

SUPPORTING STATEMENT

INFORMATION COLLECTION REQUEST

FOR

**INSTITUTIONAL CONTROLS TRACKING SYSTEMS
AND COSTS SURVEY**

PART A

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. IDENTIFICATION OF THE INFORMATION COLLECTION.....	1
1(a). Title of the Information Collection	1
1(b). Short Characterization/Abstract	1
2. NEED FOR AND USE OF THE COLLECTION.....	1
2(a). Need/Authority for the Collection.....	1
2(b). Practical Utility/Uses of the Data.....	2
3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA....	3
3(a). Nonduplication	3
3(b). Public Notice Required Prior to ICR Submission to OMB.....	3
3(c). Consultations	4
3(d). Effects of Less Frequent Collection	6
3(e). General Guidelines	7
3(f). Confidentiality	7
3(g). Sensitive Questions	7
4. THE RESPONDENTS AND THE INFORMATION COLLECTED	7
4(a). Respondents/SIC Codes	7
4(b). Information Requested	8
i. Data Elements	8
ii. Respondent Activities.....	8
5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT.....	8
5(a). Agency Activities.....	8
5(b). Collection Methodology and Management	9
5(c). Small Entity Flexibility	9
5(d). Collection Schedule.....	10
6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION	10
6(a). Estimating Respondent Burden	10
6(b). Estimating Respondent Costs.....	11
i. Estimating Labor Costs.....	11
ii. Estimating Capital and Operation and Maintenance Costs	12
iii. Capital/Start-up vs. Operating and Maintenance (O&M) Costs	12
iv. Annualizing Capital Costs	12
6(c). Estimating Agency Burden and Cost	12
6(d). Estimating the Respondent Universe and Total Burden and Cost	15

TABLE OF CONTENTS *(Cont'd)*

<u>Section</u>	<u>Page</u>
6(e). Bottom Line Burden Hours and Cost Tables	15
i. Respondent Tally	15
ii. Agency Tally	15
6(f). Burden Statement	16

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a). Title of the Information Collection

Institutional Controls Tracking Systems and Costs Survey

1(b). Short Characterization/Abstract

The U.S. Environmental Protection Agency (“EPA”), Office of Emergency and Remedial Response (“OERR”) is seeking clearance from the Office of Management and Budget (“OMB”) to gather information about the characteristics of information systems currently used by state, tribal, and local governments to track the implementation, monitoring, and enforcement of institutional controls at sites, facilities, and properties under their jurisdiction. OERR proposes to use survey questionnaires to gather information about types of institutional controls tracking systems currently in use; their purpose, scope, and structure; the kinds of data they track; their data entry, quality assurance, administration, and access features; data querying capabilities; compatibility with a future EPA system; development, population, and operating costs; and lessons learned from developing, implementing, and operating them.

OERR does not intend to use the information resulting from this survey to generalize about an overall population. Survey responses are intended to provide OERR with a detailed overview of state, tribal, and local governments’ current practices and procedures for tracking institutional controls and to enable OERR to evaluate the strengths and weaknesses of different tracking systems.

Included in this information collection request (“ICR”) are proposed survey questions submitted for OMB approval. EPA estimates that 52 states, 10 tribes, and no more than 200 local agencies (planning, zoning, and real estate recording offices) will be surveyed.

In addition to the survey, this ICR includes requests for clarification, follow-up questions, follow-up calls to unresponsive respondents, and agency visits. Clarifications and follow-up questions will be necessary if EPA requires more information to understand a tracking system. Up to 50 agencies may be asked to provide additional information. EPA proposes to visit no more than 20 agencies to evaluate their institutional controls tracking systems.

2. NEED FOR AND USE OF THE COLLECTION

2(a). Need/Authority for the Collection

OERR is currently researching the development of a system for tracking institutional controls at Fund- and enforcement-lead Superfund sites. Institutional controls are non-engineered remedial measures such as administrative and/or legal controls that minimize the potential for exposure to contamination by limiting land or resource use. Institutional controls are employed at sites where remedies leave contaminant residuals on site that do not allow for unlimited use and unrestricted exposure. Institutional controls can reduce the potential for unacceptable exposure to residual contamination and can also be used to protect the integrity of an engineered remedy.

