge. Preparing and submitting to the permitting authority a notice of new or increased discharge occurs for 5 percent of all major and 3 percent of all minor nonmunicipal permits.

Permittee Notice of Regulated Discharge Cessation

Permittees are required to notify the permitting authority when a discharge has ceased. Preparing and submitting to the permitting authority a notice of cessation of a regulated discharge occurs annually for 2 percent of all major and 0.8 percent of all minor nonmunicipal permits.

Variance Request

NPDES regulations allow permittees to request variances from technology or water quality standards. Variance requests for individual permits include the following:

- Great Lakes Modification and Variance Request.
- Variance Request for Fundamentally Different Factors.
- Variance Request for Nonconventional Pollutants.
- Variance Request for Innovative Pollution Control Technology.
- Variance Request Regarding Thermal Discharges (New).
- Variance Request Regarding Thermal Discharges (Renewal).

The number of respondents for each type is based on assumed percentages of different types of permits. The frequency of occurrence is on an as-needed basis.

Long-term Control Plans (LTCPs)

Consistent with EPA's CSO Policy, permittees are responsible for developing and implementing LTCPs that will ultimately result in compliance with the requirements of the CWA. The estimated time required per respondent to write an LTCP varies considerably depending on system size and on whether the system has already conducted studies.

Documenting Nine Minimum Control (NMC) Measures

Consistent with EPA's CSO Policy, permittees should submit appropriate documentation demonstrating implementation of the NMC measures. EPA estimates that 20 municipalities will submit NMC documentation in the next 3 years.

Certification for Exemption from Monitoring and Notification of Process Changes

The effluent limitations guidelines and standards regulations for 14 industrial categories (12 categories and 2 subcategories) allow dischargers to submit a certification to exempt them from monitoring one or more pollutants. Preparing certification for exemption documents will typically occur once per year.

Part 435 Certification Oil and Gas Extraction (Synthetic Based Drilling Fluid)

Under 40 CFR Part 435, operators may elect to use BMPs for control of discharges of synthetic-based drilling fluids cuttings. Permittees are required to certify that its BMP plan is complete, on-site, and available upon request to EPA or the NPDES permitting authority. The estimated frequency per respondent for these activities is once per year.

Pollution Prevention Alternative Certification (Pesticides Packaging and Repackaging)

The ELGs for the Pesticides Formulating Packaging & Repackaging (PFPR) industry includes an option for a pollution prevention alternative discharge allowance. In accordance with 40 CFR 455.41, permittees are required to provide certifications that the pollution prevention alternative is being implemented in the manner set forth in the permit. The estimated frequency per respondent for preparing pollution prevention alternative certifications for pesticides formulating, packaging, and repackaging category facilities is annually.

BMP Development

NPDES permits for certain industrial facilities may require the development and implementation of BMP Plans, which may include review and amendment of the BMP Plan as well as refresher training. Recurrence is on an as-needed basis for the BMP plan and semi-annually for the training.

Great Lakes Water Quality Guidance Activities

The activities in this category apply to NPDES permittees that discharge within the Great Lakes watershed and are subject to EPA's Great Lakes Water Quality Guidance.

Activities include:

- Great Lakes Antidegradation Demonstration with bioaccumulative chemicals of concern (BCCs).²
- Great Lakes Antidegradation Demonstration without BCCs.
- Great Lakes pollutant minimization plan (PMP) Implementation.
- Great Lakes Approvable Strategy.
- Great Lakes Annual Report.
- Great Lakes Bioconcentration Studies.
- Great Lakes Collecting Data and Monitoring for WET Limits.
- Great Lakes WQBEL Compliance Monitoring.

Frequency ranges from for PMP implementation to annually for monitoring and strategies/studies/reports to once every 5 years for antidegradation demonstrations.

² The criteria for when an antidegradation demonstration must be performed are different for bioaccumulative chemicals of concern (BCCs) and non-BCCs.

Burden associated with these activities can be found in Table RESPONDENT BURDEN HOURS & LABOR COSTS-7 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-8.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-7. Permittee Other Requests, Notifications, Certifications and Plans Burden

Activity Description	Hours per Response
Request for modification, revocation and reissuance, or termination	10
Section 308(a) letters – Routine	8 to 10
Section 308(a) letters – Medium complexity	100
Section 308(a) letters – Complex	2,000
New introduction of pollutants to POTWs	3
Notification of new or increased discharge	4
Permittee Notice of Regulated Discharge Cessation	4
Great Lakes Modification and Variance Request	835
Variance Request for Fundamentally Different Factors	160
Variance Request for Nonconventional Pollutants	150
Variance Request for Innovative Pollution Control Technology	60
Variance Request Regarding Thermal Discharges – New	400
Variance Request Regarding Thermal Discharges – Renewal	4
Writing Long-term Control Plans	300 to 6,000 ^a
Documenting Nine Minimum Control Measures – Small	29
Documenting Nine Minimum Control Measures – Medium	43
Documenting Nine Minimum Control Measures – Large	200
Certification for Exemption from Monitoring and Notification of Process Changes	1
Part 435 Certification Oil and Gas Extraction	787
Prevention Alternative Certification	20
BMP refresher training	40
BMP Development	50
Great Lakes Antidegradation Demonstration with bioaccumulative chemicals of concern – Municipal	22.2
Great Lakes Antidegradation Demonstration with bioaccumulative chemicals of concern – Nonmunicipal	11.1
Great Lakes Antidegradation Demonstration without BCCs – Municipal	14.8
Great Lakes Antidegradation Demonstration without BCCs – Nonmunicipal	7.4
Great Lakes Pollutant Minimization Plan implementation – Municipal	1.2
Great Lakes Pollutant Minimization Plan implementation – Nonmunicipal	1.4
Great Lakes Approvable Strategy – Municipal	104
Great Lakes Approvable Strategy – Nonmunicipal	142
Great Lakes Annual Report – Municipal	20.9
Great Lakes Annual Report – Nonmunicipal	32.4
Great Lakes Bioconcentration Studies	147
Great Lakes Collecting Data and Monitoring for WET Limits – Municipal	10,877
Great Lakes Collecting Data and Monitoring for WET Limits – Nonmunicipal	6,841

Activity Description	Hours per Response
Great Lakes WQBEL Compliance Monitoring	0.5

^a Time can range from 300 hours for a small system that has existing studies to 6,000 hours for a large system without existing studies.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-8. Agency and State Other Requests, Notifications, Certifications and Plans Burden

Activity Description	Hours per Response
Request for modification, revocation and reissuance, or termination	80
Section 308(a) letters	2 to 40
New introduction of pollutants to POTWs	4
Notification of new or increased discharge	4
Permittee Notice of Regulated Discharge Cessation	4
Variance Requests	88 to 520
Variance Request Regarding Thermal Discharges (Renewal)	1
Long-term Control Plans – small	20
Long-term Control Plans – medium	33
Long-term Control Plans – large	53
Nine Minimum Control Measures	0.33 to 26.67
Certification for Exemption from Monitoring and Notification of Process Changes	1
Part 435 Certification Oil and Gas Extraction	5.7
Prevention Alternative Certification	1
BMP plan review	5
Great Lakes Water Quality Guidance Activities	8 to 16

Miscellaneous General Permits

Non-Stormwater Discharges

The activities in this category apply to general permits issued to cover classes of facilities that do not include stormwater discharges. Activities related to these non-stormwater general permits include:

- NOI;
- DMR;
- Monitoring and inspection;
- Reports; and
- Other activities.

Except as provided in EPA's regulations, dischargers (or treatment works treating domestic sewage) seeking coverage under a general permit must submit an NOI to the Director. See 40 CFR 122.28(b)(2). The contents of the NOI are specified in the general permit and shall require the submission of information necessary for adequate program implementation, including at a

minimum, the legal name and address of the owner or operator, the facility name and address, type of facility or discharges, the receiving stream(s), and other required data elements as identified in appendix A to part 127. This includes information necessary for the permitting authority to determine eligibility under the general permit and to understand the nature, type, magnitude, frequency, and duration of discharges covered by the general permit. Specific reports and DMRs are required by NPDES regulations at 40 CFR 122.41.

Underlying assumptions regarding burden estimates are described below with hour estimates provided in Table RESPONDENT BURDEN HOURS & LABOR COSTS-9 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-10.

DMRs

The estimated frequency to prepare and submit a DMR is ranges from monthly to annually. The implementation of the eRule eliminated all DMR processing burden for state and federal respondents.

Permittee Monitoring and Inspections

The estimated frequency for conducting sampling and inspection is the same as for DMRs. State/federal activities related to permittee monitoring and inspection data are covered under the Permittee Monitoring section in 12.c.i.

Reports

Reports in this category include: permittee report of planned facility changes, facility and permit transfer report, permittee report of inaccurate previous information, permittee report of anticipated noncompliance, unanticipated bypass/upset reports, maximum daily violation reports, and other noncompliance reports. The implementation of the eRule eliminated all report processing burden for state and federal respondents.

Other Activities

The only activity in this category is Permittee Notice of Regulated Discharge Cessation. Preparing and submitting a notice of cessation is estimated to occur annually for 1 percent of all non-stormwater general permits.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-9. Permittee Non-stormwater Discharges Burden

Activity Description	Hours per Response
NOI	1
Prepare and submit a DMR	2
Conduct monitoring and inspections	2.25
Analyze samples	1.5
Prepare Reports	2 to 5
Prepare and submit a Notice of Regulated Discharge Cessation	1

Table RESPONDENT BURDEN HOURS & LABOR COSTS-10. Agency and State Non-stormwater Discharges Burden

Activity Description	Hours per Response
NOI	0.25
Process Notice of Regulated Discharge Cessation	15

Stormwater Discharges

Phase I MS4 Discharges

NPDES regulations at 40 CFR 122.26 require Phase I MS4s to file applications, submit reports, conduct monitoring, and develop and update stormwater management plans. Specific activities related to Phase I MS4s include:

- Applications;
- Reports;
- Monitoring; and
- Other activities.

Underlying assumptions regarding burden estimates are described below with hour estimates provided in Table RESPONDENT BURDEN HOURS & LABOR COSTS-11 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-12.

Applications

The estimated frequency to prepare and submit an MS4 permit application once every 5 years.

Reports

Reports under this category include compliance schedule reports, facility and permit transfer reports, permittee report of inaccurate previous information, permittee report of planned facility changes, and annual reports.

Permittee Monitoring

Sampling response and sampling analysis are estimated to occur 20 times per year. State activities related to permittee monitoring data are covered under the Permittee Monitoring section in 12.c.i.

Other Activities

Activities and time required in this category include updating stormwater management plans (SWMPs) and Section 308(a) letters. SWMPs are updated once every 5 years and EPA estimates that the Agency will receive 24 petitions for EPA to require industrial facilities discharging through the MS4 to obtain individual NPDES permits and 31 Section 308(a) Letters per year.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-11. Permittee Stormwater Phase I MS4 Discharges Burden

Activity Description	Hours per Response
MS4 permit application – Large	80
Compliance schedule reports	0.75
Facility and permit transfer report	3
Report of inaccurate previous information	2
Report of planned facility changes	4
Annual report	250
Monitoring – sampling response	73
Monitoring – sampling analysis	41
Updating stormwater management plans	200
Section 308(a) letters	8
Form 1 application – New	2.9
Form 1 application – Renewal	0.9
Form 2F application	28.1

Table RESPONDENT BURDEN HOURS & LABOR COSTS-12. Agency and State Stormwater Phase I MS4 Discharges Burden

Activity Description	Hours per Response
MS4 permit applications	60
Reports – Petitions	8
Reports – Phase I MS4	40
Stormwater management plans	20
Form 1	0.5
Form 2F	2.2

Non-municipal Stormwater Discharges

Activities in this category include only individual permit applications submitted by industrial stormwater dischargers including Form 1 (new and renewal) and Form 2F.

Phase II MS4 Discharges

NPDES regulations at 40 CFR 122.30 through 122.37 establish requirements for Phase II MS4s. Permittee activities related to Phase II MS4s include:

- NOIs; and
- Reports.

Underlying assumptions regarding burden estimates are described below with hour estimates provided in Table RESPONDENT BURDEN HOURS & LABOR COSTS-13 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-14.

NOIs

The frequency for preparing and submitting an NOI is once every 5 years.

