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Abt Associates Inc.

**A Framework for
Reviewing EPA's
State Administrative
Cost Estimates:
A Case Study**

**Appendixes A-D
Volume 2**

Contract EP-W-05-022
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FINAL REPORT

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U.S. Environmental Protection
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Contents: Volume 2

Appendix A. Stormwater Phase II Final Rule Documentation	A-1
A.1. Introduction.....	A-1
A.2. Disaggregating EPA National Estimates to the Six Case Study States	A-1
A.3. Normalizing State Questionnaire Responses	A-5
A.4. EPA Estimates and Case Study State Questionnaire Responses	A-7
Appendix B. Stage 1 Disinfectant/Disinfection Byproducts Rule.....	B-1
B.1. Introduction.....	B-1
B.2. Disaggregating EPA National Estimates to the Five Case Study States	B-1
B.3. Normalizing State Questionnaire Responses	B-3
B.4. EPA Estimates and State Questionnaire Responses	B-8
Appendix C. Particulate Matter National Ambient Air Quality Standards Rule	C-1
C.1. Introduction.....	C-1
C.2. Disaggregating EPA National Estimates to the Four Case Study States	C-1
C.3. Normalizing State Questionnaire Responses	C-4
C.4. EPA Estimates and State Questionnaire Responses	C-7
Appendix D. RCRA Subpart CC Organic Air Emission Standards Rule Documentation	D-1
D.1. Introduction.....	D-1
D.2. Disaggregating EPA National Estimates to the Four Case Study States	D-1
D.3. Normalizing State Questionnaire Responses	D-3
D.4. EPA Estimates and State Questionnaire Responses	D-4

References

Tables: Volume 2

Table A-1: Approach for Allocating EPA Administrative Costs for the Phase II Stormwater Rule to Case Study States.....	A-2
Table A-2: Affected Facilities for the Stormwater Phase II Final Rule “No Exposure” Exemption: RIA vs. National Estimates	A-4
Table A-3: Affected Facilities for the Stormwater Phase II Final Rule “No Exposure” Exemption: Estimates for Case Study States	A-5
Table A-4: Mean Hourly Wages and Labor Rate Adjustment Factors by Case Study State.....	A-5
Table A-5: Kansas: EPA Estimates and Normalized Reported Values	After A-7
Table A-6: Nevada: EPA Estimates and Normalized Reported Values	After A-7
Table A-7: New Jersey: EPA Estimates and Normalized Reported Values	After A-7
Table A-8: Oklahoma: EPA Estimates and Normalized Reported Values.....	After A-7
Table A-9: South Carolina: EPA Estimates and Normalized Reported Values	After A-7
Table A-10: Virginia: EPA Estimates and Normalized Reported Values	After A-7
Questionnaires. Completed Case Study State Questionnaires	After Appendix A
Table B-1: Approach for Allocating EPA Administrative Costs for the Stage 1 Disinfectant/Disinfection Byproducts Rule to Case Study States	B-2
Table B-2: Mean Hourly Wages and Labor Rate Adjustment Factors by Case Study State.....	B-4
Table B-3: Kansas: EPA Estimates and Normalized Reported Values	After B-8
Table B-4: Nevada: EPA Estimates and Normalized Reported Values	After B-8
Table B-5: New Jersey: EPA Estimates and Normalized Reported Values	After B-8
Table B-6: Oklahoma: EPA Estimates and Normalized Reported Values.....	After B-8
Table B-7: South Carolina: EPA Estimates and Normalized Reported Values.....	After B-8
Questionnaires. Completed Case Study State Questionnaires	After Appendix B
Table C-1: Approach for Allocating EPA Administrative Costs for the Particulate Matter NAAQS Rule to Case Study States	C-2
Table C-2: EPA-Based Estimate of Grant Funded Monitoring Costs	C-4
Table C-3: Mean Hourly Wages and Labor Rate Adjustment Factors by Case Study State.....	C-5
Table C-4: Map of Cost Categories Reported by South Carolina to RIA Cost Categories	C-6
Table C-5: Kansas: EPA Estimates and Normalized Reported Values	After C-7
Table C-6: Oklahoma: EPA Estimates and Normalized Reported Values	After C-7
Table C-7: South Carolina: EPA Estimates and Normalized Reported Values.....	After C-7
Table C-8: Virginia: EPA Estimates and Normalized Reported Values	After C-7
Questionnaires. Completed Case Study State Questionnaires	After Appendix C

Final Report, September 14, 2007

Table D-1: Approach for Allocating EPA Administrative Costs for the Subpart CC Rule to Case Study States..... D-2

Table D-2: Mean Hourly Wages, Labor Rate Adjustment Factors by State D-3

Table D-3: Nevada: EPA Estimates and Normalized Reported ValuesAfter D-4

Table D-4: Oklahoma: EPA Estimates and Normalized Reported Values.....After D-4

Table D-5: South Carolina: EPA Estimates and Normalized Reported ValuesAfter D-4

Table D-6: Virginia: EPA Estimates and Normalized Reported ValuesAfter D-4

Questionnaires. Completed Case Study State Questionnaires After Appendix D

Appendix A. Stormwater Phase II Final Rule Documentation

A.1. Introduction

Appendix A provides a detailed explanation of the process involved in adjusting EPA and state cost estimates for the Phase II Stormwater Rule to allow for comparison between the two. To ensure that the cost estimates were comparable, we took the following steps:

- We disaggregated EPA national-level costs to each of the six case study states. Section A.2 outlines the details of this process.
- We normalized state questionnaire responses to account for variations in the format of the reported estimates. Section A.3 outlines the details of this process.
- We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in Section A.4. Tables A-5 through A-10 present our cost calculations for each of the six case study states (Kansas, Nevada, New Jersey, Oklahoma, South Carolina, and Virginia). Section A.4 also presents the completed questionnaires that we received from each participating state as reference.

A.2. Disaggregating EPA National Estimates to the Six Case Study States

In Chapter 6, we present EPA's national-level administrative cost estimates for the Stormwater Phase II Final Rule based on the RIA. EPA developed administrative cost estimates for specific categories of start-up and recurring costs, which are listed in Table A-1. In this section, we describe the steps that we took to apportion the national-level costs to the six case study states for each of these administrative cost categories.

A.2.1. Start-Up Activities

For start-up activities, EPA estimated that each of the 44 states with permitting authority would incur the same cost. Based on the estimates in the RIA, we attributed 2.3 percent (1 of 44) of the national-level start-up costs to each state.

A.2.2. Recurring Costs for Permit Administration (Excluding Processing of No-Exposure Certification Forms)

For recurring activities, EPA estimated that costs would vary between states depending on the number of regulated small Municipal Separate Storm Sewer Systems (MS4s) and construction sites affecting between one and five acres of land in each state. In general, we apportioned the national estimates to each participating state based on each state's share of the regulated entities affected by the rule.

In those recurring activities for which costs depend on the number of MS4s in the state, we estimated the number of MS4s in each state based on the MS4s listed in the Federal Register (Vol. 64, No. 235; Wednesday, December 8, 1999). The number of MS4s on this list is about 11 percent higher than the count in the RIA, but we were unable to account for this discrepancy. We do not expect this difference to greatly bias our results for the case study states unless the differences between the two counts are specific to the states we are examining.

The RIA presented estimates of the number of construction start activities in Kansas, Nevada, and Oklahoma, so it was not necessary for us to develop our own estimates of these states' shares of the nation's construction start activities. We estimated the regulatory impacts attributed to New Jersey and South Carolina to be particularly small because the RIA asserted that New

Final Report, September 14, 2007

Jersey and South Carolina would incur no incremental costs associated with construction starts. The RIA stated that New Jersey and South Carolina already had programs in place with requirements for construction starts that were sufficiently close in character to the requirements of the Phase II Stormwater Rule such that New Jersey and South Carolina would incur no additional costs for these activities.

While EPA did not assign administrative costs to New Jersey and South Carolina in the RIA, we needed to develop estimates of what these administrative costs would have been for two reasons. First, consistent with the analytic approach discussed in Chapter 5, we needed to include an estimate of the EPA-based administrative costs in our information collection request form as a point of reference for New Jersey and South Carolina. Second, if New Jersey and South Carolina included costs for this category of administrative cost, we wanted to understand if the costs were significantly different from EPA's assumptions related to the number of permits they would need to process, the hourly wage rate, and the number of hours needed to process the permits.

We used the hourly wage rate and number of hours provided in the RIA, which assumed that these variables were consistent across all states. Since the RIA did not estimate the level of construction start activity in New Jersey and South Carolina, and data specific to the relevant 1-5 acre sites were not available, we estimated the number of these activities based on New Jersey and South Carolina's share of the nation's building permits (U.S. Census Bureau. (March 2006). *New Privately Owned Housing Units Authorized Series C40*), which also included sites smaller than one acre. Thus, differences in the EPA-based estimates of construction start activities and the state estimates of construction start activities may partially result from our normalization methodology.

As a final step in our analysis, we inflated all costs to 2006 dollars using data from the U.S. Bureau of Labor Statistics' *Consumer Price Index for All Urban Consumers* (CPI-U). For the Phase II Stormwater Rule, we inflated 1998 dollars using an adjustment factor of 1.24. In addition, we adjusted labor rates to reflect salary plus fringe benefits using a load factor of 1.4 (see Chapter 5 for a complete description of the methodology).

Table A-1: Approach for Allocating EPA Administrative Costs for the Phase II Stormwater Rule to Case Study States

EPA Administrative Cost Category	Approach for Allocating National –Level Costs to Case Study States
Start-Up Activities	
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.
2. Obtaining Additional Delegated Authority	No costs estimated in this category.
3. Designing Implementation Plan	
Time required to identify and designate additional MS4s.	Attributed 2.3% (1 of 44) of the national-level costs to each case study state. EPA assumed that each state would incur the same start-up costs.
Time required to revise state procedures for implementing the new rule.	Attributed 2.3% (1 of 44) of the national-level costs to each case study state. EPA assumed that each state would incur the same start-up costs.
4. General Start-Up Activities	
Time required to add 401 language to the general permit.	Attributed 2.3% (1 of 44) of the national-level costs to each case study state. EPA assumed that each state would incur the same start-up costs.
5. Compliance Assistance	No costs estimated in this category.
6. Permit Administration	No costs estimated in this category.
7. Monitoring	No costs estimated in this category.
8. Enforcement	No costs estimated in this category.
Recurring Activities	
9. Compliance Assistance	No costs estimated in this category.

Table A-1: Approach for Allocating EPA Administrative Costs for the Phase II Stormwater Rule to Case Study States

EPA Administrative Cost Category	Approach for Allocating National –Level Costs to Case Study States
10. Permit Administration	
Processing and Review of applications for Construction Start Waiver Certification	EPA's RIA presented estimated of the number of construction start activities in Kansas, Nevada, and Oklahoma, which we used. Estimated costs for South Carolina and New Jersey as a percentage share of the nation's building permits (including both relevant 1-5 acre sites and sites smaller than one acre).
Processing and Review of Construction Start Notices of Intent (NOI)	EPA's RIA presented estimated of the number of construction start activities in Kansas, Nevada, and Oklahoma, which we used. Estimated costs for South Carolina and New Jersey as a percentage share of the nation's building permits (including both relevant 1-5 acre sites and sites smaller than one acre).
Processing and Review of Construction Start Notices of Termination (NOT)	EPA's RIA presented estimated of the number of construction start activities in Kansas, Nevada, and Oklahoma, which we used. Estimated costs for South Carolina and New Jersey as a percentage share of the nation's building permits (including both relevant 1-5 acre sites and sites smaller than one acre.)
Processing and Review of MS4 Notices of Intent (NOI)	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of MS4s in each stated based on the MS4s listed n the Federal Register (Vol. 64, No. 235; Wednesday, December 8, 1999).
Processing and Review of MS4 Reports	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of MS4s in each stated based on the MS4s listed n the Federal Register (Vol. 64, No. 235; Wednesday, December 8, 1999).
Process no-exposure certification forms submitted by Phase I facilities	Collected state level data on the number of affected facilities following the methodology of EPA's RIA.
11. Monitoring	No costs estimated in this category.
12. Enforcement	No costs estimated in this category.
13. Other	No costs estimated in this category.

A.2.3. Recurring Costs for Processing “No Exposure” Exemption for Phase 1 Facilities

The Stormwater Phase II Final Rule allows certain types of Phase I industrial facilities with “no exposure” to apply for exclusion from the rule’s requirements. To qualify for the no exposure exclusion, an industrial facility must have all of its materials and activities sheltered from rain, snow, snowmelt, and runoff. The Phase I Rule identifies eleven categories of industrial activities as having “Stormwater discharge associated with industrial activity” (40 CFR §122.26(b)(14)(I)-(xi)). The Phase II Rule requires eligible facilities to submit no exposure certifications forms once every five years to the NPDES-permitting authority. NPDES-authorized states incur the administrative burden and cost by processing no exposure forms (estimated to be \$33.38 per form in the RIA; 2006\$).

As a means of estimating administrative costs associated with the no exposure exemption, EPA first estimated the universe of potentially affected facilities. The RIA for the Stormwater Phase II Final Rule identifies industry groups contained within the eleven categories of industrial activities covered under the Phase I Rule. For industry categories that identify industries by SIC code, the RIA presents data on the number of facilities in each category that were obtained from the U.S. Census Bureau’s *County Business Patterns*. For two of the eleven categories, EPA obtained data from U.S. EPA’s *Preliminary Biennial RCRA Hazardous Waste Report: Based on 1995 Data* and U.S. EPA’s *Municipal Solid Waste Fact Book*, respectively (U.S. EPA 1997c, 1996). Based on that data and personal communications with eight states, EPA estimated that 44 percent of facilities would meet the definition of “Stormwater discharge associated with industrial activity” and would thus require a permit. EPA based the percentages of these facilities that would have no exposure on the best professional judgment of U.S. EPA Phase I Stormwater staff. (Note: The Phase I Rule did not require unexposed facilities in the “Light Industrial”

Final Report, September 14, 2007

category to obtain a NPDES permit. Therefore, EPA used data from the NOI Tracking center to estimate that 8 percent of these facilities require Phase I permits. Since this 8 percent has operations that are exposed to Stormwater, they would not apply for “no exposure” under the Phase II Rule. EPA subtracted this 8 percent from the number of “light industrial” facilities that fall under the Phase I definition (i.e., 44 percent of the total number of facilities.)

To normalize the national data for the ex-post analysis, it was necessary to identify the sources used in the 1998 RIA. We gathered facility data from the sources referenced in the RIA and used the data to recreate Exhibit 9-3 of the RIA, which presents the national numbers of facilities in each of the eleven industry categories. For two of the eleven categories we were able to verify the data sources used by matching the total numbers of facilities in these categories. For the remaining categories of industries identified by SIC code, however, we were unable to verify the source of the U.S. Census Bureau data. In our efforts to locate these sources, we compared the numbers of total establishments for each SIC code category from both the 1994 and 1996 *County Business Patterns: United States* to those in the RIA; though the numbers are similar, they do not match perfectly (U.S. Census Bureau 1994, 1996). After we collected the facility universe data, we applied the numbers to the cost methodology outlined in the RIA. Based on the data we collected, we estimated the annual national administrative cost of the rule to be 1.5% lower than in the RIA (using 1994 Census data). Table A-2 presents the national facility universe estimates from the RIA and our ex-post analysis. It also details the difference in the number of potentially affected facilities and cost estimates between the RIA and our ex-post analysis estimates. Table A-3 presents the data that we collected for each of the case study states.

Table A-2: Affected Facilities for the Stormwater Phase II Final Rule “No Exposure” Exemption: RIA vs. National Estimates

Affected Facilities and Cost	RIA	National Estimates
Number of Facilities	150,999	148,787
Total 5-Year Cost, \$2006	\$5,040,564	\$4,966,713
Total Annual Cost, \$2006	\$1,008,113	\$993,343
Total Difference: National Estimate From RIA Estimate		
Number of Facilities		-2,212
Total 5-Year Cost		-\$73,851
Total Annual Cost		-\$14,770
Percentage Difference: National Estimate From RIA Estimate		
Number of Facilities		-1.47%
Total 5 Year Cost		-1.47%
Total Annual Cost		-1.47%

Sources: U.S. EPA. 1996. Municipal Solid Waste Fact Book; U.S. EPA. 1997. Preliminary Biennial RCRA Hazardous Waste Report: Based on 1995 Data; U.S. Census Bureau. 1994 County Business Patterns (SIC). <http://censtats.census.gov/cbpsic/cbpsic.shtml>; Stormwater Phase II Final Rule RIA

Table A-3: Affected Facilities for the Stormwater Phase II Final Rule “No Exposure” Exemption: Estimates for Case Study States						
	Kansas	Nevada	New Jersey	Oklahoma	South Carolina	Virginia
Total Number of Affected Facilities	1,914	736	6,023	2,129	2,219	3,453
Total 5-Year Cost, \$2006	\$63,887	\$24,575	\$201,058	\$71,061	\$74,072	\$115,273
Total Annual Cost, \$2006	\$12,777	\$4,915	\$40,212	\$14,212	\$14,814	\$23,055

Sources: U.S. EPA. 1996. *Municipal Solid Waste Fact Book*; U.S. EPA. 1997. *Preliminary Biennial RCRA Hazardous Waste Report: Based on 1995 Data*; U.S. Census Bureau. 1994 *County Business Patterns (SIC)*. <http://censtats.census.gov/cbpsic/cbpsic.shtml>

A.3. Normalizing State Questionnaire Responses

To compare EPA and the case study state estimates for each of the four regulations, we found it necessary to “normalize” each state’s questionnaire responses to account for variations in labor rates and differences in the ways each state completed the questionnaires. We describe each of the “normalization” steps in more detail below.

A.3.1. Labor Rate Adjustments

EPA estimated total national administrative costs using average national wage rates. We converted these national-level costs into state-level costs and used these as a baseline for comparison with actual case study state responses, as described in Chapter 6. Because average labor rates can vary for an individual state from those of other states and that of the nation, we applied an adjustment factor¹ based on a national average wage rate to the labor rates reported by each participating state (see Table A-4). In doing so, this analysis weights, or “normalizes,” the reported state labor rates with respect to the national average and allows for the comparison set forth in our analytic framework.

Table A-4: Mean Hourly Wages and Labor Rate Adjustment Factors by Case Study State

Case Study State	Mean Hourly Wage^a	Adjustment Factor
Kansas	\$16.33	1.12
Nevada	\$16.71	1.09
New Jersey	\$21.09	0.86
Oklahoma	\$15.12	1.20
South Carolina	\$15.50	1.17
Virginia	\$19.11	0.95
United States	\$18.21	1.00

a. Based on mean hourly wages for “All Occupations.”

Source: U.S. Bureau of Labor Statistics. 2005. *May 2005 National Occupational Employment and Wage Estimates*.

¹ Wage rates used were based on May 2005 U.S. Bureau of Labor Statistics average hourly wage for all industry groups. Normalization Factor = (Average U.S. Wage)/(Average Wage for the Case Study State).

A.3.2. Normalization of Case Study State Data

In developing our information collect request form, as described in Chapter 5, we had been advised by South Carolina (our beta tester for the original questionnaire) that it may be difficult for the case study states to estimate costs for the line items included in EPA's analysis. Given this situation, we allowed states the flexibility to report costs at the level of detail available to them. After reviewing the responses that we received, we found that the case study states commonly did not conform to the level of detail contained in EPA's analysis. As a result, we made adjustments to some of the state responses so that they were comparable with the EPA-based estimates. In general, our adjustments (e.g., assigning aggregate costs to individual line items) did not substantively change the information provided by the participating states, as described below.

Kansas

- Under "Processing and Review of MS4 Notices of Intent," Kansas reported having 58 events every 5 years. We converted this to an annual number.
- Kansas did not know the number of activities or total cost under "Process no-exposure certification forms submitted by Phase II facilities." We used the EPA-estimated number of events as a default value to estimate total cost.

Nevada

- Nevada was unable to estimate the number of EPA-omitted, recurring enforcement activities that it performs but did estimate the total enforcement time burden and cost associated with recurring enforcement.

New Jersey

- New Jersey reported labor costs as the total annual salary per full-time equivalent. Using 2,080 hours to represent one FTE, we converted annual salary to an hourly wage.
- New Jersey reported time burden in terms of the total number of full-time equivalents for all events. Using 2,080 hours to represent one FTE, we converted the total number of reported FTEs to the total number of hours. We then divided the total by the number of events to attain an estimate of hours per event.

Oklahoma

- For their estimates of costs that were not included by EPA, Oklahoma did not report numbers of activities, labor rates, or total costs. They did, however, report their total hour burdens. We calculated total costs by multiplying the time burden by the labor rate they reported in step 2 (\$31/hour), plus any non-labor costs.

South Carolina

- We recorded South Carolina's responses during an in-person interview/meeting with key staff.
- For several activities, South Carolina reported the time burden in full-time equivalents. We calculated the total hours for these activities by multiplying the number of FTEs by 2,080 hours.
- South Carolina reported labor costs as the cost for one FTE, excluding fringe. To make our adjustment, we divided the annual cost by 2,080 hours and multiplied by a fringe load factor of 1.32, the fringe rate they reported to us during our meetings.
- For the start-up permit administration category "Processing and Review of Construction Start Notices of Intent," South Carolina reported that 1 hour was appropriate for 1-2 acre

Final Report, September 14, 2007

sites but that 16 hours was more appropriate for sites larger than 2 acres. We assumed that 50% of the reported 2,500 1-5 acre sites are 1-2 acres and that the remaining 50% are 3-5 acres.

- For several activities, South Carolina subdivided the activity and provided a response for each subdivision. We combined those responses into a single line item that reflects the summation of the total costs as reported by South Carolina.
- For the Permit Administration activity “Processing and Review of MS4 Reports,” South Carolina reported that this is done once every five years. Accordingly, we divided the reported number of events by five.

Virginia

- We made no special adjustments to Virginia’s responses.

A.4. EPA Estimates and Case Study State Questionnaire Responses

We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in this section. Tables A-5 through A-10 present our cost calculations for each of the six case study states (Kansas, Nevada, New Jersey, Oklahoma, South Carolina, and Virginia). After these tables, we include the completed questionnaires that we received from each participating state as reference.

Final Report, September 14, 2007

Table A-5: Stormwater Phase II - EPA Burden Estimates - Kansas							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
Time required to identify and designate additional MS4s.	66.6	\$31	\$0	1	67	\$2,065	
Time required to revise state procedures for implementing the new rule.	100	\$31	\$0	1	100	\$3,100	
4. General Start-Up Activities	No costs estimated in this category.						
Time required to add 401 language to the general permit.	12	\$31	\$0	1	12	\$372	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						<i>179</i>	<i>\$5,537</i>
<i>Total Annualized Start-Up Costs</i>							<i>\$1,262</i>
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration	No costs estimated in this category.						
Processing and Review of applications for Construction Start Waiver Certification	1	\$31	\$0	330	330	\$10,230	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$31	\$0	1,868	1,868	\$57,908	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$31	\$0	1,868	934	\$28,954	
Processing and Review of MS4 Notices of Intent (NOI)	0.8	\$31	\$0	63	50	\$1,562	
Processing and Review of MS4 Reports	1.6	\$31	\$0	63	101	\$3,125	
Process no-exposure certification forms submitted by Phase II facilities	1	\$31	\$0	382.77	383	\$11,866	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						<i>3,666</i>	<i>\$113,645</i>
Total Annualized Costs							\$114,907

Final Report, September 14, 2007

Table A-5: Stormwater Phase II - Kansas - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan							
Time required to identify and designate additional MS4s.	66.6	\$35	\$0	1	67	\$2,331	
Time required to revise state procedures for implementing the new rule.	0	\$0	\$0	0	0	\$0	
4. General Start-Up Activities							
Time required to add 401 language to the general permit.	0	\$0	\$0	0	0	\$0	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						67	\$2,331
<i>Total Annualized Start-Up Costs</i>							\$531
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Processing and Review of applications for Construction Start Waiver Certification	1	\$35	\$0	5	5	\$175	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$35	\$0	615	615	\$21,525	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$35	\$0	600	300	\$10,500	
Processing and Review of MS4 Notices of Intent (NOI)	0.8	\$35	\$0	11.6	9	\$325	
Processing and Review of MS4 Reports	0.5	\$35	\$0	58	29	\$1,015	
Process no-exposure certification forms submitted by Phase II facilities	0.5	\$35	\$0	382.8	191	\$6,698	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						1,150	\$40,238
<i>Total Annualized Costs</i>							\$40,770

Final Report, September 14, 2007

Table A-5: Stormwater Phase II - Kansas - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Review and Comment on EPA Regulations	60	\$35	\$0	1	60	\$2,100
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
Training and Outreach Activities	24	\$35	\$150	36	864	\$35,640
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
Develop Permit	480	\$35	\$2,000	1	480	\$18,800
Develop Database System	400	\$35	\$0	1	400	\$14,000
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					<i>1,804</i>	<i>\$70,540</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$16,079</i>
Recurring Activities						
9. Compliance Assistance						
No costs estimated in this category.						
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
No costs estimated in this category.						
12. Enforcement						
No costs estimated in this category.						
13. Other						
No costs estimated in this category.						
<i>Total Recurring Costs</i>					<i>0</i>	<i>\$0</i>
<i>Total Annualized Costs</i>						<i>\$16,079</i>

Final Report, September 14, 2007

Table A-6: Stormwater Phase II - EPA Burden Estimates - Nevada							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan							
Time required to identify and designate additional MS4s.	66.6	\$31	\$0	1	67	\$2,065	
Time required to revise state procedures for implementing the new rule.	100	\$31	\$0	1	100	\$3,100	
4. General Start-Up Activities							
Time required to add 401 language to the general permit.	12	\$31	\$0	1	12	\$372	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						179	\$5,537
<i>Total Annualized Start-Up Costs</i>							\$1,262
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Processing and Review of applications for Construction Start Waiver Certification	1	\$31	\$0	405	405	\$12,555	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$31	\$0	2,298	2,298	\$71,238	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$31	\$0	2,298	1,149	\$35,619	
Processing and Review of MS4 Notices of Intent (NOI)	0.8	\$31	\$0	1	1	\$25	
Processing and Review of MS4 Reports	1.6	\$31	\$0	1	2	\$50	
Process no-exposure certification forms submitted by Phase II facilities	1	\$31.00	\$0	147.24	147	\$4,564	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						4,002	\$124,051
<i>Total Annualized Costs</i>							\$125,313

Final Report, September 14, 2007

Table A-6: Stormwater Phase II - Nevada - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
Time required to identify and designate additional MS4s.	66.6	\$54	\$0	1	67	\$3,596	
Time required to revise state procedures for implementing the new rule.	100	\$54	\$0	1	100	\$5,400	
4. General Start-Up Activities	No costs estimated in this category.						
Time required to add 401 language to the general permit.	12	\$54	\$0	1	12	\$648	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						179	\$9,644
<i>Total Annualized Start-Up Costs</i>							\$2,198
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration	No costs estimated in this category.						
Processing and Review of applications for Construction Start Waiver Certification	1	\$31	\$0	405	405	\$12,555	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$31	\$0	2,298	2,298	\$71,238	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$31	\$0	2,298	1,149	\$35,619	
Processing and Review of MS4 Notices of Intent (NOI)	1	\$54	\$0	1	1	\$54	
Processing and Review of MS4 Reports	1.6	\$54	\$0	1	2	\$86	
Process no-exposure certification forms submitted by Phase II facilities	1	\$31	\$0	736	736	\$22,816	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						4,591	\$142,368
<i>Total Annualized Costs</i>							\$144,567

Final Report, September 14, 2007

Table A-6: Stormwater Phase II - Nevada - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.					
2. Obtaining Additional Delegated Authority	No costs estimated in this category.					
3. Designing Implementation Plan	No costs estimated in this category.					
4. General Start-Up Activities	No costs estimated in this category.					
5. Compliance Assistance	No costs estimated in this category.					
Conducted outreach programs for affected entities. Conducted public outreach programs to create awareness.	2	\$54	\$0	16	32	\$1,728
6. Permit Administration	No costs estimated in this category.					
Developed additional infrastructure for permit administration because of this rule.	120	\$54	\$0	1	120	\$6,480
7. Monitoring	No costs estimated in this category.					
8. Enforcement	No costs estimated in this category.					
<i>Total Start-Up Costs</i>					152	\$8,208
<i>Total Annualized Start-Up Costs</i>						\$1,871
Recurring Activities						
9. Compliance Assistance	No costs estimated in this category.					
Conduct on-going training (in addition to the initial start-up period)	2	\$54	\$0	12	24	\$1,296
10. Permit Administration	No costs estimated in this category.					
11. Monitoring	No costs estimated in this category.					
12. Enforcement	No costs estimated in this category.					
Conduct and review regular inspections for regulatory enforcement purposes. Issue warnings and/or citations for violations. Take legal actions to enforce the regulation. Collect fines for violations. Keep records of enforcement actions. Provide notifications of enforcement actions. Report enforcement activities to EPA.	40	\$54	\$0	1	40	\$2,160
13. Other	No costs estimated in this category.					
<i>Total Recurring Costs</i>					64	\$3,456
<i>Total Annualized Costs</i>						\$5,327

Final Report, September 14, 2007

Table A-7: Stormwater Phase II - EPA Burden Estimates - New Jersey							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan							
Time required to identify and designate additional MS4s.	66.6	\$31	\$0	1	67	\$2,065	
Time required to revise state procedures for implementing the new rule.	100	\$31	\$0	1	100	\$3,100	
4. General Start-Up Activities							
Time required to add 401 language to the general permit.	12	\$31	\$0	1	12	\$372	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						179	\$5,537
<i>Total Annualized Start-Up Costs</i>							\$1,262
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Processing and Review of applications for Construction Start Waiver Certification	1	\$31	\$0	367	367	\$11,377	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$31	\$0	2,081	2,081	\$64,511	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$31	\$0	2,081	1,041	\$32,256	
Processing and Review of MS4 Notices of Intent (NOI)	0.8	\$31	\$0	378	302	\$9,374	
Processing and Review of MS4 Reports	1.6	\$31	\$0	378	605	\$18,749	
Process no-exposure certification forms submitted by Phase II facilities	1	\$31	\$0	1,204.61	1,205	\$37,343	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						5,600	\$173,610
<i>Total Annualized Costs</i>							\$174,872

Final Report, September 14, 2007

Table A-7: Stormwater Phase II - New Jersey - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
Time required to identify and designate additional MS4s.	1,040	\$31	\$0	1	1,040	\$32,240	
Time required to revise state procedures for implementing the new rule.	4,160	\$31	\$0	1	4,160	\$128,960	
4. General Start-Up Activities	No costs estimated in this category.						
Time required to add 401 language to the general permit.	0	n.a.	\$0	0	0	\$0	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						<i>5,200</i>	<i>\$161,200</i>
<i>Total Annualized Start-Up Costs</i>							<i>\$36,743</i>
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration	No costs estimated in this category.						
Processing and Review of applications for Construction Start Waiver Certification	0	n.a.	\$0	0	0	\$0	
Processing and Review of Construction Start Notices of Intent (NOI)	5	\$31	\$0	1,000	5,000	\$155,000	
Processing and Review of Construction Start Notices of Termination (NOT)	0.8	\$31	\$0	1,000	800	\$24,800	
Processing and Review of MS4 Notices of Intent (NOI)	6.1	\$31	\$0	677	4,130	\$128,021	
Processing and Review of MS4 Reports	9.2	\$31	\$0	677	6,228	\$193,080	
Process no-exposure certification forms submitted by Phase II facilities	5.2	\$31	\$0	100	520	\$16,120	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						<i>16,678</i>	<i>\$517,021</i>
Total Annualized Costs							\$553,764