Use of institutional controls at Superfund sites is authorized by the National Oil and Hazardous Substances Pollution Contingency Plan (“NCP”), 40 CFR Part 300. EPA has issued guidance on the use of institutional controls in conjunction with other cleanup remedies¹, including:

- Policy on Management of Post-Removal Site Control, OSWER Directive No. 9360.2-02, December 3, 1990.
- Use of Institutional Controls at Superfund Sites, Memorandum, July 27, 1992.
- Land Use in the CERCLA Remedy Selection Process, OSWER Directive No. 9355.7-04, May 25, 1995.
- Institutional Controls: A Reference Manual, U.S. EPA Workgroup on Institutional Controls, March 1998. [DRAFT]
- Interim Final Guidance Institutional Controls and Transfer of Real Property under CERCLA Section 120(h)(3)(A), (B), or (C), Memorandum, January 6, 2000.
- Institutional Controls: A Site Manager’s Guide to Identifying, Evaluating and Selecting Institutional Controls at Superfund and RCRA Corrective Action Cleanups, OSWER Directive No. 9355.0-74FS-P, September 2000.

The resulting increase in use of institutional controls has prompted concerns about their long-term reliability. EPA believes that developing an ability to track the implementation, monitoring, and enforcement of institutional controls is essential to ensure their reliability and acceptability and critical to fulfill EPA’s core mission of protecting human health and the environment.

2(b). Practical Utility/Uses of the Data

The survey questionnaire is designed to gather information about the purpose and scope of the respondent’s tracking system, its structure and operations, user access and information sharing practices, costs, and lessons learned from using it. OERR believes that information gathered through the survey will help it design a Superfund institutional controls tracking system that incorporates the most appropriate features of other systems and as much existing institutional controls data as possible. The proposed information collection is the first phase of a design process that includes: 1) defining and organizing data elements, 2) developing data collection points, 3) designing the user interface, 4) developing data entry and access procedures, and 5) developing and piloting a process for estimating data availability and the cost and time required for data acquisition. OERR believes that survey responses will provide useful background information for each phase of the design effort. OERR expects that the public will eventually have access to the tracking database via EPA’s website.

¹ The NCP, 40 CFR 300.430(a)(1)(iii), provides that EPA “expects to use institutional controls such as water use and deed restrictions to supplement engineering controls as appropriate . . .”

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a). Nonduplication

The Institutional Controls Tracking Systems and Costs Survey is an exploratory and descriptive survey designed to gather information about respondents' current practices and procedures for tracking information about institutional controls used in their jurisdictions. The survey requests information only about the respondent's "in-house" activities. Therefore responses provided in one survey questionnaire should not duplicate responses provided in any other. This information collection is a one-time effort. The information sought does not duplicate information collected through any other EPA survey or reported to EPA pursuant to statute. Moreover, there is no central repository of or reference work containing information about state, tribal, or local governments' institutional controls tracking systems and costs.

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

EPA has complied with the public notice requirement set forth in 5 CFR 1320.8(d)(1) by publishing a notice in the *Federal Register* on October 2, 2001 (66 FR 50182). This notice opened a 60-day public comment period.

The *Federal Register* notice is included as Appendix B. Comments received and the response to these comments are included as Appendix C.

EPA received 19 official comments on the proposed information collection. Official comments were received from:

Department of Energy: Office of Environmental Policy and Guidance, John Bascietto, 1000 Independence Avenue, SW, Washington, DC 20585, (202) 586-7917; dated November 30, 2001.

Tennessee Department of Environment and Conservation, DOE Oversight Division, John A Owsley (Director), 761 Emory Valley Road, Oak Ridge, TN 37830-7072, (865) 481-0995; dated December 19, 2001.

Association for State and Territorial Solid Waste Management Officials's (ASTSWMO) State Superfund Focus Group, Gary Behrns, 444 North Capitol Street, NW Suite 315, Washington, DC 20001, (573) 751-4187; dated December 3, 2001.

ESTM, Inc., Craig S. J. Johns, 980 9th Street, Suite 2200, Sacramento, CA 95814, (916) 498-3326; dated December 4, 2001.

Maine Department of Environmental Protection, Division of Remediation, Denise Messier, 17 State House Station, Augusta, ME 04333, (207) 287-4851.