Reports

Reports under this category include compliance schedule reports, facility and permit transfer reports, permittee report of inaccurate previous information, permittee report of planned facility changes, and annual reports. EPA estimates that 5 percent of MS4 permittees will submit compliance schedule reports and all permittees will submit an annual report. Other reports are submitted infrequently.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-13. Permittee Stormwater Phase II MS4 Discharges Burden

Activity Description	Hours per Response
NOI	60
MS4 permit application – Small	60
Compliance schedule reports	0.75
Facility and permit transfer report	3
Report of inaccurate previous information	2
Report of planned facility changes	4
Annual report	100

Table RESPONDENT BURDEN HOURS & LABOR COSTS-14. Agency and State Stormwater Phase II MS4 Discharges Burden

Activity Description	Hours per Response
MS4 permit applications	40
NOI	4
Reports	1 to 20

Stormwater Industrial Discharges

NPDES regulations at 40 CFR 122.44 and 122.48 establish certain requirements related to stormwater industrial permits. Activities related to stormwater industrial general permits (i.e. the 2021 MSGP and all state-issued stormwater industrial general permits) include:

- NOIs/NOTs;
- DMRs;
- Monitoring/Inspections;
- Reports;
- Other activities; and
- "No Stormwater Exposure" Certification.

Underlying assumptions regarding burden estimates are described below with hour estimates provided in Table RESPONDENT BURDEN HOURS & LABOR COSTS-15 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-16.

NOIs/NOTs

Permittees. NOIs can be state or EPA administered. EPA-administered permit burden estimate includes additional time for the permittees that report endangered species and new NOI questions present in the 2021 MSGP. Frequency is once every 5 years. It is presumed that 15 percent of permittees submit an NOT every year.

DMRs

Permittees prepare and submit a DMR 4 times every 5 years for 25 percent of permittees and 8 times every 5 years for the other 75 percent of permittees. The implementation of the eRule eliminated all DMR processing burden for state and federal respondents.

Permittee Monitoring and Inspections

The frequency for conducting sampling and analysis is the same as for DMRs for permittees covered by state-administered permits. For the 2021 MSGP benchmark sampling requirements, EPA assumes that permittees covered under EPA-administered permittees will conduct some type of sampling quarterly every year of the permit term. Permittees will also conduct annual site inspections and visual assessments.

State/federal activities related to monitoring and inspection data are covered under the DMRs and Reports sections.

Reports

Reports under this category include an annual report, permittee report of inaccurate previous information, permittee report of planned facility changes, permittee report of anticipated noncompliance, and permittee report of numeric effluent limit exceedance. The implementation of the eRule eliminated all DMR processing burden for state and federal respondents.

Other Activities

Activities in this category include developing new stormwater prevention plans (SWPPPs), updating existing SWPPPs, and Section 308 requests.

Industrial Facility "No Stormwater Exposure" Certification

The no exposure provision of the stormwater regulations provides industrial facilities with industrial materials and activities that are sheltered from stormwater a simplified way of complying by certifying that there is no exposure to stormwater.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-15. Permittee Stormwater Industrial Discharges Burden

Activity Description	Hours per Response
NOI – State-administered	3.7
NOI – EPA-administered	4.1
NOT	0.5
DMR	2
Monitoring – sampling response	2.25
Monitoring – sampling analysis	1.5
Annual site inspections and visual assessments	4
Annual report	1
Report of inaccurate previous information	2
Report of planned facility changes	4
Report of anticipated noncompliance	5
Report of numeric effluent limit exceedance	2
Develop a new stormwater pollution prevention plan	80
Update a stormwater pollution prevention plan	8
Section 302 request	8
"No Stormwater Exposure" Certification	0.75

Table RESPONDENT BURDEN HOURS & LABOR COSTS-16. Agency and State Stormwater Industrial Discharges Burden

Activity Description	Hours per Response
NOI	0.25
NOT	0.25
Reports	1 to 20
Stormwater pollution prevention plans	1
"No Stormwater Exposure" Certification	1

Stormwater Construction Discharges

Activities related to Stormwater Construction General Permits include:

- NOIs/NOTs;
- Inspections;
- Reports; and
- Other activities.

NPDES regulations at 40 CFR 122.28(b)(2) require submission of an NOI for permit coverage. Stormwater site inspections and other activities are required by the general permit. Specific reports are required by NPDES regulations at 40 CFR 122.41.

Underlying assumptions regarding burden estimates are described below with hour estimates provided in Table RESPONDENT BURDEN HOURS & LABOR COSTS-17 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-18.

NOIs/NOTs

Permittees prepare and submit an NOI for large and small sites once. Those requiring an Endangered Species Act evaluation will require either informal or formal evaluations.

Permittee Inspections

Permittees conduct stormwater site inspections for small and large construction sites. Site inspection data is normally stored at the construction site. Any related state/federal activities are covered under the Reports section below.

Reports

Reports in this category include permittee report of planned facility changes, facility and permit transfer report, permittee report of inaccurate previous information, permittee report of anticipated noncompliance, unanticipated bypass/upset reports (verbal or written), maximum daily violation reports (verbal or written), and other noncompliance reports.

Other Activities

Activities in this category include requesting waiver certification, development of SWPPPs, monitoring, and preparing responses to Section 308(a) requests and reviewing submitted information.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-17. Permittee Stormwater Construction Discharges Burden

Activity Description	Hours per Response
NOI – Large sites	1.75
NOI – Small sites	3.95
Endangered Species Act evaluation – Informal	6
Endangered Species Act evaluation – Formal	20
NOT	0.5
Site inspections – Small	0.25
Site inspections – Large	0.5
Report of planned facility changes	4
Facility and permit transfer report	3
Report of inaccurate previous information	2
Report of anticipated noncompliance	5
Unanticipated bypass/upset reports – Verbal	5
Unanticipated bypass/upset reports – Written	2
Maximum daily violation reports – Verbal	3
Maximum daily violation reports – Written	2
Other noncompliance reports	5
Waiver certification	1
Section 308(a) requests	8

Activity Description	Hours per Response
Stormwater pollution prevention plan - Small	22.7
Stormwater pollution prevention plan - Large	36.4

Table RESPONDENT BURDEN HOURS & LABOR COSTS-18. Agency and State Stormwater Construction Discharges Burden

Activity Description	Hours per Response
NOI	1
NOT	0.25
Reports	1 to 20
Waiver certifications	1
Stormwater pollution prevention plans	1

Airports Certification

The Airport Deicing regulation allows airports to certify that they are not using deicers containing urea for airfield pavement deicing operations to become exempt from permitting requirements.

Permittees. The time to complete and submit the certification is 1 hour.

Alaska Lands Transportation and Utility Systems and Facilities on Federal Lands Application

Permittees. The application for transportation and utility systems and facilities on Federal lands will be used when applying for a right-of-way, permit, license, lease, or certificate for the use of Federal Lands which lie within conservation system units and National Recreation or Conservation Areas as defined in the Alaska National Interest Lands Conservation Act. Conservation system units include the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers System, National Trails System, National Wilderness Preservation System, and National Forest Monuments. The estimated total hours per permittee respondent for submission of an application for Transportation and Utility Systems and Facilities on Federal Lands (Alaskan Lands Application) is 30 hours per application.

Pesticides Application Discharges (General Permit)

The activities in this category are related to general permits for discharges from the application of pesticides activities related to these discharges are:

- Activities directly related to obtaining coverage under a general permit (e.g., NOI);
- Activities associated with development of a plan (or worksheet);
- Monitoring; and
- Reporting.

Underlying assumptions regarding burden estimates are described below with hour estimates provided in Table RESPONDENT BURDEN HOURS & LABOR COSTS-19 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-20.

NOI

NPDES regulations at 40 CFR 122.28(b)(2) require submission of an NOI for coverage under a general permit. EPA estimates 0.05 percent will require formal ESA-related evaluation by the Services and 0.1 percent requires an informal evaluation by the Services. An estimated 2.5 percent of the regulated universe will need to file an NOI. The PGP designates specific operators required to submit an NOI.

NOT

The PGP requires submission of a Notice of Termination (NOT) form within 30 days of the occurrence of one of several different triggering events identified in the permit. As stated above, only certain operators are required to file an NOI and thus an NOT; representing an estimated 2.5 percent of the regulated universe.

Plan Development

The PGP requires certain NOI filers to develop a Pesticide Discharge Management Plan. Fifty-three percent of NOI filers will be required to develop a Pesticide Discharge Management Plan. Twenty-five percent of the plans will be updated annually. State/federal activities related to Pesticide Discharge Management Plans are covered under the NOI section.

Compliance Monitoring

Monitoring is required in any NPDES permit to demonstrate compliance with the permit conditions. Monitoring requirements apply from the time any authorized Operator begins discharging under the PGP. Estimated time to perform monitoring ranges from 1 to 16 times per year depending on size of operation. State/federal activities related to monitoring data are covered under the reports section below.

Reports

The PGP requires the submission of various reports, among them, an annual report, adverse incident report, reports of planned changes, and reports of noncompliance.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-19. Permittee Pesticides Application Discharges Burden

Activity Description	Hours per Response
NOI	2.5
Endangered Species Act evaluation - Informal	6
Endangered Species Act evaluation - Formal	20
NOT	0.5
Develop Pesticide Discharge Management Plan	40
Update Pesticide Discharge Management Plan	2

Activity Description	Hours per Response
Monitoring	0.25 ^a
Reports	0.5 to 2

^aFor each monitoring activity

Table RESPONDENT BURDEN HOURS & LABOR COSTS-20. Agency and State Pesticides Application Discharges Burden

Activity Description	Hours per Response
NOI	0.5
NOT	0.25
Reports	0.5 to 2

Vessel Discharges

Activities for covered vessels include: NOI/NOT filing, permit authorization and record of inspection (PARI) submission, annual report, routine inspections, annual inspections, drydock inspections, and monitoring. NPDES regulations at 40 CFR 122.28(b)(2) require submission of an NOI for coverage under a general permit. The Vessels General Permit requires permittees wishing to terminate coverage under the permit to file a NOT as well as maintaining and submitting the PARI. Monitoring, reporting, and inspections are required in any NPDES permit to demonstrate compliance with the permit conditions.

Permittees. The estimated time required per respondent for performing the above items includes: 1 hour for an NOI one time, 0.25 hours for a PARI and occurs annually; 2 to 5 hours for various reports that occur on an as-needed basis; one hour for the annual report; 0.5 to 2 hours for self-inspections that occur on an ongoing basis; 2 to 4 hours for drydock inspections that occur once every 5 years; and 6 hours for semiannual monitoring.

Federal. Reviews are performed electronically at an estimated rate of 25 per hour.

Animal Sector Discharges (Individual and General Permits)

The activities in this category apply to activities related to NPDES permits for CAFO and CAAP facilities and all activities were divided and allocated on the basis of the type of respondent. Below is a list of the possible types of respondents.

- Authorized states for CAFOs;
- CAFO facilities;
- New CAFOs per year;
- Authorized states for CAAP; and
- CAAP facilities.

Burden estimates were derived for each respondent type. Burden estimates are associated with six types of activities related to the NPDES program:

- Activities directly related to individual permit applications or permit coverage under a general permit (NOIs);
- Activities associated with plan development or special studies;
- Reporting, including certification;
- Recordkeeping; and
- Activities resulting from compliance assessments.

Many of the activities required under the 2003 NPDES Permit Regulation and Effluent Limitation Guidelines and Standards for Concentrated Animal Feeding Operations (CAFOs) have become part of USDA standards and guidelines and standard business practices. USDA has issued extensive guidelines, including the requirements for Comprehensive Nutrient Management Plans, the practice standards developed by the USDA Natural Resources Conservation Service (NRCS), the Field Office Technical Guides, and the Agricultural Waste Management Field Handbook. The combined effect of these external forces is that over time a number of activities required in EPA's original CAFO regulations have become standard industry practice, including regular visual inspections and manure and soil sampling. In previous ICRs, EPA concluded that these activities are no longer directly attributable to the NPDES regulations and should not be included in the ICR burden estimates. The burden estimates in this ICR are consistent with previous burden estimates.