Final Report, September 14, 2007

Table A-7: Stormwater Phase II - New Jersey - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Tracking EPA's Rulemaking Process: (1) Attended EPA meetings/conferences regarding this rule, (2) Attended other non-EPA meetings/conferences regarding this rule, (3) Provided EPA directly with comments on the proposed rule, (4) Conducted other start-up activities associated with tracking EPA's rulemaking process (did not describe).	1,040	\$31	\$0	blank	1,040	\$32,240
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Designing implementation plan: (1) Designed alternative standards to those in the federal regulation, (2) Performed activities related to obtaining EPA approval for the state implementation plan, and (3) Met with stakeholders and/or responded to stakeholder concerns regarding this rule.	10,400	\$31	\$0	blank	10,400	\$322,400
4. General Start-Up Activities						
General start-up activities (1) Developed internal guidance and procedures for implementing the new regulation, (2) Attended EPA training or other non-EPA sponsored training for implementing the new regulations, and (3) Conducted internal training.	2,080	\$31	\$0	blank	2,080	\$64,480

Final Report, September 14, 2007

5. Compliance Assistance						
Compliance assistance, start-up activities (1) Conducted outreach programs for affected entities, (2) Conducted public outreach programs to create awareness, and (3) Developed training programs to help affected entities comply with the new regulation.	8,320	\$31	\$0	blank	8,320	\$257,920
6. Permit Administration						
Permit administration, start-up activities (1) Developed specific permit requirements, and (2) Developed additional infrastructure for permit administration because of this rule.	4,160	\$31	\$0	blank	4,160	\$128,960
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
Enforcement, start-up activities (1) Established new procedures for enforcing the new regulation.	2,080	\$31	\$0	blank	2,080	\$64,480
<i>Total Start-Up Costs</i>					<i>28,080</i>	<i>\$870,480</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$198,413</i>
Recurring Activities						
9. Compliance Assistance						
Compliance assistance, recurring activities (1) Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities. (2) Conduct on-going training (in addition to the initial start-up period) (3) Conducted other recurring activities associated with compliance assistance: Annual municipal meetings.	6,240	\$31	\$0	blank	6,240	\$193,440

Final Report, September 14, 2007

10. Permit Administration						
Permit administration, recurring activities (1) Conduct regular reviews of submitted documents and supporting materials, (2) Verify data sources on a regular basis, (3) Consult regularly with facilities about the permitting process, (4) Issue notifications to affected entities regarding permits, (5) Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes, and (6) Issue and/or review permits to affected entities.	10,400	\$31	\$0	blank	10,400	\$322,400
11. Monitoring	No costs estimated in this category.					
12. Enforcement						
Enforcement, recurring activities (1) Conduct and review regular inspections for regulatory enforcement purposes, (2) Issue warnings and/or citations for violations, (3) Take legal actions to enforce the regulation, (4) Collect fines for violations, (5) Keep records of enforcement actions, (6) Provide notifications of enforcement actions, (7) Report enforcement activities to EPA, and (8) Incur additional recurring costs associated with enforcement activities.	8,320	\$31	\$0	blank	8,320	\$257,920
13. Other						
Other, recurring activities (1) Incur additional recurring burdens that were not listed above. Please describe: Statewide Stormwater Education Program	2,080	\$31	\$500,000	blank	2,080	\$564,480
Total Recurring Costs					27,040	\$1,338,240
Total Annualized Costs					\$1,536,653	

Final Report, September 14, 2007

Table A-8: Stormwater Phase II - EPA Burden Estimates - Oklahoma							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
Time required to identify and designate additional MS4s.	66.6	\$31	\$0	1	67	\$2,065	
Time required to revise state procedures for implementing the new rule.	100	\$31	\$0	1	100	\$3,100	
4. General Start-Up Activities	No costs estimated in this category.						
Time required to add 401 language to the general permit.	12	\$31	\$0	1	12	\$372	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						179	\$5,537
<i>Total Annualized Start-Up Costs</i>							\$1,262
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration	No costs estimated in this category.						
Processing and Review of applications for Construction Start Waiver Certification	1	\$31	\$0	242	242	\$7,502	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$31	\$0	1,369	1,369	\$42,439	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$31	\$0	1,369	685	\$21,220	
Processing and Review of MS4 Notices of Intent (NOI)	0.8	\$31	\$0	51	41	\$1,265	
Processing and Review of MS4 Reports	1.6	\$31	\$0	51	82	\$2,530	
Process no-exposure certification forms submitted by Phase II facilities	1	\$31	\$0	425.75	426	\$13,198	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						2,844	\$88,153
<i>Total Annualized Costs</i>							\$89,415

Final Report, September 14, 2007

Table A-8: Stormwater Phase II - Oklahoma - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan							
Time required to identify and designate additional MS4s.	240	\$37	\$0	1	240	\$8,880	
Time required to revise state procedures for implementing the new rule.	200	\$37	\$0	1	200	\$7,400	
4. General Start-Up Activities							
Time required to add 401 language to the general permit.	40	\$37	\$0	1	40	\$1,480	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						<i>480</i>	<i>\$17,760</i>
<i>Total Annualized Start-Up Costs</i>							<i>\$4,048</i>
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Processing and Review of applications for Construction Start Waiver Certification	0	\$0	\$0	0	0	\$0	
Processing and Review of Construction Start Notices of Intent (NOI)	2.5	\$37	\$0	1,250	3,125	\$115,625	
Processing and Review of Construction Start Notices of Termination (NOT)	4	\$37	\$0	675	2,700	\$99,900	
Processing and Review of MS4 Notices of Intent (NOI)	30	\$37	\$0	44	1,320	\$48,840	
Processing and Review of MS4 Reports	8	\$37	\$0	44	352	\$13,024	
Process no-exposure certification forms submitted by Phase II facilities	4.5	\$37	\$0	100	450	\$16,650	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						<i>7,947</i>	<i>\$294,039</i>
Total Annualized Costs							\$298,087

Final Report, September 14, 2007

Table A-8: Stormwater Phase II - Oklahoma - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.					
2. Obtaining Additional Delegated Authority	No costs estimated in this category.					
Performed tasks other than those identified above in order to decide whether to apply for delegated authority.: Cost of conducting WQD board/council meetings which oversee rulemaking activities	20	\$37.34	\$0	not reported	20	\$747
3. Designing Implementation Plan	No costs estimated in this category.					
4. General Start-Up Activities	No costs estimated in this category.					
Developed internal guidance and procedures for implementing the new regulation.: internal procedures	40	\$37.335	\$0	not reported	40	\$1,493
Attended EPA training or other non-EPA sponsored training for implementing the new regulations.: staff training	80	\$37.34	\$2,000	not reported	80	\$4,987
5. Compliance Assistance	No costs estimated in this category.					
Conducted outreach programs for affected entities.: outreach	160	\$37.34	\$0	not reported	160	\$5,974
Developed training programs to help affected entities comply with the new regulation.: training	240	\$37.335	\$0	not reported	240	\$8,960
6. Permit Administration	No costs estimated in this category.					
Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.: calls etc.	130	\$37.34	\$0	not reported	130	\$4,854
Conduct on-going training (in addition to the initial start-up period): training	216	\$37.335	\$0	not reported	216	\$8,064
7. Monitoring	No costs estimated in this category.					
Developed specific permit requirements.: permit development	720	\$37.335	\$0	not reported	720	\$26,881
Developed additional infrastructure for permit administration because of this rule.: permit administration	60	\$37.34	\$0	not reported	60	\$2,240
8. Enforcement	No costs estimated in this category.					
Conduct regular reviews of submitted documents and supporting materials.: document review	240	\$37.335	\$0	not reported	240	\$8,960

Final Report, September 14, 2007

Issue notifications to affected entities regarding permits.: issue authorizations	240	\$37.335	\$0	not reported	240	\$8,960
Issue and/or review permits to affected entities.: permits	160	\$37.34	\$0	not reported	160	\$5,974
Total Start-Up Costs					2,306	\$88,095
Total Annualized Start-Up Costs						\$20,080
Recurring Activities						
9. Compliance Assistance	No costs estimated in this category.					
10. Permit Administration	No costs estimated in this category.					
11. Monitoring	No costs estimated in this category.					
Established new procedures for enforcing the new regulation.: enforcement procedures	376	\$37.335	\$0	not reported	376	\$14,038
12. Enforcement						
Conduct and review regular inspections for regulatory enforcement purposes.: enforcement inspections	720	\$37.335	\$0	not reported	720	\$26,881
Issue warnings and/or citations for violations.: enforcement NOVs/Cos	286	\$37.335	\$0	not reported	286	\$10,678
Take legal actions to enforce the regulation.: enforcement legal	376	\$37.335	\$0	not reported	376	\$14,038
Collect fines for violations.: collection of fines	376	\$37.335	\$0	not reported	376	\$14,038
Keep records of enforcement actions.: enforcement records	188	\$37.335	\$0	not reported	188	\$7,019
Report enforcement activities to EPA.: reporting to EPA	188	\$37.335	\$0	not reported	188	\$7,019
13. Other						
Incur additional recurring burdens that were not listed above.: fee invoiceing/collection	160	\$37.34	\$0	not reported	160	\$5,974
Total Recurring Costs					2,510	\$99,685
Total Annualized Costs						\$119,765

Final Report, September 14, 2007

Table A-9: Stormwater Phase II - EPA Burden Estimates - South Carolina							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan							
Time required to identify and designate additional MS4s.	66.6	\$31	\$0	1	67	\$2,065	
Time required to revise state procedures for implementing the new rule.	100	\$31	\$0	1	100	\$3,100	
4. General Start-Up Activities							
Time required to add 401 language to the general permit.	12	\$31	\$0	1	12	\$372	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						179	\$5,537
<i>Total Annualized Start-Up Costs</i>							\$1,262
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Processing and Review of applications for Construction Start Waiver Certification	1	\$31	\$0	725	725	\$22,475	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$31	\$0	4,108	4,108	\$127,348	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$31	\$0	4,108	2,054	\$63,674	
Processing and Review of MS4 Notices of Intent (NOI)	0.8	\$31	\$0	48	38	\$1,190	
Processing and Review of MS4 Reports	1.6	\$31	\$0	48	77	\$2,381	
Process no-exposure certification forms submitted by Phase II facilities	1	\$31	\$0	443.79	444	\$13,757	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						7,446	\$230,826
<i>Total Annualized Costs</i>							\$232,088

Final Report, September 14, 2007

Table A-9: Stormwater Phase II - South Carolina - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
Time required to identify and designate additional MS4s.	170	\$40	\$0	1	170	\$6,800	
Time required to revise state procedures for implementing the new rule.	5,103.33	\$42	\$1,000	1	5,103	\$215,340	
4. General Start-Up Activities	No costs estimated in this category.						
Time required to add 401 language to the general permit.	12	\$40	\$500	1	12	\$980	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						5,285	\$223,120
<i>Total Annualized Start-Up Costs</i>							\$50,857
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration	No costs estimated in this category.						
Processing and Review of applications for Construction Start Waiver Certification	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	
Processing and Review of Construction Start Notices of Intent (NOI)	8.5	\$40	\$0	2,500	21,250	\$850,000	
Processing and Review of Construction Start Notices of Termination (NOT)	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	
Processing and Review of MS4 Notices of Intent (NOI)	19.9355	\$40	\$0	155	3,090	\$123,600	
Processing and Review of MS4 Reports	12	\$36	\$0	14	168	\$6,048	
Process no-exposure certification forms submitted by Phase II facilities	1.5	\$55	\$0	30	45	\$2,475	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						24,553	\$982,123
Total Annualized Costs							\$1,032,980

Final Report, September 14, 2007

Table A-9: Stormwater Phase II - South Carolina - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.					
2. Obtaining Additional Delegated Authority						
Development and Issuance (Costs Associated with Litigation).	2,080	\$59	\$0	2	4,160	\$245,440
Development and Issuance (Costs Associated with Litigation).	520	\$43	\$0	2	1,040	\$44,720
Redo Construction Start Forms (10% attributable to Phase II)	7.5	\$40	\$0	1	8	\$300
3. Designing Implementation Plan	No costs estimated in this category.					
4. General Start-Up Activities						
Develop no-exposure certification form	24	\$55	\$0	1	24	\$1,320
5. Compliance Assistance						
Issue Guidance for Construction Start Forms (10% attributable to Phase II)	7.5	\$40	\$0	1	8	\$300
Outreach for Construction Start Forms (10% attributable to Phase II)	7.5	\$40	\$0	2	15	\$600
Stakeholder Interaction related to Construction Start Forms (10% attributable to Phase II)	86.67	\$40	\$0	1	87	\$3,467
Issue Guidance for MS4 Forms (100% attributable to Phase II)	75	\$40	\$0	1	75	\$3,000
Outreach for MS4 Forms (100% attributable to Phase II)	150	\$40	\$0	1	150	\$6,000
Stakeholder Interaction related to MS4 Forms (100% attributable to Phase II)	108.33	\$43	\$0	1	108	\$4,658
6. Permit Administration						
New Computer System for Construction Start Forms (10% attributable to Phase II)	10	\$47	\$0	1	10	\$470
New Computer System for MS4 Forms (100% attributable to Phase II)	20	\$47	\$0	1	20	\$940
7. Monitoring	No costs estimated in this category.					
8. Enforcement	No costs estimated in this category.					
<i>Total Start-Up Costs</i>					<i>5,704</i>	<i>\$311,215</i>
<i>Total Annualized Start-Up Costs</i>					<i>\$70,937</i>	

Final Report, September 14, 2007

Recurring Activities	
9. Compliance Assistance	No costs estimated in this category.
10. Permit Administration	No costs estimated in this category.
11. Monitoring	No costs estimated in this category.
12. Enforcement	No costs estimated in this category.
13. Other	No costs estimated in this category.
<i>Total Recurring Costs</i>	0 \$0
Total Annualized Costs	\$70,937

Final Report, September 14, 2007

Table A-10: Stormwater Phase II - EPA Burden Estimates - Virginia							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
Time required to identify and designate additional MS4s.	66.6	\$31	\$0	1	67	\$2,065	
Time required to revise state procedures for implementing the new rule.	100	\$31	\$0	1	100	\$3,100	
4. General Start-Up Activities	No costs estimated in this category.						
Time required to add 401 language to the general permit.	12	\$31	\$0	1	12	\$372	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						179	\$5,537
<i>Total Annualized Start-Up Costs</i>							\$1,262
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration	No costs estimated in this category.						
Processing and Review of applications for Construction Start Waiver Certification	1	\$31	\$0	467	467	\$14,477	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$31	\$0	2,647	2,647	\$82,057	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$31	\$0	2,647	1,324	\$41,029	
Processing and Review of MS4 Notices of Intent (NOI)	0.8	\$31	\$0	47	38	\$1,166	
Processing and Review of MS4 Reports	1.6	\$31	\$0	47	75	\$2,331	
Process no-exposure certification forms submitted by Phase II facilities	1	\$31	\$0	690.64	691	\$21,410	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						5,241	\$162,469
<i>Total Annualized Costs</i>							\$163,731

Final Report, September 14, 2007

Table A-10: Stormwater Phase II - Virginia - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan							
Time required to identify and designate additional MS4s.	4	\$34	\$0	110	440	\$14,960	
Time required to revise state procedures for implementing the new rule.	300	\$40	\$0	1	300	\$12,000	
4. General Start-Up Activities							
Time required to add 401 language to the general permit.	0	n.a.	\$0	0	0	\$0	
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						<i>740</i>	<i>\$26,960</i>
<i>Total Annualized Start-Up Costs</i>							<i>\$6,145</i>
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Processing and Review of applications for Construction Start Waiver Certification	0	n.a.	\$0	0	0	\$0	
Processing and Review of Construction Start Notices of Intent (NOI)	1	\$34	\$0	2,600	2,600	\$88,400	
Processing and Review of Construction Start Notices of Termination (NOT)	0.5	\$34	\$0	2,600	1,300	\$44,200	
Processing and Review of MS4 Notices of Intent (NOI)	40	\$34	\$0	6	240	\$8,160	
Processing and Review of MS4 Reports	8	\$34	\$0	110	880	\$29,920	
Process no-exposure certification forms submitted by Phase II facilities	0	n.a.	\$0	0	0	\$0	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						<i>5,020</i>	<i>\$170,680</i>
Total Annualized Costs							\$176,825

Final Report, September 14, 2007

Table A-10: Stormwater Phase II - Virginia - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						No costs estimated in this category.
2. Obtaining Additional Delegated Authority						No costs estimated in this category.
3. Designing Implementation Plan						No costs estimated in this category.
4. General Start-Up Activities						No costs estimated in this category.
5. Compliance Assistance						No costs estimated in this category.
6. Permit Administration						No costs estimated in this category.
7. Monitoring						No costs estimated in this category.
8. Enforcement						No costs estimated in this category.
<i>Total Start-Up Costs</i>					0	\$0
<i>Total Annualized Start-Up Costs</i>						\$0
Recurring Activities						
9. Compliance Assistance						No costs estimated in this category.
10. Permit Administration						No costs estimated in this category.
11. Monitoring						No costs estimated in this category.
12. Enforcement						
Enforcement, recurring activities: Inspections for land disturbing activities covered or not covered by the General Permit for construction activities.	7.4	\$34	\$0	2,600	19,240	\$654,160
Enforcement, recurring activities: Follow-up inspections per findings of initial inspections.	5.8	\$34	\$0	650	3,770	\$128,180
Enforcement, recurring activities: Enforcement actions on land disturbing projects not in compliance with the General Permit	120	\$40	\$0	26	3,120	\$124,800
13. Other						
Other Recurring Activities: Citizen complaints regarding the MS4 operation, maintenance and water quality.	8	\$34	\$0	6	48	\$1,632
Other Recurring Activities: Citizen complaints about land disturbing activities covered or not covered by the General Permit for construction activities	16	\$34	\$0	200	3,200	\$108,800
<i>Total Recurring Costs</i>					29,378	\$1,017,572
<i>Total Annualized Costs</i>						\$1,017,572

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Kansas

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Kansas for administering the Phase II Storm Water Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
	One-Time Activity Total					\$5,537 (179 hours)
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	330 applications annually	\$10,230
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	1,868 notifications annually	\$57,908
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	1,868 notifications annually	\$28,954
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	63 notifications annually	\$1,562
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	63 reports annually	\$3,125
9	Permit Administration: Process no exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
	Annual Activity Total					\$101,799 (3,283 hours)

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate KS's share of these facilities, but will try to provide these estimates before our visit with your state.

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1999) *Economic Analysis of the Final Phase II Storm Water Rule*.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Kansas

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
2	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
3	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): Used individual permits	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	330 applications annually	\$10,230
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 5	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$155
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	1,868 notifications annually	\$57,908
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 615	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$19,065
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	1,868 notifications annually	\$28,954
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 600	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$18,600

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	63 notifications annually	\$1,562
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 58 done once every 5 years	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,438
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	63 reports annually	\$3,125
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.5 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 58	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$899
9	Permit Administration: Process no-exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Just started September 1, 2006	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.5	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: UNKNOWN	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: UNKNOWN

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate KS’s share of these facilities, but will try to estimate this before our visit with your state. If you have records of the number of facilities that have applied for no exposure certification, please provide them here.

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Phase II Storm Water Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Phase II Storm Water Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe: DEVELOPED DATABASE FOR PROGRAM MANAGEMENT

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Kansas

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Review and comment on EPA Regulations	60 hrs total	\$31	NONE	Total	\$1,860
2						
3						
4						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Training and Outreach Activities	24 hrs/event	\$31	\$150 Travel	36 / year	\$32,184
6						
7	Develop Permit Develop Database System	480 hrs 400 hrs	\$31	\$2000 printing	None	\$29,280
8						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule. We would also like to know if the Phase II Storm Water Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing Construction Start Notices of Intent, but your state already required and processed Construction Start Notices of Intent before the Phase II Storm Water Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Phase II Storm Water Rule might require that you process Construction Start Waiver Certification applications in instances where state regulations previously required only a Construction Start notification.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Nevada

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Nevada for administering the Phase II Storm Water Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$28	none estimated	one-time activity	\$1,865
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$28	none estimated	one-time activity	\$2,800
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$28	none estimated	one-time activity	\$336
	One-Time Activity Total					\$5,001 (179 hours)
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$28	none estimated	405 applications annually	\$11,340
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$28	none estimated	2,298 notifications annually	\$64,344
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$28	none estimated	2,298 notifications annually	\$32,172
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$28	none estimated	1 notification annually	\$22
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$28	none estimated	1 report annually	\$45
9	Permit Administration: Process no exposure certification forms submitted by Phase I facilities.	1 hour	\$28	none estimated	736 annually	\$20,613
	Annual Activity Total					\$128,537 (4,591 hours)

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1999) Economic Analysis of the Final Phase II Storm Water Rule.

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$28	none estimated	one-time activity	\$1,865
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Work is performed by a Staff Engineer	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$50	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$3330
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$28	none estimated	one-time activity	\$2,800
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Work is performed by a Staff Engineer	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$50	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$5000
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$28	none estimated	one-time activity	\$336
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Work is performed by a Staff Engineer	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$50	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$600

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$28	none estimated	405 applications annually	\$11,340
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$28	none estimated	2,298 notifications annually	\$64,344
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$28	none estimated	2,298 notifications annually	\$32,172
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$28	none estimated	1 notification annually	\$22
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Work is performed by a Staff Engineer	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1.0	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$50	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$50
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$28	none estimated	1 report annually	\$45
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Work is performed by a Staff Engineer	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$50	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$80
9	Permit Administration: Process no-exposure certification forms submitted by Phase I facilities.	1 hour	\$28	none estimated	736 annually	\$20,613
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate CO’s share of these facilities, but will try to estimate this before our visit with your state. If you have records of the number of facilities that have applied for no exposure certification, please provide them here.

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Phase II Storm Water Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Phase II Storm Water Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe: Self explanatory

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe: Developed an Electronic Notice of Intent process through the internet.

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe: Since the implementation of the Phase II rule, Nevada has seen over a 100% increase in stormwater permitting that has required all necessary enforcement activity.

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.
Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1						
2						
3						
4						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Compliance Assistance, start up activities: Conduct Outreach programs	2.0	\$50	none estimated	16 Workshops during the first 18 months	\$1600
6	Compliance assistance, recurring activities: Conduct on-going training	2.0	\$50	none estimated	12 Workshops per year	\$1200
7	Permit administration: Developed additional infrastructure - Web based Notice of Intent / permit process	120	\$50	none estimated	one-time activity	\$6000
8						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
9						
10						
11						
12	Enforcement, recurring activities	40	\$50	none estimated	unknown / Total cost calculated per enforcement action	\$2000
13						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule. We would also like to know if the Phase II Storm Water Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing Construction Start Notices of Intent, but your state already required and processed Construction Start Notices of Intent before the Phase II Storm Water Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule.

Yes No

If yes, please describe those activities here:

Web based permit process accounts for all stormwater activity, Phase 1 and Phase II. Total permits have increased 27%.

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Phase II Storm Water Rule might require that you process Construction Start Waiver Certification applications in instances where state regulations previously required only a Construction Start notification.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in New Jersey

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to New Jersey for administering the Phase II Storm Water Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
	One-Time Activity Total					\$5,537 (179 hours)
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	367 applications annually	\$11,377
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	2,081 notifications annually	\$64,511
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	2,081 notifications annually	\$32,256
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	378 notifications annually	\$9,374
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	378 reports annually	\$18,749
9	Permit Administration: Process no exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
	Annual Activity Total					\$136,267 (4,396 hours)

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate NJ's share of these facilities, but will try to provide these estimates before our visit with your state.

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1999) *Economic Analysis of the Final Phase II Storm Water Rule*.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in New Jersey

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 0.5 Man-Yr.	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 75,000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$37,500
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 2 M/Y	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 75,000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 150,000
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
3	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:

Request for Information on the Costs of Administering the Phase II Storm Water Rule in New Jersey

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	367 applications annually	\$11,377
4	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	2,081 notifications annually	\$64,511
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 6 M/y Follow-Up: 40% attributable to Phase II.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 75,000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: Follow-Up Response: About 1,000 are Phase II	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 450,000
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	2,081 notifications annually	\$32,256
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1 M/Y Follow-Up: 40% attributable to Phase II.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 75,000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: Follow-Up Response: About 1,000 are Phase II	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 37,500

Request for Information on the Costs of Administering the Phase II Storm Water Rule in New Jersey

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	378 notifications annually	\$9,374
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2 M/Y	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 75,000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 677	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 150,000
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	378 reports annually	\$18,749
8	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3 M/Y	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 75,000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 677	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 225,000
9	Permit Administration: Process no-exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
9	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.25 M/Y	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 75,000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	Your estimate: 100	Your estimate: 18,750

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate NJ’s share of these facilities, but will try to estimate this before our visit with your state. If you have records of the number of facilities that have applied for no exposure certification, please provide them here.

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Phase II Storm Water Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Phase II Storm Water Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe: Annual municipal meetings

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.
Please describe: Statewide Stormwater Education Program

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking EPA Rule	0.5 M/Y	75000			37,500
2						
3	Designing Implementation Plans	5 M/Y	75,000			375,000
4	Start-Up	1 M/Y	75,000			75,000

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Compliance Assistance	4 M/Y	75,000			300,000
6	Compliance assistance recurring	3 M/Y	75,000			225,000
7	Permit administration	2 M/Y	75,000			150,000
8	Permit administration (recurring)	5 M/Y	75,000			375,000

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule. We would also like to know if the Phase II Storm Water Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing Construction Start Notices of Intent, but your state already required and processed Construction Start Notices of Intent before the Phase II Storm Water Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Some stormwater management activities for new construction as well as NPDES stormwater construction permits over 5 acres

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule.

Yes No

If yes, please describe those activities here:

Annual report database

Increased database for construction activities over 1 acre

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Phase II Storm Water Rule might require that you process Construction Start Waiver Certification applications in instances where state regulations previously required only a Construction Start notification.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 4: In EPA's Regulatory Impact Analysis, EPA assumed that the Phase II Storm Water Rule would not cause New Jersey to incur any additional costs associated with Construction Starts, including:

- (1) Processing and Review of applications for Construction Start Waiver Certification,
- (2) Processing and Review of Construction Start Notices of Intent (NOI), and
- (3) Processing and Review of Construction Start Notices of Termination (NOT).

(See rows 4–6 of the Step 1 Table)

EPA based this assumption on the argument that New Jersey already had regulations for Construction Starts that were as protective (and therefore as administratively burdensome) as EPA's Phase II Storm Water Rule. Thus, EPA argued that New Jersey would incur no incremental costs associated with Construction Starts. Note that EPA did assume that New Jersey would incur start-up costs (see rows 1–3 of the Step 1 Table) and costs associated with MS4s (see rows 6–8 of the Step 1 Table).

Do you agree that the burden of processing Construction Start applications and notices under the federal Phase II Storm Water Rule is no greater than the burden under the prior state regulation?

Yes No

If no, please explain why the burden is greater under the Phase II Storm Water Rule. If possible, try to compare the burden before and after the rule (e.g., it takes an additional hour to process and review each application for construction start waiver certification, or it takes twice as long to process and review each application for construction start waiver certification):

Additional requirement for 1 acre or more

Request for Information on the Costs of Administering the Phase II Storm Water Rule in New Jersey

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
9	Enforcement start-up	1 M/Y	75,000			75,000
10	Enforcement recurring	8 M/Y				600,000
11	Other – Statewide Stormwater Education	1 M/Y	75,000	500,000		575,000
12						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13						
14						
15						
16						

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Oklahoma for administering the Phase II Storm Water Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
	One-Time Activity Total					\$5,537 (179 hours)
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	242 applications annually	\$7,502
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	1,369 notifications annually	\$42,439
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	1,369 notifications annually	\$21,220
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	51 notifications annually	\$1,265
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	51 reports annually	\$2,530
9	Permit Administration: Process no exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
	Annual Activity Total					\$74,955 (2,418 hours)

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate OK's share of these facilities, but will try to provide these estimates before our visit with your state.

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1999) *Economic Analysis of the Final Phase II Storm Water Rule*.

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Analyzed census population urbanized areas, City boundaries, etc...	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: 240 hrs	too low <input checked="" type="checkbox"/> about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: 200 hrs	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Done during routine renewal	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: 40 hrs	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:

**Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates: Step 2 (continued):
Comment on EPA's Regulatory Impact Analysis Estimates:**

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	242 applications annually	\$7,502
4	Did your state perform this activity? Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): We didn't adopt waiver provisions	too low about right <input checked="" type="checkbox"/> too high don't know Your estimate: 0	too low about right <input checked="" type="checkbox"/> too high don't know Your estimate: 0	too low about right too high don't know Your estimate:	too low about right <input checked="" type="checkbox"/> too high don't know Your estimate: 0	too low about right too high don't know Your estimate: 0
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	1,369 notifications annually	\$42,439
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes No Your comments and basis for estimates (if provided): We perform routine inspections on a % of active sites ea yr (7259).	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: 2.5	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right <input checked="" type="checkbox"/> too high don't know Your estimate: 1,250	too low about right too high don't know Your estimate: \$96,875
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	1,369 notifications annually	\$21,220
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes No Your comments and basis for estimates (if provided): We perform a field inspection on each NOT	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: 4 hrs	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right <input checked="" type="checkbox"/> too high don't know Your estimate: 675	too low about right too high don't know Your estimate: \$83,700

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	51 notifications annually	\$1,265
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes No Your comments and basis for estimates (if provided): Need to consider time required to get a complete and approvable NOI PLUS Public Notice	too low about right too high don't know Your estimate: 30 hrs	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate: 44, a few received waivers	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: \$40,920
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	51 reports annually	\$2,530
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes No Your comments and basis for estimates (if provided):	too low about right too high don't know Your estimate: 8 hrs	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate: 44	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: \$10,912
9	Permit Administration: Process no-exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes No Your comments and basis for estimates (if provided): We perform a field inspection on each No-Exposure	<input checked="" type="checkbox"/> too low about right too high don't know Your estimate: 4.5 hrs	too low about right too high don't know Your estimate:	too low about right too high don't know Your estimate:	Your estimate: 100 annually	Your estimate:

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate OK's share of these facilities, but will try to estimate this before our visit with your state. If you have records of the number of facilities that have applied for no exposure certification, please provide them here.

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Phase II Storm Water Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Phase II Storm Water Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.
Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

[Rule making to incorporate EPA Rules by reference](#)

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.
Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.
Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.
Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.
Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.
Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.
Please describe:

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.

12.3 Take legal actions to enforce the regulation.

12.4 Collect fines for violations.

12.5 Keep records of enforcement actions.

12.6 Provide notifications of enforcement actions.

12.7 Report enforcement activities to EPA.

12.8 Incur additional recurring costs associated with enforcement activities.

12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Annual fee/invoicing process (initial invoicing and follow up collection activities).

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1						
2	rulemaking	20 hrs	Cost of conducting WQD board/council meetings which oversee rulemaking activities			
3						
4	4.1 internal procedures 4.2 staff training	40 hrs 80 hrs	travel cost for training – \$2,000			

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	5.1 outreach	160 hrs				
	5.3 training	240 hrs		training materials \$1,000		
6	6.1 calls etc...	130 hrs				
	6.2 training	216 hrs				
7	7.1 permit development	720 hrs				
	7.2 permit admin.	60 hrs				
8	8.1 document review	240 hrs				
	8.4 issue authorizations	240 hrs				
	8.6 permits	160 hrs				
11	11.1 enforcement procedures	376 hrs				

<p>12</p>	<p>12.1 enforcement inspections 12.2 enforcement NOVs/Cos 12.3 enforcement legal 12.4 collection of fines 12.5 enforcement records 12.7 reporting to EPA</p>	<p>12.1 - 720 hrs 12.2 - 286 hrs 12.3 - 376 hrs 12.4 - 376 hrs 12.5 - 188 hrs 12.7 - 188 hrs</p>				
<p>13</p>	<p>fee invoicing/collection</p>	<p>160 hrs</p>				

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule. We would also like to know if the Phase II Storm Water Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing Construction Start Notices of Intent, but your state already required and processed Construction Start Notices of Intent before the Phase II Storm Water Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Phase II Storm Water Rule might require that you process Construction Start Waiver Certification applications in instances where state regulations previously required only a Construction Start notification.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in South Carolina

Follow-Up Step: Please confirm that we have recorded your responses correctly and provide additional information where needed.