3(c). Consultations

This ICR is based on consultations with the following:

Federal Contacts

Michael E. Bellot
Office of Emergency and Remedial Response
bellot.michael@epa.gov

Stephen Hess
Office of General Counsel/EPA Institutional Controls Workgroup
hess.stephen@epa.gov

Terry Roundtree
Environmental Protection Agency Region 5
roundtree.terry@epa.gov

Maryane Tremaine
Environmental Protection Agency Region 7
tremaine.maryane@epa.gov

Tom Kremer
Environmental Protection Agency Region 9
kremer.tom@epa.gov

Harry Dutcher
Department of Army, Army Environmental Center
harry.dutcher@aec.apgea.army.mil

Richard Engel
Naval Facilities Engineering, Real Estate Base Closure Division
engelra@navfac.navy.mil

Letitia (Tish) O'Connor
Department of Energy, Office of Long Term Stewardship, Regulatory and Institutional Controls
letitia.oconor@em.doe.gov

State Contacts

Ben Macintosh
CALSTATES Help Desk
Department of Toxic Substances Control
CAL EPA
ben.macintosh@dtsc.ca.gov

Robert O'Hara
Site Remediation Program Unit
Remedial Project Management Section
Division of Remediation Management
Bureau of Land
Illinois EPA
robert.ohara@epa.state.il.us

Mark Wight
Division of Legal Counsel
Illinois EPA
mark.wight@epa.state.il.us

Art O'Connell
Chief, Site Assessment/State Superfund Division
Environmental Restoration and Redevelopment Program
Maryland Department of the Environment
aconnell@mde.state.md.us

Patrick Lannon
Site Remediation Section
Minnesota Pollution Control Agency
patrick.lannon@pca.state.mn.us

Hannah Martin
Superfund Program
Missouri Department of Natural Resources
nrmarth@mail.dnr.state.mo.us

John Defina
Site Remediation Program
New Jersey Department of Environmental Protection
jdefina@dep.state.nj.us

Harold Sandbeck
Division of Environmental Response and Remediation
Utah Department of Environmental Quality
hsandb@deq.state.ut.us

Trish Akana
Toxics Cleanup Program
Washington Department of Ecology
taka461@ecy.wa.gov

Jane Lemcke
Remediation and Redevelopment Program

Wisconsin Department of Natural Resources
lemckj@dnr.state.wi.us

Local Contacts

Ignacio Dayrit
Emeryville, California
idayrit@ci.emeryville.ca.us

Donald Gardner
Office of Transportation
Portland, Oregon
don.gardner@trans.ci.portland.or.us

Estevan Lopez
Local Government Land Use Planning Department
Santa Fe County, New Mexico
elopez@co.santa-fe.nm.us

William McLay
Local Government Land Use Planning Department
Montgomery County, Pennsylvania
bmclay@mail.montcopa.org

Vaughn Umphrey
Local Government Land Use Planning Department
Grand Rapids, Michigan
vumphrey@ci.grand-rapids.mi.us

Land Use Planning Association Contacts

Sanjay Jerr
America Planning Association
sjerr@planning.org

Joseph Schilling
Director, Community and Economic Development
International City/County Management Association
jschilling@icma.orgail

3(d). Effects of Less Frequent Collection

Not applicable.

3(e). General Guidelines

This proposed ICR complies with OMB general guidelines for the collection of information and contains no provision with any characteristic listed in 5 CFR 1320.5(d)(2).

3(f). Confidentiality

Not applicable.

3(g). Sensitive Questions

Not applicable.

4. THE RESPONDENTS AND THE INFORMATION COLLECTED

4(a). Respondents/SIC Codes

Respondents to the Institutional Controls Tracking Systems and Costs Survey will include state, tribal, or local government agencies or organizations that maintain tracking systems, databases, or other information systems that collect or track information pertaining to the selection, planning, design, implementation, oversight, monitoring, or enforcement of institutional controls at sites, facilities, or properties under their jurisdiction. OERR will identify respondents with the help of its State, Tribal, and Site Identification Center, membership data provided by the International City/County Management Association, 777 North Capitol Street, N.W., Suite 500, Washington, DC 20002-4201, and consultations with state, tribal, and agency officials identified in the course of institutional controls meetings, conferences, symposia, and workshops. Respondents will fall into one or more of the following professional categories and SIC codes:

<u>SIC Code</u>	<u>Professional Category</u>
9111	City and town managers' offices
9111	County supervisors' and executives' offices
9121	City and town councils
9121	County commissioners
9431	Environmental health programs-government
9511	Environmental protection agencies-government
9511	Environmental quality and control agencies-government
9511	Pollution control agencies-government
9511	Waste management program administration-government
9511	Water control and quality agencies-government
9532	Community development agencies-government
9532	Redevelopment land agencies-government
9532	Urban planning commissions-government
9532	Urban renewal agencies-government.