Permittees. Table RESPONDENT BURDEN HOURS & LABOR COSTS-21 and Table RESPONDENT BURDEN HOURS & LABOR COSTS-22 presents burden assumptions for CAFO and CAAP facilities.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-21. Summary of Burden Assumption for CAFO Facilities

Activity Description	Hours per Response
Read rule, determine requirements and plan	3
Complete notice of intent for general permit	9.2
Develop/update NMP	170
Prepare and submit annual report	2
Recordkeeping	80
Inspection	4

Table RESPONDENT BURDEN HOURS & LABOR COSTS-22. Summary of Burden Assumption for CAAP Facilities

Activity Description	Hours per Response
Complete notice of intent for general permit	2
BMP plan development	40
BMP training	6

Activity Description	Hours per Response
BMP plan	1.25
Investigational new animal drugs (INAD) program sign-up report	1
INAD or extra-label use report	1.5
Structural failure report	5
Spill report	2
Inspection, cleaning, maintenance & repair records	103 to 118

States/Federal. Table RESPONDENT BURDEN HOURS & LABOR COSTS-23 presents a summary of the burden assumptions for state/federal respondents.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-23. Summary of State/Federal Burden Assumption for Animal Sector

Activity Description	Hours per Response
Program modification	80
Review/process permits and NMPs	50
Public hearings/notice	20
Other noncompliance reports (CAFO permittees)	2
Report receipt (INAD program sign-up, spill, structural failure)	0.5
CAFO facility inspection	16
Annual report review, all permitted CAFOs	4
Research on environmental effects of INAD	3
Determination of site-specific limits for INAD	3
Notify state fish & wildlife department	0.5
Review cause of failure and past reports to evaluate effectiveness of practices	1

Cooling Water Intake Structure Discharges

Cooling Water Intake Structures Phase I - New Facilities

The activities in this category are related to application and recordkeeping regulation established by the section 316(b) New Facility Rule (66 FR 65256; December 18, 2001). The regulation applies to industrial facilities constructed after January 2002 that withdraw significant quantities of cooling water from waters of the U.S. The rule requires new facilities to submit several distinct types of information as part of their NPDES permit application. In addition, the rule requires new facilities to maintain monitoring and reporting data as outlined by the permitting authority in their NPDES permits.

Below is a list of the types of respondents for which updated estimated respondent numbers were used to develop burden estimates:

- Average annual number of new CWIS facilities;

- Average annual number of new CWIS permits; and
- Average annual CWIS permit renewals.

Permittees. Table RESPONDENT BURDEN HOURS & LABOR COSTS-24 presents the estimated burden hours for first-time permit renewal applications and initial compliance activities. Frequencies for these activities vary between once and twice per permit term. Table RESPONDENT BURDEN HOURS & LABOR COSTS-25 presents the estimated burden hours and frequency per facility for recurring activities that apply to all new CWIS facilities.

States/Federal. State agencies and EPA acting as the permit authority conduct permit issuance activities, verification study reviews and other activities. The burden per activity ranges between 21 hours and 646 hours per permit.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-24. Estimated Facility Burden Hours for Initial Application and Compliance Activities for Phase 1 New CWIS Facilities

Permittee Application and Initial Compliance Activity	Burden (hours)
Start-up activities	43
Permit application activities	146
Source waterbody flow information	104
Source water baseline biological characterization data	265
CWIS flow reduction requirements (Track I)	108
CWIS velocity requirements (Track I)	138
Design and construction technology plan (Track I)	108
Comprehensive demonstration study plan (Track II)	271
Source water baseline biological characterization study (Track II)	5,196
Evaluation of potential CWIS effects (Track II)	1,626
Verification monitoring plan (Track II)	128
Freshwater verification study (Track II)	92
Estuary verification study (Track II)	122
Initial biological monitoring for impingement (freshwater)	379
Initial biological monitoring for impingement (estuary)	482
Initial biological monitoring for entrainment (freshwater)	614
Initial biological monitoring for entrainment (estuary)	776

**Table RESPONDENT BURDEN HOURS & LABOR COSTS-25. Estimated Facility Burden Hours for
Recurring
Activities for Phase 1 New CWIS Facilities**

Permittee Recurring Activity	Burden (hours)
Permit renewal activities	72
Source waterbody flow information	31
Source water baseline biological characterization data	79
CWIS flow reduction requirements (Track I)	108
CWIS velocity requirements (Track I)	75
Design and construction technology plan (Track I)	43
Comprehensive demonstration study plan (Track II)	80
Source water baseline biological characterization study — freshwater (Track 2)	2,808
Source water baseline biological characterization study — marine (Track 2)	5,268
Reduced biological monitoring for impingement (freshwater)	191
Reduced biological monitoring for impingement (estuary)	244
Reduced biological monitoring for entrainment (freshwater)	308
Reduced biological monitoring for entrainment (estuary)	392
Velocity monitoring	163
Inspection of installed technologies	253
Yearly status report activities	348

Cooling Water Intake Structures Phase III - New Offshore Oil and Gas Facilities

The activities in this category are related to NPDES application, monitoring, and recordkeeping requirements established by the 316(b) Phase III Rule (71 FR 35006; June 16, 2006). The permitting authority for all offshore oil and gas facilities is the federal government and thus there is no burden for state or local governments.

Below is a list of the types of respondents for which updated estimated respondent numbers were used to develop burden estimates:

- Average annual new offshore oil & gas facilities applying for an NPDES permit;
- Average annual new offshore oil & gas re-applying for an NPDES permit; and
- Average annual new offshore oil & gas facilities performing annual activities.

Permittees. Table RESPONDENT BURDEN HOURS & LABOR COSTS-26 presents the estimated burden hours per facility for permit renewal applications. Table RESPONDENT BURDEN HOURS & LABOR COSTS-27 presents the estimated burden hours and frequency per facility for recurring activities that apply to all new Phase III CWIS facilities.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-26. Estimated Facility Burden for Initial Permit Renewal Applications and Compliance Activities for Phase III – Oil and Gas Facilities

Permittee Initial Application Activity	Burden (hours)
Start-up activities	43
Permit application activities	51
Source water body flow information	38
CWIS velocity information	150
Design and construction technology plan	36
Source water baseline biological characterization study	166

Table RESPONDENT BURDEN HOURS & LABOR COSTS-27. Estimated Facility Burden for Recurring Activities

Permittee Recurring Activity	Burden (hours)
Start-up activities	13
Permit application activities	13
Source water body flow information	11
CWIS velocity information	45
Design and construction technology plan	20
Source water baseline biological characterization study	49
Biological monitoring for impingement	530
Biological monitoring for entrainment	370
Biological monitoring for entrainment (Alaska)	516
Velocity monitoring	163
Visual inspections	253
Yearly status report activities	223

States. Offshore oil and gas facilities operate in federal waters, there is no state burden.

Federal. Table RESPONDENT BURDEN HOURS & LABOR COSTS-28 presents the estimated burden hours and frequency for federal oversight activities.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-28. Estimated Facility Burden for Federal Oversight

Federal Permit Oversight	Burden (hours)
Permitting authority permit issuance activities (per facility)	229
Permitting authority permit renewal activities (per facility)	104
Annual Permitting authority activities (per facility)	50

Cooling Water Intake Structures Existing Facilities

The activities in this category are related to NPDES application and recordkeeping requirements defined under the 316(b) Existing Facility regulation. A major component of the burden is associated with the preparation of permit application materials required under 122.21(r)(2)-(13) which must be submitted during the first permit renewal that occurs during the five-year period after October 2014. Once a permit has been renewed, the burden will be associated with annual monitoring and reporting activities and the subsequent permit renewal applications for which the burden is significantly reduced compared to the initial renewal. The initial CWIS Existing Facility Rule ICR covered the burden associated with the three-year period from October 2014 through October 2017. The initial permit renewal years that corresponded to the period with the highest burdens have concluded, therefore, this ICR reflects permit renewal applications and ongoing annual monitoring and reporting activities and the subsequent permit renewal applications.

Below is a list of the types of respondents for which updated estimated respondent numbers were used to develop burden estimates:

- Total power plants;
- Total power plants with a design intake flow (DIF) greater than 50 MGD;
- Total power plants with an actual intake flow (AIF) greater than 125 MGD;
- Total manufacturers with cooling water;
- Total manufacturers with an AIF greater than 125 MGD;
- Annual new power plant units; and
- Annual new manufacturer units.

Permittees. Table RESPONDENT BURDEN HOURS & LABOR COSTS-29 presents the estimated burden hours and frequency per facility for recurring activities that apply to all new CWIS facilities.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-29. Estimated per facility burden hours and frequency for recurring activities that apply to all existing CWIS facilities

Annual activities	Burden (hours)
Permit renewal activities	72
Compliance monitoring - all existing facilities (power plants and manufacturing)	357
Recurring reporting and recordkeeping - existing facilities (power plants and manufacturing)	11
Compliance monitoring - new units	90
Recurring reporting and recordkeeping - new units	20

States/Federal. State and federal agencies conduct various permit application review activities for existing CWIS facilities that require 72.7 hours on average and 11 hours on average for new facilities in addition to various annual activities that require approximately 3 hours.

Recordkeeping

Permittees. Recordkeeping activities include those associated with data collected, DMRs, permit documents, notices, and correspondence. NPDES regulations require permittees to maintain records and periodically report on monitoring activities. NPDES permits, in accordance with 40 CFR 122.41(j), require permittees to retain permit records for at least three years.

Recordkeeping requirements for sewage sludge and CAFOs require records must be kept for five years. NPDES regulations at 40 CFR 122.41(l)(4)(i) require that monitoring results must be reported on a DMR. In addition, regulations at 40 CFR 122.44(i)(2) require permittees to submit reports (on discharges and sludge use or disposal) at least annually; however, because NPDES regulations state that monitoring and reporting frequencies should be dependent on the nature of the discharge, reporting may be more frequent than annually. NPDES permits may require the submittal of other required information, e.g., notices and permit documents (aside from reports on discharge and sludge use/disposal), on other frequencies. Frequency may range from ongoing to once every five years. The estimated time required per response ranges from 10 minutes (0.17 hours) for sludge permits to 6-7 hours for general stormwater and major industrial NPDES permits.

States. The estimated time required for state respondents for permit oversight recordkeeping ranges from a per-state aggregate of 0.33 hours for the CSO program to 50 hours for sludge programs to 300 hours for the NPDES program.

Pretreatment (Indirect) Discharges

The activities in this category are related to the administration of the pretreatment program and all activities were grouped and allocated based on the type of respondent.

Burden estimates for POTWs, IUs, state, and federal government are associated with the following types of activities related to the Pretreatment Program:

- Program development (POTWs and state/federal);
- Program implementation (POTWs, IUs and state/federal);
- Limits modification requests and removal credits (POTWs and IUs);
- POTWs as users of the data (POTWs);
- Recordkeeping (EPA, POTWs, IUs and states);
- EPA and states as users of the data; and
- Reporting (states, POTWs and IUs).

Industrial Users. The burden estimates for industrial users are summarized in Table RESPONDENT BURDEN HOURS & LABOR COSTS-30. Frequency of activities range from once per year to once per five years.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-30. Summary of Burden Assumptions Related to Industrial Users

Industrial User Activity	Burden (hours)
Baseline monitoring and report for new sources	42.3
IU compliance schedule progress report for new sources	4
IU compliance attainment analysis and report for new sources	34.3
IU resampling compliance report	17
IU self-monitoring compliance sampling and report ^a	14.5 to 16.6
Pollution prevention plans for PFPR facilities	20
Minimum monitoring requirements for Paper Mills in specific categories	826
Pollution prevention compliance alternative; transportation equipment cleaning	209 to 235
Best management practices for Paper Mills in specific categories	617
Request for coverage under a general control mechanism	0.5
Periodic certifications for 12 categories ^b	1
IU slug load notification	2
Notification of changed discharge	4
Bypass notification	5 to 7
Notification of changed monitoring location	1
Slug control plan	2
Alternative limits modification request	2
Net/gross adjustment request	50
Dental office one-time compliance report	1.27

^aThese assumptions are carried forward from the Pretreatment Streamlining ICR.

^bIndustrial categories include but are not limited to, Electroplating and Metal Finishing; Electrical and Electrical Components; Steam Electric Power Generating; Pulp, Paper, and Paperboard; Centralized Waste Treatment; Pharmaceutical Manufacturing; Pesticide Chemicals; Aluminum Forming.