Ann Clark, Glenn Trofatter, and Andy Yasinsac of the South Carolina Department of Health and Environmental Control (DHEC) provided the information summarized below during a meeting with Abt Associates Inc. on July 28, 2006.

Notes: The table beginning below and continuing on the following pages presents the cost estimates based on EPA's regulatory impact analysis as well as your comments regarding the EPA estimates. We recorded your answers in red font below and highlighted the sections where you were going to get back to us in yellow. Please get back to us on the components highlighted in yellow and review the answers we recorded in red to make sure we interpreted your answers correctly.

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary, 2006\$)	Non-Labor Costs	Number of Activities
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$50,000	\$0	one-time activity
1	<i>Activity was performed.</i>	<input checked="" type="checkbox"/> too low Your estimate: <i>170 hours</i>	<input checked="" type="checkbox"/> about right Your estimate: <i>\$50,000</i>	<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> about right
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$50,000	\$0	one-time activity
	<i>Activity was performed. You listed several items here that we have separated into rows 2a-2d.</i>	<input checked="" type="checkbox"/> too low	<input checked="" type="checkbox"/> too low	<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> about right
2a	Revise the regulation	<i>250 hours</i>	<i>\$70,000</i>	<i>\$500 (printing costs)</i>	<i>one-time activity</i>
2b	Revise small MS4 Permit (this label was all we had in our notes, can you elaborate on what this refers to?)	2 FTEs	\$50,000 salary	<i>\$500 (printing costs)</i>	<i>one-time activity</i>
2c	3 months for management.	<i>¼ FTE (3 months)</i>	<i>\$75,000 salary</i>	\$0	<i>one-time activity</i>
2d	1 months for legal staff.	<i>1/12 FTE (1 month)</i>	<i>\$50,000-\$60,000 salary</i>	\$0	<i>one-time activity</i>
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$50,000	\$0	one-time activity
3	<i>Activity was performed.</i>	<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> about right Your estimate: <i>\$50,000</i>	<input checked="" type="checkbox"/> too low Your estimate: <i>\$500 (printing costs)</i>	<input checked="" type="checkbox"/> about right

Request for Information on the Costs of Administering the Phase II Storm Water Rule in South Carolina

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary, 2006\$)	Non-Labor Costs	Number of Activities
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hour	\$50,000	\$0	725 applications annually
4	Activity was not performed.	n.a.	n.a.	n.a.	n.a.
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hour	\$50,000	\$0	4,108 notifications annually
5	Activity was performed.	⊗ about right Your estimate: Noted that this seemed right for 1-2 acre sites, but too low for 2+ acre sites, which required more like 16 hours.	⊗ about right Your estimate: \$50,000	⊗ about right	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high ⊗ don't know Your estimate: 2,500 1-5 acre sites; need to get back to us on fraction that are 1-2 acre sites.
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$50,000	\$0	4,108 notifications annually
6	*State will do it, but does not do it now.	⊗ about right Your estimate:	⊗ too high Your estimate: \$25,000	⊗ about right	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high ⊗ don't know Your estimate: 2,500 1-5 acre sites; need to get back to us on fraction that are 1-2 acre sites. Noted that 1-2 acre sites may be unlikely to submit NOTs.
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$50,000	\$0	48 notifications annually
7	Activity was performed.	⊗ too low Your estimate: 15 hours (1 st review) 24 hours (2 nd review)	⊗ about right Your estimate: \$50,000	⊗ about right	⊗ too low Your estimate: Had to be done twice because of litigation; 70 reports first time and 85 the second time; Have to redo it every 5 years.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in South Carolina

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary, 2006\$)	Non-Labor Costs	Number of Activities
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$50,000	\$0	48 reports annually
8	Activity was performed.	⊗ too low Your estimate: 12 hours	⊗ about right* Your estimate: \$45,000	⊗ about right	⊗ too low Your estimate: 70
9	Permit Administration: Process no-exposure certification forms submitted by Phase I facilities.	1 hour	\$50,000	none estimated	not available*
9	Activity was performed.	⊗ about right* Your estimate: 1.5	⊗ too low Your estimate: \$70,000	⊗ about right Your estimate:	Your estimate: 30 per year (2-3 per month)

Request for Information on the Costs of Administering the Phase II Storm Water Rule in South Carolina

Costs Omitted from EPA’s Analysis: Please confirm that we have recorded your responses correctly.

Your Estimates of the Cost for “Omitted Costs”

Row #	Description	Time Burden (per-activity)	Labor Cost (salary, 2006\$)	Non-Labor Costs	Number of Activities
1a	Development and Issuance (Costs Associated with Litigation).	1 FTE	\$75,000	\$0	2 (done twice because of litigation)
1b	Development and Issuance (Costs Associated with Litigation).	¼ FTE (3 months)	\$55,000	\$0	2 (done twice because of litigation)
2a	Redo Construction Start Forms (10% attributable to Phase II)	10% of 75 hours	\$50,000	\$0	1
2b	New Computer System for Construction Start Forms (10% attributable to Phase II)	10% of 100 hours	\$60,000	\$0	1
2c	Issue Guidance for Construction Start Forms (10% attributable to Phase II)	10% of 75 hours	\$50,000	\$0	1
2d	Outreach for Construction Start Forms (10% attributable to Phase II)	10% of 75 hours	\$50,000	\$0	2 (done twice because of litigation)
2e	Stakeholder Interaction related to Construction Start Forms (10% attributable to Phase II)	10% of 5 hours per day for 8 months	\$50,000	\$0	1
3a	New Computer System for MS4 Forms (100% attributable to Phase II)	20 hours	\$60,000	\$0	1
3b	Issue Guidance for MS4 Forms (100% attributable to Phase II)	75 hours	\$50,000	\$0	1

Request for Information on the Costs of Administering the Phase II Storm Water Rule in South Carolina

Your Estimates of the Cost for “Omitted Costs”

Row #	Description	Time Burden (per-activity)	Labor Cost (salary, 2006\$)	Non-Labor Costs	Number of Activities
3c	Outreach for MS4 Forms (100% attributable to Phase II)	150 hours	\$50,000	\$0	1
3d	Stakeholder Interaction related to MS4 Forms (100% attributable to Phase II)	1 hour per day for 5 months	\$55,000	\$0	1
4	Develop no-exposure certification form	24 hours (3 days)	\$70,000	\$0	1

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Phase II Storm Water Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Phase II Storm Water Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe: **3 days to develop no exposure certification form at \$70,000 (one-time)**

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Virginia

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Virginia for administering the Phase II Storm Water Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
	One-Time Activity Total					\$5,537 (179 hours)
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	467 applications annually	\$14,477
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	2,647 notifications annually	\$82,057
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	2,647 notifications annually	\$41,029
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	47 notifications annually	\$1,166
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	47 reports annually	\$2,331
9	Permit Administration: Process no exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
	Annual Activity Total					\$141,059 (4,550 hours)

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate VA's share of these facilities, but will try to provide these estimates before our visit with your state.

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1999) *Economic Analysis of the Final Phase II Storm Water Rule*.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Virginia

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Designing Implementation Plan: Time required to identify and designate additional MS4s.	66.6 hours	\$31	none estimated	one-time activity	\$2,065
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on experience to designate and identify additional MS4s.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 4 hrs/MS4	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$36	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: approximately 110 MS4s	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$15,840
2	Designing Implementation Plan: Time required to revise state procedures for implementing the new rule.	100 hours	\$31	none estimated	one-time activity	\$3,100
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on experience with VA’s APA process.	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 300	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$42	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$12,600
3	General Start-Up Activities: Time required to add 401 language to the general permit.	12 hours	\$31	none estimated	one-time activity	\$372
3	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): This was included in the time for Row 2 above.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Virginia

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Processing and Review of applications for Construction Start Waiver Certification	1 hours	\$31	none estimated	467 applications annually	\$14,477
4	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5	Permit Administration: Processing and Review of Construction Start Notices of Intent (NOI)	1 hours	\$31	none estimated	2,647 notifications annually	\$82,057
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on experience.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$36	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2,600	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$93,600
6	Permit Administration: Processing and Review of Construction Start Notices of Termination (NOT)	0.5 hours	\$31	none estimated	2,647 notifications annually	\$41,029
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on experience.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$36	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2,600 if all projects complete NOT	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$93,600

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Virginia

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration: Processing and Review of MS4 Notices of Intent (NOI)	0.8 hours	\$31	none estimated	47 notifications annually	\$1,166
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on experience .	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 40	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$36	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 6	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$8,640
8	Permit Administration: Processing and Review of MS4 Reports	1.6 hours	\$31	none estimated	47 reports annually	\$2,331
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on experience .	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 8	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$36	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 110	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$31,680
9	Permit Administration: Process no-exposure certification forms submitted by Phase I facilities.	1 hour	\$31	none estimated	not available*	not available*
9	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

*EPA estimated that about 180,000 facilities nationwide would apply for no exposure certification. To date, Abt has been unable to estimate VA’s share of these facilities, but will try to estimate this before our visit with your state. If you have records of the number of facilities that have applied for no exposure certification, please provide them here.

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Phase II Storm Water Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Phase II Storm Water Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe: Citizen complaints regarding MS4s and the general permit for construction activities. Inspections and compliance follow-up for projects covered and not covered by the General Permit for construction activities. Enforcement actions for projects not in compliance with the General Permit.

Request for Information on the Costs of Administering the Phase II Storm Water Rule in Virginia

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Citizen complaints regarding the MS4 operation, maintenance and water quality.	8 hrs/complaint	\$36		6	\$1,728
2	Citizen complaints about land disturbing activities covered or not covered by the General Permit for construction activities	16 hrs/complaint	\$36		200	\$115,200
3	Inspections for land disturbing activities covered or not covered by the General Permit for construction activities.	7.4 hrs/inspection	\$36		2600	\$692,640
4	Follow-up inspections per findings of initial inspections.	5.8 hrs/inspection	\$36		650	\$135,720

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Enforcement actions on land disturbing projects not in compliance with the General Permit	120 hrs minimum per action	\$42		26	\$131,040
6						
7						
8						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule. We would also like to know if the Phase II Storm Water Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing Construction Start Notices of Intent, but your state already required and processed Construction Start Notices of Intent before the Phase II Storm Water Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Erosion and Sediment Control Law - regulated land disturbing activities greater than or equal to 10,00 sqft require an an approved erosion and sediment control plan before land disturbance begins. Administered through local governments for private project and through DCR for state agency projects.

Virginia Stormwater Management Act - voluntary for local governments and mandatory for state agency projects. Land disturbing projects greater than or equal to 1 acre required to have an approved stormwater management plan before land disturbance begins.

Chesapeake Bay Preservation Act - 84 localities reired to implement programs, including erosion and sediment control and stormwater management, to protect the Chesapeake Bay. The threshold for land disturbance reduced to 2,500 sqft or greater.

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Phase II Storm Water Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Phase II Storm Water Rule – e.g., 20 percent of the records entered into the database are related to the Phase II Storm Water Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Phase II Storm Water Rule might require that you process Construction Start Waiver Certification applications in instances where state regulations previously required only a Construction Start notification.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Appendix B. Stage 1 Disinfectant/Disinfection Byproducts Rule

B.1. Introduction

Appendix B provides a detailed explanation of the process involved in adjusting EPA and state cost estimates for the Stage 1 Disinfectant/Disinfection Byproducts Rule (Disinfection Byproducts) to allow for comparison between the two. To ensure that the cost estimates were comparable, we took the following steps:

- We disaggregated EPA national-level costs to each of the five case study states. Section B.2 outlines the details of this process.
- We normalized state questionnaire responses to account for variations in the format of the reported estimates. Section B.3 outlines the details of this process.
- We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in Section B.4. Tables B-3 through B-7 present our cost calculations for each of the five participating states (Kansas, Nevada, New Jersey, Oklahoma, and South Carolina). Section B.4 also presents the completed questionnaires that we received from each participating state as reference.

B.2. Disaggregating EPA National Estimates to the Five Case Study States

In Chapter 7, we present EPA's national-level cost estimates for the Disinfection Byproducts Rule that were based on the estimates prepared for the RIA (U.S. EPA 1998e). The RIA categorizes state administrative costs as annual or one-time. One-time tasks (start-up activities) include program development and staff training, public outreach and assistance, technical system upgrading and compliance support, and various administrative tasks. Annual (recurring) activities include meeting reporting requirements, enforcement support, coordination with EPA, on-going staff training, and data entry. Table B-1 provides a summary of the normalization methods we used to develop start-up and recurring cost estimates for each of the five case study states.

In the RIA, EPA developed national administrative cost estimates for 56 states and territories. The RIA presented some of the costs on a per-state basis. We apportioned these costs to the case study states assuming that about 1.8 percent (1 of 56) of these costs are attributed to each state.

The RIA estimated other costs on a per-regulated entity basis. We apportioned these national estimates to each participating state based on each state's share of the regulated entities affected by the rule. For the Stage 1 Disinfection Byproducts Rule, we estimated the percentage of entities located in each state by collecting data on the number of water systems within that state. While the RIA contains data on the number of water systems in the 1991 Safe Drinking Water Information System (SDWIS), we used the 1998 SDWIS data, which were the only available data for this analysis (U.S. EPA 1998d). We compared the 1991 and 1998 SDWIS data and found that the 1998 SDWIS data indicated 2 percent fewer water systems than the count included in the RIA.

One of the administrative cost activities is dependent on the number of labs within the state. Due to data constraints, we simply divided the total number of labs presented in the RIA by the number of regulated states and territories to develop an average estimate for the case study states. Finally, for some activities (such as clerical tasks), the estimated total hours depend on the

Final Report, September 14, 2007

number of FTEs spent performing other activities. We apportioned the national estimates to the case study states based on the state's share of the total hours spent in other categories.

As a final step in the conversion process, we inflated all costs to 2006 dollars using data from the U.S. Bureau of Labor Statistics' *Consumer Price Index for All Urban Consumers* (CPI-U). For the Stage 1 Disinfection Byproducts Rule, we inflated 1998 dollars using an adjustment factor of 1.24. In addition, we adjusted labor rates to reflect salary plus fringe benefits using a load factor of 1.4 (see Chapter 5 for a complete description of the methodology).

Table B-1: Approach for Allocating EPA Administrative Costs for the Stage 1 Disinfectant/Disinfection Byproducts Rule to Case Study States

EPA Administrative Cost Category	Approach for Allocating National-Level Costs to Case Study States
Start-Up Activities	
1. Tracking EPA's Rulemaking Progress	
Regulation Adoption and Program Development	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
2. Obtaining Additional Delegated Authority	
	No costs estimated in this category.
3. Designing Implementation Plan	
	No costs estimated in this category.
4. General Start-Up Activities	
Staff Training (Rule Specific)	This category is dependent on the number of FTEs spent performing other tasks. Assumed that national estimates were proportional to state's share of the total hours spent in other categories.
5. Compliance Assistance	
Public Notification	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
Initial Lab Certification and Training and Site Visit and Follow Up	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated that each state would have 1.8 percent (1 of 56) of the labs in the nation.
System Training and Technical Assistance	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
6. Permit Administration	
Review Plans and Specifications (LGW)	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Review Plans and Specifications (LSW)	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Review Plans and Specifications (SGW)	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Review Plans and Specifications (SSW)	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Enhanced Coagulation Determination	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Issue Notice of Intent	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
7. Monitoring	
Maintain Data Management System	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
Notification of Required Monitoring	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Issue/Monitor Compliance Schedule	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).

Final Report, September 14, 2007

Table B-1: Approach for Allocating EPA Administrative Costs for the Stage 1 Disinfectant/Disinfection Byproducts Rule to Case Study States

EPA Administrative Cost Category	Approach for Allocating National-Level Costs to Case Study States
8. Enforcement	
Violation Letters	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Recurring Activities	
9. Compliance Assistance	
On-Going Technical Assistance	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
Staff Training (On-Going)	This category is dependent on the number of FTEs spent performing other tasks. Assumed that national estimates were proportional to state's share of the total hours spent in other categories.
Lab Certification	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
Compliance Follow-Up	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
10. Permit Administration	No costs estimated in this category.
11. Monitoring	
SDWIS Reporting	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
Data Entry (ground)	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
Data Entry (surface)	Assumed that national estimates were proportional to state's share of the regulated entities affected by the rule. Estimated the number of systems in each stated based on the systems listed in SDWIS (U.S. EPA 1998d).
12. Enforcement	No costs estimated in this category.
13. Other	
Coordination With EPA	Attributed 1.8% (1 of 56) of the national-level costs to each case study state. EPA assumed that each state would incur the same costs.
Clerical	This category is dependent on the number of FTEs spent performing other tasks. Assumed that national estimates were proportional to state's share of the total hours spent in other categories.
Supervision	This category is dependent on the number of FTEs spent performing other tasks. Assumed that national estimates were proportional to state's share of the total hours spent in other categories.

B.3. Normalizing State Questionnaire Responses

To compare EPA and the case study state estimates for each of the four regulations, we found it necessary to “normalize” each state’s questionnaire responses to account for variations in labor rates and differences in the ways each state completed the questionnaires. We describe each of the “normalization” steps in more detail below.

B.3.1. Labor Rate Adjustments

EPA estimated total national administrative costs using average national wage rates. We converted these national-level costs into state-level costs and used these as a baseline for comparison with actual case study state responses, as described in Chapter 7. Because average labor rates can vary for an individual state from those of other states and that of the nation, we applied an adjustment factor¹ based on a national average wage rate to the labor rates reported by each participating state (see Table B-2). In doing so, this analysis weights, or “normalizes,” the reported state labor rates with respect to the national average and allows for the comparison set forth in our analytic framework.

¹ Wage rates used were based on May 2005 U.S. Bureau of Labor Statistics average hourly wage for all industry groups. Normalization Factor = (Average U.S. Wage)/(Average Wage for the Case Study State).

Table B-2: Mean Hourly Wages and Labor Rate Adjustment Factors by Case Study State

Case Study State	Mean Hourly Wage ^a	Adjustment Factor
Kansas	\$16.33	1.12
Nevada	\$16.71	1.09
New Jersey	\$21.09	0.86
Oklahoma	\$15.12	1.20
South Carolina	\$15.50	1.17
United States	\$18.21	1.00

a. Based on mean hourly wages for “All Occupations.”

Source: U.S. Bureau of Labor Statistics. 2005. *May 2005 National Occupational Employment and Wage Estimates*.

B.3.2. Normalization of Case Study State Data

In developing our information collection request form, as described in Chapter 5, we had been advised by South Carolina (our beta tester for the original questionnaire) that it may be difficult for the case study states to estimate costs for the line items included in EPA’s analysis. Given this situation, we allowed states the flexibility to report costs at the level of detail available to them. After reviewing the responses that we received, we found that the case study states commonly did not conform to the level of detail contained in EPA’s analysis. As a result, we made adjustments to some of the state responses so that they were comparable with the EPA-based estimates. In general, our adjustments (e.g., assigning aggregate costs to individual line items) did not substantively change the information provided by the participating states, as described below.

Kansas

- Kansas reported that they spend 16 hours per FTE and 16 FTEs annually for ongoing staff training but did not report a total cost or labor rate. We assumed the RIA labor rate of \$41 and calculated a total cost based on this factor.
- Kansas reported having performed data entry for ground systems but did not provide an estimate for the number of hours per system. Kansas reported a total cost of \$0. We included a cost of \$0 in the analysis.
- Kansas combined Lines 14 and 15 (“Issue/Monitor Compliance Schedule;” “Notification of Required Monitoring”). We apportioned the total Kansas reported to lines 14 and 15 based on the relative importance of lines 14 and 15 according to the RIA.
- Kansas combined Lines 17 and 20 (“On-Going Technical Assistance”; “Compliance Follow-Up”). We apportioned the total Kansas reported to lines 17 and 20 based on the relative importance of lines 17 and 20 according to the RIA.
- For Line 26, “Other Recurring Activities: Supervision,” Kansas reported 0.4 annual activities. In the RIA, this value is based on the number of FTEs in other categories. As such, the value for “number of activities” in this category is somewhat abstract. We normalized this value to one annual activity and adjusted the time burden to reflect the total hour burden.

Final Report, September 14, 2007

Nevada

- For several line item activities, Nevada presented estimates as a range rather than a point estimate. For example, under the category “Staff Training (rule specific),” Nevada estimated the number of activities as “1 to 1.5 FTE.” To make these ranges fit our model, we estimated point estimates based on the other factors for that line item (in this example, we took the total cost and divided by the labor cost for one activity). Similar adjustments were needed for the following categories: “Public Notification”; “System Training and Technical Assistance”; and “Staff Training (Ongoing).”
- Nevada reported that the labor cost of maintaining the data management system was \$25 to \$40 an hour and that 200 hours are required. After clarification from Nevada, we changed this to reflect two different activities of 200 hours each (one with a labor rate of \$25 and the other with a labor rate of \$40). Also after clarification, we added \$2,080 and \$7,000 to the non-labor cost of \$2800 for staff training costs and SDWIS contractor expenses, respectively.
- A separate entity from Nevada’s environment department performs activities in the category “Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide.” Therefore, Nevada did not have an estimate for this activity. We included the EPA estimate as a substitute.
- Nevada was not able to estimate a cost for the activity “Issue/Monitor Compliance Schedule.” We included the EPA estimate as a substitute.
- Nevada was not able to estimate a cost for the activity “Violation Letters.” We included the EPA estimate as a substitute.
- For Line 25, “Other Recurring Activities: Clerical,” Nevada did not estimate the number of annual activities. In the RIA, this value is based on the number of FTEs in other categories. As such, the value for “number of activities” in this category is somewhat abstract. We normalized this value to one annual activity and adjusted the time burden to reflect the total hour burden.

New Jersey

- For several activities, New Jersey reported non-labor costs as hourly costs. We adjusted these responses to reflect the total per-event cost. For example, under activity “Regulation Adoption and Program Development,” New Jersey reported a non-labor cost of \$15 per hour. We multiplied this by the time burden per activity (200 hours) and included the resulting per activity non-labor cost (\$3,000) in our calculations.
- For the activity “Initial Lab Certification and Training and Site Visit and Follow Up,” New Jersey reported that another department performs this activity and that they did not have enough information to make an estimate. We included the EPA estimate as a substitute.
- For the activity “Recurring Enforcement Support: Lab Certification,” New Jersey reported that another department performs this activity and that they did not have enough information to make an estimate. We included the EPA estimate as a substitute.
- For the activity “SDWIS Reporting,” New Jersey did not have an estimate for the time burden, the number of activities, or the total cost. We included EPA estimates as a substitute for these values.
- For Line 25, “Other Recurring Activities: Clerical,” New Jersey reported 0.5 annual activities. In the RIA, this value is based on the number of FTEs in other categories. As

Final Report, September 14, 2007

such, the value for “number of activities” in this category is somewhat abstract. We normalized this value to one annual activity and adjusted the time burden to reflect the total hour burden.

Oklahoma

- For the activity “Public Notification,” Oklahoma marked “don’t know” for the number of activities estimate. We assumed the EPA estimate, “1 one-time activity,” for our calculations (the total cost provided by Oklahoma matches our calculations using this assumption).
- Oklahoma commented that their estimates for time burden and number of activities in the start-up monitoring category were actually recurring items. After confirming this with Oklahoma, we included these items as EPA-omitted activities in the recurring monitoring category. We kept non-labor costs, which were more generally one-time costs, in the start-up monitoring category.
- For several activities, Oklahoma marked “don’t know” in the non-labor cost field. We assume these costs to be the EPA estimate of \$0 (the total costs reported by Oklahoma match those of our calculations).
- In the omitted category “Compliance Assistance, recurring,” Oklahoma reported the time burden as 700 hours and the number of activities as one. Our calculations reflect these values, though Oklahoma did comment that the 700 hours are divided over multiple activities among 16 FTEs.
- In the omitted category “Permit Administration, recurring,” Oklahoma reported the time burden as 200 hours and the number of activities as one. Our calculations reflect these values, though Oklahoma did comment that the 200 hours are divided over multiple activities among 4 FTEs.
- In the omitted category “Monitoring, recurring,” Oklahoma reported the time burden as 300 hours and the number of activities as one. Our calculations reflect these values, though Oklahoma did comment that the 300 hours are divided over multiple activities among 4 FTEs.
- In the omitted category “Enforcement, recurring,” Oklahoma reported the time burden as 1,600 hours and the number of activities as one. Our calculations reflect these values, though Oklahoma did comment that the 1,600 hours are divided over multiple activities among 14 FTEs.
- For Line 15, “Issue/Monitor Compliance Schedule,” Line 25, “Other Recurring Activities: Clerical,” and Line 26, “Other Recurring Activities: Supervision,” New Jersey reported 0.5, 0.8, and 0.8 annual activities, respectively. In the RIA, these values are based on the number of FTEs in other categories. As such, the values for “number of activities” in these categories are somewhat abstract. We normalized these values to one annual activity and adjusted the time burden to reflect the total hour burden.

South Carolina

- South Carolina did not report total cost estimates. As a result, we derived all total costs from South Carolina’s estimates for time burden, labor cost, non-labor cost, and number of activities.

Final Report, September 14, 2007

- South Carolina reported labor costs as annual salary (without benefits). To normalize these values, we divided the annual salary by 2,080 hours (1 FTE) and adjusted this wage by a fringe load factor of 1.4.
- For the activity “Initial Lab Certification and Training and Site Visit and Follow Up,” South Carolina did not have enough information to make an estimate. We included the EPA estimate as a substitute.
- For the activity “System Training and Technical Assistance,” South Carolina did not have enough information to make an estimate. We included the EPA estimate as a substitute.
- For the activity “Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide,” South Carolina did not have enough information to make an estimate. We included the EPA estimate as a substitute.
- For the activity “Lab Certification,” South Carolina did not have enough information to make an estimate. We included the EPA estimate as a substitute.
- For the activity “Coordination with EPA,” South Carolina did not have enough information to make an estimate. We included the EPA estimate as a substitute.
- For the activities “Review Plans and Specifications (LSW),” “Review Plans and Specifications (SGW),” and “Review Plans and Specifications (SSW),” South Carolina reported separate estimates for construction specifications and monitoring plans. For each, we combined these estimates into one estimate that reflects the reported total cost.
- For the activity “Issue/Monitor Compliance Schedule,” South Carolina reported that eight systems violated initially and that there were two systems in violation each year afterwards. We included six systems in the start-up category (eight minus two) and two systems in the corresponding EPA-omitted recurring category.
- For the activity “Violation Letters,” South Carolina reported that there were 160 letters initially and that there were fifteen to twenty letters each year afterwards. We included 143 letters in the start-up category (the rounded difference of 160 and the average of fifteen and twenty) and rounded average of fifteen and twenty (18) in the corresponding EPA-omitted recurring category.
- For the activity “Enforcement Support: On-Going Technical Assistance,” South Carolina reported that they spent one FTE for the first six years and 0.4 FTE each year afterwards. We included 832 hours in the recurring category (2,080x0.4) and 7,488 hours (6x2,080-6x832) in the corresponding EPA-omitted start-up category.
- For Line 15, “Issue/Monitor Compliance Schedule,” Line 25, “Other Recurring Activities: Clerical,” and Line 26, “Other Recurring Activities: Supervision,” South Carolina reported 6, 0.3, and 0.4 annual activities, respectively. In the RIA, these values are based on the number of FTEs in other categories. As such, the values for “number of activities” in these categories are somewhat abstract. We normalized these values to one annual activity and adjusted the time burden to reflect the total hour burden.

B.4. EPA Estimates and State Questionnaire Responses

We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in this section. Tables B-3 through B-7 present our cost calculations for each of the five case study states (Kansas, Nevada, New Jersey, Oklahoma, and South Carolina). After these tables, we include the completed questionnaires that we received from each participating state as reference.

Final Report, September 14, 2007

Table B-3: Disinfection Byproducts - EPA Burden Estimates - Kansas						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$41	\$0	1	840	\$34,440
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	80	\$41	\$0	13	1,040	\$42,640
5. Compliance Assistance						
Public Notification	168	\$41	\$0	1	168	\$6,888
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$41	\$0	32	768	\$31,488
System Training and Technical Assistance	1,680	\$41	\$0	1	1,680	\$68,880
6. Permit Administration						
Review Plans and Specifications (LGW)	40	\$41	\$0	2	80	\$3,280
Review Plans and Specifications (LSW)	80	\$41	\$0	29	2,320	\$95,120
Review Plans and Specifications (SGW)	24	\$41	\$0	101	2,424	\$99,384
Review Plans and Specifications (SSW)	32	\$41	\$0	105	3,360	\$137,760
Enhanced Coagulation Determination	23	\$41	\$0	135	3,105	\$127,305
Issue Notice of Intent	24	\$41	\$0	16	384	\$15,744
7. Monitoring						
Maintain Data Management System	2,184	\$41	\$0	1	2,184	\$89,544
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$41	\$25,000	1	2,291	\$118,931
Notification of Required Monitoring	2	\$41	\$0	818	1,636	\$67,076
Issue/Monitor Compliance Schedule	80	\$41	\$0	0.3	24	\$984
8. Enforcement						
Violation Letters	2	\$41	\$0	164	328	\$13,448
Total Start-Up Costs					22,304	\$952,912
Total Annualized Start-Up Costs						\$217,202
Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	840	\$41	\$0	1	840	\$34,440
Staff Training (On-Going)	40	\$41	\$0	4	160	\$6,560
Enforcement Support: Lab Certification	840	\$41	\$0	1	840	\$34,440
Enforcement Support: Compliance Follow Up	840	\$41	\$0	1	840	\$34,440
10. Permit Administration						
No costs estimated in this category.						

Final Report, September 14, 2007

11. Monitoring						
SDWIS Reporting	840	\$41	\$0	1	840	\$34,440
Data Entry (ground)	1	\$41	\$0	670	670	\$27,470
Data Entry (surface)	9	\$41	\$0	75	675	\$27,675
12. Enforcement	No costs estimated in this category.					
13. Other						
Coordination With EPA	840	\$41	\$0	1	840	\$34,440
Clerical	1,680	\$41	\$0	0.3	504	\$20,664
Supervision	1,680	\$41	\$0	0.4	672	\$27,552
<i>Total Recurring Costs</i>					4,865	\$282,121
Total Annualized Costs						\$499,323

Final Report, September 14, 2007

Table B-3: Disinfection Byproducts - Kansas - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$45.72	\$0	1	840	\$38,405
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	40	\$45.72	\$0	19	760	\$34,747
5. Compliance Assistance						
Public Notification	80	\$45.72	\$0	1	80	\$3,658
Initial Lab Certification and Training and Site Visit and Follow Up	0	\$0.00	\$0	0	0	\$0
System Training and Technical Assistance	1,378	\$45.72	\$0	1	1,378	\$63,002
6. Permit Administration						
Review Plans and Specifications (LGW)	8	\$45.72	\$0	2	16	\$732
Review Plans and Specifications (LSW)	0	\$0.00	\$0	0	0	\$0
Review Plans and Specifications (SGW)	0	\$0.00	\$0	0	0	\$0
Review Plans and Specifications (SSW)	24	\$45.72	\$0	65	1,560	\$71,323
Enhanced Coagulation Determination	0	\$0.00	\$0	0	0	\$0
Issue Notice of Intent	0	\$0.00	\$0	0	0	\$0
7. Monitoring						
Maintain Data Management System	504	\$45.72	\$0	1	504	\$23,043
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	336	\$45.72	\$60,000	1	336	\$75,362
Notification of Required Monitoring	1,971.1	\$45.72	\$0	625	1,232	\$56,324
Issue/Monitor Compliance Schedule	18.07	\$45.72	\$0	1	18	\$826
8. Enforcement						
Violation Letters	2	\$45.72	\$0	30	60	\$2,743
<i>Total Start-Up Costs</i>					6,724	\$370,165
<i>Total Annualized Start-Up Costs</i>						\$84,374
Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	1,820	\$45.72	\$0	1	1,820	\$83,211
Staff Training (On-Going)	16	\$45.72	\$0	16	256	\$11,704
Enforcement Support: Lab Certification	0	\$0.00	\$0	0	0	\$0
Enforcement Support: Compliance Follow Up	1,820	\$45.7201	\$0	1	1,820	\$83,211
10. Permit Administration						
No costs estimated in this category.						