4(b). Information Requested

i. Data Elements

The Institutional Controls Tracking Systems and Costs Survey will be sent to state, tribal, and local government entities that are likely to exercise responsibility for institutional controls.

The survey will request the following information from respondents:

- General system and respondent information;
- Purpose and scope of the respondent's tracking system, i.e., the types of sites and institutional controls tracked;
- Structure and operations of the respondent's tracking system, including database software, programming language, types of information tracked, number of data elements, data entry and quality assurance procedures, and data reporting and querying capabilities;
- User access and information sharing, including restrictions on data availability;
- Lessons learned;
- Costs of discharging the respondent's responsibilities for institutional controls, including staff, capital costs, training, and other direct costs, and subsidies, contributions, and other cost-sharing arrangements.

ii. Respondent Activities

A copy of the survey is attached to this proposed ICR as Appendix A. Respondents will have to engage in the following activities to complete the survey questionnaire:

- Review introduction and instructions,
- Review operations and gather information,
- Complete and return questionnaire,
- Respond to EPA follow-up requests.

These activities will be the same whether the respondent uses the hard copy or electronic questionnaire format.

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a). Agency Activities

Agency activities associated with the Institutional Controls Tracking Systems and Costs Survey include the following:

- Develop survey questionnaire;
- Administer the questionnaire including identifying respondents, putting the questionnaire in electronic form, and reproducing, mailing, and transmitting the questionnaire;

- Review survey questionnaire responses including reviewing responses for completeness and evaluating them for appropriate follow-up;
- Perform follow-up activities;
- Analyze responses
- Prepare findings.

5(b). Collection Methodology and Management

Section 4(b)(ii), “Respondent Activities,” describes the information collection methodology employed for this survey. EPA plans to distribute the Institutional Controls Tracking Systems and Costs Survey questionnaire in hard copy and electronic formats. Respondents will be able to respond in either format. The full survey questionnaire asks up to approximately 65 questions and employs standard professional terminology. EPA designed the questionnaire to collect only data about information systems that track institutional controls, and respondents are asked to provide data only if they have such a tracking system. Respondents are not asked to collect or generate new data. If a question cannot be answered using available data or best professional judgment, respondents are asked to indicate this fact by responding “other.” EPA will review the questionnaires as they are returned and follow them up as needed to obtain missing or incomplete data and to clarify or supplement responses.

Question format varies according to the type of data sought in each section of the questionnaire. Most questions ask the respondent for a yes-or-no or narrative response or to check boxes and identify additional options. In these cases, the respondent only needs to check off the appropriate response. The questionnaire was designed in this way to reduce the burden on respondents. A few questions relating to costs involve filling in blanks and estimating hours based on average salaries and percentages of time spent on specified activities. The questionnaire has been peer-reviewed by OERR personnel and management. All of the questions in the survey have therefore gone through multiple iterations, ensuring that the survey offers a complete range of questions that will elicit the information needed and that the questions do not collect redundant information. EPA is not planning to pretest or pilot test the questionnaire as EPA believes that public comments will reveal any deficiencies in the questionnaire design. OERR will reduce potential burden at the tribal and local levels by conducting pre-screening to focus data collection on larger and more sophisticated tribal and local entities that are most likely to operate institutional controls tracking systems. The pre-screening will be conducted through telephone interviews and other information sources.

Survey results and data will be stored in OERR offices and will be made available to the general public upon request. OERR staff will also make survey result summaries available to other EPA program offices, Federal agencies, or Congress upon request.

5(c). Small Entity Flexibility

Not applicable.

5(d). Collection Schedule

Information collection will begin upon approval of this proposed ICR and assignment of an OMB control number to the survey instrument. The approximate collection schedule is as follows:

<u>Activity</u>	<u>Schedule</u>
Distribute questionnaires	Within two weeks of OMB approval of ICR
Review survey responses	Begin within two weeks of survey distribution
Conduct follow-up activities	Begin within 30 days of survey distribution
Review survey responses	Complete within 100 days of survey distribution
Conduct follow-up activities	Complete within 120 days of survey distribution
Analyze responses	Within 80 days of receipt of all survey responses
Prepare findings	Within 100 days of receipt of all survey responses.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a). Estimating Respondent Burden

Burden hour estimates are based on experience with similar surveys administered to comparable groups of survey respondents. Although the survey is voluntary and many respondents will not have institutional controls tracking systems, EPA has assumed a 100 percent response rate in developing the respondent burden estimate. As the estimated burden is light and the ability to track institutional controls is a matter of vital interest to state, tribal, and local entities, EPA expects that respondents will take advantage of the opportunity to engage in a dialogue with EPA, share their experience, and influence the development of EPA’s institutional controls tracking system.