POTWs. The underlying assumptions regarding burden estimates for POTWs are summarized in Table RESPONDENT BURDEN HOURS & LABOR COSTS-31.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-31. Summary of Burden Related to POTWs

POTW Activity	Burden (hours)
POTW pretreatment program approval request	250
POTW pretreatment compliance schedule progress report	5
Annual POTW report	40
Issuance of discharge permits or other control mechanisms for SIUs	20
Inspection and sampling of CIU and SIUs	8
CIU and SIU effluent analysis	15.2
Establish mass limits	8
Establish equivalent concentration limits	8
Public notification of significant noncompliance	3
Evaluation of the need to revise local limits	50
Removal credit applications	125
Removal credit self-monitoring reports	40
Recordkeeping	100
Review dental office one-time compliance reports	0.75

Dental Offices. In the event a new dental office opens or a regulated dental discharger transfers ownership, the new owner must submit a One-Time Compliance Report (estimated to take 76 minutes or 1.27 hours per dental office).

Dental offices that use or remove amalgam would need to keep on-site records of inspections, cleaning, maintenance, repair, and recycling. EPA estimates that one percent of dental offices will need a repair for their amalgam separator and will need to keep a record of it. EPA estimates that recordkeeping will require 200 minutes (or 3.34 hours) of burden per dental office.

States and POTWs. EPA estimates a one-time burden of 45 minutes associated for Control Authorities (states and POTWs) to review and file each One-Time Compliance Report for ownership transfers and for newly opened dental offices.

States/Federal. Some activities performed by authorized states are performed by EPA Regions where EPA is the Control Authority. Table RESPONDENT BURDEN HOURS & LABOR COSTS-32 includes assumptions for both.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-32. Summary of Burden Assumption Related to Control Authorities (States and EPA)

State Activity	Burden (hours)
Issuance of SIU discharge permits	20
Inspection and sampling of CIU and SIUs	8
CIU and SIU effluent analysis	15.2
Public notification of significant noncompliance	3
Evaluation of the need to revise local limits	50
POTW pretreatment compliance schedule progress report	2
POTW pretreatment program approval request	40
POTW pretreatment program modification approval request	20
Baseline monitoring report-new sources	24
IU compliance schedule progress report-new sources	1
CIU compliance attainment report-new sources	2
IU resampling compliance report	4
IU/SIU self-monitoring compliance report categorical SIUs	2
IU/SIU self-monitoring compliance report non-categorical SIUs	1
PFPR P2 Plan-modifications	3
Periodic certifications	1
IU slug load notification	0.25
Notification of changed discharge	2
Annual POTW reports	20
Review of Inspection and sampling of IU and SIU effluent data	0.5
Pretreatment Compliance Inspection (PCI)	24
Evaluation of the need to revise local limits	1
Net/Gross adjustment request	10
Removal credit approval	80
Removal credit self-monitoring report review	1
Maintenance of records by Approval Authority	50
Maintenance of monitoring records by Approval Authority	5
Dental office one-time compliance reports	0.75
Alternative Phase 2 Compliance Deadline Request	16
General Permit and Program Report Inventory Update	1

State Activity	Burden (hours)
Annual Review of General Permit and Program Report Information	4

"NA" indicates there is no burden to EPA for the activity.

¹ There is additional burden due to states that act as Control Authorities.

Federal. Table RESPONDENT BURDEN HOURS & LABOR COSTS-33 below presents the assumptions related to EPA pretreatment program oversight activities.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-33. Summary of Burden Assumption Related to EPA Program Oversight

Federal Activity	Burden (hours)
State pretreatment program approval request	325
POTW pretreatment compliance schedule progress report ^a	2
POTW pretreatment program approval request ^a	40
POTW pretreatment program modification approval request ^a	20
Annual POTW reports ^a	20
Pretreatment compliance inspection (PCI)	24
Review of Inspection and sampling of IU and SIU effluent data ^a	0.5
Evaluation of the need to revise local limits ^a	1
Categorical determination request	20
Fundamentally different factors variance request	400
Removal credit approval request ^a	80
Removal credit self-monitoring report ^a	1

^a For these activities, burden is apportioned to the federal government only where the federal government is the Approval Authority.

Program Administration Activities

This category applies to permitting authority activities that are not directly attributable to the individual categories described above.

State Certification of EPA-issued Permits

When EPA issues NPDES permits, it must ensure that the permits are in compliance with state laws, including WQS. Under CWA Section 401, EPA may not issue a permit until the state or Tribe where the discharge originates either certifies that the permit will comply with the clean water provisions of the CWA or waives certification.

The respondents to this item are the estimated 637 entities including states, tribes, and U.S. territories that must certify EPA-issued permits. The average respondent burden is estimated to be 4 hours.

Inspection and Investigation

Authorized states are required to maintain a “program for periodic inspections of the facilities and activities subject to regulation.” 40 CFR 123.26(b)(2). Under EPA’s *Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy* (available at <https://www.epa.gov/compliance/clean-water-act-national-pollutant-discharge-elimination-system-compliance-monitoring>), authorized states prepare annual Compliance Monitoring Strategy (CMS) plans that articulate commitments for compliance assessment activities (e.g., inspections) and end-of-year reports that summarize CMS plan implementation over the prior year. EPA has developed a template for states to use when preparing CMS plans and end-of-year reports.

The various types of compliance monitoring activities conducted by permitting authorities include:

- Compliance Sampling Inspection (CSI). The estimated burden for this inspection is 120 hours.
- Compliance Evaluation Inspection (CEI). The estimated burden for this inspection is 24 hours.
- Performance Audit Inspection (PAI). The estimated burden for this inspection is 96 hours.
- Diagnostic Inspection (DI). The estimated burden for this inspection is 128 hours.
- Compliance Biomonitoring Inspection (CBI). The estimated burden for this inspection is 240 hours.
- Toxic Sampling Inspection (XSI). The estimated burden for this inspection is 280 hours.
- Reconnaissance Inspection (RI). The RI is the briefest of all NPDES inspections; the estimated burden for this inspection is 8 hours.

The list of compliance monitoring activities described above is not the complete set of activities that EPA and states conduct pursuant to the CMS. EPA estimates that on an annual basis for major facilities:

- 9 percent receive CSIs,
- 68 percent receive CEIs,
- 6 percent receive PAIs,
- 1 percent receive CBIs,
- 0.4 percent receive XSIs,
- 18 percent receive RIs, and
- 0.3 percent of municipal major facilities receive DIs.

Of the minor facilities, on an annual basis:

- 3 percent receive CSIs,
- 17 percent receive CEIs.

Facilities receiving RIs on an annual basis include:

- 10 percent of industrial stormwater general permittees,
- 5 percent of large (> 5 acres) construction stormwater general permittees,
- 2.5 percent of small (1-5 acres) construction stormwater general permittees,
- 20 percent of Phase I MS4s, and
- one-seventh of Phase II MS4s.

NPDES Program Authorization

This category includes: state requests that an authorized program be transferred back to EPA, with a burden estimate of 480 hours; state requests for NPDES program modifications, with a burden estimate of 250 hours; and state requests for sewage sludge program approval under Part 501, with a burden estimate of 750 hours. EPA estimates that over the three-year period of this ICR, one state will request program authorization, one state will request that an authorized program or program component be transferred, 12 states will request program modification to update their legal authorities in response to the regulatory changes (e.g., rulemakings, state water quality standards revisions, etc.) anticipated in the NPDES program, and one state will request a sewage sludge program approval.

EPA State Coordination and Technical Assistance

The activities in this category are related to providing support to state administration of the program and the associated implementing regulations to ensure the quality, consistency, and legal defensibility of each authorized program. This item includes requirements for authorized states to make available to EPA for review any information obtained or used in the administration of a state program. Program and Permit Quality Reviews (PQRs) and real time permit reviews (RTRs) work together to allow EPA to fulfill its statutory obligation of ensuring that authorized states issue permits and administer the NPDES program in accordance with the Clean Water Act (CWA), the implementing regulations, and the agreed upon provisions outlined in the Memorandum of Agreement (MOA) between the appropriate EPA Region and the authorized state.

The burden estimate assumes that states must submit all major permits, about 5 percent of minor permits, and all general permits, as well as general program information collected as part of the application process. Time required is estimated to be 10 minutes each and applies to 70 percent of the major permits, 5 percent of the minor permits, and 100 percent of the general permits transmitted to EPA. The remaining 30 percent of major permits require 2 hours transmittal time.

Electronic Reporting

The Electronic Reporting Rule includes both the initial one-time activities associated with the transition to electronic reporting (primarily in the first three years after promulgation) and ongoing activities, which reflect considerable burden reductions associated with data entry and document mailing. EPA extended the compliance deadline for implementation to December 21, 2028 for Phase 2 state NPDES general permits and program reports in 34 states.

Phase 1 of the Electronic Reporting Rule required authorized state NPDES programs to electronically transmit basic facility and permit information to EPA within the first year. After one year (by December 21, 2016) authorized programs began electronically transmitting their state data, including information generated from compliance assessment (e.g., inspections), violation determinations, and enforcement actions. Also, starting on December 21, 2016 permittees began submitting DMRs electronically. In addition, by this deadline, facilities permitted under the NPDES biosolids program where EPA is the control authority, began submitting annual reports electronically. The one-time implementation activities associated with Phase 1 as well as ongoing activities related to the Phase 1 and Phase 2 requirements have been included.

Under Phase 2, authorized programs had until December 21, 2025, to begin electronically collecting, managing, and sharing the Phase 2 NPDES program data. EPA has established an alternative compliance deadline to December 21, 2028 for Phase 2 state NPDES general permits and program reports in 34 states. The minimum set of NPDES data that states must share is listed in Appendix A, 40 CFR part 127. These electronic data transfers to EPA must be timely, accurate, complete, and consistent with EPA's data sharing protocols. The NPDES eRule data sharing requirements are provided in 40 CFR § 127.23. This information includes:

- General permit reports (NOI, NOT, No Exposure Certification (NOE), and Low Erosivity Waiver and Other Waivers from Stormwater Controls (LEW));
- Sewage Sludge/Biosolids Annual Program Report (where the state is the authorized NPDES biosolids program); and
- Other NPDES program reports (CAFO Annual Report, MS4 Program Reports, Pretreatment Program Reports, SIU Compliance Reports in Municipalities without approved Pretreatment Programs, Sewer Overflow Event Reports, CWA Section 316(b) Annual Reports).

Permittees. The ongoing burden for permittees includes 0.4 hours per respondent per year to periodically reset the passcode and mailing some reports.

States. State agency activities include:

- Transfer of the minimum set of NPDES data from state NPDES data systems to the EPA national NPDES data system.
- Training and technical support.

- Required programmatic data entry associated with submitting programmatic data to EPA.
- Prepare and send a waiver request to EPA when they are seeking an alternative Phase 2 compliance deadline for general permits or program reports.
- Prepare and send basic information to EPA as they update or deploy their general permits and program reports and the related electronic reporting tools.
- Annually review EPA's inventory of general permits and program reports and the related electronic reporting tools. Authorized NPDES programs will summarize this review in an email to EPA.

Underlying assumptions regarding burden estimates are described below.

- The analysis assumes states currently operating their own systems will bear an ongoing annual cost to manage transfer of data between their system and EPA's. The annual burden estimate per state is 2,080 hours 1 full-time equivalent (FTE) programmer/technical labor per state per year.
- The analysis also assumes that each authorized NPDES state program, whether it operates its own system or uses EPA's tools, will bear an ongoing annual cost to provide training and technical support to regulated entities. The estimated annual training and technical support burden per authorized state is 2 FTEs of programmer/technical labor per state per year or 4,160 hours of programmer/technical labor. This is a conservative estimate based on the upper end of the range reported in comments submitted by states.
- Ongoing data entry associated with states submitting required programmatic data to EPA is estimated to have a total annual labor burden of 85,445 hours.
- EPA expects to receive 12 updates on general permits renewals each month. EPA estimates that these will be monthly updates and each update will take 1 hour to prepare and send to EPA.
- All 48 authorized NPDES programs will also need to annually review EPA's inventory of general permits and program reports and the related electronic reporting tools. Authorized NPDES programs will summarize this review in an email to EPA. EPA estimates that these will be monthly updates and each update will take 4 hours to prepare and send to EPA.

Federal. The estimated annual EPA burden for ongoing activities to operate and maintain the necessary changes in the ICIS-NPDES system required by the rule is estimated at 16,389 hours per year. EPA will also review all alternative Phase 2 compliance deadline requests submitted by state permitting authorities. Each review and approval process is estimated to take 16 hours.