Final Report, September 14, 2007

11. Monitoring						
SDWIS Reporting	128	\$45.72	\$0	1	128	\$5,852
Data Entry (ground)	0	\$45.72	\$0	670	0	\$0
Data Entry (surface)	0	\$0.00	\$0	0	0	\$0
12. Enforcement	No costs estimated in this category.					
13. Other						
Coordination With EPA	336	\$45.72	\$0	1	336	\$15,362
Clerical	504	\$45.72	\$0	1	504	\$23,043
Supervision	1,680	\$45.72	\$0	0.4	672	\$30,724
<i>Total Recurring Costs</i>					4,024	\$253,107
Total Annualized Costs						\$337,480

Final Report, September 14, 2007

Table B-3: Disinfection Byproducts - Kansas - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress		No costs estimated in this category.				
2. Obtaining Additional Delegated Authority		No costs estimated in this category.				
3. Designing Implementation Plan		No costs estimated in this category.				
4. General Start-Up Activities		No costs estimated in this category.				
5. Compliance Assistance		No costs estimated in this category.				
6. Permit Administration		No costs estimated in this category.				
7. Monitoring		No costs estimated in this category.				
8. Enforcement		No costs estimated in this category.				
<i>Total Start-Up Costs</i>					0	\$0
<i>Total Annualized Start-Up Costs</i>						\$0
Recurring Activities						
9. Compliance Assistance		No costs estimated in this category.				
10. Permit Administration		No costs estimated in this category.				
11. Monitoring		No costs estimated in this category.				
12. Enforcement		No costs estimated in this category.				
13. Other		No costs estimated in this category.				
<i>Total Recurring Costs</i>					0	\$0
<i>Total Annualized Costs</i>						\$0

Final Report, September 14, 2007

Table B-4: Disinfection Byproducts - EPA Burden Estimates - Nevada						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$41	\$0	1	840	\$34,440
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	80	\$41	\$0	7	560	\$22,960
5. Compliance Assistance						
Public Notification	168	\$41	\$0	1	168	\$6,888
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$41	\$0	32	768	\$31,488
System Training and Technical Assistance	1,680	\$41	\$0	1	1,680	\$68,880
6. Permit Administration						
Review Plans and Specifications (LGW)	40	\$41	\$0	2	80	\$3,280
Review Plans and Specifications (LSW)	80	\$41	\$0	5	400	\$16,400
Review Plans and Specifications (SGW)	24	\$41	\$0	81	1,944	\$79,704
Review Plans and Specifications (SSW)	32	\$41	\$0	19	608	\$24,928
Enhanced Coagulation Determination	23	\$41	\$0	24	552	\$22,632
Issue Notice of Intent	24	\$41	\$0	6	144	\$5,904
7. Monitoring						
Maintain Data Management System	2,184	\$41	\$0	1	2,184	\$89,544
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$41	\$31,058	1	2,291	\$124,989
Notification of Required Monitoring	2	\$41	\$0	323	646	\$26,486
Issue/Monitor Compliance Schedule	80	\$41	\$0	0.1	8	\$328
8. Enforcement						
Violation Letters	2	\$41	\$0	65	130	\$5,330
Total Start-Up Costs					12,873	\$564,181
Total Annualized Start-Up Costs						\$128,597
Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	840	\$41	\$0	1	840	\$34,440
Staff Training (On-Going)	40	\$41	\$0	3	120	\$4,920
Enforcement Support: Lab Certification	840	\$41	\$0	1	840	\$34,440
Enforcement Support: Compliance Follow Up	840	\$41	\$0	1	840	\$34,440
10. Permit Administration						
No costs estimated in this category.						

Final Report, September 14, 2007

11. Monitoring						
SDWIS Reporting	840	\$41	\$0	1	840	\$34,440
Data Entry (ground)	1	\$41	\$0	535	535	\$21,935
Data Entry (surface)	9	\$41	\$0	14	126	\$5,166
12. Enforcement	No costs estimated in this category.					
13. Other						
Coordination With EPA	840	\$41	\$0	1	840	\$34,440
Clerical	1,680	\$41	\$0	0.3	504	\$20,664
Supervision	1,680	\$41	\$0	0.3	504	\$20,664
<i>Total Recurring Costs</i>					4,141	\$245,549
Total Annualized Costs						\$374,146

Final Report, September 14, 2007

Table B-4: Disinfection Byproducts - Nevada - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$43.59	\$1,500	1	840	\$38,116
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	48	\$43.59	\$0	1.1875	57	\$2,485
5. Compliance Assistance						
Public Notification	216	\$33.50	\$500	1	216	\$7,736
Initial Lab Certification and Training and Site Visit and Follow Up	32	\$45.77	\$1,800	6	192	\$10,588
System Training and Technical Assistance	204	\$44.659	\$1,500	1	204	\$10,610
6. Permit Administration						
Review Plans and Specifications (LGW)	12	\$43.59	\$0	5	60	\$2,615
Review Plans and Specifications (LSW)	20	\$43.59	\$0	6	120	\$5,231
Review Plans and Specifications (SGW)	4	\$43.59	\$1,500	188	752	\$34,280
Review Plans and Specifications (SSW)	6	\$43.59	\$200	19	114	\$5,169
Enhanced Coagulation Determination	0.5	\$43.59	\$0	17	9	\$371
Issue Notice of Intent	0	\$0	\$0	0	0	\$0
7. Monitoring						
Maintain Data Management System	200	\$70.835	\$11,880	1	200	\$26,047
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$41	\$31,058	1	2,291	\$124,989
Notification of Required Monitoring	1	\$43.59	\$250	219	219	\$9,796
Issue/Monitor Compliance Schedule	80	\$41.00	\$0	0	8	\$328
8. Enforcement						
Violation Letters	2	\$41	\$0	65	130	\$5,330
Total Start-Up Costs					5,282	\$283,692
Total Annualized Start-Up Costs						\$64,663
Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	350	\$43.59	\$10,800	1	350	\$26,057
Staff Training (On-Going)	80	\$35.417	\$0	1	80	\$2,833
Enforcement Support: Lab Certification	96	\$45.77	\$1,800	2	192	\$10,588
Enforcement Support: Compliance Follow Up	350	\$43.59	\$0	1	350	\$15,257
10. Permit Administration						
No costs estimated in this category.						

Final Report, September 14, 2007

11. Monitoring						
SDWIS Reporting	110	\$43.59	\$0	1	110	\$4,795
Data Entry (ground)	1	\$11.987	\$0	200	200	\$2,397
Data Entry (surface)	9	\$11.987	\$0	25	225	\$2,697
12. Enforcement	No costs estimated in this category.					
13. Other						
Coordination With EPA	40	\$43.59	\$0	1	40	\$1,744
Clerical	32	\$11.99	\$500	1.0795	35	\$914
Supervision	208	\$49.04	\$0	1	208	\$10,200
<i>Total Recurring Costs</i>					1,507	\$77,482
Total Annualized Costs						\$142,146

Final Report, September 14, 2007

Table B-4: Disinfection Byproducts - Nevada - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress		No costs estimated in this category.				
2. Obtaining Additional Delegated Authority		No costs estimated in this category.				
3. Designing Implementation Plan		No costs estimated in this category.				
4. General Start-Up Activities		No costs estimated in this category.				
5. Compliance Assistance		No costs estimated in this category.				
6. Permit Administration		No costs estimated in this category.				
7. Monitoring		No costs estimated in this category.				
8. Enforcement		No costs estimated in this category.				
<i>Total Start-Up Costs</i>					0	\$0
<i>Total Annualized Start-Up Costs</i>						\$0
Recurring Activities						
9. Compliance Assistance		No costs estimated in this category.				
10. Permit Administration		No costs estimated in this category.				
11. Monitoring		No costs estimated in this category.				
12. Enforcement		No costs estimated in this category.				
13. Other		No costs estimated in this category.				
<i>Total Recurring Costs</i>					0	\$0
<i>Total Annualized Costs</i>						\$0

Final Report, September 14, 2007

Table B-5: Disinfection Byproducts - EPA Burden Estimates - New Jersey						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$41	\$0	1	840	\$34,440
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	80	\$41	\$0	17	1,360	\$55,760
5. Compliance Assistance						
Public Notification	168	\$41	\$0	1	168	\$6,888
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$41	\$0	32	768	\$31,488
System Training and Technical Assistance	1,680	\$41	\$0	1	1,680	\$68,880
6. Permit Administration						
Review Plans and Specifications (LGW)	40	\$41	\$0	14	560	\$22,960
Review Plans and Specifications (LSW)	80	\$41	\$0	8	640	\$26,240
Review Plans and Specifications (SGW)	24	\$41	\$0	580	13,920	\$570,720
Review Plans and Specifications (SSW)	32	\$41	\$0	30	960	\$39,360
Enhanced Coagulation Determination	23	\$41	\$0	38	874	\$35,834
Issue Notice of Intent	24	\$41	\$0	26	624	\$25,584
7. Monitoring						
Maintain Data Management System	2,184	\$41	\$0	1	2,184	\$89,544
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$41	\$25,000	1	2,291	\$118,931
Notification of Required Monitoring	2	\$41	\$0	1,313	2,626	\$107,666
Issue/Monitor Compliance Schedule	80	\$41	\$0	1	80	\$3,280
8. Enforcement						
Violation Letters	2	\$41	\$0	263	526	\$21,566
Total Start-Up Costs					29,575	\$1,259,141
Total Annualized Start-Up Costs						\$287,003
Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	840	\$41	\$0	1	840	\$34,440
Staff Training (On-Going)	40	\$41	\$0	5	200	\$8,200
Enforcement Support: Lab Certification	840	\$41	\$0	1	840	\$34,440
Enforcement Support: Compliance Follow Up	840	\$41	\$0	1	840	\$34,440
10. Permit Administration						
No costs estimated in this category.						

Final Report, September 14, 2007

11. Monitoring						
SDWIS Reporting	840	\$41	\$0	1	840	\$34,440
Data Entry (ground)	1	\$41	\$0	3,830	3,830	\$157,030
Data Entry (surface)	9	\$41	\$0	21	189	\$7,749
12. Enforcement	No costs estimated in this category.					
13. Other						
Coordination With EPA	840	\$41	\$0	1	840	\$34,440
Clerical	1,680	\$41	\$0	0.5	840	\$34,440
Supervision	1,680	\$41	\$0	1	1,680	\$68,880
<i>Total Recurring Costs</i>					7,579	\$448,499
Total Annualized Costs						\$735,502

Final Report, September 14, 2007

Table B-5: Disinfection Byproducts - New Jersey - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	200	\$35.40	\$3,000	1	200	\$10,080
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	40	\$35.401	\$600	22	880	\$44,353
5. Compliance Assistance						
Public Notification	168	\$35.4	\$2,520	1	168	\$8,467
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$41	\$0	32	768	\$31,488
System Training and Technical Assistance	1,000	\$35.401	\$15,000	2	2,000	\$100,802
6. Permit Administration						
Review Plans and Specifications (LGW)	40	\$35.401	\$600	14	560	\$28,225
Review Plans and Specifications (LSW)	120	\$35.401	\$1,800	8	960	\$48,385
Review Plans and Specifications (SGW)	40	\$35.401	\$600	50	2,000	\$100,802
Review Plans and Specifications (SSW)	60	\$35.401	\$900	10	600	\$30,241
Enhanced Coagulation Determination	0	\$0	\$0	0	0	\$0
Issue Notice of Intent	0	\$0	\$0	0	0	\$0
7. Monitoring						
Maintain Data Management System	2,000	\$35.40114	\$30,000	2	4,000	\$201,605
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	0	\$0	\$0	0	0	\$0
Notification of Required Monitoring	2	\$35.401	\$30	1,500	3,000	\$151,203
Issue/Monitor Compliance Schedule	300	\$35	\$4,500	1	300	\$15,120
8. Enforcement						
Violation Letters	4	\$35.401	\$60	263	1,052	\$53,022
<i>Total Start-Up Costs</i>					<i>15,436</i>	<i>\$823,794</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$187,772</i>

Final Report, September 14, 2007

Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	840	\$35,401	\$12,600	1	840	\$42,337
Staff Training (On-Going)	20	\$35	\$300	10	200	\$10,080
Enforcement Support: Lab Certification	840	\$41	\$0	1	840	\$34,440
Enforcement Support: Compliance Follow Up	1,000	\$35,401	\$15,000	1	1,000	\$50,401
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
SDWIS Reporting	840	\$35,401	\$15	1	840	\$29,752
Data Entry (ground)	1	\$35,401	\$15	3,830	3,830	\$193,036
Data Entry (surface)	4	\$35	\$60	35	140	\$7,056
12. Enforcement						
No costs estimated in this category.						
13. Other						
Coordination With EPA	500	\$43,172	\$7,500	1	500	\$29,086
Clerical	1,000	\$30.22	\$15,000	0.5	500	\$22,610
Supervision	1,680	\$51,8065	\$25,200	1	1,680	\$112,235
<i>Total Recurring Costs</i>					<i>7,690</i>	<i>\$531,034</i>
Total Annualized Costs						\$718,806

Final Report, September 14, 2007

Table B-5: Disinfection Byproducts - New Jersey - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Attended EPA meetings/conferences regarding this rule. Attended other non-EPA meetings/conferences regarding this rule. Provided EPA with comments on the proposed rule through a third party (e.g., ECOS). Conducted other start-up activities associated with tracking EPA's rulemaking process.	1,000	\$56.124	\$15,000	1	1,000	\$71,124
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Designed alternative standards to those in the federal regulation.	100	\$52	\$1,500	1	100	\$6,681
4. General Start-Up Activities						
Developed internal guidance and procedures for implementing the new regulation. Attended EPA training or other non-EPA sponsored training for implementing the new regulations.	200	\$51.807	\$3,000	1	200	\$13,361
5. Compliance Assistance						
Conducted outreach programs for affected entities. Developed training programs to help affected entities comply with the new regulation.	40	\$34.538	\$4,600	6	240	\$35,889
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					1,540	\$127,055
<i>Total Annualized Start-Up Costs</i>						\$28,960
Recurring Activities						
9. Compliance Assistance						
No costs estimated in this category.						
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
No costs estimated in this category.						
12. Enforcement						
No costs estimated in this category.						
13. Other						
No costs estimated in this category.						
<i>Total Recurring Costs</i>					0	\$0
Total Annualized Costs						\$28,960

Final Report, September 14, 2007

Table B-6: Disinfection Byproducts - EPA Burden Estimates - Oklahoma						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$41	\$0	1	840	\$34,440
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	80	\$41	\$0	20	1,600	\$65,600
5. Compliance Assistance						
Public Notification	168	\$41	\$0	1	168	\$6,888
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$41	\$0	32	768	\$31,488
System Training and Technical Assistance	1,680	\$41	\$0	1	1,680	\$68,880
6. Permit Administration						
Review Plans and Specifications (LGW)	40	\$41	\$0	3	120	\$4,920
Review Plans and Specifications (LSW)	80	\$41	\$0	63	5,040	\$206,640
Review Plans and Specifications (SGW)	24	\$41	\$0	126	3,024	\$123,984
Review Plans and Specifications (SSW)	32	\$41	\$0	227	7,264	\$297,824
Enhanced Coagulation Determination	23	\$41	\$0	291	6,693	\$274,413
Issue Notice of Intent	24	\$41	\$0	22	528	\$21,648
7. Monitoring						
Maintain Data Management System	2,184	\$41	\$0	1	2,184	\$89,544
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$41	\$25,000	1	2,291	\$118,931
Notification of Required Monitoring	2	\$41	\$0	1,086	2,172	\$89,052
Issue/Monitor Compliance Schedule	80	\$41	\$0	0.5	40	\$1,640
8. Enforcement						
Violation Letters	2	\$41	\$0	217	434	\$17,794
Total Start-Up Costs					34,412	\$1,453,686
Total Annualized Start-Up Costs						\$331,346

Final Report, September 14, 2007

Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	840	\$41	\$0	1	840	\$34,440
Staff Training (On-Going)	40	\$41	\$0	4	160	\$6,560
Enforcement Support: Lab Certification	840	\$41	\$0	1	840	\$34,440
Enforcement Support: Compliance Follow Up	840	\$41	\$0	1	840	\$34,440
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
SDWIS Reporting	840	\$41	\$0	1	840	\$34,440
Data Entry (ground)	1	\$41	\$0	833	833	\$34,153
Data Entry (surface)	9	\$41	\$0	161	1,449	\$59,409
12. Enforcement						
No costs estimated in this category.						
13. Other						
Coordination With EPA	840	\$41	\$0	1	840	\$34,440
Clerical	1,680	\$41	\$0	0	672	\$27,552
Supervision	1,680	\$41	\$0	0	672	\$27,552
<i>Total Recurring Costs</i>					<i>5,802</i>	<i>\$327,426</i>
Total Annualized Costs						\$658,772

Final Report, September 14, 2007

Table B-6: Disinfection Byproducts - Oklahoma - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$49.37897	\$2,000	10	8,400	\$416,783
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	80	\$49.379	\$3,000	20	1,600	\$82,006
5. Compliance Assistance						
Public Notification	168	\$49.38	\$500	1	168	\$8,796
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$49.379	\$0	32	768	\$37,923
System Training and Technical Assistance	3,360	\$49.379	\$5,000	1	3,360	\$170,913
6. Permit Administration						
Review Plans and Specifications (LGW)	40	\$49.379	\$0	3	120	\$5,925
Review Plans and Specifications (LSW)	80	\$49.379	\$0	63	5,040	\$248,870
Review Plans and Specifications (SGW)	24	\$49.379	\$0	126	3,024	\$149,322
Review Plans and Specifications (SSW)	32	\$49.379	\$0	227	7,264	\$358,689
Enhanced Coagulation Determination	23	\$49.37897	\$0	291	6,693	\$330,493
Issue Notice of Intent	24	\$49.379	\$0	22	528	\$26,072
7. Monitoring						
Maintain Data Management System	0	\$49	\$5,000	0	0	\$5,000
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	0	\$49	\$385,000	0	0	\$385,000
Notification of Required Monitoring	0	\$49	\$400	0	0	\$400
Issue/Monitor Compliance Schedule	0	\$49	\$0	0	0	\$0
8. Enforcement						
Violation Letters	2	\$49.379	\$0	700	1,400	\$69,131
<i>Total Start-Up Costs</i>					36,965	\$2,295,324
<i>Total Annualized Start-Up Costs</i>						\$523,185

Final Report, September 14, 2007

Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	4,700	\$49,379	\$5,000	1	4,700	\$237,081
Staff Training (On-Going)	80	\$49,379	\$5,000	10	800	\$44,503
Enforcement Support: Lab Certification	840	\$49,379	\$0	1	840	\$41,478
Enforcement Support: Compliance Follow Up	1,680	\$49,379	\$0	1	1,680	\$82,957
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
SDWIS Reporting	840	\$49,379	\$0	1	840	\$41,478
Data Entry (ground)	1	\$49,379	\$0	833	833	\$41,133
Data Entry (surface)	9	\$49,379	\$0	161	1,449	\$71,550
12. Enforcement						
No costs estimated in this category.						
13. Other						
Coordination With EPA	840	\$49,379	\$0	1	840	\$41,478
Clerical	1,680	\$49,379	\$0	0.8	1,344	\$66,365
Supervision	1,680	\$49,379	\$0	0.8	1,344	\$66,365
<i>Total Recurring Costs</i>					<i>11,142</i>	<i>\$734,389</i>
Total Annualized Costs						\$1,257,575

Final Report, September 14, 2007

Table B-6: Disinfection Byproducts - Oklahoma - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).	80	\$49.38	\$0	1	80	\$3,950
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Met with stakeholders and/or responded to stakeholder concerns regarding this rule.	40	\$49.38	\$0	1	40	\$1,975
4. General Start-Up Activities						
Conducted internal training.	120	\$49.379	\$0	1	120	\$5,925
5. Compliance Assistance						
Developed training programs to help affected entities comply with the new regulation.	120	\$49.379	\$0	1	120	\$5,925
6. Permit Administration						
Conduct on-going training (in addition to the initial start-up period)	700	\$49.379	\$0	1	700	\$34,565
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
Issue and/or review permits to affected entities.	200	\$49.38	\$0	1	200	\$9,876
<i>Total Start-Up Costs</i>					<i>1,060</i>	<i>\$62,218</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$14,182</i>

Final Report, September 14, 2007

Recurring Activities						
9. Compliance Assistance						
Conducted other start-up activities associated with monitoring.	420	\$49.379	\$0	1	420	\$20,739
10. Permit Administration						
Incur additional recurring costs associated with monitoring activities.	300	\$49.38	\$0	1	300	\$14,814
11. Monitoring						
Purchased new equipment for enforcing the new regulation	200	\$49.38	\$0	1	200	\$9,876
Maintain Data Management System	3,276	\$49.379	\$0	1	3,276	\$161,766
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$49.379	\$0	1	2,291	\$113,127
Notification of Required Monitoring	2	\$49.379	\$0	1,086	2,172	\$107,251
Issue/Monitor Compliance Schedule	80	\$49.38	\$0	0.5	40	\$1,975
12. Enforcement						
Incur additional recurring costs associated with enforcement activities.	1,600	\$49.379	\$0	1	1,600	\$79,006
13. Other						
	No costs estimated in this category.					
<i>Total Recurring Costs</i>					<i>10,299</i>	<i>\$508,554</i>
Total Annualized Costs						\$522,736

Final Report, September 14, 2007

Table B-7: Disinfection Byproducts - EPA Burden Estimates - South Carolina						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$41	\$0	1	840	\$34,440
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	80	\$41	\$0	12	960	\$39,360
5. Compliance Assistance						
Public Notification	168	\$41	\$0	1	168	\$6,888
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$41	\$0	32	768	\$31,488
System Training and Technical Assistance	1,680	\$41	\$0	1	1,680	\$68,880
6. Permit Administration						
Review Plans and Specifications (LGW)	40	\$41	\$0	4	160	\$6,560
Review Plans and Specifications (LSW)	80	\$41	\$0	19	1,520	\$62,320
Review Plans and Specifications (SGW)	24	\$41	\$0	176	4,224	\$173,184
Review Plans and Specifications (SSW)	32	\$41	\$0	67	2,144	\$87,904
Enhanced Coagulation Determination	23	\$41	\$0	86	1,978	\$81,098
Issue Notice of Intent	24	\$41	\$0	16	384	\$15,744
7. Monitoring						
Maintain Data Management System	2,184	\$41	\$0	1	2,184	\$89,544
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$41	\$25,000	1	2,291	\$118,931
Notification of Required Monitoring	2	\$41	\$0	801	1,602	\$65,682
Issue/Monitor Compliance Schedule	80	\$41	\$0	0.3	24	\$984
8. Enforcement						
Violation Letters	2	\$41	\$0	160	320	\$13,120
Total Start-Up Costs					20,927	\$896,127
Total Annualized Start-Up Costs						\$204,259

Final Report, September 14, 2007

Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	840	\$41	\$0	1	840	\$34,440
Staff Training (On-Going)	40	\$41	\$0	4	160	\$6,560
Enforcement Support: Lab Certification	840	\$41	\$0	1	840	\$34,440
Enforcement Support: Compliance Follow Up	840	\$41	\$0	1	840	\$34,440
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
SDWIS Reporting	840	\$41	\$0	1	840	\$34,440
Data Entry (ground)	1	\$41	\$0	1,163	1,163	\$47,683
Data Entry (surface)	9	\$41	\$0	48	432	\$17,712
12. Enforcement						
No costs estimated in this category.						
13. Other						
Coordination With EPA	840	\$41	\$0	1	840	\$34,440
Clerical	1,680	\$41	\$0	0.3	504	\$20,664
Supervision	1,680	\$41	\$0	0.4	672	\$27,552
<i>Total Recurring Costs</i>					<i>5,115</i>	<i>\$292,371</i>
Total Annualized Costs						\$496,630

Final Report, September 14, 2007

Table B-7: Disinfection Byproducts - South Carolina - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Regulation Adoption & Program Development	840	\$47,445	\$0	1	840	\$39,854
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Staff Training (Rule Specific)	50	\$35,584	\$89	20	1,000	\$35,673
5. Compliance Assistance						
Public Notification	168	\$35,584	\$0	1	168	\$5,978
Initial Lab Certification and Training and Site Visit and Follow Up	24	\$41	\$0	32	768	\$31,488
System Training and Technical Assistance	1,680	\$41	\$0	1	1,680	\$68,880
6. Permit Administration						
Review Plans and Specifications (LGW)	5	\$35.6	\$0	4	20	\$712
Review Plans and Specifications (LSW)	\$27,385	\$35,584	\$0	52	1,424	\$50,672
Review Plans and Specifications (SGW)	3,6916	\$35,584	\$0	642	2,370	\$84,334
Review Plans and Specifications (SSW)	28.2	\$35,5841	\$0	50	1,410	\$50,174
Enhanced Coagulation Determination	23	\$35,584	\$0	62	1,426	\$50,743
Issue Notice of Intent	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
7. Monitoring						
Maintain Data Management System	2,184	\$47,4454	\$0	1	2,184	\$103,621
Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291	\$41	\$25,000	1	2,291	\$118,931
Notification of Required Monitoring	0.15	\$35,584	\$0.4	801	120	\$4,276
Issue/Monitor Compliance Schedule	80	\$35,584	\$0	6	480	\$17,080
8. Enforcement						
Violation Letters	2	\$35,584	\$0	143	286	\$10,177
<i>Total Start-Up Costs</i>					<i>16,181</i>	<i>\$672,593</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$153,308</i>

Final Report, September 14, 2007

Recurring Activities						
9. Compliance Assistance						
Enforcement Support: On-Going Technical Assistance	832	\$41,515	\$0	1	832	\$34,540
Staff Training (On-Going)	5.25	\$35,584	\$0	23	121	\$4,297
Enforcement Support: Lab Certification	840	\$41	\$0	1	840	\$34,440
Enforcement Support: Compliance Follow Up	2,080	\$35,584	\$0	1	2,080	\$74,015
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
SDWIS Reporting	520	\$35,584	\$0	1	520	\$18,504
Data Entry (ground)	3	\$35,584	\$0	630	1,890	\$67,254
Data Entry (surface)	12	\$35,584	\$0	62	744	\$26,475
12. Enforcement						
No costs estimated in this category.						
13. Other						
Coordination With EPA	840	\$41	\$0	1	840	\$34,440
Clerical	2,080	\$19.77	\$0	0.3	624	\$12,336
Supervision	2,080	\$47,445.4	\$0	0.4	832	\$39,475
<i>Total Recurring Costs</i>					<i>7,027</i>	<i>\$345,774</i>
Total Annualized Costs						\$499,082

Final Report, September 14, 2007

Table B-7: Disinfection Byproducts - South Carolina - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
2. Obtaining Additional Delegated Authority			No costs estimated in this category.			
3. Designing Implementation Plan						
4. General Start-Up Activities						
5. Compliance Assistance						
Monitoring, Recurring Activities: Issue/Monitor Compliance Schedule	0.2	\$36	\$0	2	0	\$11
Compliance Assistance, Start-Up Activities: Enforcement Support: On-Going Technical Assistance	7,488	\$41,5147	\$0	1	7,488	\$310,862
6. Permit Administration						
7. Monitoring			No costs estimated in this category.			
8. Enforcement						
<i>Total Start-Up Costs</i>					7,488	\$310,873
<i>Total Annualized Start-Up Costs</i>						\$70,859
Recurring Activities						
9. Compliance Assistance						
10. Permit Administration						
11. Monitoring						
12. Enforcement						
Enforcement, Recurring Activities: Violation Letters	2	\$35.58	\$0	18	36	\$1,281
13. Other			No costs estimated in this category.			
<i>Total Recurring Costs</i>					36	\$1,281
Total Annualized Costs						\$72,140

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 1: Review Cost Estimates from EPA’s Regulatory Impact Analysis:

This table summarizes the estimated cost to Kansas for administering the Stage 1 Disinfection Byproducts Rule based on EPA’s regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$41	none estimated	1 one-time activity	\$34,440
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$41	none estimated	13 FTEs	\$42,640
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$41	none estimated	1 one-time activity	\$6,888
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$41	none estimated	32 labs	\$31,488
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$41	none estimated	1 one-time activity	\$68,880
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$41	none estimated	2 plans	\$3,280
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$41	none estimated	29 plans	\$95,120
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$41	none estimated	101 plans	\$99,384
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$41	none estimated	105 plans	\$137,760
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$41	none estimated	135 systems	\$127,305
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$41	none estimated	16 notices	\$15,744
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$41	none estimated	1 one-time activity	\$89,544
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$41	\$25,000 (equipment)	1 one-time activity	\$124,989
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$41	none estimated	818 notices	\$67,076
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$41	none estimated	0.3 one-time activity	\$984

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 1(continued): Review Cost Estimates from EPA’s Regulatory Impact Analysis:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$41	none estimated	164 letters	\$13,448
	One-Time Activity Total					\$958,970 (22,632 hours)
17	Compliance Assistance, Recurring Activities: Enforcement Support: On-Going Technical Assistance	840 hours	\$41	none estimated	1 FTE annually	\$34,440
18	Compliance Assistance, Recurring Activities: Staff Training (On-Going)	40 hours	\$41	none estimated	4 FTEs annually	\$6,560
19	Compliance Assistance, Recurring Activities: Enforcement Support: Lab Certification	840 hours	\$41	none estimated	1 FTE annually	\$34,440
20	Compliance Assistance, Recurring Activities: Enforcement Support: Compliance Follow-Up	840 hours	\$41	none estimated	1 FTE annually	\$34,440
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$41	none estimated	1 FTE annually	\$34,440
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$41	none estimated	670 systems annually	\$27,470
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$41	none estimated	75 systems annually	\$27,675
24	Other Recurring Activities: Coordination With EPA	840 hours	\$41	none estimated	1 FTE annually	\$34,440
25	Other Recurring Activities: Clerical	1,680 hours	\$41	none estimated	0.3 clerk annually	\$20,664
26	Other Recurring Activities: Supervision	1,680 hours	\$41	none estimated	0.4 supervisor annually	\$27,552
	Annual Activity Total					\$282,121 (6,881 hours)

Source: Abt Associates Inc.’s calculation based on estimates in EPA’s (1998) *Regulatory Impact Analysis for the Stage 1 Disinfectants/Disinfection Byproducts Rule*.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$41	none estimated	1 one-time activity	\$34,440
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$41	none estimated	13 FTEs	\$42,640
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 40 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 19 FTEs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$31,160
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$41	none estimated	1 one-time activity	\$6,888
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 80	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 3,880

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$41	none estimated	32 labs	\$31,488
4	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$41	none estimated	1 one-time activity	\$68,880
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1,378	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1 one-time activity	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$56,498
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$41	none estimated	2 plans	\$3,280
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 8	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$656

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$41	none estimated	29 plans	\$95,120
7	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$41	none estimated	101 plans	\$99,384
8	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$41	none estimated	105 plans	\$137,760
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 24	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 65 plans	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$63,960

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$41	none estimated	135 systems	\$127,305
10	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): ??	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: ??	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$41	none estimated	16 notices	\$15,744
11	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$41	none estimated	1 one-time activity	\$89,544
12	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 504	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$20,664