After receiving the survey questionnaire from EPA, the responsible official would review the instructions, determine whether his/her agency tracks or maintains a database containing information about institutional controls, and, if so, decide whether to respond to the survey. A professional technical and a clerical staff person would review the agency’s operations to gather information about its institutional controls responsibilities, tracking activities, and costs. The technical professional would review this information and provide the results to the responsible official. The official or technical professional would then complete the questionnaire and return it to EPA. Exhibit 6-1 provides information on respondent burden by information collection activity and labor category.

Exhibit 6-1
Hours Per Respondent by Collection Activity and Labor Category
Institutional Controls Tracking Systems and Costs Survey

Information Collection Activity				Labor Hours
	Admin.	Technical	Clerical	
Review introduction and instructions	0.50	0.50		1.00
Review operations/gather information		2.25	2.25	4.50
Complete and return questionnaire		1.00		1.00
Respond to EPA follow-up requests	0.75	1.75	1.00	3.50
TOTAL				10.00

6(b). Estimating Respondent Costs

i. Estimating Labor Costs

This is a non-rule-related ICR. Accordingly, hourly labor rate estimates are based on Table 4 (“Employer cost per hour worked for employee compensation and costs as a percent of total compensation: State and local government, by occupational and industry group”) of the Bureau of Labor Statistics’ “Employer Costs for Employee Compensation” (<ftp://ftp.bls.gov/pub/special.requests/ocwc/ect/ececrlse.pdf>). We used the March 2001 version of the report, which is the most recent available, incorporating increases in compensation costs for civilian workers for the first quarter of 2001 as set forth in the Bureau’s “Employment Cost Index” (<http://www.bls.gov/news.release/pdf/eci.pdf>). The following labor rates were used for this ICR:

- Executive, administrative, and managerial (“Admin.”) - \$37.42/hour,
- Professional technical (“Technical”) - \$25.32/hour,
- Administrative support, including clerical (“Clerical”) - \$19.27/hour.

These rates were multiplied by the burden hours that appear in Exhibit 6-1 to determine labor costs per respondent. Exhibit 6-2 provides labor costs per respondent by information collection activity and labor category.

Exhibit 6-2
Labor Costs Per Respondent by Collection Activity and Labor Category
Institutional Controls Tracking Systems and Costs Survey

Information Collection Activity				Labor Costs
	Admin.	Technical	Clerical	
Review introduction and instructions	\$18.71	\$12.66	\$0.00	\$31.37
Review operations/gather information	\$0.00	\$56.97	\$43.36	\$100.33
Complete and return questionnaire	\$0.00	\$25.32	\$0.00	\$25.32
Respond to EPA follow-up requests	\$28.07	\$44.31	\$19.27	\$91.65
TOTAL				\$248.67

ii. Estimating Capital and Operation and Maintenance Costs

Activities supported by this ICR do not involve the purchase of monitoring or reporting equipment.

iii. Capital/Start-up vs. Operating and Maintenance (O&M) Costs

Activities supported by this ICR do not involve the purchase of monitoring or reporting equipment.

iv. Annualizing Capital Costs

Not applicable.

6(c). Estimating Agency Burden and Cost

EPA developed separate burden and cost estimates for EPA personnel and government contractors to reflect the fact that the government information collection and analysis activities described by this ICR will be implemented by a government contractor under EPA's supervision. Accordingly, both labor hours and labor costs are broken out into EPA and contractor categories.

Hourly labor rates for government employees are based on the hourly wage rates set forth in the Office of Personnel Management's 2001 General Schedule, Locality Rates of Pay for Washington-Baltimore, DC-MD-VA-WV (<http://www.opm.gov/oca/01tables/GShrly/html/washingt.htm>). These rates were multiplied by the standard benefits factor of 1.6 to reflect non-wage benefits and arrive at the true cost of government labor. The following labor rates were used for this ICR:

- GS-14/01 Manager ("Admin.") - \$57.26/hour,
- GS-13/01 Technical Staff ("Technical") - \$48.46/hour,
- GS-05/01 Clerical Staff ("Clerical") - \$18.54/hour.