In addition, when an authorized state, tribe, or territory has less than 90 percent participation rate for one or more data groups, EPA will use its CWA authority to issue targeted individual notices requiring NPDES-regulated entities to utilize their NPDES program's electronic reporting

system. It is estimated there will be 14,624 letters during the 3-year period or an average of 4,875 per year. It is estimated each letter will require 0.5 hours to prepare and send.

EPA Regions will need to prepare and send basic information to EPA as they update general permits and annually review EPA's inventory of general permits and program reports. EPA assumes that Regions are re-issuing approximately 9 general permits each year and that each update will take one hour to complete. Each of the seven EPA Regions with general permits will also have to submit an annual review that will each take 4 hours to complete.

12d. Respondent Burden Hours and Labor Costs

Table RESPONDENT BURDEN HOURS & LABOR COSTS-34 presents the estimated respondent burden and cost estimates grouped by activity type and respondent type. This table describes respondents that are permit holders (which can include both private and municipal entities). Table RESPONDENT BURDEN HOURS & LABOR COSTS-35 describes respondents which are states acting as the NPDES permitting authority.

When calculating respondent labor costs, EPA makes the following assumptions:

- EPA used a labor rate of \$63.46 per hour for all authorized state and territory respondent activities defined in this ICR. This hourly rate was based on the average hourly wage for state and municipal employees as determined by the U.S. Department of Labor³.
- The average hourly rate for municipal employees, which account for all POTW and MS4 costs, as determined by the U.S. Department of Labor, Bureau of Labor Statistics, is \$53.79 (including overhead costs of 50 percent)⁴.
- EPA assumes the average hourly rate in the private sector is \$78.14⁵

³U.S. Department of Labor, Bureau of Labor Statistics, Total Compensation for state and local government workers; *Table 3. Employer Costs for Employee Compensation for state and local government workers by occupation and industry group, December 2024.*

⁴U.S. Department of Labor, Bureau of Labor Statistics, Total Compensation for Civilian workers, office and administrative support; *Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group, December 2024.*

⁵U.S. Department of Labor, Bureau of Labor Statistics, Total Compensation for Management, professional, and related; *Table 5. Employer Costs for Employee Compensation for private industry workers by bargaining and work status, December 2024.*

Table RESPONDENT BURDEN HOURS & LABOR COSTS-34. Permittee Labor Burden and Cost by Activity

Discharges	Permit Type	Activity Category	Capital / Startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents ^a	Number of Responses Year	Total Hours / Year	Total Labor Cost
Municipal (Individual Permits)	Great Lakes Program - Municipal	All	\$0	\$0	\$0	8 16	8 16	4, 990	33,050	\$1,777,734
	Individual Permits	DMRs	\$0	\$0	\$0	36,0 64	36,0 64	238, 664	5 39,862	\$29,039,155
		Monitoring	\$0	\$0	\$0	72,1 28	72,1 28	477, 328	7,2 61,836	\$390,614,161
		Reports	\$0	\$0	\$0	7,0 75	7,0 75	8, 868	22,986	\$1,236,430
		Other	\$0	\$0	\$0	1,1 23	1,1 23	1, 123	10,916	\$587,185
		Recordkeeping	\$0	\$0	\$0	17,5 35	17,5 35	17, 535	42,719	\$2,297,844
	Existing POTWs	Reports	\$0	\$0	\$0	18,3 50	18,3 50	63, 169	94,937	\$5,106,651
		Other	\$0	\$0	\$0	-	-	-	-	\$0
		Recordkeeping	\$0	\$0	\$0	16,730	16,730	44,533	16,480	\$886,476
	POTW Sludge Management and CSO	Applications	\$0	\$10,558,676	\$10,558,676	11,4 02	11,4 02	11, 402	114,505	\$6,159,211
		CSO Notification	\$28,566	\$0	\$28,566	823	823	3,88 1	12, 127	\$652,325
		DMRs	\$0	\$0	\$0	12,6 15	12,6 15	40, 390	80,779	\$4,345,115
		Monitoring	\$0	\$0	\$0	28,1 09	28,1 09	85, 771	5 34,333	\$28,741,753
		Reports	\$0	\$0	\$0	1 11	1 11	211	189	\$10,166
		Other	\$0	\$0	\$0	935	935	935	96,831	\$5,208,557
		Recordkeeping	\$0	\$0	\$0	98	98	98	3,053	\$164,239

Discharges	Permit Type	Activity Category	Capital / Startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents ^a	Number of Responses Year	Total Hours / Year	Total Labor Cost
Non-Municipal (Individual Permits)	Great Lakes Program - Non- Municipal	All	\$0	\$0	\$0	1,068	1,068	2,594	23,314	\$1,821,785
	All Individual Permits	Applications	\$0	\$0	\$0	11,925	11,925	11,925	169,962	\$13,280,855
		DMRs	\$0	\$0	\$0	39,235	39,235	233,806	658,025	\$51,418,089
		Monitoring	\$0	\$7,256,301	\$7,256,301	78,640	78,640	460,854	5,514,092	\$430,871,153
		Reports	\$0	\$0	\$0	8,952	8,952	10,188	27,253	\$2,129,540
		Other	\$0	\$0	\$0	4,537	4,537	6,452	73,383	\$5,734,163
		Recordkeeping	\$0	\$0	\$0	32,244	32,244	32,552	49,353	\$3,856,456
	ProTWS Sludge Management	Applications	\$0	\$0	\$0	806	806	806	14,662	\$1,145,682
		DMRs	\$0	\$0	\$0	3,051	3,051	12,770	25,540	\$1,995,721
		Monitoring	\$0	\$0	\$0	17,158	17,158	36,656	192,217	\$15,019,833
		Reports	\$0	\$0	\$0	46	46	78	114	\$8,908
		Other	\$0	\$0	\$0	1,443	1,443	1,443	3,342	\$1,042,557
		Recordkeeping	\$0	\$0	\$0	3,795	3,795	13,544	3,332	\$260,329
	Existing Non- Municipal Sludge Only	DMRs	\$0	\$0	\$0	795	795	2,921	5,843	\$456,535
		Monitoring	\$0	\$0	\$0	2,314	2,314	6,783	38,609	\$3,016,892
		Reports	\$0	\$0	\$0	-	-	-	-	\$0
		Recordkeeping	\$0	\$0	\$0	1,38	1,38	3,6		\$121,056

Discharges	Permit Type	Activity Category	Capital / Startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents ^a	Number of Responses Year	Total Hours / Year	Total Labor Cost
						8	8	23	1,549	
Other Miscellaneous (General Permits)	Non- Stormwater	NOI	\$0	\$0	\$0	16,940	16,940	16,940	1	\$1,323,660
		DMRs	\$0	\$0	\$0	29,534	29,534	147,551	29	\$23,063,266
		Monitoring	\$0	\$0	\$0	59,076	59,076	295,143	64	\$50,618,932
		Reports	\$0	\$0	\$0	18,931	18,931	18,931	6	\$5,076,443
		Other	\$0	\$0	\$0	847	847	847	847	\$66,185
		Recordkeeping	\$0	\$0	\$0	101,638	101,638	101,638	11	\$9,265,622
Stormwater (Individual and General Permits)	Airport	Certification	\$0	\$0	\$0	198	198	198	198	\$15,472
	Alaska Lands	Application	\$0	\$0	\$0	3	3	3	90	\$7,033
	All MS4	Other	\$0	\$0	\$0	52	52	52	1,184	\$63,687
	Stormwater Construction	Inspection & Investigation	\$0	\$0	\$0	83,989	83,989	1,249,481	52	\$40,705,919
		NOI/NOT	\$0	\$0	\$0	167,978	167,978	167,978	30	\$23,912,807
		Recordkeeping	\$0	\$0	\$0	170,710	170,710	170,710	38	\$29,730,666
		Reports	\$0	\$0	\$0	1,754	1,754	1,754	7,628	\$596,052
		Other	\$0	\$0	\$0	91,112	91,112	111,207	2,38	\$186,600,552
	Stormwater Industrial - General	Certification	\$0	\$0	\$0	7,647	7,647	7,647	5,735	\$448,123
		DMRs	\$0	\$0	\$0	19,806	19,806	23,768	4	\$3,714,394

Discharges	Permit Type	Activity Category	Capital / Startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents ^a	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Inspection & Investigation	\$0	\$0	\$0	225,587	225,587	240,829	583,659	\$45,607,113
		NOI/NOT	\$0	\$0	\$0	18,650	18,650	18,650	29,840	\$2,331,698
		Recordkeeping	\$0	\$0	\$0	111,900	111,900	111,900	643,425	\$50,277,230
		Reports	\$0	\$0	\$0	6,564	6,564	6,564	21,592	\$1,687,199
		Other	\$0	\$0	\$0	56,446	56,446	37,796	532,874	\$41,638,755
	Stormwater Industrial - Individual	Applications	\$0	\$0	\$0	275	275	275	3,205	\$250,400
		Recordkeeping	\$0	\$0	\$0	171	171	171	204	\$15,964
		Other	\$0	\$0	\$0	67	67	67	5,360	\$418,830
	Stormwater Phase I MS4s	Applications	\$0	\$0	\$0	93	93	93	7,472	\$401,919
		Monitoring	\$0	\$0	\$0	934	934	18,680	1,064,760	\$57,273,440
		Recordkeeping	\$0	\$0	\$0	93	93	93	467	\$25,120
		Reports	\$0	\$0	\$0	537	537	549	116,961	\$6,291,347
		Other	\$0	\$0	\$0	93	93	93	18,680	\$1,004,797
	Stormwater Phase II MS4s	NOI	\$0	\$0	\$0	1,208	1,208	1,208	72,504	\$3,899,990
		Recordkeeping	\$0	\$0	\$0	6,042	6,042	6,042	16,918	\$909,998
		Reports	\$0	\$0	\$0	6,750	6,750	6,901	606,134	\$32,603,940
Pesticides (General Permits)	Pesticide Applicator	NOI/NOT	\$0	\$0	\$0	365,000	365,000	1,927	4,818	\$376,498
		Monitoring	\$0	\$0	\$0	365,000	365,000	450,4	11	\$8,798,759

Discharges	Permit Type	Activity Category	Capital / Startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents ^a	Number of Responses Year	Total Hours / Year	Total Labor Cost
						0		10	2,603	
		Reports	\$0	\$0	\$0	365,000	365,000	6,794	4,6041	\$3,597,667
		Plan Development	\$0	\$0	\$0	365,000	365,000	1,854	2,8,211	\$2,204,443
		Recordkeeping	\$0	\$0	\$0	365,000	365,000	815,410	63,7,473	\$49,812,101
Vessels (Individual and General Permits)	Large Vessels	NOI/NOT/PARI	\$0	\$0	\$0	9,116	9,116	9,116	8,268	\$646,042
		Reports	\$0	\$0	\$0	85,092	85,092	85,092	8,5,162	\$6,654,553
		Inspections	\$0	\$0	\$0	187,154	187,154	187,154	17,5,184	\$13,688,909
		Monitoring	\$0	\$0	\$0	5,600	5,600	11,200	6,7,200	\$5,251,008
		Recordkeeping	\$0	\$0	\$0	85,070	85,070	85,070	4,2,535	\$3,323,685
Animal Sector (Individual and General Permits)	CAFO	Start-up	\$0	\$0	\$0	-	-	-	-	\$0
		NPDES Application	\$0	\$0	\$0	3,419	3,419	3,419	2,9,063	\$2,270,998
		NMP	\$0	\$0	\$0	3,419	3,419	3,419	58,1,264	\$45,419,969
		Inspection	\$0	\$0	\$0	4,408	4,408	4,408	1,7,633	\$1,377,812
		Reports	\$0	\$0	\$0	17,267	17,267	17,267	3,9,243	\$3,066,455
		Recordkeeping	\$0	\$3,834,861	\$3,834,861	21,370	21,370	1,827,135	1,86,0,080	\$145,346,684
	CAAP	NPDES Application	\$0	\$0	\$0	423	41	41	244	\$19,039
		General Permit Application	\$0	\$0	\$0	423	44	44	88	\$6,875
		BMP Plan	\$0	\$0	\$0	227	227	227	6,028	\$471,008