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$41	\$25,000 (equipment)	1 one-time activity	\$124,989
13	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 336	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$60,000	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$73,776
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$41	none estimated	818 notices	\$67,076
14	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: none estimated	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 625	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$51,250
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$41	none estimated	0.3 one-time activity	\$984
15	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): COMBINED 14 & 15	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$41	none estimated	164 letters	\$13,448
16	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 30	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,460
17	Compliance Assistance, Recurring: Activities Enforcement Support: On-Going Technical Assistance	840 hours	\$41	none estimated	1 FTE annually	\$34,440
17	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Included Line 20 numbers and comments in Line 17	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3640	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$149,420
18	Compliance Assistance, Recurring: Activities Staff Training (On-Going)	40 hours	\$41	none estimated	4 FTEs annually	\$6,560
18	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 16	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 16 FTEs	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$0

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
19	Compliance Assistance, Recurring: Activities Enforcement Support: Lab Certification	840 hours	\$41	none estimated	1 FTE annually	\$34,440
19	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$0
20	Compliance Assistance, Recurring: Activities Enforcement Support: Compliance Follow-Up	840 hours	\$41	none estimated	1 FTE annually	\$34,440
20	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Included in Line 17	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$41	none estimated	1 FTE annually	\$34,440
21	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 128	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$5,248

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$41	none estimated	670 systems annually	\$27,470
22	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$0
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$41	none estimated	75 systems annually	\$27,675
23	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$0
24	Other Recurring Activities: Coordination With EPA	840 hours	\$41	none estimated	1 FTE annually	\$34,440
24	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 336	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$13,776

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
25	Other Recurring Activities: Clerical	1,680 hours	\$41	none estimated	0.3 clerk annually	\$20,664
25	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 504	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
26	Other Recurring Activities: Supervision	1,680 hours	\$41	none estimated	0.4 supervisor annually	\$27,552
26	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Stage 1 Disinfection Byproducts Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Stage 1 Disinfection Byproducts Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1						
2						
3						
4						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5						
6						
7						
8						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule. We would also like to know if the Stage 1 Disinfection Byproducts Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing SDWIS reporting, but your state already required and processed SDWIS reporting before the Stage 1 Disinfection Byproducts Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Stage 1 Disinfection Byproducts Rule might require that you review plans and specifications for systems in instances where state regulations previously required only recordkeeping of plans and specifications.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Nevada for administering the Stage 1 Disinfection Byproducts Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$36	none estimated	1 one-time activity	\$30,240
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$36	none estimated	7 FTEs	\$20,160
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$36	none estimated	1 one-time activity	\$6,048
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$36	none estimated	32 labs	\$27,648
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$36	none estimated	1 one-time activity	\$60,480
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$36	none estimated	2 plans	\$2,880
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$36	none estimated	5 plans	\$14,400
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$36	none estimated	81 plans	\$69,984
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$36	none estimated	19 plans	\$21,888
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$36	none estimated	24 systems	\$19,872
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$36	none estimated	6 notices	\$5,184
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$36	none estimated	1 one-time activity	\$78,624
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$36	\$31,058 (equipment)	1 one-time activity	\$113,534
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$36	none estimated	323 notices	\$23,256
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$36	none estimated	0.1 one-time activity	\$288

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 1 (continued): Review Cost Estimates from EPA’s Regulatory Impact Analysis:

Row #	Description	Time Burden (per-activity)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$36	none estimated	65 letters	\$4,680
	One-Time Activity Total					\$499,166 (13,003 hours)
17	Compliance Assistance, Recurring Activities: Enforcement Support: On-Going Technical Assistance	840 hours	\$36	none estimated	1 FTE annually	\$30,240
18	Compliance Assistance, Recurring Activities: Staff Training (On-Going)	40 hours	\$36	none estimated	3 FTEs annually	\$4,320
19	Compliance Assistance, Recurring Activities: Enforcement Support: Lab Certification	840 hours	\$36	none estimated	1 FTE annually	\$30,240
20	Compliance Assistance, Recurring Activities: Enforcement Support: Compliance Follow-Up	840 hours	\$36	none estimated	1 FTE annually	\$30,240
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$36	none estimated	1 FTE annually	\$30,240
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$36	none estimated	535 systems annually	\$19,260
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$36	none estimated	14 systems annually	\$4,536
24	Other Recurring Activities: Coordination With EPA	840 hours	\$36	none estimated	1 FTE annually	\$30,240
25	Other Recurring Activities: Clerical	1,680 hours	\$36	none estimated	0.3 clerk annually	\$18,144
26	Other Recurring Activities: Supervision	1,680 hours	\$36	none estimated	0.3 supervisor annually	\$18,144
	Annual Activity Total					\$215,604 (5,989 hours)

Source: Abt Associates Inc.’s calculation based on estimates in EPA’s (1998) *Regulatory Impact Analysis for the Stage 1 Disinfectants/Disinfection Byproducts Rule*.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$36	none estimated	1 one-time activity	\$30,240
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,500	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$35,100
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$36	none estimated	7 FTEs	\$20,160
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 48 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1.0 to 1.5 fte	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,280
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$36	none estimated	1 one-time activity	\$6,048
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 216 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$15 to \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$500	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$7,140

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$36	none estimated	32 labs	\$27,648
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Actual work performed by another Bureau	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$36	none estimated	1 one-time activity	\$60,480
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 204 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40 to \$45/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,500	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$9,860
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$36	none estimated	2 plans	\$2,880
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 12 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 5 plans	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,400

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$36	none estimated	5 plans	\$14,400
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 20 hrs/plan	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 6 plans	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$4,800
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$36	none estimated	81 plans	\$69,984
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4/hrs plan	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,500	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 188 plans	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$30,580
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$36	none estimated	19 plans	\$21,888
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 6hrs/plan	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$200	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$4,760

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$36	none estimated	24 systems	\$19,872
10	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.5hr/system	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 17 systems	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$340
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$36	none estimated	6 notices	\$5,184
11	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$36	none estimated	1 one-time activity	\$78,624
12	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 200 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$25 to \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,800	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$24,880

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$36	\$31,058 (equipment)	1 one-time activity	\$113,534
13	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Actual work performed by anohter Bureau	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$36	none estimated	323 notices	\$23,256
14	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1 hr/system	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$250	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 219 notices	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$9,010
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$36	none estimated	0.1 one-time activity	\$288
15	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$36	none estimated	65 letters	\$4,680
16	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
17	Compliance Assistance, Recurring: Activities Enforcement Support: On-Going Technical Assistance	840 hours	\$36	none estimated	1 FTE annually	\$30,240
17	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 350 hrs/annually	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: Contractor \$10,800	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1.3 fte	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$24,800
18	Compliance Assistance, Recurring: Activities Staff Training (On-Going)	40 hours	\$36	none estimated	3 FTEs annually	\$4,320
18	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 80 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$25- \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1fte	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,600

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
19	Compliance Assistance, Recurring: Activities Enforcement Support: Lab Certification	840 hours	\$36	none estimated	1 FTE annually	\$30,240
19	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Actual work performed by another Bureau	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
20	Compliance Assistance, Recurring: Activities Enforcement Support: Compliance Follow-Up	840 hours	\$36	none estimated	1 FTE annually	\$30,240
20	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 350 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.35 fte	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$14,000
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$36	none estimated	1 FTE annually	\$30,240
21	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 110 hours	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.36fte	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$3,950

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$36	none estimated	535 systems annually	\$19,260
22	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$11/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 200 systems	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,200
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$36	none estimated	14 systems annually	\$4,536
23	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$11/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 25 systems	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,475
24	Other Recurring Activities: Coordination With EPA	840 hours	\$36	none estimated	1 FTE annually	\$30,240
24	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 40 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$40/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.02fte	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,600

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
25	Other Recurring Activities: Clerical	1,680 hours	\$36	none estimated	0.3 clerk annually	\$18,144
25	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 32 hours	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$11/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$500	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$880
26	Other Recurring Activities: Supervision	1,680 hours	\$36	none estimated	0.3 supervisor annually	\$18,144
26	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 208 hours	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$45/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.1 fte	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$7,500

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Stage 1 Disinfection Byproducts Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Stage 1 Disinfection Byproducts Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1						
2						
3						
4						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5						
6						
7						
8						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3

Row #	Description	Time Burden (per-activity)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
9						
10						
11						
12						
13						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule. We would also like to know if the Stage 1 Disinfection Byproducts Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing SDWIS reporting, but your state already required and processed SDWIS reporting before the Stage 1 Disinfection Byproducts Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Stage 1 Disinfection Byproducts Rule might require that you review plans and specifications for systems in instances where state regulations previously required only recordkeeping of plans and specifications.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Questions for Nevada:

Disinfection Byproducts:

For Row # 4 of Step 2: You stated that the work is performed by another bureau. Do we have an estimate for this? **Yes, we have obtained an estimate. Time Burden: too low, 32 hours; Labor costs: too low, \$42/hr; non labor costs \$1,800; number of activities: too high, 6 labs; Total cost: too high, \$9,864.**

For Row # 12 of Step 2: You stated that the total cost would be \$24,880, however the total cost using the provided inputs calculates to \$10,800. How was total cost calculated here? **Staff training costs \$2,080; mailings \$2,800; SDWIS contractor expense \$7,000; 200 hours @\$40 = \$8,000 and 200 hours @\$25 = \$5,000 for a total of \$24,880**

For Row # 13 of Step 2: You stated that you perform this activity, however you marked that you don't have estimates. Is this correct? **Yes. The primacy lab for Nevada is the State Health Lab at the University of Nevada, Reno, a separate entity from our organization. We have requested their input on this item but have not received a response.**

For Row # 15 of Step 2: You stated that you perform this activity, however you marked that you don't have estimates. Is this correct? **Yes. We performed the activity but had no way to estimate a cost.**

For Row # 16 of Step 2: You stated that you perform this activity, however you marked that you don't have estimates. Is this correct? **Yes. We performed the activity but had no way to estimate a cost.**

For Row # 17 of Step 2: You stated the total cost as \$24,800 (350 hours * \$40/hr + 10,800), however you listed the number of activities as 1.3 FTE annually (which would give a total cost of \$29,000). Could you please clarify? **Incorrect entry for number of activities, please change to 1.0 FTE and check box for "about right"**

For Row # 19 of Step 2: You stated that you perform this activity, however you marked that you don't have estimates. Is this correct? **Work was performed by another Bureau, we now have an estimate: Time Burden: too high, 96 hours; Labor costs: too low, \$42/hr; Non labor costs: \$1,800; Number of activities: too low, 2 FTE; Total costs \$9864.**

For Row # 20 of Step 2: You stated the total cost as \$14,000 (350 hours * \$40/hr), however you listed the number of activities as 0.35 FTE annually (which would give a total cost of \$4,900). Could you please clarify? **Misunderstanding on what the FTE represented. Correct response should be "about right" for the FTE, please remove the 0.35 FTE entry.**

For Row # 21 of Step 2: You stated the total cost as \$3,950, however the inputs calculate to a cost of \$1,584. How was the total cost calculated here? **Misunderstanding on what the FTE represented. Correct response should be "about right" for the FTE, please remove the .36FTE entry. Total cost shown was also incorrect, should have been \$4,400.**

For Row # 24 of Step 2: You stated the total cost as \$1,600 (40 hours * \$40/hr), however you listed the number of activities as 0.02 FTE. Can you please clarify? **Misunderstanding on what the FTE represented. Correct response should be "about right" for the FTE, please remove the .02 FTE entry.**

For Row # 26 of Step 2: You stated the total cost as \$7,500, however the inputs listed calculate to \$936. Can you please clarify this calculation? **Math errors should be \$9,360. Additionally, please remove our 0.1 FTE entry and change to "about right".**

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to New Jersey for administering the Stage 1 Disinfection Byproducts Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$41	none estimated	1 one-time activity	\$34,440
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$41	none estimated	17 FTEs	\$55,760
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$41	none estimated	1 one-time activity	\$6,888
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$41	none estimated	32 labs	\$31,488
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$41	none estimated	1 one-time activity	\$68,880
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$41	none estimated	14 plans	\$22,960
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$41	none estimated	8 plans	\$26,240
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$41	none estimated	580 plans	\$570,720
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$41	none estimated	30 plans	\$39,360
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$41	none estimated	38 systems	\$35,834
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$41	none estimated	26 notices	\$25,584
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$41	none estimated	1 one-time activity	\$89,544
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$41	\$25,000 (equipment)	1 one-time activity	\$124,989
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$41	none estimated	1,313 notices	\$107,666
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$41	none estimated	1 one-time activity	\$3,280

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 1: Review Cost Estimates from EPA’s Regulatory Impact Analysis:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$41	none estimated	263 letters	\$21,566
	One-Time Activity Total					\$1,265,199 (30,101 hours)
17	Compliance Assistance, Recurring Activities: Enforcement Support: On-Going Technical Assistance	840 hours	\$41	none estimated	1 FTE annually	\$34,440
18	Compliance Assistance, Recurring Activities: Staff Training (On-Going)	40 hours	\$41	none estimated	5 FTEs annually	\$8,200
19	Compliance Assistance, Recurring Activities: Enforcement Support: Lab Certification	840 hours	\$41	none estimated	1 FTE annually	\$34,440
20	Compliance Assistance, Recurring Activities: Enforcement Support: Compliance Follow-Up	840 hours	\$41	none estimated	1 FTE annually	\$34,440
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$41	none estimated	1 FTE annually	\$34,440
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$41	none estimated	3,830 systems annually	\$157,030
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$41	none estimated	21 systems annually	\$7,749
24	Other Recurring Activities: Coordination With EPA	840 hours	\$41	none estimated	1 FTE annually	\$34,440
25	Other Recurring Activities: Clerical	1,680 hours	\$41	none estimated	0.5 clerk annually	\$34,440
26	Other Recurring Activities: Supervision	1,680 hours	\$41	none estimated	1 supervisor annually	\$68,880
	Annual Activity Total					\$448,499 (10,939 hours)

Source: Abt Associates Inc.’s calculation based on estimates in EPA’s (1998) *Regulatory Impact Analysis for the Stage 1 Disinfectants/Disinfection Byproducts Rule*.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$41	none estimated	1 one-time activity	\$34,440
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): We adopted rule by reference reducing our time spent, but I included primacy process in the estimate.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 200	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 11200
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$41	none estimated	17 FTEs	\$55,760
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): for non labor costs, I am including a hourly charge the we are charge for indirect costs plus our administrative costs put on person hourly basis. But not included are contract costs or analytical costs.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 40	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 22	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 49280
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$41	none estimated	1 one-time activity	\$6,888
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 9400

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$41	none estimated	32 labs	\$31,488
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Done by another program do not have enough to comment	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$41	none estimated	1 one-time activity	\$68,880
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1000	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 112000
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$41	none estimated	14 plans	\$22,960
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 31360

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$41	none estimated	8 plans	\$26,240
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 120	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 53760
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$41	none estimated	580 plans	\$570,720
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 40	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 50	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 112000
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$41	none estimated	30 plans	\$39,360
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 60	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 33600

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$41	none estimated	38 systems	\$35,834
10	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$41	none estimated	26 notices	\$25,584
11	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$41	none estimated	1 one-time activity	\$89,544
12	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): not complete yet to use SDWIS	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2000	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 224000

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$41	\$25,000 (equipment)	1 one-time activity	\$124,989
13	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): our lab (we use another Department lab) has not brought these methods up yet as the lab will be relocating in the nest several years. We have aggreement with another state to use their lab.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$41	none estimated	1,313 notices	\$107,666
14	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1500	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 168000
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$41	none estimated	1 one-time activity	\$3,280
15	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 300	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 16800

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$41	none estimated	263 letters	\$21,566
16	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 58900
17	Compliance Assistance, Recurring: Activities Enforcement Support: On-Going Technical Assistance	840 hours	\$41	none estimated	1 FTE annually	\$34,440
17	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 47000
18	Compliance Assistance, Recurring: Activities Staff Training (On-Going)	40 hours	\$41	none estimated	5 FTEs annually	\$8,200
18	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 20	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 11200

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in New Jersey

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
19	Compliance Assistance, Recurring: Activities Enforcement Support: Lab Certification	840 hours	\$41	none estimated	1 FTE annually	\$34,440
19	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Done by others	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:
20	Compliance Assistance, Recurring: Activities Enforcement Support: Compliance Follow-Up	840 hours	\$41	none estimated	1 FTE annually	\$34,440
20	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1000	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 56000
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$41	none estimated	1 FTE annually	\$34,440
21	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): yes but only for MCL not M& R still working on	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$41	none estimated	3,830 systems annually	\$157,030
22	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 214480
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$41	none estimated	21 systems annually	\$7,749
23	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 35	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
24	Other Recurring Activities: Coordination With EPA	840 hours	\$41	none estimated	1 FTE annually	\$34,440
24	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 500	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 50	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
25	Other Recurring Activities: Clerical	1,680 hours	\$41	none estimated	0.5 clerk annually	\$34,440
25	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1000	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 35	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 25000
26	Other Recurring Activities: Supervision	1,680 hours	\$41	none estimated	1 supervisor annually	\$68,880
26	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 60	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15/hr	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 126000

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Stage 1 Disinfection Byproducts Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Stage 1 Disinfection Byproducts Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.
Please describe: part of FACA process

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.
Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.
Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.
Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.
Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe: working with counties and enforcement program to develop procedure

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Pre Rule activity was part of the FACA process, participant for ASDWA and ECOS	1000	65	15/hr	1	80000
2						
3	minor rule modification	100	60	15/hr	1	7500
4	general nothring specific	200	60	15/hr		15000

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	contractor , njwater assoc (rural water) for training	40	40	15/hr plus 4000/ event (contract cost)	6	37200
6	Include					
7	Included					
8	Included					

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule. We would also like to know if the Stage 1 Disinfection Byproducts Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing SDWIS reporting, but your state already required and processed SDWIS reporting before the Stage 1 Disinfection Byproducts Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:
manual review system in place, permit system in place, tried to adjust costs to reflect.

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule.

Yes No

If yes, please describe those activities here:

I tried to estimate total data costs and allot to various rules.

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Stage 1 Disinfection Byproducts Rule might require that you review plans and specifications for systems in instances where state regulations previously required only recordkeeping of plans and specifications.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 1: Review Cost Estimates from EPA’s Regulatory Impact Analysis:

This table summarizes the estimated cost to Oklahoma for administering the Stage 1 Disinfection Byproducts Rule based on EPA’s regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$41	none estimated	1 one-time activity	\$34,440
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$41	none estimated	20 FTEs	\$65,600
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$41	none estimated	1 one-time activity	\$6,888
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$41	none estimated	32 labs	\$31,488
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$41	none estimated	1 one-time activity	\$68,880
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$41	none estimated	3 plans	\$4,920
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$41	none estimated	63 plans	\$206,640
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$41	none estimated	126 plans	\$123,984
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$41	none estimated	227 plans	\$297,824
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$41	none estimated	291 systems	\$274,413
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$41	none estimated	22 notices	\$21,648
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$41	none estimated	1 one-time activity	\$89,544
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$41	\$25,000 (equipment)	1 one-time activity	\$124,989
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$41	none estimated	1,086 notices	\$89,052
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$41	none estimated	0.5 one-time activity	\$1,640

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 1: Review Cost Estimates from EPA’s Regulatory Impact Analysis:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$41	none estimated	217 letters	\$17,794
	One-Time Activity Total					\$1,459,744 (34,846 hours)
17	Compliance Assistance, Recurring Activities: Enforcement Support: On-Going Technical Assistance	840 hours	\$41	none estimated	1 FTE annually	\$34,440
18	Compliance Assistance, Recurring Activities: Staff Training (On-Going)	40 hours	\$41	none estimated	4 FTEs annually	\$6,560
19	Compliance Assistance, Recurring Activities: Enforcement Support: Lab Certification	840 hours	\$41	none estimated	1 FTE annually	\$34,440
20	Compliance Assistance, Recurring Activities: Enforcement Support: Compliance Follow-Up	840 hours	\$41	none estimated	1 FTE annually	\$34,440
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$41	none estimated	1 FTE annually	\$34,440
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$41	none estimated	833 systems annually	\$34,153
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$41	none estimated	161 systems annually	\$59,409
24	Other Recurring Activities: Coordination With EPA	840 hours	\$41	none estimated	1 FTE annually	\$34,440
25	Other Recurring Activities: Clerical	1,680 hours	\$41	none estimated	0.4 clerk annually	\$27,552
26	Other Recurring Activities: Supervision	1,680 hours	\$41	none estimated	0.4 supervisor annually	\$27,552
	Annual Activity Total					\$327,426 (7,986 hours)

Source: Abt Associates Inc.’s calculation based on estimates in EPA’s (1998) *Regulatory Impact Analysis for the Stage 1 Disinfectants/Disinfection Byproducts Rule*.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$41	none estimated	1 one-time activity	\$34,440
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$2,000 travel to meetings, public outreach etc.. production of informational documents	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 10	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$36,440
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$41	none estimated	20 FTEs	\$65,600
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$3,000 travel for training	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 20	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$68,600
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$41	none estimated	1 one-time activity	\$6,888

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate: \$500, publication costs	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$7,388
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Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$41	none estimated	32 labs	\$31,488
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$41	none estimated	1 one-time activity	\$68,880
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3,360 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 5,000, travel to provide training/technical assistance, training material production training facility rental	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 20	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$142,760

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$41	none estimated	3 plans	\$4,920
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$41	none estimated	63 plans	\$206,640
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$41	none estimated	126 plans	\$123,984
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$41	none estimated	227 plans	\$297,824
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$41	none estimated	291 systems	\$274,413
10	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$41	none estimated	22 notices	\$21,648
11	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$41	none estimated	1 one-time activity	\$89,544
12	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3,276 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$5,000 computer hardware, minor training	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: continual effort	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$139,316

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$41	\$25,000 (equipment)	1 one-time activity	\$124,989
13	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$385,000, continuous process of purchasing new, replacing old equipment and training scientist on the use of equipment	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: continuous	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$478,931
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$41	none estimated	1,086 notices	\$89,052
14	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$400 document production and distribution	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$89,452
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$41	none estimated	0.5 one-time activity	\$1,640
15	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$41	none estimated	217 letters	\$17,794
16	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 700	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$57,400
17	Compliance Assistance, Recurring: Activities Enforcement Support: On-Going Technical Assistance	840 hours	\$41	none estimated	1 FTE annually	\$34,440
17	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4,700	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$5,000 travel for onsite visits	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2.5 FTE annually	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$197,700
18	Compliance Assistance, Recurring: Activities Staff Training (On-Going)	40 hours	\$41	none estimated	4 FTEs annually	\$6,560
18	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

		Your estimate: 80 hrs	Your estimate:	Your estimate: \$5,000 travel, registraion fees	Your estimate: 10 FTEs annually	Your estimate: \$37,800
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Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
19	Compliance Assistance, Recurring: Activities Enforcement Support: Lab Certification	840 hours	\$41	none estimated	1 FTE annually	\$34,440
19	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
20	Compliance Assistance, Recurring: Activities Enforcement Support: Compliance Follow-Up	840 hours	\$41	none estimated	1 FTE annually	\$34,440
20	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1,680	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$68,880
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$41	none estimated	1 FTE annually	\$34,440
21	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right	<input type="checkbox"/> too low <input type="checkbox"/> about right	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> too low <input checked="" type="checkbox"/> about right

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

	Your comments and basis for estimates (if provided):	<input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
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Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$41	none estimated	833 systems annually	\$34,153
22	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$41	none estimated	161 systems annually	\$59,409
23	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
24	Other Recurring Activities: Coordination With EPA	840 hours	\$41	none estimated	1 FTE annually	\$34,440
24	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

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Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
25	Other Recurring Activities: Clerical	1,680 hours	\$41	none estimated	0.4 clerk annually	\$27,552
25	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.8 clerk annually	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$55,104
26	Other Recurring Activities: Supervision	1,680 hours	\$41	none estimated	0.4 supervisor annually	\$27,552
26	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.8 supervisor annually	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$55,104

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Stage 1 Disinfection Byproducts Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Stage 1 Disinfection Byproducts Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in Oklahoma

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	1.2-1.5 Tracking EPA's Rulemaking Policy	80 hrs	\$41	unknown	one-time	\$3,280
2	3.2-3.3 Designing Implementation Plan	40 hrs	\$41	unknown	one-time	\$1,640
3	4.1-4.3 General Start-Up Activities	120 hrs	\$41	unknown	one-time	\$4,920
4	5.1-5.3 Compliance Assistance, Start-Up Activities (training systems in sample collection)	120 hrs	\$41	unknown	one-time	\$4,920

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	6.1-6.2 Compliance Assistance, Recurring Activities	700 hrs	\$41	unknown	count as one but involves multiple activities totaling approximately 700 hrs among 16 FTEs	\$28,700
6	8.1,8.3,8.4,8.6 Permit Administration, Recurring Activities	200 hrs	\$41	unknown	count as one but involves multiple activities totaling approximately 200 hrs among 4 FTEs	\$8,200
7	9.1-9.3 Monitoring, Start-Up Activities (TOC instrumentation, method development, THM field testing)	420 hrs	\$41	unknown	one-time	\$17,220
8	10.1-10.5 Monitoring, Recurring Activities	300 hrs	\$41	unknown	300 hrs spread among 4 FTEs	\$12,300
	11.1-11.2 Enforcement, Start-Up Activities	200 hrs			one-time	\$8,200
	12.1-12.8 Enforcement, Recurring Activities	1,600 hrs			1,600 hrs spread among 14 FTEs	\$65,600

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule. We would also like to know if the Stage 1 Disinfection Byproducts Rule replaced an existing state rule/requirement. For example, if you reported a burden for processing SDWIS reporting, but your state already required and processed SDWIS reporting before the Stage 1 Disinfection Byproducts Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Stage 1 Disinfection Byproducts Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Stage 1 Disinfection Byproducts Rule – e.g., 20 percent of the records entered into the database are related to the Stage 1 Disinfection Byproducts Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Stage 1 Disinfection Byproducts Rule might require that you review plans and specifications for systems in instances where state regulations previously required only recordkeeping of plans and specifications.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Follow-Up Step: Please confirm that we have recorded your responses correctly and provide additional information where needed.

Douglas Kinard and Glenn Trofatter of the South Carolina Department of Health and Environmental Control (DHEC) provided the information summarized below during a meeting with Abt Associates Inc. on July 28, 2006.

Notes: The table beginning below and continuing on the following pages presents the cost estimates based on EPA’s regulatory impact analysis as well as your comments regarding the EPA estimates. We recorded your answers in red font below and highlighted the sections where you were going to get back to us in yellow. Please get back to us on the components highlighted in yellow and review the answers we recorded in red to make sure we interpreted your answers correctly.

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary 2006\$)	Non-Labor Costs	Number of Activities
1	Complete State Political Process: Regulation Adoption & Program Development	840 hours	\$60,000	none estimated	1 one-time activity
1		⊗ about right	⊗ about right	⊗ about right:	⊗ about right
2	General Start-Up Activities: Staff Training (Rule Specific)	80 hours	\$60,000	none estimated	12 FTEs
2		⊗ too high Your estimate: 50 hours	⊗ too high Your estimate: \$45,000	⊗ too low \$89 (200 mile round trip; 44.5 cents per mile – Abt’s proposed estimate, please comment)	⊗ too low Your estimate: 20
3	Compliance Assistance Start-Up Activities: Public Notification	168 hours	\$60,000	none estimated	1 one-time activity
3		⊗ about right	⊗ too high Your estimate: \$45,000	⊗ about right:	⊗ about right:
4	Compliance Assistance Start-Up Activities: Initial Lab Certification and Training and Site Visit and Follow Up	24 hours	\$60,000	none estimated	32 labs
4	Doug noted that a different group does this, so they will need to provide this information (SC to follow up on this). Also noted that there is a small certification fee, but it covers only a small portion of the costs.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary 2006\$)	Non-Labor Costs	Number of Activities
5	Compliance Assistance Start-Up Activities: System Training and Technical Assistance	1,680 hours	\$60,000	none estimated	1 one-time activity
	Doug noted that he would get back to us; also noted that many meetings were required; they included training meetings and water association meetings. Preliminary items are listed below in rows 5a-5c. Doug wanted to think about whether these items were correct and whether additional items should be included (SC to follow up on this).	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5a	Visiting 62 plants x 8 hours each.	8 hours	\$45,000	none estimated	62 plants
5b	55 presentations at 13 hours each (presentation time plus travel time for 3 people).	13 hours	\$45,000	none estimated	55 plants
5c	One hour of technical assistance provided during 60 inspections, over 5 years	1 hours	\$45,000	none estimated	300 inspections (60 per year for 5 years)
6	Permit Administration, Start-Up Activities: Review Plans and Specifications (LGW)	40 hours	\$60,000	none estimated	4 plans
6	No facilities needed construction specs reviewed; but monitoring plans were required.	<input checked="" type="checkbox"/> too high Your estimate: 5 hours for monitoring plan.	<input checked="" type="checkbox"/> too high Your estimate: \$45,000	<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> about right
7	Permit Administration, Start-Up Activities: Review Plans and Specifications (LSW)	80 hours	\$60,000	none estimated	19 plans
7	Required some construction specifications and some monitoring plans.	<input checked="" type="checkbox"/> too high Your estimate: 60 hours for construction specs; 7 hours for monitoring plans.	<input checked="" type="checkbox"/> too high Your estimate: \$45,000	<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> too low Your estimate: 20 Construction specs and 32 plans.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary 2006\$)	Non-Labor Costs	Number of Activities
8	Permit Administration, Start-Up Activities: Review Plans and Specifications (SGW)	24 hours	\$60,000	none estimated	176 plans
8	Required some construction specifications and some monitoring plans.	⊗ too low ⊗ too high Your estimate: 40 hours for construction specs; 3 hours for monitoring plans.	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ too low Your estimate: 12 Construction specs and 630 plans.
9	Permit Administration, Start-Up Activities: Review Plans and Specifications (SSW)	32 hours	\$60,000	none estimated	67 plans
9	Required some construction specifications and some monitoring plans.	⊗ too low ⊗ too high Your estimate: 60 hours for construction specs; 7 hours for monitoring plans.	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ too high Your estimate: 20 Construction specs and 30 plans.
10	Permit Administration, Start-Up Activities: Enhanced Coagulation Determination	23 hours	\$60,000	none estimated	86 systems
10		⊗ about right	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ too high Your estimate: 62 systems.
11	Permit Administration, Start-Up Activities: Issue Notice of Intent	24 hours	\$60,000	none estimated	16 notices
11	Did not perform this activity.	n.a.	n.a.	n.a.	n.a.
12	Monitoring, Start-Up Activities: Maintain Data Management System	2,184 hours	\$60,000	none estimated	1 one-time activity
12		⊗ about right	⊗ about right Your estimate: \$60,000	⊗ about right	⊗ about right

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary 2006\$)	Non-Labor Costs	Number of Activities
13	Monitoring, Start-Up Activities: Upgrade Primacy Lab for HAA5s, Chlorite, and Bromide	2,291 hours	\$60,000	\$25,000 (equipment)	1 one-time activity
13	(SC to follow up on this).	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
14	Monitoring, Start-Up Activities: Notification of Required Monitoring	2 hours	\$60,000	none estimated	801 notices
14		<input checked="" type="checkbox"/> too high Your estimate: 0.15 hours per letter	<input checked="" type="checkbox"/> too high Your estimate: \$45,000	<input checked="" type="checkbox"/> too low Your estimate: \$0.39 postage per letter	<input checked="" type="checkbox"/> about right
15	Monitoring, Start-Up Activities: Issue/Monitor Compliance Schedule	80 hours	\$60,000	none estimated	0.3 one-time activity
15	Noted that this is really an enforcement activity.	<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> too high Your estimate: \$45,000	<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> too low Your estimate: 8 systems violated initially, 2-per year after that.
16	Enforcement, Start-Up Activities: Violation Letters	2 hours	\$60,000	none estimated	160 letters
16		<input checked="" type="checkbox"/> about right	<input checked="" type="checkbox"/> too high Your estimate: \$45,000	<input checked="" type="checkbox"/> too low Your estimate: \$0.39 postage per letter	<input checked="" type="checkbox"/> about right* Your estimate: About 160 initially; 15-20 per year after that.