Hourly labor rates for contractor employees are based on Table 10 ("Private industry, by occupational and industry group") of the Bureau of Labor Statistics' "Employer Costs for Employee Compensation" (<ftp://ftp.bls.gov/pub/special.requests/ocwc/ect/ececrlse.pdf>). We used the March 2001 version of the report, which is the most recent available, incorporating increases in compensation costs for civilian workers for the first quarter of 2001 as set forth in the Bureau's "Employment Cost Index" (<http://www.bls.gov/news.release/pdf/eci.pdf>). The following labor rates were used for this ICR:

- Executive, administrative, and managerial ("Manager") - \$40.86/hour,
- Professional technical ("Analyst") - \$27.20/hour,
- Administrative support, including clerical (Research Asst./"RA") - \$17.27/hour.

Exhibit 6-3 and Exhibit 6.4 provide information on government burden and labor costs, respectively, by information collection activity and labor category. The information provided in these exhibits is divided into separate EPA and contractor sections. The labor cost estimates were developed by multiplying the hourly labor rates described above by the government burden information in Exhibit 6-3.

Exhibit 6-3
Government Burden by Collection Activity and Labor Category
Institutional Controls Tracking Systems and Costs Survey

Information Collection Activity	Agency			Total Agency Hours	Contractor			Total Contractor Hours
	Hours Per Activity				Hours Per Activity			
	Admin.	Technical	Clerical		Manager	Analyst	RA	
Develop survey questionnaire	35	35	0	70	150	30	50	230
Administer survey questionnaire	5	0	0	5	10	10	40	60
Review questionnaire responses	5	5	0	10	10	40	40	90
Perform follow-up activities	40	40	0	80	10	40	80	130
Analyze responses	5	10	0	15	60	160	40	260
Prepare findings	10	20	0	30	200	200	80	480
TOTAL				210				1250

Exhibit 6-4
Government Labor Costs by Collection Activity and Labor Category
Institutional Controls Tracking Systems and Costs Survey

Information Collection Activity	Agency			Total Agency Costs	Contractor			Total Contractor Costs
	Cost Per Activity				Cost Per Activity			
	Admin.	Technical	Clerical		Manager	Analyst	RA	
Develop survey questionnaire	\$2004	\$1,696	\$0	\$3,700	\$6,129	\$816	\$864	\$7,809
Administer survey questionnaire	\$286	\$0	\$0	\$286	\$409	\$272	\$691	\$1,372
Review questionnaire responses	\$286	\$242	\$0	\$528	\$409	\$1,088	\$691	\$2,188
Perform follow-up activities	\$2,290	\$1,938	\$0	\$4,228	\$409	\$1,088	\$1,382	\$2,879
Analyze responses	\$286	\$485	\$0	\$771	\$2,452	\$4,352	\$691	\$7,495
Prepare findings	\$573	\$969	\$0	\$1,542	\$8,172	\$5,440	\$1,382	\$14,994
TOTAL				\$11,055				\$36,737

6(d). Estimating the Respondent Universe and Total Burden and Cost

The estimated size of the respondent universe is 262 parties. The objective of the survey is 262 completed surveys.

Based on information provided in Exhibit 6-1, total respondent burden for the survey is estimated as follows:

$$10 \text{ hours/survey} \times 262 \text{ surveys} = \underline{2,620 \text{ hours}}$$

Based on information provided in Exhibit 6-2, total respondent costs for the survey are estimated as follows:

$$\$248.67/\text{survey} \times 262 \text{ surveys} = \underline{\$65,151.54}$$

6(e). Bottom Line Burden Hours and Cost Tables

i. Respondent Tally

Exhibit 6-5 provides bottom-line burden hours and costs for the respondents.

**Exhibit 6-5
Bottom-Line Estimate: Respondents**

Category	Respondents	Per Respondent	Unit	Total
Hours	262	10.00	Hours	2,620
Costs	262	\$248.67	Dollars	\$65,152

ii. Agency Tally

Exhibit 6-6 provides bottom-line burden hours and costs for the Agency. Note that Agency burden and hours and Contractor burden and hours from Exhibits 6-3 and 6-4 have been summed together to arrive at combined estimates for Agency burden and costs.

**Exhibit 6-6
Bottom-Line Estimate: Agency**

Category	Hours	Costs
Agency	210	\$11,055
Contractor	1,250	\$36,737
TOTAL	1460	\$47,792

6(f). Burden Statement

The respondent burden for this collection of information is estimated to be 10 hours per response, including time required to review instructions, review operations, gather information, complete and return the questionnaire, and respond to follow-up questions.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR number and OMB control number in any correspondence.