Discharges	Permit Type	Activity Category	Capital / Startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents ^a	Number of Responses Year	Total Hours / Year	Total Labor Cost
		INAD Program	\$0	\$0	\$0	42 3	19	40	106	\$8,315
		Reports	\$0	\$0	\$0	17 7	17 7	56	79	\$6,139
		Recordkeeping	\$0	\$0	\$0	21 0	21 0	8 11	34 7,050	\$27,118,492
Cooling Water Intake Structures (Individual Permits)	CWIS Existing Facility	Annual Activities	\$0	\$1,516,891	\$1,516,891	1,10 7	1,10 7	1,2 20	1 5,517	\$1,212,472
		Recordkeeping	\$0	\$664	\$664	1,44 7	1,44 7	1,4 46	1 5,906	\$1,242,895
	Phase I New Facility	Application	\$0	\$546,847	\$546,847	1 4	14	1 07	2 2,304	\$1,742,809
		Permit Renewal	\$0	\$1,393,258	\$1,393,258	9 8	98	3 97	9 9,771	\$7,796,085
		Annual Activities	\$785,095	\$271,115	\$1,056,210	1 4	14	55	1 6,902	\$1,320,714
		Recordkeeping	\$0	\$0	\$0	11 8	11 8	-	8,793	\$687,116
	Phase III New Offshore Oil & Gas	Application	\$195,156	\$7,807	\$202,963	6	6	36	2,703	\$211,212
		Permit Renewal	\$0	\$7,807	\$7,807	6	6	36	836	\$65,325
		Annual Activities	\$0	\$1,137,153	\$1,137,153	4 4	44	1 83	5 4,207	\$4,235,697
		Recordkeeping	\$0	\$0	\$0	1 2	12	-	270	\$21,098
Indirect (Pretreatment)	POTW Pretreatment Programs	IU Reporting, Notifications, Monitoring, Special Requests	\$0	\$0	\$0	35,28 0	35,280	64,115	86,985	\$4,678,938
		Program Development	\$0	\$0	\$0	6 6	66	1 45	2,357	\$126,765
		Program Implementation	\$0	\$0	\$0	19,11 6	18,691	45,0 14	60 3,844	\$32,480,742

Discharges	Permit Type	Activity Category	Capital / Startup cost	O&M Cost	Total Annualized Capital and O&M Cost	Total Number of Respondents	Annual Number of Respondents ^a	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Program/Categorical Determination	\$0	\$0	\$0	2 8	28	28	1,375	\$73,961
		Recordkeeping	\$0	\$0	\$0	-	1,59 3	1,5 93	15 9,300	\$8,568,747
	Significant Industrial User	Program Implementation	\$0	\$0	\$0	97,15 7	96,801	173,537	831,436	\$,64,968,409
		Program/Categorical Determination- Special Requests	\$0	\$0	\$0	2 2	22	22	140	\$10,940
		Monitoring, Recordkeeping	\$0	\$10,081,852	\$10,081,852	12 0	12 0	1 20	960	\$75,014
		Recordkeeping	\$0	\$0	\$0	-	29,956	29,956	59,912	\$4,681,524
	Dental Amalgam	Compliance Certification	\$0	\$1,013	\$1,013	1,29 8	1,298	1,298	1,644	\$50,216
		Transfer of Ownership Report	\$0	\$9,026	\$9,026	11,57 1	11,571	11,571	14,657	\$447,577
		Recordkeeping	\$0	\$0	\$0	116,11 2	116,112	116,112	387,622	\$11,836,802
	Total		\$1,008,817	\$36,623,272	\$37,632,089	4,169,375	4,198,976	8,557,539	30,677,180	\$2,0934,853,620

^a The Annual Number of Respondents listed for each activity includes double counting of respondents that perform multiple activities that fall within each group.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-35. State Labor Burden and Cost by Activity

Discharges	Permit Type	Activity Category	O&M Cost	Annual Number of Respondents	Number of Responses Year	Total Hours / Year	Total Labor Cost
Municipal (Individual Permits)	Great Lakes Program - Municipal	All	\$0	42	142	1,577	\$100,045
	Individual Permits	DMRs	\$0	-	-	-	\$0
		Monitoring	\$0	-	-	-	\$0
		Reports	\$0	1,248	10,104	24,497	\$1,554,599
		Other	\$0	545	5,808	177,989	\$11,295,163
		Recordkeeping	\$0	-	-	-	\$0
	Existing POTWs	Reports	\$0	121	47,936	18,179	\$1,153,637
		Other	\$0	-	-	-	\$0
		Recordkeeping	\$0	38	10	483	\$30,672
	POTW Sludge Management and CSO	Applications	\$0	162	7,113	31,934	\$2,026,534
		CSO Notification	\$0	-	-	-	\$0
		DMRs	\$0	-	-	-	\$0
		Monitoring	\$0	-	-	-	\$0
		Reports	\$0	28	144	846	\$53,655
		Other	\$0	168	261	3,065	\$194,488
		Recordkeeping	\$0	-	-	-	\$0
Non-Municipal (Individual Permits)	Great Lakes Program - Non-Municipal	All	\$0	-	-	-	\$0
	All Individual Permits	Applications	\$0	432	12,901	9,848	\$624,970
		DMRs	\$0	-	-	-	\$0
		Monitoring	\$0	-	-	-	\$0
		Reports	\$0	1,392	11,690	38,482	\$2,442,092
		Other	\$0	1,435	8,320	84,884	\$5,386,727
		Recordkeeping	\$0	-	-	-	\$0
	ProTWS Sludge Management	Applications	\$0	18	688	1,490	\$94,579
		DMRs	\$0	-	-	-	\$0
		Monitoring	\$0	-	-	-	\$0
		Reports	\$0	45	9	40	\$2,507

Discharges	Permit Type	Activity Category	O&M Cost	Annual Number of Respondents	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Other	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
	Existing Non-Municipal Sludge Only	DMRs	\$0	-	-	-	\$0
		Monitoring	\$0	-	-	-	\$0
		Reports	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
Other Miscellaneous (General Permits)	Non-Stormwater	NOI	\$0	48	16,706	4,176	\$265,038
		DMRs	\$0	-	-	-	\$0
		Monitoring	\$0	-	-	-	\$0
		Reports	\$0	576	20,702	73,436	\$4,660,249
		Other	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
Stormwater (Individual and General Permits)	Airport	Certification	\$0	-	-	-	\$0
	Alaska Lands	Application	\$0	-	-	-	\$0
	All MS4	Other	\$0	-	-	-	\$0
	Stormwater Construction	Inspection & Investigation	\$0	144	11,465	230,728	\$14,641,999
		NOI/NOT	\$0	192	160,756	100,473	\$6,375,985
		Recordkeeping	\$0	-	-	-	\$0
		Reports	\$0	528	1,783	12,123	\$769,326
		Other	\$0	144	6,283	6,283	\$398,745
	Stormwater Industrial - General	Certification	\$0	48	7,318	7,318	\$464,388
		DMRs	\$0	-	-	-	\$0
		Inspection & Investigation	\$0	96	18,390	296,112	\$18,791,268
		NOI/NOT	\$0	48	17,848	4,462	\$283,159
		Recordkeeping	\$0	-	-	-	\$0
		Reports	\$0	528	4,481	28,025	\$1,778,467

Discharges	Permit Type	Activity Category	O&M Cost	Annual Number of Respondents	Number of Responses Year	Total Hours / Year	Total Labor Cost
	Stormwater Industrial - Individual	Other	\$0	96	17,848	7,809	\$495,527
		Applications	\$0	48	103	227	\$14,380
		Recordkeeping	\$0	-	-	-	\$0
		Other	\$0	-	-	-	\$0
	Stormwater Phase I MS4s	Applications	\$0	-	-	-	\$0
		Inspection & Investigation	\$0	96	285	5,352	\$339,638
		Monitoring	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
		Reports	\$0	672	553	19,151	\$1,215,322
		Other	\$0	106	111	2,227	\$141,338
	Stormwater Phase II MS4s	Inspection & Investigation	\$0	96	1,998	35,184	\$2,232,777
		NOI	\$0	10	1,117	4,470	\$283,641
		Recordkeeping	\$0	-	-	-	\$0
		Reports	\$0	672	6,481	12,676	\$804,429
Pesticides (General Permits)	Pesticide Applicator	NOI/NOT	\$0	48	1,731	845	\$53,602
		Monitoring	\$0	-	-	-	\$0
		Reports	\$0	48	5,430	5,793	\$367,635
		Plan Development	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
Animal Sector (Individual and General Permits)	CAFO	Start-up	\$0	-	-	-	\$0
		NPDES Application	\$0	47	8,548	272,492	\$17,292,335
		NMP	\$0	-	-	-	\$0
		Inspection	\$0	-	-	-	\$0
		Reports	\$0	47	33,499	152,201	\$9,658,663
		Recordkeeping	\$0	-	-	-	\$0
	CAAP	NPDES Application	\$0	48	30	8	\$514
		General Permit Application	\$0	-	-	-	\$0

Discharges	Permit Type	Activity Category	O&M Cost	Annual Number of Respondents	Number of Responses Year	Total Hours / Year	Total Labor Cost
		BMP Plan	\$0	48	48	11	\$673
		INAD Program	\$0	48	55	87	\$5,540
		Reports	\$0	48	98	109	\$6,900
		Recordkeeping	\$0	-	-	-	\$0
Cooling Water Intake Structure Permits (Individual Permits)	CWIS All	Annual CWIS Program Oversight	\$0	-	-	-	\$0
	CWIS Existing Facility	Annual Activities	\$700,881	1,065	2,152	26,965	\$1,711,211
		Other	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
	Phase I New Facility	Application	\$2,642	6	44	1,589	\$100,817
		Permit Renewal	\$434	13	1,185,772	1,060	\$67,246
		Annual Activities	\$6,269	93	363	4,171	\$264,671
		Recordkeeping	\$0	112	-	400	\$25,384
	Phase III New Offshore Oil & Gas	Application	\$0	-	-	-	\$0
		Permit Renewal	\$0	-	-	-	\$0
		Annual Activities	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
Indirect (Pretreatment)	POTW Pretreatment Programs	IU Reporting, Notifications, Monitoring, Special Requests	\$0	5,081	5,430	55,475	\$3,520,466
		Program Development	\$0	1	0	100	\$6,346
		Program Implementation	\$0	242	4,169	50,679	\$3,216,064
		Program/Categorical Determination	\$0	-	-	-	\$0
		Recordkeeping	\$0	42	42	11,290	\$716,463
	Significant Industrial User	Program Implementation	\$0	-	-	-	\$0

Discharges	Permit Type	Activity Category	O&M Cost	Annual Number of Respondents	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Program/Categorical Determination-Special Requests	\$0	-	-	-	\$0
		Monitoring, Recordkeeping	\$0	-	-	-	\$0
		Recordkeeping	\$0	-	-	-	\$0
	Dental Amalgam	Compliance Certification	\$0	1,307	1,307	980	\$52,734
		Transfer of Ownership Report	\$0	10,207	10,207	7,655	\$411,789
		Recordkeeping	\$0	-	-	-	\$0
Program Administration	Individual Permits	Submittal of Permit Information to EPA	\$0	192	1,864	965	\$62,529
		Other	\$0	637	201	803	\$50,937
	All Permits	NPDES Program Authorization	\$0	49	5	1,730	\$109,786
		Inspection & Investigation	\$0	1,200	8,699	539,808	\$34,256,216
		Recordkeeping	\$0	48	48	14,400	\$913,824
	Electronic Reporting	Reports	\$0	96	609,526	11,078	\$703,024
		Other	\$0	74	74	253,760	\$16,103,610
	Permit Quality Review	Pre-Interview	\$0	10	10	384	\$24,369
	Total		\$710,226	48	2,278,706	2,658,402	\$168,618,687

Table RESPONDENT BURDEN HOURS & LABOR COSTS-36 estimates the total respondent burden hours and labor costs for permittees subject to NPDES program requirements and authorized states, tribes, territories and D.C.

Table RESPONDENT BURDEN HOURS & LABOR COSTS-36. Summary of Labor Burden and Costs

	Average Annual Respondents	Average Annual Total Burden (hours)	Average Annual Total Labor Costs (2024\$)
Permittees	853,275	30,677,180	\$2,094,853,620
States, tribes, territories, and D.C. ^a	637	2,658,402	\$168,618,687
Totals	853,912	33,335,582	\$2,263,472,306

^a 590 of these 637 are not authorized to administer the NPDES program and respond to only one information item (certification of EPA-issued permits).