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary 2006\$)	Non-Labor Costs	Number of Activities
17	Compliance Assistance, Recurring: Activities Enforcement Support: On-Going Technical Assistance	840 hours	\$60,000	none estimated	1 FTE annually
17		⊗ too low* ⊗ about right** Your estimate: *1 FTE for 2000-2005 **0.4 FTE afterwards (2080 hours x 6 years; 832 hours annually after that).	⊗ too high Your estimate: \$52,500 (one \$45,000 and one \$60,000)	⊗ about right	⊗ about right
18	Compliance Assistance, Recurring: Activities Staff Training (On-Going)	40 hours	\$60,000	none estimated	4 FTEs annually
18	Training is done internally.	⊗ too high Your estimate: 5 hours per trainee; 7 hours per training development; (averages out to be 5.25 hours.)	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ too low Your estimate: 23: 20 trained and 3 conducting the training.
19	Compliance Assistance, Recurring: Activities Enforcement Support: Lab Certification	840 hours	\$60,000	none estimated	1 FTE annually
19	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): (SC to follow up on this).	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
20	Compliance Assistance, Recurring: Activities Enforcement Support: Compliance Follow-Up	840 hours	\$60,000	none estimated	1 FTE annually
20	Noted that this is a compliance determination.	⊗ too low Your estimate: 2080 (1 FTE)	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ about right

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Row #	Description	Time Burden (per-activity)	Labor Cost (annual salary 2006\$)	Non-Labor Costs	Number of Activities
21	Monitoring, Recurring Activities: SDWIS Reporting	840 hours	\$60,000	none estimated	1 FTE annually
21		⊗ too high Your estimate: 520 (1/4 FTE)	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ about right
22	Monitoring, Recurring Activities: Data Entry (ground)	1 hours	\$60,000	none estimated	1,163 systems annually
22		⊗ too low Your estimate: 3 hours	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ too high Your estimate: 630
23	Monitoring, Recurring Activities: Data Entry (surface)	9 hours	\$60,000	none estimated	48 systems annually
23		⊗ too low Your estimate: 12 hours	⊗ too high Your estimate: \$45,000	⊗ about right	⊗ too low Your estimate: 62
24	Other Recurring Activities: Coordination With EPA	840 hours	\$60,000	none estimated	1 FTE annually
24	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): (SC to follow up on this).	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
25	Other Recurring Activities: Clerical	1,680 hours	\$60,000	none estimated	0.3 clerk annually
25		⊗ too low Your estimate: 2080	⊗ too high Your estimate: \$25,000	⊗ about right	⊗ about right
26	Other Recurring Activities: Supervision	1,680 hours	\$60,000	none estimated	0.4 supervisor annually
26		⊗ too low Your estimate: 2080	⊗ about right \$60,000	⊗ about right	⊗ about right

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Stage 1 Disinfection Byproducts Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Stage 1 Disinfection Byproducts Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.
Please describe: **Enforcement Support: Technical Assistance (see row 17)**

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.
Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.
Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.
Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.
Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.
Please describe:

Request for Information on the Costs of Administering the Stage 1 Disinfection Byproducts Rule in South Carolina

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations (violation letters – see row 16).
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.
Please describe: Issue/Monitor Compliance Schedule (see row 15).

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.
Please describe:

Other Notes:

- This rule was a major concern of the water industry for the approximately six years leading up to promulgation.

Appendix C. Particulate Matter National Ambient Air Quality Standards Rule

C.1. Introduction

Appendix C provides a detailed explanation of the process involved in adjusting EPA and state cost estimates for the Particulate Matter National Ambient Air Quality Standards Rule (PM 2.5 NAAQS) to allow for comparison between the two. To ensure that the cost estimates were comparable, we took the following steps:

- We disaggregated EPA national-level costs to each of the five case study states. Section C.2 outlines the details of this process.
- We normalized state questionnaire responses to account for variations in the format of the reported estimates. Section C.3 outlines the details of this process.
- We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in Section C.4. Tables C-5 through C-8 present our cost calculations for each of the four participating case study states (Kansas, Oklahoma, South Carolina, and Virginia). Section C.4 also presents the completed questionnaires that we received from each participating state as reference.

C.2. Disaggregating EPA National Estimates to the Four Case Study States

In Chapter 8, we present EPA's national-level cost estimates for the Particulate Matter NAAQS Rule that were based on the burden estimates prepared for the RIA (U.S. EPA 1997a). In the RIA, administrative costs are classified as either one-time (start-up) or recurring costs. One-time administrative costs are associated with interpreting and understanding the requirements of the rule as well as revising state implementation plans. Recurring costs involve monitoring, data gathering and running models, plan development and review, compliance assistance, and record-keeping. The costs and scope estimated by the analysis differ between non-attainment (NA) and attainment area states. Any state with a non-attainment area is designated as a non-attainment state. EPA designates an area as non-attainment if it has violated the fine particle standards over a three-year period, or if relevant information indicates that it contributes to violations in a nearby area. EPA also may designate an area as attainment/unclassifiable, if: 1) monitored air quality data show that area has not violated the fine particle standards over a three-year period; or if 2) there is not enough information to determine the air quality in the area. Table C-1 provides a summary of the normalization methods used for the Particulate Matter NAAQS Rule.

All of the costs presented in the RIA are per-state costs; however, there are differences between the burdens associated with activities in non-attainment and attainment states. Virginia is 1 of the 25 states that are classified as non-attainment. The remaining states, Kansas, Oklahoma, and South Carolina, are 3 of the 26 states that are classified as attainment. To disaggregate national costs, we apportioned 4 percent (1/25) of the national impact estimates for non-attainment states to Virginia. Similarly, we attributed approximately 3.8 percent (1/26) of the national impact estimates for attainment states individually to Kansas, Oklahoma, and South Carolina.

Final Report, September 14, 2007

Table C-1: Approach for Allocating EPA Administrative Costs for the Particulate Matter NAAQS Rule to Case Study States

EPA Administrative Cost Category	Approach for Allocating National –Level Costs to Case Study States
Start-Up Activities	
1. Tracking EPA's Rulemaking Progress	
Interpret Rule/Identify New Requirements	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
2. Obtaining Additional Delegated Authority	
No costs estimated in this category.	
3. Designing Implementation Plan	
Revise SIPs	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
4. General Start-Up Activities	
No costs estimated in this category.	
5. Compliance Assistance	
No costs estimated in this category.	
6. Permit Administration	
No costs estimated in this category.	
7. Monitoring	
No costs estimated in this category.	
8. Enforcement	
No costs estimated in this category.	
Recurring Activities	
9. Compliance Assistance	
Development of Source Guidance Documents	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Public Hearings	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Review/Revise Compliance Plans	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Evaluate Strategies for Conformity	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Prepare and Review Progress Reports	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
10. Permit Administration	
No costs estimated in this category.	
11. Monitoring	
Evaluate/Improve Inventories	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Data Gathering and Assembly	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Run Model	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Evaluate and Interpret Monitoring Results	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
12. Enforcement	
No costs estimated in this category.	

Table C-1: Approach for Allocating EPA Administrative Costs for the Particulate Matter NAAQS Rule to Case Study States

EPA Administrative Cost Category	Approach for Allocating National –Level Costs to Case Study States
13. Other	
Develop Regional Implementation Plans	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Recordkeeping	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Identify Alternative Control Strategies	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.
Participate in PM Regional Groups	Attributed 4% (1 of 25) of the national-level costs to each non-attainment case study state (Virginia). Attributed 3.8% (1 of 26) of the national-level costs to each attainment case study state (Kansas, Oklahoma, South Carolina). EPA assumed each state would incur the same costs.

The RIA categorizes the burden estimate for each administrative activity as “Not Applicable (No Burden Hours),” “Low Burden (1 to 20 hours),” “Moderate Burden (21 to 40 hours),” and “High Burden (41 to 160 hours).” EPA developed point estimates based on the midpoints of the burden ranges. Accordingly, for each line item in our analysis, we also use the midpoints of the burden ranges.

The PM 2.5 RIA also accounted for 490,000 hours and \$19 million dollars in recurring monitoring costs that would be incurred by states but paid for by EPA. EPA ICR # 940.14 is cited as the source for these estimates, however, we were unable to obtain a copy of the original ICR.¹ Not having the original ICR made it difficult to develop state-level estimates for these costs, because we lacked any documentation about how EPA developed these estimates. Without the original ICR, we relied on two sources of information to deduce the methodology behind the figures cited in the RIA: (1) a more recent version of the supporting statement for a renewal of this ICR (EPA ICR # 940.16), and (2) the 2005 103 grant allocation, by state, which allocates funds to states in the amount estimated by the ICR.

The \$19 million dollars divided by 490,000 hours is about \$39, which is about the same as the \$40 state fully loaded labor rate reported in the RIA (1990\$). Therefore, we presume that the \$19 million figure cited in the RIA does not include any non-labor costs. It should be noted, however, that the more recent ICR does include non-labor costs and equipment/contractor costs that account for more than half of the total costs. Thus, it appears that there were major revisions to the ICR methodology between the version cited in the RIA and the more recent version. It is also important to point out that the more recent ICR supporting statements, on which grant funds related to the PM 2.5 rule are actually based, do account for non-labor costs. However, the baseline for this analysis is the original RIA-based estimate of these costs, not the actual grant amounts that EPA provided to states. As such, it would not be appropriate to use the results in this study to draw conclusions about whether or not grant levels are adequate.

The ICR indicated that the labor cost estimates were based on the Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants (EPA 1993); this document listed a load factor of 2.5 and indicated that this load factor accounts for

¹ We contacted EPA’s Office of Air Quality Planning and Standards, but they were unable to find a copy of the original ICR.

both fringe and overhead. Thus, as described in Chapter 5, we adjusted the \$19 million by 2.5/1.4, so labor costs include a 40 percent fringe rate and exclude overhead costs. We also adjusted the estimate to 2006\$ from 1990\$ using the U.S. Bureau of Labor Statistics Consumer Price Index. These adjustments to inflate the estimate to 2006\$ and exclude overhead costs result in a national estimate of \$16.7 million. We used the share of the national 2005 grant allocation received by each state to estimate each case study states' share of this \$16.7 million. The results of this calculation are shown in Table C-2.

All costs were inflated to 2006 dollars using data from the U.S. Bureau of Labor Statistics' *Consumer Price Index for All Urban Consumers* (CPI-U). For the Particulate Matter NAAQS Rule, we inflated 1990 dollars using an adjustment factor of 1.55. In addition, we adjusted labor rates to reflect salary plus fringe benefits using a load factor of 1.4 (see Chapter 5 for a complete description of the methodology).

Table C-2: EPA-Based Estimate of Grant Funded Monitoring Costs			
State	Net Grant Allocation 2005 (Excludes In-Kind Transfers) (\$000)	Percent of 2005 Grant Allocation	Estimated Share of EPA-based National Estimate of \$16.7 Million in Monitoring Costs (\$000, 2006)
Kansas	\$237	0.81%	\$135
Oklahoma	\$365	1.24%	\$207
South Carolina	\$611	2.08%	\$347
Virginia	\$430	1.46%	\$244
United States	\$29,361		\$16,660

Source: Personal Communication with U.S. EPA Office of Air Quality Planning and Standards, 2006; U.S. EPA, 1997.

C.3. Normalizing State Questionnaire Responses

To compare EPA and the case study state estimates for each of the four regulations, we found it necessary to “normalize” each state’s questionnaire responses to account for variations in labor rates and differences in the ways each state completed the questionnaires. We describe each of the “normalization” steps in more detail below.

C.3.1. Labor Rate Adjustments

EPA estimated total national administrative costs using average national wage rates. We converted these national-level costs into state-level costs and used these as a baseline for comparison with actual case study state responses, as described in Chapter 8. Because average labor rates can vary for an individual state from those of other states and that of the nation, we applied an adjustment factor² based on a national average wage rate to the labor rates reported by each participating state (see Table C-3). In doing so, this analysis weights, or “normalizes,” the reported state labor rates with respect to the national average and allows for the comparison set forth in our analytic framework.

² Wage rates used were based on May 2005 U.S. Bureau of Labor Statistics average hourly wage for all industry groups. Normalization Factor = (Average U.S. Wage)/(Average Wage for the Case Study State).

Table C-3: Mean Hourly Wages and Labor Rate Adjustment Factors by Case Study State

Case Study State	Mean Hourly Wage ^a	Adjustment Factor
Kansas	\$16.33	1.12
Oklahoma	\$15.12	1.20
South Carolina	\$15.50	1.17
Virginia	\$19.11	0.95
United States	\$18.21	1.00

a. Based on mean hourly wages for "All Occupations."

Source: U.S. Bureau of Labor Statistics. 2005. May 2005 National Occupational Employment and Wage Estimates.

C.3.2. Normalization of Case Study Data

In developing our information collection request form, as described in Chapter 5, we had been advised by South Carolina (our beta tester for the original questionnaire) that it may be difficult for the case study states to estimate costs for the line items included in EPA’s analysis. Given this situation, we allowed states the flexibility to report costs at the level of detail available to them. After reviewing the responses that we received, we found that the case study states commonly did not conform to the level of detail contained in EPA’s analysis. As a result, we made adjustments to some of the state responses so that they were comparable with the EPA-based estimates. In general, our adjustments (e.g., assigning aggregate costs to individual line items) did not substantively change the information provided by the participating states, as described below. Since EPA estimated only the total hour burden per-state, rather than a per-activity hour burden and a number of activities, we converted responses where states reported a per-activity hour burden and a number of activities to a total hour burden to be comparable with the EPA estimate.

Kansas

- Under “Data Gathering and Assembly,” Kansas reported 1 annual activity as being too low. Instead, Kansas commented that this activity is ongoing, but did not give a different estimate. For our analysis, we used 1 activity, which calculates to the same total cost as reported by Kansas.
- Under “Evaluate and Interpret Monitoring Results,” Kansas reported 1 annual activity as being too low. Instead, Kansas commented that this activity is ongoing but did not give a different estimate. For our analysis, we used 1 activity, which calculates to the same total cost as reported by Kansas.
- Kansas reported the time burden as occurring quarterly. We multiplied the quarterly estimates by four to produce an annual estimate.
- Under “Participate in PM Regional Groups,” Kansas reported 1 annual activity as being too low. Instead, Kansas commented that this activity is ongoing but did not give a different estimate. For our analysis, we used 1 activity, which calculates to the same total cost as reported by Kansas.

Oklahoma

- Oklahoma reported that the non-labor costs in row 9, “Data Gathering and Assembly,” also partially reflect non-labor costs for row 11, “Evaluate and Interpret Monitoring Results.” However, for the purposes of our model, we only included these costs in row 9.

Final Report, September 14, 2007

South Carolina

- South Carolina did not strictly use our questionnaire for reporting estimates. In instances where South Carolina did not use our categories, we identified the category in our model that most closely matched the reported category. We based the matches on the category definitions listed in the RIA. We included reported categories that did not match our model as EPA-omitted categories (Table C-4).
- In cases where multiple reported categories would fit into a single category in the model, we use the summation of the total time burden for all activities for the time burden estimate. South Carolina reported a labor rate of \$60 per hour for all activities, so we used this value for the labor rate. Because the time burden represents the summation of all total time burden estimates, we artificially substituted a one for the number of activities. It should be noted that the number of activities is “hidden” in the total time burden estimate for these line items.
- Under some line items, South Carolina did not include an estimate for the number of activities. We assumed this number to be one.

Table C-4: Map of Cost Categories Reported by South Carolina to RIA Cost Categories	
South Carolina Category	Corresponding RIA Category
“Included By Both” Categories	
Reviewed the Federal Register notices and/or other documents	Interpret Rule/Identify New Requirements
Attended EPA meetings/conferences regarding this rule	
Attended other non-EPA meetings/conferences regarding this rule	
Conducted other start-up activities associated with tracking EPA’s rule making process	
Data analysis and administrative activities (i.e.: PM2.5 estimate maps)	Revise SIPs
Development of base inventory emission factors	
Provide opportunities for the public and/or stakeholders to comment on on-going permitting processes	Public Hearings
“Omitted-By-EPA” Categories	
Provided EPA directly with comments on the proposed rule	Tracking EPA’s Rulemaking Progress
Provided EPA with comments on the proposed rule through a third party	
Amended state laws to incorporate the requirements of the new regulation	Obtaining Additional Delegated Authority
Compile our recommendations	Designing Implementation Plan
Consult with EPA on recommendations	
Monitor strategy for special studies	
Educate the public and stakeholders about the rule	Compliance Assistance: Start-Up
Community and stakeholder outreach related to unclassifiable areas	
Conducted internal training	
Developed a system for monitoring population exposure	Monitoring: Start-Up
Purchased new equipment for monitoring purposes	
Conducted other recurring activities associated with monitoring	
Collect data from monitoring on a continuous basis	Monitoring: Recurring
Review collected data on a regular basis	
Record and store monitoring data	
Report monitoring data	
Incur additional recurring costs associated with monitoring data	
Conducted other recurring activities associated with monitoring activities	

Virginia

- For the activity item “Run Model,” Virginia reported incurring non-labor costs but was not able to produce an estimate. We assumed a value of \$0 for this component.
- Virginia reported that it was not possible to provide a separate estimate for the activity item “Recordkeeping.” However, costs for this item are reported indirectly in the other activity items.

- In the EPA-omitted categories, Virginia did not report estimates for the number of activities or for non-labor costs. We assumed values of one for the number of activities and \$0 for the non-labor costs.

C.4. EPA Estimates and State Questionnaire Responses

We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in this section. Tables C-5 through C-8 present our cost calculations for each of the four participating case study states (Kansas, Oklahoma, South Carolina, and Virginia). After these tables, we include the completed questionnaires that we received from each participating state as reference.

Final Report, September 14, 2007

Table C-5: PM 2.5 - EPA Burden Estimates - Kansas						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (Attainment)	10.5	\$39	\$0	1	11	\$410
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (Attainment)	0	\$39	\$0	1	0	\$0
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					11	\$410
<i>Total Annualized Start-Up Costs</i>						\$93
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (Attainment)	0	\$39	\$0	1	0	\$0
Public Hearings (Attainment)	0	\$39	\$0	1	0	\$0
Review/Revise Compliance Plans (Attainment)	0	\$39	\$0	1	0	\$0
Evaluate Strategies for Conformity (Attainment)	10.5	\$39	\$0	1	11	\$410
Prepare and Review Progress Reports (Attainment)	10.5	\$39	\$0	1	11	\$410
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (Attainment)*	10.5	\$39	\$0	1	11	\$410
Data Gathering and Assembly (Attainment)*	10.5	\$39	\$0	1	11	\$410
Run Model (Attainment)*	10.5	\$39	\$0	1	11	\$410
Evaluate and Interpret Monitoring Results (Attainment)*	10.5	\$39	\$0	1	11	\$410
Grant-Funded Monitoring	3,960	\$34	\$0	\$1	3,960	\$134,640
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (Attainment)	0	\$39	\$0	1	0	\$0
Recordkeeping (Attainment)	10.5	\$39	\$0	1	11	\$410
Identify Alternative Control Strategies (Attainment)	0	\$39	\$0	1	0	\$0
Participate in PM Regional Groups (Attainment)	30.5	\$39	\$0	1	31	\$1,190
<i>Total Recurring Costs</i>					4,023	\$138,696
Total Annualized Costs						\$138,789
<i>*Line-Items are Modeling Costs.</i>						

Final Report, September 14, 2007

Table C-5: PM 2.5 - Kansas - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (no NA's)	10	\$37.9	\$50	1	10	\$429
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (no NA's)	0	\$0	\$0	0	0	\$0
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					10	\$429
<i>Total Annualized Start-Up Costs</i>						\$98
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (no NA's)	0	\$0	\$0	0	0	\$0
Public Hearings (no NA's)	0	\$0	\$0	0	0	\$0
Review/Revise Compliance Plans (no NA's)	0	\$0	\$0	0	0	\$0
Evaluate Strategies for Conformity (no NA's)	\$10.5	\$37.9	\$0	1	11	\$398
Prepare and Review Progress Reports (no NA's)	\$10.5	\$37.9	\$0	1	11	\$398
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (no NA's)	\$10.5	\$37.9	\$0	1	11	\$398
Data Gathering and Assembly (no NA's)	20.0	\$37.9	\$0	1	20	\$758
Run Model (no NA's)	0	\$0	\$0	0	0	\$0
Evaluate and Interpret Monitoring Results (no NA's)	15.0	\$37.9	\$0	1	15	\$569
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (no NA's)	0	\$0	\$0	0	0	\$0
Recordkeeping (no NA's)	96	\$37.914	\$400	1	96	\$4,040
Identify Alternative Control Strategies (no NA's)	0	\$0	\$0	0	0	\$0
Participate in PM Regional Groups (no NA's)	30.5	37.9	\$400	1	31	\$1,556
<i>Total Recurring Costs</i>					67	\$8,117
<i>Total Annualized Costs</i>						\$8,215

Final Report, September 14, 2007

Table C-5: PM 2.5 - Kansas - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.	5	\$38	\$0	1	5	\$190
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
Developed internal guidance and procedures for implementing the new regulation.	10	\$37.9	\$0	1	10	\$379
5. Compliance Assistance						
Conducted other start-up activities associated with compliance assistance.	5	\$37.9	\$0	2	10	\$379
6. Permit Administration						
Developed specific permit requirements.	10	\$37.9	\$0	1	10	\$379
7. Monitoring						
Developed a system for monitoring affected entities. Purchased new equipment for monitoring purposes.	10	\$37.9	\$20,000	1	10	\$20,379
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					45	\$21,706
<i>Total Annualized Start-Up Costs</i>						\$4,948
Recurring Activities						
9. Compliance Assistance						
Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.	10	\$37.9	\$0	1	10	\$379
10. Permit Administration						
Conduct regular reviews of submitted documents and supporting materials. Verify data sources on a regular basis. Consult regularly with facilities about the permitting process. Issue notifications to affected entities regarding permits. Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes. Issue and/or review permits to affected entities.	40	\$37.914	\$1,000	1	40	\$2,517

Final Report, September 14, 2007

11. Monitoring						
Collect data from monitoring on a continuous basis. Review collected data on a regular basis. Record and store monitoring data. Report monitoring data. Incur additional recurring costs associated with monitoring activities.	3,000	\$33,4538	\$2,000	1	3,000	\$102,361
12. Enforcement						
Conduct and review regular inspections for regulatory enforcement purposes. Issue warnings and/or citations for violations. Take legal actions to enforce the regulation. Collect fines for violations. Keep records of enforcement actions. Provide notifications of enforcement actions. Report enforcement activities to EPA.	40	\$37,914	\$1,000	1	40	\$2,517
13. Other	No costs estimated in this category.					
Total Recurring Costs					3,090	\$107,774
Total Annualized Costs					\$112,721	

Final Report, September 14, 2007

Table C-6: PM 2.5 - EPA Burden Estimates - Oklahoma						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (Attainment)	11	\$39	\$0	1	11	\$410
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (Attainment)	0	\$39	\$0	1	0	\$0
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					11	\$410
<i>Total Annualized Start-Up Costs</i>						\$93
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (Attainment)	0	\$39	\$0	1	0	\$0
Public Hearings (Attainment)	0	\$39	\$0	1	0	\$0
Review/Revise Compliance Plans (Attainment)	0	\$39	\$0	1	0	\$0
Evaluate Strategies for Conformity (Attainment)	10.5	\$39	\$0	1	11	\$410
Prepare and Review Progress Reports (Attainment)	10.5	\$39	\$0	1	11	\$410
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (Attainment)*	10.5	\$39	\$0	1	11	\$410
Data Gathering and Assembly (Attainment)*	10.5	\$39	\$0	1	11	\$410
Run Model (Attainment)*	10.5	\$39	\$0	1	11	\$410
Evaluate and Interpret Monitoring Results (Attainment)*	10.5	\$39	\$0	1	11	\$410
Grant-Funded Monitoring	6,090	\$34	\$0	1	6,090	\$207,060
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (Attainment)	0	\$39	\$0	1	0	\$0
Recordkeeping (Attainment)	10.5	\$39	\$0	1	11	\$410
Identify Alternative Control Strategies (Attainment)	0	\$39	\$0	1	0	\$0
Participate in PM Regional Groups (Attainment)	30.5	\$39	\$0	1	31	\$1,190
<i>Total Recurring Costs</i>					6,153	\$211,116
Total Annualized Costs						\$211,209
<i>*Line-Items are Modeling Costs.</i>						

Final Report, September 14, 2007

Table C-6: PM 2.5 - Oklahoma - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (no NA's)	26	\$40.95	\$0	1	26	\$1,065
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (no NA's)	80	\$40.95	\$0	1	80	\$3,276
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					<i>106</i>	<i>\$4,341</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$989</i>
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (no NA's)	0	\$0	\$0	0	0	\$0
Public Hearings (no NA's)	0	\$0	\$0	0	0	\$0
Review/Revise Compliance Plans (no NA's)	0	\$0	\$0	0	0	\$0
Evaluate Strategies for Conformity (no NA's)	0	\$0	\$0	0	0	\$0
Prepare and Review Progress Reports (no NA's)	0	\$0	\$0	0	0	\$0
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (no NA's)	10.5	\$40.95	\$0	1	11	\$430
Data Gathering and Assembly (no NA's)	8	\$40.9484	\$360,000	470	3,760	\$513,966
Run Model (no NA's)	0	\$0	\$0	0	0	\$0
Evaluate and Interpret Monitoring Results (no NA's)	7.6	\$40.9484	\$0	320	2,432	\$99,587
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (no NA's)	0	\$0	\$0	0	0	\$0
Recordkeeping (no NA's)	150	\$40.948	\$0	1	150	\$6,142
Identify Alternative Control Strategies (no NA's)	0	\$0	\$0	0	0	\$0
Participate in PM Regional Groups (no NA's)	30.5	\$40.95	\$0	1	31	\$1,249
<i>Total Recurring Costs</i>					<i>6,203</i>	<i>\$621,374</i>
<i>Total Annualized Costs</i>						<i>\$622,363</i>

Final Report, September 14, 2007

Table C-6: PM 2.5 - Oklahoma - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Attended EPA meetings/conferences regarding this rule.	24	\$40.95	\$0	1	24	\$983
Attended other non-EPA meetings/conferences regarding this rule.	24	\$40.95	\$0	1	24	\$983
2. Obtaining Additional Delegated Authority						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
Purchased new equipment for monitoring purposes.	0	\$0	\$281,500	1	0	\$281,500
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>						<i>48</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$64,612</i>
Recurring Activities						
9. Compliance Assistance						
No costs estimated in this category.						
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
No costs estimated in this category.						
12. Enforcement						
No costs estimated in this category.						
13. Other						
No costs estimated in this category.						
<i>Total Recurring Costs</i>						<i>0</i>
<i>Total Annualized Costs</i>						<i>\$0</i>
<i>Total Annualized Costs</i>						<i>\$64,612</i>

Final Report, September 14, 2007

Table C-7: PM 2.5 - EPA Burden Estimates - South Carolina						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (Attainment)	11	\$39	\$0	1	11	\$410
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (Attainment)	0	\$39	\$0	1	0	\$0
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					11	\$410
<i>Total Annualized Start-Up Costs</i>						\$93
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (Attainment)	0	\$39	\$0	1	0	\$0
Public Hearings (Attainment)	0	\$39	\$0	1	0	\$0
Review/Revise Compliance Plans (Attainment)	0	\$39	\$0	1	0	\$0
Evaluate Strategies for Conformity (Attainment)	10.5	\$39	\$0	1	11	\$410
Prepare and Review Progress Reports (Attainment)	10.5	\$39	\$0	1	11	\$410
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (Attainment)*	10.5	\$39	\$0	1	11	\$410
Data Gathering and Assembly (Attainment)*	10.5	\$39	\$0	1	11	\$410
Run Model (Attainment)*	10.5	\$39	\$0	1	11	\$410
Evaluate and Interpret Monitoring Results (Attainment)*	10.5	\$39	\$0	1	11	\$410
Grant-Funded Monitoring	10,194	\$34	\$0	1	10,194	\$346,596
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (Attainment)	0	\$39	\$0	1	0	\$0
Recordkeeping (Attainment)	10.5	\$39	\$0	1	11	\$410
Identify Alternative Control Strategies (Attainment)	0	\$39	\$0	1	0	\$0
Participate in PM Regional Groups (Attainment)	30.5	\$39	\$0	1	31	\$1,190
<i>Total Recurring Costs</i>					10,257	\$350,652
Total Annualized Costs						\$350,745
<i>*Line-Items are Modeling Costs.</i>						

Final Report, September 14, 2007

Table C-7: PM 2.5 - South Carolina - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (no NA's)	434.5	\$70.49	\$0	1	435	\$30,628
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (no NA's)	825	\$70.49032	\$0	1	825	\$58,155
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					1,260	\$88,783
<i>Total Annualized Start-Up Costs</i>						\$20,237
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (no NA's)	0	\$0	\$0	0	0	\$0
Public Hearings (no NA's)	0	\$0	\$0	0	0	\$0
Review/Revise Compliance Plans (no NA's)	0	\$0	\$0	0	0	\$0
Evaluate Strategies for Conformity (no NA's)	0	\$0	\$0	0	0	\$0
Prepare and Review Progress Reports (no NA's)	0	\$0	\$0	0	0	\$0
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (no NA's)	0	\$0	\$0	0	0	\$0
Data Gathering and Assembly (no NA's)	0	\$0	\$0	0	0	\$0
Run Model (no NA's)	0	\$0	\$0	0	0	\$0
Evaluate and Interpret Monitoring Results (no NA's)	0	\$0	\$0	0	0	\$0
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (no NA's)	0	\$0	\$0	0	0	\$0
Recordkeeping (no NA's)	0	\$0	\$0	0	0	\$0
Identify Alternative Control Strategies (no NA's)	0	\$0	\$0	0	0	\$0
Participate in PM Regional Groups (no NA's)	0	\$0	\$0	0	0	\$0
<i>Total Recurring Costs</i>					0	\$0
Total Annualized Costs						\$20,237

Final Report, September 14, 2007

Table C-7: PM 2.5 - South Carolina - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Provided EPA directly with comments on the proposed rule	15	\$70.49	\$0	1	15	\$1,057
Provided EPA with comments on the proposed rule through a third party	14	\$70.5	\$0	2	28	\$1,974
2. Obtaining Additional Delegated Authority						
Amended state laws to incorporate the requirements of the new regulation	225	\$70.49	\$0	1	225	\$15,860
3. Designing Implementation Plan						
Compile our recommendations	225	\$70.49	\$0	1	225	\$15,860
Consult with EPA on recommendations	150	\$70.49	\$0	1	150	\$10,574
Monitor strategy for special studies	225	\$70.49	\$0	1	225	\$15,860
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
Educate the public and stakeholders about the rule	112.5	\$70.49	\$0	1	113	\$7,930
Community and stakeholder outreach related to unclassifiable areas	45	\$70.49	\$0	5	225	\$15,860
Conducted internal training	23	\$70.5	\$0	1	23	\$1,586
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
Developed a system for monitoring population exposure	900	\$70.49	\$0	1	900	\$63,441
Purchased new equipment for monitoring purposes	20	\$70.5	\$16,000	1	20	\$17,410
Conducted other recurring activities associated with monitoring	40	\$70.5	\$0	1	40	\$2,820
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					2,188	\$170,233
<i>Total Annualized Start-Up Costs</i>						\$38,802
Recurring Activities						
9. Compliance Assistance						
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Collect data from monitoring on a continuous basis	100	\$70.49	\$0	1	100	\$7,049
Review collected data on a regular basis	75	\$70.49	\$0	1	75	\$5,287
Record and store monitoring data	20	\$70.5	\$0	1	20	\$1,410
Report monitoring data	25	\$70.49	\$0	1	25	\$1,762

Final Report, September 14, 2007

Incur additional recurring costs associated with monitoring data	20	\$70.5	\$0	1	20	\$1,410
Conducted other recurring activities associated with monitoring activities	40	\$70.5	\$0	1	40	\$2,820
12. Enforcement	No costs estimated in this category.					
13. Other	No costs estimated in this category.					
<i>Total Recurring Costs</i>					<i>280</i>	<i>\$19,737</i>
Total Annualized Costs						\$58,539

Final Report, September 14, 2007

Table C-8: PM 2.5 - EPA Burden Estimates - Virginia						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (NA's)	31	\$39	\$0	1	31	\$1,190
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (NA's)	101	\$39	\$0	1	101	\$3,920
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					<i>131</i>	<i>\$5,109</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$1,165</i>
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (NA's)	30.5	\$39	\$0	1	31	\$1,190
Public Hearings (NA's)	100.5	\$39	\$0	1	101	\$3,920
Review/Revise Compliance Plans (NA's)	100.5	\$39	\$0	1	101	\$3,920
Evaluate Strategies for Conformity (NA's)	30.5	\$39	\$0	1	31	\$1,190
Prepare and Review Progress Reports (NA's)	30.5	\$39	\$0	1	31	\$1,190
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (NA's)*	30.5	\$39	\$0	1	31	\$1,190
Data Gathering and Assembly (NA's)*	100.5	\$39	\$0	1	101	\$3,920
Run Model (NA's)*	30.5	\$39	\$0	1	31	\$1,190
Evaluate and Interpret Monitoring Results (NA's)*	30.5	\$39	\$0	1	31	\$1,190
Grant-Funded Monitoring	7,173	\$34	\$0	1	7,173	\$243,882
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (NA's)	30.5	\$39	\$0	1	31	\$1,190
Recordkeeping (NA's)	30.5	\$39	\$0	1	31	\$1,190
Identify Alternative Control Strategies (NA's)	100.5	\$39	\$0	1	101	\$3,920
Participate in PM Regional Groups (NA's)	100.5	\$39	\$0	1	101	\$3,920
<i>Total Recurring Costs</i>					<i>7,658</i>	<i>\$272,996</i>
Total Annualized Costs						\$274,160
<i>*Line-Items are Modeling Costs.</i>						

Final Report, September 14, 2007

Table C-8: PM 2.5 - Virginia - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Interpret Rule/Identify New Requirements (no NA's)	40	\$32.4	\$0	1	40	\$1,296
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
Revise SIPs (no NA's)	1,040	\$32.399	\$65,000	1	1,040	\$98,695
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>					<i>1,080</i>	<i>\$99,991</i>
<i>Total Annualized Start-Up Costs</i>						<i>\$22,791</i>
Recurring Activities						
9. Compliance Assistance						
Development of Source Guidance Documents (no NA's)	40	\$28.587	\$0	1	40	\$1,143
Public Hearings (no NA's)	100.5	32.4	\$0	1	101	\$3,256
Review/Revise Compliance Plans (no NA's)	100.5	32.4	\$0	1	101	\$3,256
Evaluate Strategies for Conformity (no NA's)	30	\$28.6	\$0	1	30	\$858
Prepare and Review Progress Reports (no NA's)	30	\$28.6	\$0	1	30	\$858
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Evaluate/Improve Inventories (no NA's)	1,040	\$32.399	\$0	1	1,040	\$33,695
Data Gathering and Assembly (no NA's)	10,304	\$32.8632	\$116,200	1	10,304	\$454,822
Run Model (no NA's)	500	\$32.3987	\$0	1	500	\$16,199
Evaluate and Interpret Monitoring Results (no NA's)	80	\$32.4	\$0	1	80	\$2,592
12. Enforcement						
No costs estimated in this category.						
13. Other						
Develop Regional Implementation Plans (no NA's)	0	\$0	\$0	0	0	\$0
Recordkeeping (no NA's)	0	\$0	\$0	0	0	\$0
Identify Alternative Control Strategies (no NA's)	0	\$0	\$0	0	0	\$0
Participate in PM Regional Groups (no NA's)	\$100.5	\$32.4	\$0	1	101	\$3,256
<i>Total Recurring Costs</i>					<i>12,225</i>	<i>\$519,935</i>
<i>Total Annualized Costs</i>						<i>\$542,726</i>

Final Report, September 14, 2007

Table C-8: PM 2.5 - Virginia - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Attended EPA meetings/conferences regarding this rule.	40	\$32.4	\$0	1	40	\$1,296
Attended other non-EPA meetings/conferences regarding this rule.	20	\$32.4	\$0	1	20	\$648
Provided EPA directly with comments on the proposed rule.	80	\$32.4	\$0	1	80	\$2,592
Conducted other start-up activities associated with tracking EPA's rulemaking process.	40	\$32.4	\$0	1	40	\$1,296
2. Obtaining Additional Delegated Authority						
Amended state laws to incorporate the requirements of the new regulation.	100	\$32.4	\$0	1	100	\$3,240
3. Designing Implementation Plan						
Performed activities related to obtaining EPA approval for the state implementation plan.	40	\$32.4	\$0	1	40	\$1,296
Conducted other start-up activities associated with designing implementation plans.	80	\$32.4	\$0	1	80	\$2,592
4. General Start-Up Activities						
5. Compliance Assistance						
Conducted outreach programs for affected entities.	30	\$28.6	\$0	1	30	\$858
Conducted public outreach programs to create awareness.	30	\$28.6	\$0	1	30	\$858
Developed training programs to help affected entities comply with the new regulation.	40	\$28.587	\$0	1	40	\$1,143
Conducted other start-up activities associated with compliance assistance.	50	\$28.587	\$0	1	50	\$1,429
6. Permit Administration						
Developed specific permit requirements.	10	\$34.3	\$0	1	10	\$343
7. Monitoring						
Developed a system for monitoring affected entities.	478	\$40.441	\$0	1	478	\$19,331
Purchased new equipment for monitoring purposes.	166	\$50.342	\$17,500	1	166	\$25,857
Conducted other start-up activities associated with monitoring.	478	\$40.441	\$48,000	1	478	\$67,331
8. Enforcement						
No costs estimated in this category.						
Total Start-Up Costs					1,682	\$130,109

Final Report, September 14, 2007

<i>Total Annualized Start-Up Costs</i>							\$29,656	
Recurring Activities								
9. Compliance Assistance								
Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.	30	\$28.6	\$0	1	30	\$858		
Conduct on-going training (in addition to the initial start-up period)	40	\$28.587	\$0	1	40	\$1,143		
Conducted other recurring activities associated with compliance assistance.	40	\$28.587	\$0	1	40	\$1,143		
10. Permit Administration								
No costs estimated in this category.								
11. Monitoring								
No costs estimated in this category.								
12. Enforcement								
No costs estimated in this category.								
13. Other								
No costs estimated in this category.								
<i>Total Recurring Costs</i>							110	\$3,145
Total Annualized Costs							\$32,801	

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Kansas

Step 1: Review Cost Estimates from EPA’s Regulatory Impact Analysis:

This table summarizes the estimated cost to Kansas for administering the Particulate Matter NAAQS Rule based on EPA’s regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking EPA's rule making process: Interpret Rule/Identify New Requirements (Attainment)	1.3 hours	\$34	none estimated	one-time activity	\$44
2	Designing implementation plan: Revise SIPs (Attainment)	0 hours*	\$34	none estimated	one-time activity	\$0
	<i>One-time Activity Total</i>					<i>\$44 (1 hour)</i>
3	Compliance assistance: recurring: Development of Source Guidance Documents (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
4	Compliance assistance: recurring: Public Hearings (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
5	Compliance assistance: recurring: Review/Revise Compliance Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
6	Compliance assistance: recurring: Evaluate Strategies for Conformity (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
7	Compliance assistance: recurring: Prepare and Review Progress Reports (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
8	Monitoring: recurring: Evaluate/Improve Inventories (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
9	Monitoring: recurring: Data Gathering and Assembly (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
10	Monitoring: recurring: Run Model (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
11	Monitoring: recurring: Evaluate and Interpret Monitoring Results (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
12	Other Recurring Activities: Develop Regional Implementation Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Kansas

Step 1: Review Cost Estimates from EPA’s Regulatory Impact Analysis:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Other Recurring Activities: Recordkeeping (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
14	Other Recurring Activities: Identify Alternative Control Strategies (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
15	Other Recurring Activities: Participate in PM Regional Groups (Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
	Annual Activity Total					\$3,536 (104 hours)

* EPA assumed that only states with non-attainment areas would perform these activities.

Source: Abt Associates Inc.’s calculation based on estimates in EPA’s (1997) *Regulatory Impact Analysis for the Particulate Matter and Ozone National Ambient Air Quality Standards and Proposed Regional Haze Rule*.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Kansas

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking EPA's rule making process: Interpret Rule/Identify New Requirements (Attainment)	1.3 hours	\$34	none estimated	one-time activity	\$44
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$50	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: on going	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$390
2	Designing implementation plan: Revise SIPs (Attainment)	0 hours*	\$34	none estimated	one-time activity	\$0
2	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
3	Compliance assistance: recurring: Development of Source Guidance Documents (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
3	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

* EPA assumed that only states with non-attainment areas would perform these activities.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Compliance assistance: recurring: Public Hearings (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
4	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5	Compliance assistance: recurring: Review/Revise Compliance Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
5	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
6	Compliance assistance: recurring: Evaluate Strategies for Conformity (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

* EPA assumed that only states with non-attainment areas would perform these activities.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Compliance assistance: recurring: Prepare and Review Progress Reports (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
8	Monitoring: recurring: Evaluate/Improve Inventories (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
9	Monitoring: recurring: Data Gathering and Assembly (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 20	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: on going	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$680

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Monitoring: recurring: Run Model (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
10	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$0
11	Monitoring: recurring: Evaluate and Interpret Monitoring Results (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
11	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 15	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: on going	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$510
12	Other Recurring Activities: Develop Regional Implementation Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
12	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

* EPA assumed that only states with non-attainment areas would perform these activities.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Kansas

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Other Recurring Activities: Recordkeeping (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
13	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 24	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$100	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: quarterly	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$916
14	Other Recurring Activities: Identify Alternative Control Strategies (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
14	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
15	Other Recurring Activities: Participate in PM Regional Groups (Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
15	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$400	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: on going	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,437

* EPA assumed that only states with non-attainment areas would perform these activities.

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Particulate Matter NAAQS Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Particulate Matter NAAQS Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe: Incorporated into existing regulated entity and public outreach activities

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Review regulatory documents	5 hrs	\$34	--	1	\$170
2	9. Monitoring start up	10 hrs	\$34	\$20,000	1	\$20,340
3	10. Monitoring Recurring	3,000 hrs/y	\$30	\$2,000	On going	\$92,000
	12. Enforcement Recuring	40 hrs/year r	\$34	\$1,000	On oing	\$2,360
4	4.1 Develop Guidance & proceedures	10 hrs	\$34	--	1	\$340

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Incorporated into existing outreach activities	5 hrs	\$34	--	2	\$170
6	Respond to letters, etc.	10 hrs	\$34	--	On going	\$340
7	New permit requirements	10 hrs	\$34	--	On going	\$340
8	Recurring Permit Activities	40 hrs	\$34	\$1,000	On going	\$2,360

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Particulate Matter NAAQS Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Particulate Matter NAAQS Rule – e.g., 20 percent of the records entered into the database are related to the Particulate Matter NAAQS Rule. We would also like to know if the Particulate Matter NAAQS Rule replaced an existing state rule/requirement. For example, if you reported a burden for participating in regional management groups, but your state already required and participated in regional management groups before the Particulate Matter NAAQS Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Many of permitting, compliance, and monitoring activities were being performed for other pollutants.

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Particulate Matter NAAQS Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Particulate Matter NAAQS Rule – e.g., 20 percent of the records entered into the database are related to the Particulate Matter NAAQS Rule.

Yes No

If yes, please describe those activities here:

The burden on the preceding tables were prorated for thepar NAAQS rule

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Particulate Matter NAAQS Rule might require that you hold public hearings in instances where state regulations previously required only a means for accepting public comment.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Oklahoma for administering the Particulate Matter NAAQS Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking EPA's rule making process: Interpret Rule/Identify New Requirements (Attainment)	1.3 hours	\$34	none estimated	one-time activity	\$44
2	Designing implementation plan: Revise SIPs (Attainment)	0 hours*	\$34	none estimated	one-time activity	\$0
	<i>One-time Activity Total</i>					<i>\$44 (1 hour)</i>
3	Compliance assistance: recurring: Development of Source Guidance Documents (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
4	Compliance assistance: recurring: Public Hearings (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
5	Compliance assistance: recurring: Review/Revise Compliance Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
6	Compliance assistance: recurring: Evaluate Strategies for Conformity (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
7	Compliance assistance: recurring: Prepare and Review Progress Reports (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
8	Monitoring: recurring: Evaluate/Improve Inventories (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
9	Monitoring: recurring: Data Gathering and Assembly (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
10	Monitoring: recurring: Run Model (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
11	Monitoring: recurring: Evaluate and Interpret Monitoring Results (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
12	Other Recurring Activities: Develop Regional Implementation Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Other Recurring Activities: Recordkeeping (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
14	Other Recurring Activities: Identify Alternative Control Strategies (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
15	Other Recurring Activities: Participate in PM Regional Groups (Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
	Annual Activity Total					\$3,536 (104 hours)

* EPA assumed that only states with non-attainment areas would perform these activities.

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1997) *Regulatory Impact Analysis for the Particulate Matter and Ozone National Ambient Air Quality Standards and Proposed Regional Haze Rule*.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking EPA's rule making process: Interpret Rule/Identify New Requirements (Attainment)	1.3 hours	\$34	none estimated	one-time activity	\$44
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Estimate based on time required to read and understand the Federal Register articles times staff (1 legal, 1 manager, 1 rules writer).	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 26	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$884
2	Designing implementation plan: Revise SIPs (Attainment)	0 hours*	\$34	none estimated	one-time activity	\$0
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Although Oklahoma is designated an attainment state, the state must still change its rules to adopt the new NAAQS standards.	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 80 hours	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2720
3	Compliance assistance: recurring: Development of Source Guidance Documents (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
3	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0

* EPA assumed that only states with non-attainment areas would perform these activities.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Compliance assistance: recurring: Public Hearings (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
4	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
5	Compliance assistance: recurring: Review/Revise Compliance Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
5	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
6	Compliance assistance: recurring: Evaluate Strategies for Conformity (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
6	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0

* EPA assumed that only states with non-attainment areas would perform these activities.

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Compliance assistance: recurring: Prepare and Review Progress Reports (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
7	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
8	Monitoring: recurring: Evaluate/Improve Inventories (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): ML: This activity is funded by a grant.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
9	Monitoring: recurring: Data Gathering and Assembly (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): 19 PM2.5 monitoring sites statewide. ML: Non-labor costs include: equipment operation and maintenance costs, filter analysis costs, other supplies, and travel costs. These costs include some non-labor costs associated with evaluating and interpreting results (row 11), but they are now reported all together in this row. ML: This activity is funded by a grant.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate: 8 hours per activity	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$222,000 \$360,000 (Added 138,000 that was previously reported in row 11)	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 470 activities	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$350,000 \$487,840

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Monitoring: recurring: Run Model (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
10	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): No models run for monitor siting purposes.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
11	Monitoring: recurring: Evaluate and Interpret Monitoring Results (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
11	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Daily data reviews, validation and QA activities. (ML: There are non-labor costs incurred associated with this activity, but they are reported together with the other recurring monitoring non-labor costs in row 9.) ML: This activity is funded by a grant.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate: 7.6 hours per activity	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate: \$138,000 \$0 (ML: Cost moved, but not deleted. Recurring non-labor monitoring costs are now all reported above, in row 9.	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 320 activities	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate: \$221,000 \$82,688
12	Other Recurring Activities: Develop Regional Implementation Plans (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
12	Did your state perform this activity?	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input checked="" type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
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* EPA assumed that only states with non-attainment areas would perform these activities.

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Other Recurring Activities: Recordkeeping (Attainment)	10.5 hours	\$34	none estimated	1 annual activity	\$357
13	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on annual man hours for ongoing computer inventory support, outreach calls, meetings, and data entry.	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 150	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$5,100
14	Other Recurring Activities: Identify Alternative Control Strategies (Attainment)	0 hours*	\$34	none estimated	1 annual activity	\$0
14	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0
15	Other Recurring Activities: Participate in PM Regional Groups (Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
15	Did your state perform this activity?	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
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* EPA assumed that only states with non-attainment areas would perform these activities.

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Particulate Matter NAAQS Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Particulate Matter NAAQS Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.
Please describe: Estimate based on employee experience.

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.
Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.
Please describe: Develop state rule language (70 hours); Legal process (public hearings, etc.) for rule passage (10 hours).
Estimate based on employee interviews.

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.
Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.
Please describe: Emissions Inventory compliance assistance for annual inventory assistance.

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe: Estimates drawn from PM2.5 grant reports.

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe: Estimates drawn from PM2.5 grant reports.

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.
Please describe: Revise agency's databases to accommodate PM2.5 information.
Estimate based on employee interviews.

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking Rulemaking Processes 1.1 Review FR 1.2 EPA mtgs/conferences 1.3 Attend non EPA mtgs/conferences 1.2. EPA mtgs/conferences 1.3 Attend non EPA mtgs conferences ML: the 1.1 cost is already accounted for in row 1 of Section 2.	26 hours 24 hours 24 hours 24 hours	\$34	none estimated	one-time activities	\$2516 \$1,632
2	Designing Implementation Plan: 3.3. 3.4 MPL: This cost is already accounted for in row 2 of Section 2.	10 hours 70 hours	\$34	none estimated	one-time activities	\$2720

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Oklahoma

<p>3</p>	<p>Monitoring: Start-Up Activities 9.1 Develop monitoring system 9.2 Purchased new equipment 9.3 Other start-up activities Correction based on personal communication with Pat Sullivan on 9/20/2006 \$13,500 in monitoring equipment times 19 sites; \$17,500 for calibration equipment; \$7,500 For data download devices. ML: This activity is funded by a grant.</p>	<p>8 hours per activity</p>	<p>\$34</p>	<p>\$138,000 \$281,500</p>	<p>470 annual activities</p>	<p>\$350,000 \$281,500</p>
<p>4</p>	<p>Monitoring: Recurring: 10.1 Collect data 10.2 Review data 10.3 Record & store data 10.4 Report data 10.5 Incur additional recurring costs 10.6 Other recurring activities ML: These cost are already accounted for in row 13 of Section 2.</p>	<p>7.6 hours per activity</p>	<p>\$34</p>	<p>\$143,000</p>	<p>320 annual activities</p>	<p>\$221,000</p>

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for "Omitted Cost" Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Other Recurring Activities: Recordkeeping (Attainment) 13.1 Computer inventory system support, public outreach via phone calls and meetings, and data entry. ML: These cost are accounted for in rows 9 and 11 of Section 2.	150	\$34	none estimated	1 annual activity	\$5100
6						
7						
8						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Particulate Matter NAAQS Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Particulate Matter NAAQS Rule – e.g., 20 percent of the records entered into the database are related to the Particulate Matter NAAQS Rule. We would also like to know if the Particulate Matter NAAQS Rule replaced an existing state rule/requirement. For example, if you reported a burden for participating in regional management groups, but your state already required and participated in regional management groups before the Particulate Matter NAAQS Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Additional Comments: The Air Quality Division of the Oklahoma Department of Environmental Quality has actively participated in regional planning activities associated with CENRAP, CENSARA, and Regional Haze. We estimate that our agency expends a total of 3-4 FTEs annually to these activities. These costs associated with Regional Haze are not included in this analysis.

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Particulate Matter NAAQS Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Particulate Matter NAAQS Rule – e.g., 20 percent of the records entered into the database are related to the Particulate Matter NAAQS Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Particulate Matter NAAQS Rule might require that you hold public hearings in instances where state regulations previously required only a means for accepting public comment.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

EPA's Regulatory Impact Analysis

Request for Information on the Costs of Administering the 1997 Particulate Matter NAAQS Rule in South Carolina:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe 2006\$)	Non-labor cost	Number of activities	Total Cost
	Tracking EPA's rule making process					
1.1	Reviewed the Federal Register notices and/or other documents	3 hrs	\$60.00	\$0.00	52	\$9360
1.2	Attended EPA meetings/conferences regarding this rule	45 hrs	\$60.00	\$0.00	2	\$5400
1.3	Attended other non-EPA meetings/conferences regarding this rule	38 hrs	\$60.00	\$0.00	2	\$4560
1.4	Provided EPA directly with comments on the proposed rule	15 hrs	\$60.00	\$0.00	1	\$900
1.5	Provided EPA with comments on the proposed rule through a third party	14 hrs	\$60.00	\$0.00	2	\$1680
1.6	Conducted other start-up activities associated with tracking EPA's rule making process	112.5 hrs	\$60.00	\$0.00	1	\$6750
1.7	Educate the public and stakeholders about the rule	112.5 hrs	\$60.00	\$0.00	1	\$6750
1.8	Data analysis and administrative activities (i.e.: PM2.5 estimate maps)	300 hrs	\$60.00	\$0.00	1	\$18000
	Obtaining regulatory authority					
2.1	Amended state laws to incorporate the requirements of the new regulation	225 hrs	\$60.00	\$0.00	1	\$13500
	Designation and 120 day consultation process					
3.1	Compile our recommendations	225 hrs	\$60.00	\$0.00	1	\$13500
3.2	Consult with EPA on recommendations	150 hrs	\$60.00	\$0.00	1	\$9000
3.3	Monitor strategy for special studies	225 hrs	\$60.00	\$0.00	1	\$13500
3.4	Community and stakeholder outreach related to unclassifiable areas	45 hrs	\$60.00	\$0.00	5	\$13500

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe 2006\$)	Non-labor cost	Number of activities	Total Cost
	General start-up activities					
4.1	Conducted internal training	22.5 hrs	\$60.00	\$0.00	1	\$1350
4.2	Development of base inventory emission factors	525 hrs	\$60.00	\$0.00	1	\$31500
	Permit administration, recurring activities					
5.1	Provide opportunities for the public and/or stakeholders to comment on on-going permitting processes	N/A				
	Monitoring, start-up activities					
6.1	Developed a system for monitoring population exposure	<u>900</u>	<u>\$60.00</u>			<u>\$54,000</u>
6.2	Purchased new equipment for monitoring purposes	<u>20</u>	<u>\$60.00</u>	<u>\$16,000</u>		<u>\$17,200</u>
6.3	Conducted other recurring activities associated with monitoring	<u>40</u>	<u>\$60.00</u>			<u>\$2,400</u>
	Monitoring, recurring activities					
7.1	Collect data from monitoring on a continuous basis	<u>100</u>	<u>\$60.00</u>			<u>\$6,000</u>
7.2	Review collected data on a regular basis	<u>75</u>	<u>\$60.00</u>			<u>\$4,500</u>
7.3	Record and store monitoring data	<u>20</u>	<u>\$60.00</u>			<u>\$1,200</u>
7.4	Report monitoring data	<u>25</u>	<u>\$60.00</u>			<u>\$1,500</u>
7.5	Incur additional recurring costs associated with monitoring data	<u>20</u>	<u>\$60.00</u>			<u>\$1,200</u>
7.6	Conducted other recurring activities associated with monitoring activities	<u>40</u>	<u>\$60.00</u>			<u>\$2,400</u>

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Virginia for administering the Particulate Matter NAAQS Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking EPA's rule making process: Interpret Rule/Identify New Requirements (Non-Attainment)	3.6 hours	\$34	none estimated	one-time activity	\$122
2	Designing implementation plan: Revise SIPs (Non-Attainment)	24.5 hours	\$34	none estimated	one-time activity	\$833
	<i>One-time Activity Total</i>					<i>\$955 (28 hours)</i>
3	Compliance assistance: recurring: Development of Source Guidance Documents (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
4	Compliance assistance: recurring: Public Hearings (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
5	Compliance assistance: recurring: Review/Revise Compliance Plans (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
6	Compliance assistance: recurring: Evaluate Strategies for Conformity (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
7	Compliance assistance: recurring: Prepare and Review Progress Reports (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
8	Monitoring: recurring: Evaluate/Improve Inventories (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
9	Monitoring: recurring: Data Gathering and Assembly (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
10	Monitoring: recurring: Run Model (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
11	Monitoring: recurring: Evaluate and Interpret Monitoring Results (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

Step 1: Review Cost Estimates from EPA’s Regulatory Impact Analysis:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
12	Other Recurring Activities: Develop Regional Implementation Plans (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
13	Other Recurring Activities: Recordkeeping (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
14	Other Recurring Activities: Identify Alternative Control Strategies (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
15	Other Recurring Activities: Participate in PM Regional Groups (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
	Annual Activity Total					\$25,381 (747 hours)

Source: Abt Associates Inc.’s calculation based on estimates in EPA’s (1997) *Regulatory Impact Analysis for the Particulate Matter and Ozone National Ambient Air Quality Standards and Proposed Regional Haze Rule*.

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Tracking EPA's rule making process: Interpret Rule/Identify New Requirements (Non-Attainment)	3.6 hours	\$34	none estimated	one-time activity	\$122
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): <i>Abt: These costs were originally reported in row 18 of section 4, we moved them here.</i>	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>40 hours</i>	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$1,360</i>
2	Designing implementation plan: Revise SIPs (Non-Attainment)	24.5 hours	\$34	none estimated	one-time activity	\$833
2	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): Not begun yet but response is based on previous planning experience for ozone. <i>Abt: Can you provide an estimate for the number of hours for Section 2, row 2?</i> <i>Response: Our planning process in the DC area for PM2.5 will be similar the ozone process. This is a multi-jurisdictional planning process which always adds to the level of effort and time involved. We also provided annual funding support to a regional council of governments to coordinate the planning efforts in the area (\$65,000 annually). Estimated in-house work effort 1,040 hours (\$35,360).</i>	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>1,040</i>	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate: <i>\$65,000 in annual planning expenses provided to a regional council of governments to coordinate the planning efforts in the area.</i>	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>Annual Activity.</i>	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$100,360</i>

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

3	Compliance assistance: recurring: Development of Source Guidance Documents (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Compliance staff input.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 40	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$30	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,200

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Compliance assistance: recurring: Public Hearings (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5	Compliance assistance: recurring: Review/Revise Compliance Plans (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
6	Compliance assistance: recurring: Evaluate Strategies for Conformity (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Baased on inputs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

		Your estimate: 30	Your estimate: \$30	Your estimate:	Your estimate:	Your estimate: \$900
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Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Compliance assistance: recurring: Prepare and Review Progress Reports (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Based on inputs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 30	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$30	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$900
8	Monitoring: recurring: Evaluate/Improve Inventories (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Inventory staff input. Fine particulate matter inventory had to be developed from scratch.	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1040	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$35,360
9	Monitoring: recurring: Data Gathering and Assembly (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Monitoring staff input. See Step 3 for more details. Abt: In row 9 of Section 2, you refer to costs reported below, which specific checklist items include these costs? 10.1 – 10.6? Response: This item refers to collection of monitoring data. I took a big picture approach to this and assumed ALL monitoring activities and costs would be included. This	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10.1: 5,188 10.2: 1,248 10.3: 728 10.4: 208 10.5: 686 10.6: 2,246	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10.1: \$31.73 10.2: \$37.77 10.3: \$38.45 10.4: \$42.52 10.5: \$44.88 10.6: \$33.83	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10.1: \$90,200 10.2: \$0 10.3: \$0 10.4: \$0 10.5: \$12,000 10.6: \$14,000	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10.1: \$254,839 10.2: \$47,135 10.3: \$27,989 10.4: \$8,844 10.5: \$42,789 10.6: \$89,989

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

<p>would cover section 9 and 10 of Step 3 (monitoring start-up and recurring activities).</p> <p>ML (Abt): SINCE THIS CATEGORY REFERS TO RECURRING COSTS, THIS COULD INCLUDE SECTION 10 BUT NOT SECTION 9.</p>					
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Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Monitoring: recurring: Run Model (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
10	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): Not performed yet. Estimate based on modeling staff and previous experience with ozone	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 500	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$17,000
11	Monitoring: recurring: Evaluate and Interpret Monitoring Results (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
11	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): ML (Abt): ARE THESE HOURS ACCOUNTED FOR IN THE OTHER MONITORING COSTS YOU REPORTED IN STEP 4 OR IS	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 80	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$2,720

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

	<p>IT SOMETHING ADDITIONAL NOT REPORTED ELSEWHERE?</p> <p>Abt: You did not report anything in Section 2, row 11, "Evaluate and Interpret Monitoring Results." Is that because you did not perform this activity? If you reported the costs of this in Section 4, can you tell me which checklist number(s) include these costs?</p> <p>Response: No. I missed this one. We have performed and participated in several projects to analyze monitoring results. Estimated in-house work effort 80 hours (\$2,720).</p>					
12	<p>Other Recurring Activities: Develop Regional Implementation Plans (Non-Attainment)</p>	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
12	<p>Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): Abt: You did not report anything in Section 2, row 12, "Develop Regional Implementation Plans." Is that because you did not perform this activity? If you reported the costs of this activity in Section 4, can you tell me which checklist number(s) include these costs?</p> <p>Response: The time and cost involved in this item is included in Item 2-2. Also I assume "regional" planning to mean an effort like the one for regional haze where we are participating with ten other southern states to develop haze SIP. There is no corresponding regional effort for PM2.5 planning.</p>	<p><input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:</p>	<p><input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:</p>	<p><input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:</p>	<p><input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:</p>	<p><input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:</p>

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	Other Recurring Activities: Recordkeeping (Non-Attainment)	30.5 hours	\$34	none estimated	1 annual activity	\$1,037
13	<p>Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Abt: You did not report anything in Section 2, row 13, “Recordkeeping.” Is that because you did not perform this activity? If you reported the costs of this activity in Section 4, can you tell me which checklist number(s) include these costs?</p> <p>Response: While there are certainly general record keeping tasks involved in all of this, it is not possible to identify and cost out separately. I was assuming that record keeping for such tasks as monitoring and inventory develop is included in these line items.</p>	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don’t know Your estimate: Accounted for under other activities.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don’t know Your estimate: Accounted for under other activities.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don’t know Your estimate: Accounted for under other activities.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don’t know Your estimate: Accounted for under other activities.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don’t know Your estimate: Accounted for under other activities.
14	Other Recurring Activities: Identify Alternative Control Strategies (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
14	<p>Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):</p>	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

15	Other Recurring Activities: Participate in PM Regional Groups (Non-Attainment)	100.5 hours	\$34	none estimated	1 annual activity	\$3,417
15	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Technical and planning staff input.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Particulate Matter NAAQS Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Particulate Matter NAAQS Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.
Please describe: Track and commented on EPA standard and implementation approach.

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.
Please describe: Adopted air quality standard and defined area status.

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.
Please describe: Developed area designation recommendations and negotiated final designations.