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.

Most calculations in this ICR account for labor costs only. A facility incurs O&M costs when it uses services, materials, or supplies needed to comply with the rule's reporting and recordkeeping requirements that the facility will not use otherwise. Another type of O&M cost is for the purchase of contracted services such as laboratory analyses. The purchase of supplies such as filing cabinets and services such as photocopying or boat rental, is also considered O&M costs, and may also be referred to as ODCs.

This section presents an estimate of annual operating and maintenance (O&M) and capital and start-up costs. The majority of the burden and cost calculations in this ICR are the result of labor costs only. The ICR accounts for O&M costs for certain testing/analysis plus certain capital and start-up costs incurred by respondents that perform activities outside the normal operation practices. All costs presented have been adjusted using the Consumer Price Index to November 2024 dollars.

All costs presented in this section have been adjusted with the Consumer Price Index to November 2024 dollars. These costs are linked to the distinctive activities described below.

The permittee O&M costs are linked to the following activities:

- NPDES permit application and renewal requirements;
- Monitoring and reporting;
- Baseline determination and estimate of the incremental monitoring burden and cost for remining sites;
- Minimum monitoring requirements for direct discharging mills in the “bleached papergrade kraft and soda” and “papergrade sulfite” subcategories of the “pulp, paper, and paperboard” point source category;
- Animal sector testing/analysis and public notice costs;
- SIU discharge monitoring under the Pretreatment Program;
- CWIS Phase I and existing facility annual activities such as operation and upkeep of capital equipment, as well as purchase of contracted services such as laboratory analyses and other direct costs (ODCs);
- CWIS Phase III (offshore oil and gas) facility entrainment monitoring sample analysis if performed by an outside laboratory;
- CWIS existing facility equipment O&M, contract services, and ODCs; and,
- Postage costs for mailing in permit applications and dental office reporting.

The permittee capital and start-up costs are linked to the activities listed below:

- CSO notification;
- Baseline determination and estimate of the incremental monitoring burden and cost for remining sites;
- Start-up costs for the animal sector;
- CWIS Phase I purchase and installation of pilot study technology; and,
- CWIS Phase III (offshore oil & gas) cost for installing remote monitoring devices

Table RESPONDENT CAPITAL AND O&M COSTS-37 summarizes annual O&M and capital and start-up costs.

Table RESPONDENT CAPITAL AND O&M COSTS-37. Summary of Annual O&M and Capital and Start-up Costs

	Permittees	States
Costs (capital and start-up)	\$1,008,817	\$0
Costs (O&M)	\$36,623,272	\$710,226
Total annual costs	\$37,632,089	\$710,226

General Application Requirements for NPDES Permits

Testing and Contractors Costs for POTWs and PrOTWs

Assumptions and estimates for these O&M costs (i.e., testing/contractor costs) are detailed in Table RESPONDENT CAPITAL AND O&M COSTS-38 to Table RESPONDENT CAPITAL AND O&M COSTS-40.

Table RESPONDENT CAPITAL AND O&M COSTS-38. Estimated Percent of POTWs that Perform Form 2A Pollutant Testing In-House

Facility type	Basic conventional and nonconventional	Additional conventional and nonconventional	Priority pollutants and state WQS	Multiple species biomonitoring
< 0.1 mgd, no priority pollutants.	60%	--	--	--
0.1–1.0 mgd, no priority pollutants.	80%	80%	--	--
Minors, with priority pollutants.	85%	85%	50%	85%
Majors, no priority pollutants.	85%	85%	10%	75%
Majors, with priority pollutants.	90%	90%	70%	85%

Table RESPONDENT CAPITAL AND O&M COSTS-39. Estimated Percent of POTWs that Perform Form 2S pollutant Testing In-House

Facility type	Basic conventional and nonconventional
	% Currently Testing
NPDES POTWs	95
NPDES PrOTWs	95
Sludge Only POTWs	50
Sludge Only PrOTWs	50

Table RESPONDENT CAPITAL AND O&M COSTS-40. Testing/Contractor Costs (O&M costs)

	Tests/year	Cost per test (\$)	Total \$
Form 2A			
Basic conventional and non-conventional	3	\$155	\$373,860
Additional conventional and non-conventional	3	\$311	\$447,840
Priority pollutants/state WQS	3	\$1,788	\$5,905,764
Multiple species biomonitoring	1	\$12,439	\$3,831,212
Form 2S			
NPDES and sludge-only facilities	1	\$311	\$132,486
Section 308 Requests			
Municipal (complex)	1	\$1,788	\$8,940
Nonmunicipal (medium)	1	\$1,555	\$6,998

Postage for all Application Forms Submittal

Permittees currently must mail permit applications to the permitting authority for processing. Application forms range from 3-5 pages to more than 30. Permittees may choose to include additional monitoring data pages as well. EPA assumes that it will cost \$3.83 to mail each permit application (postage for an envelope with up to 60 sheets of paper).

Baseline Determination and Estimate of the Incremental Monitoring Burden and Cost for Remining Sites (DMR Sampling Analysis)

EPA assumes that baseline determination monitoring and annual monitoring costs will be required for all the reporting requirements for mining sites in Indiana (5), Kentucky (7), and Tennessee (9). EPA assumes a sample analysis and mileage cost of \$44/sample adjusted to November 2024 using the CPI (Source: Baseline Standards and BMPs for the Coal Mining Point Source Category-Coal Remining Subcategory and Western Alkaline Coal Mining Subcategory ICR; OMB control no. 2040-0239; EPA ICR no. 1944.03).

Minimum Monitoring Requirements for Direct Discharging Mills in the Bleached Papergrade Kraft and Soda Subcategory and the Papergrade Sulfite Subcategory of the Pulp, Paper, and Paperboard Point Source Category (DMR Sampling Analysis)

To estimate O&M costs associated with these activities, EPA assumes that mills will send their collected samples to outside laboratories for analysis. Some facilities could perform in-house analysis for some pollutants (i.e., adsorbable organic halides (AOX) and/or chloroform). However, for the purposes of this ICR, EPA assumed that all analyses will be contracted to outside laboratories to express the full potential analytical costs of minimum monitoring on Subparts B and E mills. In the future, facilities might elect to conduct analysis in-house, particularly AOX analyses, because the monitoring requirement is daily.

Analytical costs performed at outside laboratories were taken from the Minimum Monitoring Requirements for Direct Discharging Mills in the Bleached Papergrade Kraft and Soda Subcategory and the Papergrade Sulfite Subcategory of the Pulp, Paper, and Paperboard Point Source Category ICR (OMB control no. 2040-0243; EPA ICR no. 1878.02). These costs are \$239 for AOX, \$1,736 for TCDD/TCDF, \$991 for chlorinated phenolics, and \$534 for chloroform.

Seventy-five Subpart B Bleached Papergrade Kraft & Soda mills perform daily sampling for AOX, weekly sampling for chloroform, and monthly grab sampling for TCDD, TCDF, and chlorinated phenolics. Thirty-eight Subpart B Bleached Papergrade Kraft & Soda mills perform monthly composite sampling for TCDD, TCDF, and chlorinated phenolics. Five of the Subpart E Ca / Sodium / Mg Sulfite mills perform daily AOX sampling. Two each for the Subpart E Ammonium Sulfite and Specialty Grade perform monthly sampling for TCDD, TCDF, and chlorinated phenolics.

Animal Sector Testing/Analysis and Public Notice Costs

The Animal Sector includes O&M costs that account for state agencies issuing public notices and certain testing and analysis costs incurred by respondents that perform activities outside the normal operation practices. O&M costs are based on costs from the Consolidated Animal Sectors ICR (OMB control no. 2040-0250; EPA ICR no. 1989.10). The average cost for state agencies to issue a public notice was \$1,847 per notice and the average testing and analysis cost was \$99 per event. O&M for recordkeeping was assumed to be 10 percent of recordkeeping labor costs.

Pretreatment Industrial Users Discharge Monitoring

There are O&M costs incurred by IUs for discharge monitoring. The total annual respondent O&M costs associated with this ICR are estimated to be \$10,081,852.

CWIS Monitoring

CWIS Phase I Flow, Velocity and Biological Monitoring

O&M and ODC costs are associated with multiple activities including flow, velocity and biological monitoring. EPA assumes that samples taken for the Source Water Baseline Biological Characterization Study to be included with the application will be analyzed by a contracted laboratory. For annual O&M costs, EPA assumes that entrainment monitoring sampling analysis will be performed by an outside laboratory. Table RESPONDENT CAPITAL AND O&M COSTS-41 presents a summary of O&M and ODC costs for CWIS Phase I facilities.

CWIS Phase III – Application and Permit Renewal Activities New Offshore Oil and Gas Facilities

Estimated O&M costs for permit application and permit renewal activities include \$1,301 for various ODCs. For annual O&M costs, EPA assumed that the analysis of impingement monitoring samples will be done on-site, while entrainment monitoring samples is performed by an outside laboratory. Laboratory analysis for entrainment samples is estimated to cost \$5,191 per year per facility. The ODCs associated with biological monitoring are estimated to be

approximately \$1,139 per facility. Table RESPONDENT CAPITAL AND O&M COSTS-41 presents a summary of O&M and ODC costs for CWIS Phase III Facilities

CWIS Existing Facility Operations and Contracted Services

O&M costs include costs for the operation and upkeep of capital equipment, cost for the purchase of contracted services, such as laboratory analyses, and the purchase of supplies such as filing cabinets and services such as photocopying or boat rental which are referred to as other direct costs (ODCs). Table RESPONDENT CAPITAL AND O&M COSTS-41 presents a summary of O&M and ODC costs for CWIS Existing Facilities.

Table RESPONDENT CAPITAL AND O&M COSTS-41. Summary of Estimated Annual Total O&M Costs for CWIS Facilities

Facility Category	O&M/ODC Cost
Phase I New Facility	\$2,996,316
Phase III New Offshore Oil & Gas	\$1,347,923
CWIS Existing Facility	\$1,517,556

CWIS Phase I Purchase and Installation of Pilot Study Technology

EPA anticipates that Track II facilities that operate once-through cooling intakes will perform pilot studies to determine the effectiveness of their chosen technology. For costing purposes, EPA is assuming that a pilot study will be performed using a Gunderboom system. EPA estimated the pilot study would cost \$402,000.

CWIS Phase III New Offshore Remote Monitoring Equipment

EPA estimated that the initial permit application capital costs for installing a remote monitoring device for impingement monitoring at each facility was \$33,261.

Dental Amalgam Postage

EPA estimates that annual O&M costs to dental offices for reporting postage will be an average of \$10,038 and to state and POTW Control Authorities for storage of files will be an average of \$4,375.

CSO Control Policy Public Notification Signage

1The capital costs associated with public notification of CSO locations, events, and public health and environmental effects are included in this ICR. The costs are for municipalities to replace notification signs. From estimates presented in previous ICRs each sign will be replaced every 10 years which is equal to an average annual cost of \$16.

Remining Sites DMR Sampling Analysis Flow Metering Equipment

EPA assumes that flow metering from an installed weir is required for mining sites in Indiana and Tennessee. For all other states, EPA assumes that flow metering is already required and installed as part of the state Rahall remining permit program.

For Indiana and Tennessee, EPA assumes installed weir costs of \$2,054 based on the basis of an escalation of the 2004 cost estimates from previous the Baseline Standards and BMPs for the Coal Mining Point Source Category-Coal Remining Subcategory and Western Alkaline Coal Mining Subcategory ICR (OMB control no. 2040-0239; EPA ICR no. 1944.03) (originally from Weir & Flume Sales Company and Tarco Tech Industries). Indiana will have 5 sites/year × 4 preexisting discharge points/site. Tennessee will have 9 sites/year × 4 preexisting discharge points/site. These costs are annualized using a 7 percent discount rate and an estimated 10-year life for the weir.

Animal Sector Soil Sampling Equipment

Start-up capital costs for Animal Sector facilities include the \$47 purchase of a soil auger to collect soil samples and the \$57 purchase of a manure sampler. CAFOs will also need pay \$57 to install depth markers in their lagoons. All operations will need to expend an estimated \$1,847 to develop the NMP elements that pertain to the production area, including performing an engineering analysis of the waste storage volume requirements needed to comply with the CAFO rule.

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.

14a. Agency Activities

The federal government burden includes activities related to administration of NPDES permits in non-authorized states, territories, and federal Indian lands as well as oversight of NPDES programs. In states without approved NPDES programs, the federal government issues and administers NPDES permits. These burdens are similar to those incurred by the states and are calculated using the same methodology and assumptions. **Table AGENCY COSTS-42** describes agency activities.

14b. Agency Labor Cost

EPA determined the hourly employment cost of federal employees using methodology established in previous ICRs. According to the U.S. Office of Personnel Management, 2024 General Schedule (2024-GS), the average annual salary of a government employee at the GS-9, Step 10 level is \$66,731. At 2,080 hours per year, the hourly wage is \$32.08. Assuming overhead costs of 60 percent, or \$19.25 per hour, the fully loaded cost of employment for a federal employee is \$51.33.

Table AGENCY COSTS-42 presents calculated agency burden hour and labor cost estimates grouped by program administration activity type.

Table AGENCY COSTS-42. Agency Burden and Cost Estimates by Activity

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
Municipal (Individual Permits)	Great Lakes Program - Municipal	All	\$0	-	-	\$0
	Individual Permits	DMRs	\$0	-	-	\$0
		Monitoring	\$0	-	-	\$0
		Reports	\$0	6	78	\$4,004
		Other	\$0	6	257	\$13,192
		Recordkeeping	\$0	-	-	\$0
	Existing POTWs	Reports	\$0	158	162	\$8,331
		Other	\$0	4	13	\$667
		Recordkeeping	\$0	-	-	\$0
	POTW Sludge Management and CSO	Applications	\$0	265	368	\$18,901
		CSO Notification	\$0	-	-	\$0
		DMRs	\$0	-	-	\$0
		Monitoring	\$0	-	-	\$0
		Reports	\$0	-	-	\$0
		Other	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
Non-Municipal (Individual Permits)	Great Lakes Program - Non-Municipal	All	\$0	-	-	\$0
	All Individual Permits	Applications	\$0	48	57	\$2,937

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
		DMRs	\$0	-	-	\$0
		Monitoring	\$0	-	-	\$0
		Reports	\$0	2,805	6,533	\$335,328
		Other	\$0	1,383	11,232	\$576,566
		Recordkeeping	\$0	-	-	\$0
	PrOTWS Sludge Management	Applications	\$0	-	-	\$0
		DMRs	\$0	-	-	\$0
		Monitoring	\$0	37	10	\$488
		Reports	\$0	18	136	\$6,971
		Other	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
	Existing Non-Municipal Sludge Only	DMRs	\$0	-	-	\$0
		Monitoring	\$0	-	-	\$0
		Reports	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
Other Miscellaneous (General Permits)	Non-Stormwater	NOI	\$0	234	58	\$3,000
		DMRs	\$0	-	-	\$0

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Monitoring	\$0	-	-	\$0
		Reports	\$0	190	2,144	\$110,055
		Other	\$0	36	144	\$7,392
		Recordkeeping	\$0	-	-	\$0
Stormwater (Individual and General Permits)	Airport	Certification	\$0	-	-	\$0
	Alaska Lands	Application	\$0	3	2	\$92
	All MS4	Other	\$0	-	-	\$0
	Stormwater Construction	Inspection & Investigation	\$0	-	-	\$0
		NOI/NOT	\$0	7,225	5,074	\$260,446
		Recordkeeping	\$0	-	-	\$0
		Reports	\$0	27	436	\$22,381
		Other	\$0	118	118	\$6,048
		Certification	\$0	329	329	\$16,873
		DMRs	\$0	-	-	\$0
	Stormwater Industrial - General	Inspection & Investigation	\$0	-	-	\$0
		NOI/NOT	\$0	1,404	351	\$18,011
		Recordkeeping	\$0	-	-	\$0
					-	

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Reports	\$0	84	1,000	\$51,332
		Other	\$0	696	696	\$35,701
	Stormwater Industrial - Individual	Applications	\$0	2	2	\$111
		Recordkeeping	\$0	-	-	\$0
		Other	\$0	9	9	\$462
	Stormwater Phase I MS4s	Applications	\$0	1	30	\$1,540
		Inspection & Investigation	\$0	-	-	\$0
		Monitoring	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
		Reports	\$0	0	3	\$176
		Other	\$0	1	12	\$616
	Stormwater Phase II MS4s	Inspection & Investigation	\$0	-	-	\$0
		NOI	\$0	91	364	\$18,685
		Recordkeeping	\$0	-	-	\$0
		Reports	\$0	473	974	\$49,982
Pesticides (General Permits)	Pesticide Applicator	NOI/NOT	\$0	-	-	\$0
		Monitoring	\$0	529	491	\$25,211

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Reports	\$0	-	-	\$0
		Plan Development	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
Vessels (Individual and General Permits)	Large Vessels	NOI/NOT/PARI	\$0	1,054	21	\$1,082
		Reports	\$0	3,775	231	\$11,841
		Inspections	\$0	-	-	\$0
		Monitoring	\$0	11,200	5,600	\$287,457
		Recordkeeping	\$0	-	-	\$0
Animal Sector (Individual and General Permits)	CAFO	Start-up	\$0	-	-	\$0
		NPDES Application	\$552,680	3,774	16	\$803
		NMP	\$0	-	-	\$0
		Inspection	\$0	-	-	\$0
		Reports	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
	CAAP	NPDES Application	\$5,999	45	33	\$1,691
		General Permit Application	\$0	-	-	\$0
		BMP Plan	\$0	-	-	\$0

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
		INAD Program	\$0	-	-	\$0
		Reports	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
Cooling Water Intake Structures (Individual Permits)	CWIS All	Annual CWIS Program Oversight	\$414	6	177	\$9,086
	CWIS Existing Facility	Annual Activities	\$0	58	145	\$7,443
		Other	\$0	3	1,041	\$53,436
		Recordkeeping	\$0	73	15,940	\$818,230
	Phase I New Facility	Application	\$108	2	83	\$4,267
		Permit Renewal	\$18	4	55	\$2,833
		Annual Activities	\$257	19	233	\$11,984
		Recordkeeping	\$0	-	-	\$0
	Phase III New Offshore Oil & Gas	Application	\$0	-	-	\$0
		Permit Renewal	\$4,680	78	1,998	\$102,560
		Annual Activities	\$1,290	172	2,150	\$110,363
		Recordkeeping	\$0	-	-	\$0
Indirect (Pretreatment)	POTW Pretreatment Programs	IU Reporting, Notifications, Monitoring, Special Requests	\$0	9,341	22,582	\$1,159,188
		Program Development	\$0	-	-	\$0

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
					-	
		Program Implementation	\$0	-	-	\$0
		Program/Categorical Determination	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
	Significant Industrial User	Program Implementation	\$0	-	-	\$0
		Program/Categorical Determination-Special Requests	\$0	-	-	\$0
		Monitoring, Recordkeeping	\$0	-	-	\$0
		Recordkeeping	\$0	-	-	\$0
	Dental Amalgam	Compliance Certification	\$0	180	135	\$7,259
		Transfer of Ownership Report	\$0	1,405	1,054	\$56,685
		Recordkeeping	\$0	-	-	\$0
Program Administration	Individual Permits	Submittal of Permit Information to EPA	\$0	-	-	\$0
		Other	\$0	-	-	\$0
	All Permits	NPDES Program Authorization	\$0	423	5,616	\$288,267
		Inspection & Investigation	\$0	18,041	17,139	\$879,769
		Recordkeeping	\$0	-	-	\$0
	Electronic Reporting	Reports	\$0	7,185	15,501	\$795,697

Discharges	Permit Type	Activity Category	O&M Cost	Number of Responses Year	Total Hours / Year	Total Labor Cost
		Other	\$0	7	28	\$1,437
	Permit Quality Review	Pre-Interview	\$0	68	544	\$27,924
Total			\$565,446	73,096	121,404	\$6,234,799

14c. Agency Non-Labor Costs

O&M or capital and start-up costs for the federal government are presented in Table AGENCY COSTS-43.

Table AGENCY COSTS-43. Summary of Estimated Annual Total Agency O&M Costs by Program Activity

Program	O&M Costs
CWIS Program Oversight	\$6,767
CAFO and CAAP reviews	\$558,679

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 current OMB-approved burden for the existing NPDES ICR is 31,143,504 hours. The burden requested in this ICR renewal is 33,335,582 hours. Overall, the burden requested in this ICR is 2,192,078 hours (7 percent) more than the previously approved burden of the prior ICR. This increase in burden hours occurred in the absence of EPA rulemakings or statutory changes that would have expanded the scope of the NPDES program. Rather, the burden hour increase occurred due to a number of factors, including a 16% increase in EPA's estimates of responses from 9,310,277 in the current ICR to 10,836,245 in this ICR that reflects greater accuracy in estimating the number of permittee respondents due to improved electronic data reporting and collection. In addition, this ICR consolidates a portion of the burden (148 responses and 9,480 hrs.) associated with the Great Lakes Antidegradation Demonstrations and Great Lakes Regulatory Relief Requests which had previously been split between the WQS Regulation ICR (OMB Control Number 2040-0049) and this ICR.

Capital and O&M cost burden increased due to several factors including increases in the number of respondents and adjustments to the methodology, including evaluating pretreatment costs. In addition, there has been a significant increase in laboratory analytic and labor costs.

Table REASONS FOR CHANGE IN BURDEN-44, Table REASONS FOR CHANGE IN BURDEN-45, and Table REASONS FOR CHANGE IN BURDEN-46 summarize adjustments in the number of responses, burden hours, and capital and O&M cost burden.

Table REASONS FOR CHANGE IN BURDEN-44. Summary of Adjustment in Number of Responses

Total Responses Approved in 2023 ICR	Total Responses Requested in this ICR	Change Due to:			Total Change (Percent)
		New Statute	Agency Actions (New Rules, Etc.)	Revised Estimates	
9,310,277	10,836,245	0	0	1,525,968	16%

Table REASONS FOR CHANGE IN BURDEN-45. Summary of Adjustment in Number of Burden Hours

Total Hours Approved in 2023 ICR	Total Hours Requested in this ICR	Change Due to:			Total Change (Percent)
		New Statute	Agency Actions (New Rules, Etc.)	Revised Estimates	
31,143,504	33,335,582	0	0	2,192,078	7%

Table REASONS FOR CHANGE IN BURDEN-46. Summary of Adjustment in the Capital/Startup and O&M Cost Burden

Total Cost Approved in 2023 ICR	Total Cost Burden Requested in this ICR	Change due to:			Total Change (Percent)
		New Statute	Agency Actions (New Rules, Etc.)	Revised Estimates	
\$22,999,181	\$38,313,749	0	0	15,314,568	67%

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.

ICIS is the national electronic management information system that automates entry of, updates, and facilitates retrieval of NPDES data and tracks permit issuance, permit limits and monitoring data, and other data on facilities regulated under NPDES. The public can access permit data by:

- Using EPA's Envirofacts Data Warehouse and Applications website at <https://enviro.epa.gov/>. Envirofacts lets users combine ICIS-NPDES data with other EPA databases and mapping tools.
- Using EPA's Enforcement and Compliance History Online (ECHO) website at <https://echo.epa.gov/>. ECHO gives the public access to compliance-history-related data for permittees by geographic area.

17. DISPLAY OF EXPIRATION DATA

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

EPA has not made a request regarding display of the expiration date.

18. CERTIFICATION STATEMENT

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

EPA is able to certify compliance with all provisions under item 19 of OMB Form 83-I.B.

Appendix A — Copy of Regulation Authorizing Data Collection and Federal Register Notice

F.1 Clean Water Act Section 402

(See attached PDF document)

F.2 ICR Federal Register Notice

(See attached PDF document)

Appendix B — Application Forms

Forms included:

- Application Forms 1, 2A, 2B, 2C, 2D, 2E, 2F, 2S;
- Construction General Permit NOI, NOT;
- Pesticide General Permit NOI, NOT, Annual Report;
- Multi Sector General Permit NOI, NOT, DMR, Annual Report, No Exposure Certification Form;
- Vessel General Permit NOI, NOT, PARI;
- Uniform Federal Transportation/Utility System Application Form
- One-Time Compliance Reporting Form for Dental Dischargers

(See attached PDF document)