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.
Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.
Please describe: _____

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe: _____

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe: _____

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe: _____

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe: _____

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe: _____

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe: _____

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	5.1 Conducted outreach programs	30	\$30			\$900
2	5.2 Conducted public outreach programs to create awareness	30	\$30			\$900
3	5.3 Developed training programs	40	\$30			\$1,200
4	5.4 Other start-up activities	50	\$30			\$1,500

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	6.1 Respond regularly to letters, phone calls etc.	30	\$30			\$900
6	6.2 Conducted on-going training	40	\$30			\$1,200
7	6.3 Other recurring activities	40	\$30			\$1,200
8	7.1 Developed specific permit requirements	10	\$36			\$360

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
9	9.1 Developed a system for monitoring affected entities	478	\$42.44			\$20,288
10	9.2 Purchased new equipment for monitoring purposes	166	\$52.83		Test equipment telemetry \$17,500	\$26,200
11	9.3 Conducted other start-up activities	478	\$42.44		Site investigation & prep \$48,000	\$68,288
12	10.1 Collect data from monitoring on a continuous basis Moved to section 2, row 9.	5,188	\$31.73	—	Contract Services \$90,200	\$254,839

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for "Omitted Cost" Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
13	10.2 Review of collected data on a continuous basis Moved to section 2, row 9.	1,248	\$37.77		—	\$47,135
14	10.3 Record and store monitoring data Moved to section 2, row 9.	728	\$38.45		—	\$27,989
15	10.4 Report monitoring data Moved to section 2, row 9.	208	\$42.52		—	\$8,844
16	10.5 Incur additional recurring costs Moved to section 2, row 9.	686	\$44.88	—	Supplies \$12,000	\$42,789

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for "Omitted Cost" Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
17	10.6 Other recurring activities Moved to section 2, row 9.	2,246	\$33.83		Parts, Services, Training \$14,000	\$89,989
18	1.1 Review of documents Moved to section 2, row 1.	40	\$34.00			\$1,360
19	1.2 Attend EPA meetings	40	\$34.00			\$1,360
20	1.3 Attend other meetings	20	\$34.00			\$680

Request for Information on the Costs of Administering the Particulate Matter NAAQS Rule in Virginia

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
21	1.4 Provided comments to EPA	80	\$34.00			\$2,720
22	1.6 Other start-up activities	40	\$34.00			\$1,360
23	2.2 Amended state laws	100	\$34.00			\$3,400
24	3.2 Obtaining EPA SIP approval	40	434.00			\$1,360

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
25	3.4 Other start-up activities (designation of areas process)	80	\$34.00			\$2,720
26						
27						
28						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Particulate Matter NAAQS Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Particulate Matter NAAQS Rule – e.g., 20 percent of the records entered into the database are related to the Particulate Matter NAAQS Rule. We would also like to know if the Particulate Matter NAAQS Rule replaced an existing state rule/requirement. For example, if you reported a burden for participating in regional management groups, but your state already required and participated in regional management groups before the Particulate Matter NAAQS Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Particulate Matter NAAQS Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Particulate Matter NAAQS Rule – e.g., 20 percent of the records entered into the database are related to the Particulate Matter NAAQS Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Particulate Matter NAAQS Rule might require that you hold public hearings in instances where state regulations previously required only a means for accepting public comment.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Appendix D. RCRA Subpart CC Organic Air Emission Standards Rule Documentation

D.1. Introduction

Appendix D provides a detailed explanation of the process involved in adjusting EPA and state cost estimates for the Organic Air Emission Standards Regulation for Tanks, Surface Impoundments, and Containers at Hazardous Waste Treatment, Storage, and Disposal Facilities And Hazardous Waste Generators (the Subpart CC regulation) to allow for comparison between the two. To ensure that the cost estimates were comparable, we took the following steps:

- We disaggregated EPA national-level costs to each of the six case study states. Section D.2 outlines the details of this process.
- We normalized state questionnaire responses to account for variations in the format of the reported estimates. Section D.3 outlines the details of this process.
- We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in Section D.4. Tables D-3 through D-6 present our cost calculations for each of the four case study states (Nevada, Oklahoma, South Carolina, and Virginia). Section D.4 also presents the completed questionnaires that we received from each participating state as reference.

D.2. Disaggregating EPA National Estimates to the Four Case Study States

In Chapter 9, we present EPA's national-level cost estimates for the Subpart CC Rule that were based on the burden estimates prepared for the Subpart CC ICR (EPA 1997b and 2000d). The ICR categorizes all state costs as annual costs and does not consider any one-time or start-up costs. Table D-1 provides a summary of the normalization methods used for the Subpart CC Rule.

We combined some cost components from the original 1997 ICR supporting statement with the 2000 ICR supporting statement to produce more complete estimates for this analysis. For example, the 1997 supporting statement included certain enforcement activities that were omitted from the 2000 supporting statement because they were not specifically related to the information collection burden. However, we included these burden estimates in our analysis because we are interested in all administrative costs associated with the Subpart CC rule. We also included the burden associated with notification reports, which was inadvertently omitted from the 1997 supporting statement but included in the 2000 supporting statement.

The ICR estimated all costs on a per-regulated entity basis. As a result, we apportioned the national estimates to our case study states proportional to the state's share of the regulated entities affected by the rule. For the Subpart CC Rule, all activities are dependent on the number of large quantity generators (LQGs) and treatment, storage, and disposal facilities (TSDFs) in the state. While the ICR presents data from the EPA 2001 *National Biennial RCRA Hazardous Waste Report* (2001 Biennial Report), we were unable to identify the exact sources for all of the data presented. We therefore used data from the 2001 Biennial Report to approximate the dataset presented in the ICR. Our estimate for TSDFs is 40 percent lower than the data contained within the ICR; however, our estimate for LQGs, which account for the vast majority of the entities

Final Report, September 14, 2007

regulated by the Subpart CC Rule, is significantly smaller. Using the 2001 Biennial Report, our estimate for LQGs is only about 2 percent greater than in the ICR.

Table D-1: Approach for Allocating EPA Administrative Costs for the Subpart CC Rule to Case Study States

EPA Administrative Cost Category	Approach for Allocating National –Level Costs to Case Study States
Start-Up Activities	
1. Tracking EPA’s Rulemaking Progress	No costs estimated in this category.
2. Obtaining Additional Delegated Authority	No costs estimated in this category.
3. Designing Implementation Plan	No costs estimated in this category.
4. General Start-Up Activities	No costs estimated in this category.
5. Compliance Assistance	No costs estimated in this category.
6. Permit Administration	No costs estimated in this category.
7. Monitoring	No costs estimated in this category.
8. Enforcement	No costs estimated in this category.
Recurring Activities	
9. Compliance Assistance	No costs estimated in this category.
10. Permit Administration	
Review Waste Exceedance Reports: Technical Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Control Device Exceedance Reports: Technical Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Notification Reports: Technical Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Management Hours	Set the number of activities equal to one for each state. For the time burden, assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Clerical Hours	Set the number of activities equal to one for each state. For the time burden, assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
11. Monitoring	No costs estimated in this category.
12. Enforcement	
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Compliance Inspections: Travel to and from site: Enforcement Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
On-Site Inspection: Enforcement Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Prepare Inspection Report: Enforcement Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Notice of Non Compliance: Enforcement Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Follow-up enforcement: Enforcement Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
Litigation: Legal Hours	Assumed that national estimates were proportional to state’s share of the regulated entities affected by the rule. Estimated the number of LQGs and TSDFs in each state based on the numbers listed in 2001 RCRA Info database.
13. Other	

As a final step in the conversion process, we inflated all costs to 2006 dollars using data from the U.S. Bureau of Labor Statistics’ *Consumer Price Index for All Urban Consumers* (CPI-U). For

the Subpart CC Rule, we inflated 1997 dollars using an adjustment factor of 1.26. In addition, we adjusted labor rates to reflect salary plus fringe benefits using a load factor of 1.4 (see Chapter 5 for a complete description of the methodology).

D.3. Normalizing State Questionnaire Responses

To compare EPA and the case study state estimates for each of the four regulations, we found it necessary to “normalize” each state’s questionnaire responses to account for variations in labor rates and differences in the ways each state completed the questionnaires. We describe each of the “normalization” steps in more detail below.

D.3.1. Labor Rate Adjustments

EPA estimated total national administrative costs using average national wage rates. We converted these national-level costs into state-level costs and used these as a baseline for comparison with actual case study state responses, as described in Chapter 9. Because average labor rates can vary for an individual state from those of other states and that of the nation, we applied an adjustment factor¹ based on a national average wage rate to the labor rates reported by each participating state (see Table D-2). In doing so, this analysis weights, or “normalizes,” the reported state labor rates with respect to the national average and allows for the comparison set forth in our analytic framework.

Table D-2: Mean Hourly Wages, Labor Rate Adjustment Factors by State

Case Study State	Mean Hourly Wage ^a	Adjustment Factor
Nevada	\$16.71	1.09
Oklahoma	\$15.12	1.20
South Carolina	\$15.50	1.17
Virginia	\$19.11	0.95
United States	\$18.21	1.00

a. Based on mean hourly wages for “All Occupations.”

Source: U.S. Bureau of Labor Statistics. 2005. *May 2005 National Occupational Employment and Wage Estimates*.

D.3.2. Normalization of Case Study State Data

In developing our information collection request form, as described in Chapter 5, we had been advised by South Carolina (our beta tester for the original questionnaire) that it may be difficult for the case study states to estimate costs for the line items included in EPA’s analysis. Given this situation, we allowed states the flexibility to report costs at the level of detail available to them. After reviewing the responses that we received, we found that the case study states commonly did not conform to the level of detail contained in EPA’s analysis. As a result, we made adjustments to some of the state responses so that they were comparable with the EPA-based estimates. In general, our adjustments (e.g., assigning aggregate costs to individual line items) did not substantively change the information provided by the participating states, as described below.

Nevada

- For line items in categories one, four, and six of the costs omitted by EPA, Nevada reported the number of activities as the number of employees involved with an activity.

¹ Wage rates used were based on May 2005 U.S. Bureau of Labor Statistics average hourly wage for all industry groups. Normalization Factor = (Average U.S. Wage)/(Average Wage for the Case Study State).

Final Report, September 14, 2007

We adjusted these entries so that the number of employees per activity is reflected in the time burden estimate instead of the number of activities.

- Under line item 6 of the EPA-omitted costs, Nevada reported that training occurs once every two years. We adjusted the number of activities by dividing by two.

Oklahoma

- For five EPA-omitted costs, Oklahoma originally reported costs associated with activities that were not 100 percent attributable to the Subpart CC Rule. In a follow-up response they reported the percentage of the costs of these activities that could be directly attributed to the RCRA Subpart CC Rule. The time burden for the questionnaire omitted categories 4.1, 4.2, and 4.3 were decreased to 20 percent of the total, 6.1 to 1 percent of the total, and 11.1 to 10 percent of the total.

South Carolina

- For the “General Start-Up Activities” category under EPA-omitted costs, South Carolina presented two sets of costs, one pertaining to permitting and regulation development and the other to monitoring, compliance, and enforcement. For these items, we analyze each as a separate line item within the same category.

Virginia

- Virginia originally did not respond to questions related to non-compliance events. In a follow-up interview, they indicated that Virginia has not had any non-compliance events, to date. Therefore, there are no costs associated with the enforcement activities.

D.4. EPA Estimates and State Questionnaire Responses

We present our estimates of administrative costs—both the EPA-based and the normalized case study state estimates—in this section. Tables D-3 through D-6 present our cost calculations for each of the four case study states (Nevada, Oklahoma, South Carolina, and Virginia). After these tables, we include the completed questionnaires that we received from each participating state as reference.

Final Report, September 14, 2007

Table D-3: RCRA Subpart CC - EPA Burden Estimates - Nevada							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
4. General Start-Up Activities	No costs estimated in this category.						
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						0	\$0
<i>Total Annualized Start-Up Costs</i>							\$0
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Review Waste Exceedance Reports: Technical Hours	4	\$31	\$0	0.3	1	\$37	
Control Device Exceedance Reports: Technical Hours	4	\$31	\$0	0.1	0	\$12	
Notification Reports: Technical Hours	1	\$31	\$0	8	8	\$248	
Management Hours	0.5	\$42	\$0	1	1	\$21	
Clerical Hours	1	\$17	\$0	1	1	\$17	
11. Monitoring	No costs estimated in this category.						
12. Enforcement							
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	9.2	\$31	\$0	2	18	\$570	
Compliance Inspections: Travel to and from site: Enforcement Hours	8	\$30	\$315	2	16	\$1,110	
On-Site Inspection: Enforcement Hours	8	\$30	\$0	2	16	\$480	
Prepare Inspection Report: Enforcement Hours	16	\$30	\$0	2	32	\$960	
Notice of Non Compliance: Enforcement Hours	160	\$30	\$0	0.2	32	\$960	
Follow-up enforcement: Enforcement Hours	40	\$30	\$315	0.2	8	\$303	
Litigation: Legal Hours	2,080	\$55	\$0	0.04	83	\$4,576	
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						217	\$9,295
<i>Total Annualized Costs</i>							\$9,295

Final Report, September 14, 2007

Table D-3: RCRA Subpart CC - Nevada - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
4. General Start-Up Activities	No costs estimated in this category.						
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						0	\$0
<i>Total Annualized Start-Up Costs</i>							\$0
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Review Waste Exceedance Reports: Technical Hours	4	\$41	\$0	0.3	1	\$49	
Control Device Exceedance Reports: Technical Hours	4	\$41	\$0	0.1	0.4	\$16	
Notification Reports: Technical Hours	1	\$41	\$0	8	8	\$328	
Management Hours	0.5	\$41	\$0	1	1	\$21	
Clerical Hours	1	\$16	\$0	1	1	\$16	
11. Monitoring	No costs estimated in this category.						
12. Enforcement							
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8	\$41	\$0	2	16	\$656	
Compliance Inspections: Travel to and from site: Enforcement Hours	8	\$41	\$315	2	16	\$1,286	
On-Site Inspection: Enforcement Hours	8	\$41	\$0	2	16	\$656	
Prepare Inspection Report: Enforcement Hours	16	\$41	\$0	2	32	\$1,312	
Notice of Non Compliance: Enforcement Hours	160	\$41	\$0	0.2	32	\$1,312	
Follow-up enforcement: Enforcement Hours	40	\$41	\$315	0.2	8	\$391	
Litigation: Legal Hours	0	\$0	\$0	0	0	\$0	
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						131	\$6,043
<i>Total Annualized Costs</i>							\$6,043

Final Report, September 14, 2007

Table D-3: RCRA Subpart CC - Nevada - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority. Attended EPA meetings/conferences regarding this rule. Attended other non-EPA meetings/conferences regarding this rule.	24	\$41.4	\$0	1	24	\$994
2. Obtaining Additional Delegated Authority						
Amended state laws to incorporate the requirements of the new regulation.	6	\$41.4	\$0	1	6	\$248
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
No costs estimated in this category.						
Attended EPA training or other non-EPA sponsored training for implementing the new regulations.	72	\$41.41	\$0	1	72	\$2,982
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
No costs estimated in this category.						
7. Monitoring						
No costs estimated in this category.						
8. Enforcement						
No costs estimated in this category.						
<i>Total Start-Up Costs</i>						
					102	\$4,224
<i>Total Annualized Start-Up Costs</i>						
						\$963
Recurring Activities						
9. Compliance Assistance						
Conduct on-going training (in addition to the initial start-up period)	14	\$41.4	\$700	1	7	\$640
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
No costs estimated in this category.						
12. Enforcement						
No costs estimated in this category.						
13. Other						
No costs estimated in this category.						
<i>Total Recurring Costs</i>						
					7	\$10,051
Total Annualized Costs						
						\$11,013

Final Report, September 14, 2007

Table D-4: RCRA Subpart CC - EPA Burden Estimates - Oklahoma							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
4. General Start-Up Activities	No costs estimated in this category.						
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						0	\$0
<i>Total Annualized Start-Up Costs</i>							\$0
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Review Waste Exceedance Reports: Technical Hours	4	\$31	\$0	1	4	\$124	
Control Device Exceedance Reports: Technical Hours	4	\$31	\$0	0.3	1	\$37	
Notification Reports: Technical Hours	1	\$31	\$0	16	16	\$496	
Management Hours	1	\$42	\$0	1	1	\$42	
Clerical Hours	2	\$17	\$0	1	2	\$34	
11. Monitoring	No costs estimated in this category.						
12. Enforcement							
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	9.2	\$31	\$0	4	37	\$1,141	
Compliance Inspections: Travel to and from site: Enforcement Hours	8	\$30	\$315	4	32	\$2,220	
On-Site Inspection: Enforcement Hours	8	\$30	\$0	4	32	\$960	
Prepare Inspection Report: Enforcement Hours	16	\$30	\$0	4	64	\$1,920	
Notice of Non Compliance: Enforcement Hours	160	\$30	\$0	0	64	\$1,920	
Follow-up enforcement: Enforcement Hours	40	\$30	\$315	0.4	16	\$606	
Litigation: Legal Hours	2,080	\$55	\$0	0.1	208	\$11,440	
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						477	\$20,940
<i>Total Annualized Costs</i>							\$20,940

Final Report, September 14, 2007

Table D-4: RCRA Subpart CC - Oklahoma - Reported By State - Line Item Activities Estimated by EPA							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
4. General Start-Up Activities	No costs estimated in this category.						
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						0	\$0
<i>Total Annualized Start-Up Costs</i>							\$0
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Review Waste Exceedance Reports: Technical Hours	4	\$41	\$0	0.5	2	\$82	
Control Device Exceedance Reports: Technical Hours	4	\$41	\$0	0.2	1	\$33	
Notification Reports: Technical Hours	1	\$41	\$0	15	15	\$615	
Management Hours	2	\$51	\$0	1	2	\$102	
Clerical Hours	2	\$20	\$0	1	2	\$40	
11. Monitoring	No costs estimated in this category.						
12. Enforcement							
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8	\$36	\$0	3	24	\$864	
Compliance Inspections: Travel to and from site: Enforcement Hours	2	\$36	\$224	3	6	\$888	
On-Site Inspection: Enforcement Hours	8	\$36	\$300	3	24	\$1,164	
Prepare Inspection Report: Enforcement Hours	16	\$36	\$0	3	48	\$1,728	
Notice of Non Compliance: Enforcement Hours	10	\$36	\$0	3	30	\$1,080	
Follow-up enforcement: Enforcement Hours	40	\$36	\$100	3	120	\$4,620	
Litigation: Legal Hours	1,000	\$66	\$0	1	1,000	\$66,000	
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						1,274	\$77,216
Total Annualized Costs							\$77,216

Final Report, September 14, 2007

Table D-4: RCRA Subpart CC - Oklahoma - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Federal Register Notices are reviewed daily to see if any new hazardous waste rules have been published.	0.2	\$42	\$0	250	50	\$2,100
2. Obtaining Additional Delegated Authority						
No costs estimated in this category.						
3. Designing Implementation Plan						
No costs estimated in this category.						
4. General Start-Up Activities						
No costs estimated in this category.						
5. Compliance Assistance						
No costs estimated in this category.						
6. Permit Administration						
Item 7.1-Dev. permit req.Item Item	24	\$41	\$0	1	24	\$984
7.3-Staff training	96	\$41	\$12,000	1	96	\$15,936
7. Monitoring						
9.3-Other monitoring activities	0	\$0	\$0	0	0	\$0
8. Enforcement						
Item 11.1 Estimate of time spent reviewing new federal regulations, reviewing current inspection checklists, updating checklists as needed, revising procedures as needed, etc.	0.1	\$42	\$0	250	25	\$1,050
Total Start-Up Costs					170	\$20,070
Total Annualized Start-Up Costs						\$4,575
Recurring Activities						
9. Compliance Assistance						
Item 6.1 Each staff member estimates approx. 1/2 hrs per day is spent responding to inquiries that are related to RCRA but not directly related to enforcement (e.g. questions from the public or media)	0.005	\$36	\$0	250	1	\$45
10. Permit Administration						
8.1-Peer review documentsItem	see below	see below	see below	see below	0	\$0
8.2-Verify data sources	4	\$41	\$0	3	12	\$492
Item 8.6-Issue &/or review permitsItem	16	\$41	\$0	1	16	\$656
8.7-Other activities, e.g. trainingItem	16	\$41	\$2,000	0.5	8	\$2,328
11. Monitoring						
No costs estimated in this category.						

Final Report, September 14, 2007

12. Enforcement						
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	included in section 2	0	\$0			
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	included in section 2	0	\$0			
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	included in section 2	0	\$0			
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	included in section 2	0	\$0			
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	included in section 2	0	\$0			
13. Other						
Items 2.1, 2.2, 3.1, 3.2. These items involve annual revisions of DEQ rules to incorporate by reference the federal hazardous waste regulations. We do this once per year.	see below	see below	see below	see below	0	\$0
"	see below	see below	see below	see below	0	\$0
"	see below	see below	see below	see below	0	\$0
"	50	\$42	\$0	1	50	\$2,100
Items 4.1, 4.2, 4.3 Each staff member attends at least one training class per year, generally for a week (40 hrs/member x 7 members.	see below	see below	see below	see below	0	\$0
"	see below	see below	see below	see below	0	\$0
"	56	\$36	\$3,500	1	56	\$5,516
Total Recurring Costs					37	\$11,137
Total Annualized Costs						\$15,712

Final Report, September 14, 2007

Table D-5: RCRA Subpart CC - EPA Burden Estimates - South Carolina							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
4. General Start-Up Activities	No costs estimated in this category.						
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						0	\$0
<i>Total Annualized Start-Up Costs</i>							\$0
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Review Waste Exceedance Reports: Technical Hours	4	\$31	\$0	1	4	\$124	
Control Device Exceedance Reports: Technical Hours	4	\$31	\$0	1	4	\$124	
Notification Reports: Technical Hours	1	\$31	\$0	35	35	\$1,085	
Management Hours	2	\$42	\$0	1	2	\$84	
Clerical Hours	4	\$17	\$0	1	4	\$68	
11. Monitoring	No costs estimated in this category.						
12. Enforcement							
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	9.2	\$31	\$0	10	92	\$2,852	
Compliance Inspections: Travel to and from site: Enforcement Hours	8	\$30	\$315	10	80	\$5,550	
On-Site Inspection: Enforcement Hours	8	\$30	\$0	10	80	\$2,400	
Prepare Inspection Report: Enforcement Hours	16	\$30	\$0	10	160	\$4,800	
Notice of Non Compliance: Enforcement Hours	160	\$30	\$0	1	160	\$4,800	
Follow-up enforcement: Enforcement Hours	40	\$30	\$315	1	40	\$1,515	
Litigation: Legal Hours	2,080	\$55	\$0	0	416	\$22,880	
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						1,077	\$46,282
<i>Total Annualized Costs</i>							\$46,282

Final Report, September 14, 2007

Table D-5: RCRA Subpart CC - South Carolina - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						No costs estimated in this category.
2. Obtaining Additional Delegated Authority						No costs estimated in this category.
3. Designing Implementation Plan						No costs estimated in this category.
4. General Start-Up Activities						No costs estimated in this category.
5. Compliance Assistance						No costs estimated in this category.
6. Permit Administration						No costs estimated in this category.
7. Monitoring						No costs estimated in this category.
8. Enforcement						No costs estimated in this category.
<i>Total Start-Up Costs</i>					0	\$0
<i>Total Annualized Start-Up Costs</i>						\$0
Recurring Activities						
9. Compliance Assistance						No costs estimated in this category.
10. Permit Administration						
Review Waste Exceedance Reports: Technical Hours	4	\$26	\$0	1	4	\$104
Control Device Exceedance Reports: Technical Hours	4	\$26	\$0	1	4	\$104
Notification Reports: Technical Hours	1	\$26	\$0	44	44	\$1,144
Management Hours	8	\$49	\$0	1	8	\$392
Clerical Hours	4	\$20	\$0	1	4	\$80
11. Monitoring						No costs estimated in this category.
12. Enforcement						
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	0.5	\$35	\$0	19	10	\$333
Compliance Inspections: Travel to and from site: Enforcement Hours	6	\$35	\$60	19	114	\$5,130
On-Site Inspection: Enforcement Hours	2	\$35	\$0	19	38	\$1,330
Prepare Inspection Report: Enforcement Hours	16	\$35	\$0	19	304	\$10,640
Notice of Non Compliance: Enforcement Hours	20	\$35	\$0	4	80	\$2,800
Follow-up enforcement: Enforcement Hours	5	\$35	\$60	4	20	\$940
Litigation: Legal Hours	60	\$65	\$0	2	120	\$7,800
13. Other						No costs estimated in this category.
<i>Total Recurring Costs</i>					750	\$30,797
<i>Total Annualized Costs</i>						\$30,797

Final Report, September 14, 2007

Table D-5: RCRA Subpart CC - South Carolina - Reported By State - Line Item Activities Estimated by States Only						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						
Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.	40	\$35.25	\$0	1	40	\$1,410
2. Obtaining Additional Delegated Authority						
Amended state laws to incorporate the requirements of the new regulation.	1,500	\$35.245	\$0	1	1,500	\$52,868
3. Designing Implementation Plan						
Met with stakeholders and/or responded to stakeholder concerns regarding this rule.	64	\$35.245	\$0	44	2,816	\$99,250
4. General Start-Up Activities						
Developed internal guidance and procedures for implementing the new regulation.	200	\$35.245	\$0	1	200	\$7,049
Developed internal guidance and procedures for implementing the new regulation.	80	\$35.25	\$0	1	80	\$2,820
Attended EPA training or other non-EPA sponsored training for implementing the new regulations.	200	\$35.245	\$0	1	200	\$7,049
Attended EPA training or other non-EPA sponsored training for implementing the new regulations.	96	\$35.25	\$0	1	96	\$3,384
Conducted internal training.	200	\$35.245	\$0	1	200	\$7,049
Conducted internal training.	120	\$35.245	\$0	1	120	\$4,229
5. Compliance Assistance						
Conducted outreach programs for affected entities.	16	\$35	\$0	4	64	\$2,256
6. Permit Administration						
Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.	4	\$35.245	\$0	40	160	\$5,639
Conduct on-going training (in addition to the initial start-up period)	15	\$35.245	\$0	9	135	\$4,758
7. Monitoring						
Developed specific permit requirements.	64	\$35.245	\$0	13	832	\$29,324

Final Report, September 14, 2007

8. Enforcement						
Conduct regular reviews of submitted documents and supporting materials.	64	\$35,245	\$0	13	832	\$29,324
Verify data sources on a regular basis.	64	\$35,245	\$0	13	832	\$29,324
Consult regularly with facilities about the permitting process.	64	\$35,245	\$0	13	832	\$29,324
Issue notifications to affected entities regarding permits.	64	\$35,245	\$0	13	832	\$29,324
Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.	64	\$35,245	\$0	13	832	\$29,324
Issue and/or review permits to affected entities.	64	\$35,245	\$0	13	832	\$29,324
<i>Total Start-Up Costs</i>					6,443	\$403,028
<i>Total Annualized Start-Up Costs</i>						\$91,864
Recurring Activities						
9. Compliance Assistance						
Purchased new equipment for monitoring purposes.	0	\$0	\$0	0	0	\$0
10. Permit Administration						
No costs estimated in this category.						
11. Monitoring						
Established new procedures for enforcing the new regulation.	24	\$35.25	\$0	1	24	\$846
12. Enforcement						
Conduct and review regular inspections for regulatory enforcement purposes.	2	\$35.2	\$0	9	18	\$634
Issue warnings and/or citations for violations.	3	\$35.2	\$0	3	9	\$317
Take legal actions to enforce the regulation.	100	\$64,616	\$0	2	200	\$12,923
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	20	\$35.25	\$0	2	40	\$1,410
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	10	\$35.25	\$0	2	20	\$705
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	10	\$35.25	\$0	2	20	\$705
Items 12.1 - 12.5. Already included within the Enforcement activity summaries.	5	\$35.25	\$0	5	25	\$881
13. Other						
No costs estimated in this category.						
<i>Total Recurring Costs</i>					356	\$18,421
<i>Total Annualized Costs</i>						\$110,286

Final Report, September 14, 2007

Table D-6: RCRA Subpart CC - EPA Burden Estimates - Virginia							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
4. General Start-Up Activities	No costs estimated in this category.						
5. Compliance Assistance	No costs estimated in this category.						
6. Permit Administration	No costs estimated in this category.						
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						0	\$0
<i>Total Annualized Start-Up Costs</i>							\$0
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
Review Waste Exceedance Reports: Technical Hours	4	\$31	\$0	1	4	\$124	
Control Device Exceedance Reports: Technical Hours	4	\$31	\$0	0.5	2	\$62	
Notification Reports: Technical Hours	1	\$31	\$0	28	28	\$868	
Management Hours	2	\$42	\$0	1	2	\$84	
Clerical Hours	3	\$17	\$0	1	3	\$51	
11. Monitoring	No costs estimated in this category.						
12. Enforcement							
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	9.2	\$31	\$0	8	74	\$2,282	
Compliance Inspections: Travel to and from site: Enforcement Hours	8	\$30	\$315	8	64	\$4,440	
On-Site Inspection: Enforcement Hours	8	\$30	\$0	8	64	\$1,920	
Prepare Inspection Report: Enforcement Hours	16	\$30	\$0	8	128	\$3,840	
Notice of Non Compliance: Enforcement Hours	160	\$30	\$0	1	160	\$4,800	
Follow-up enforcement: Enforcement Hours	40	\$30	\$315	1	40	\$1,515	
Litigation: Legal Hours	2,080	\$55	\$0	0	208	\$11,440	
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						777	\$31,426
Total Annualized Costs							\$31,426

Final Report, September 14, 2007

Table D-6: RCRA Subpart CC - Virginia - Reported By State - Line Item Activities Estimated by EPA						
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)
Start-Up Activities						
1. Tracking EPA's Rulemaking Progress						No costs estimated in this category.
2. Obtaining Additional Delegated Authority						No costs estimated in this category.
3. Designing Implementation Plan						No costs estimated in this category.
4. General Start-Up Activities						No costs estimated in this category.
5. Compliance Assistance						No costs estimated in this category.
6. Permit Administration						No costs estimated in this category.
7. Monitoring						No costs estimated in this category.
8. Enforcement						No costs estimated in this category.
<i>Total Start-Up Costs</i>					0	\$0
<i>Total Annualized Start-Up Costs</i>						\$0
Recurring Activities						
9. Compliance Assistance						No costs estimated in this category.
10. Permit Administration						
Review Waste Exceedance Reports: Technical Hours	4	\$30	\$0	2	8	\$240
Control Device Exceedance Reports: Technical Hours	4	\$30	\$0	2	8	\$240
Notification Reports: Technical Hours	1	\$30	\$0	2	2	\$60
Management Hours	2	\$40	\$0	1	2	\$80
Clerical Hours	3	\$16	\$0	1	3	\$48
11. Monitoring						No costs estimated in this category.
12. Enforcement						
Compliance Inspections: Select Site and Review Permit: Enforcement Hours	4	\$29	\$0	2	8	\$232
Compliance Inspections: Travel to and from site: Enforcement Hours	6	\$29	\$0	2	12	\$348
On-Site Inspection: Enforcement Hours	4	\$29	\$0	2	8	\$232
Prepare Inspection Report: Enforcement Hours	4	\$29	\$0	2	8	\$232
Notice of Non Compliance: Enforcement Hours	0	\$0	\$0	0	0	\$0
Follow-up enforcement: Enforcement Hours	0	\$0	\$0	0	0	\$0
Litigation: Legal Hours	0	\$0	\$0	0	0	\$0
13. Other						No costs estimated in this category.
<i>Total Recurring Costs</i>					59	\$1,712
Total Annualized Costs						\$1,712

Final Report, September 14, 2007

Table D-6: RCRA Subpart CC - Virginia - Reported By State - Line Item Activities Estimated by States Only							
Description	Time Burden (hours)	Labor Costs (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Hour Burden	Total Costs (thousands, 2006\$)	
Start-Up Activities							
1. Tracking EPA's Rulemaking Progress	No costs estimated in this category.						
2. Obtaining Additional Delegated Authority	No costs estimated in this category.						
3. Designing Implementation Plan	No costs estimated in this category.						
4. General Start-Up Activities							
(1) Developed internal guidance and procedures for implementing the new regulation	40	\$30	\$0	1	40	\$1,200	
5. Compliance Assistance							
(1) Conducted other start-up activities associated with compliance assistance: Compliance determination on a conservation vent.	40	\$30	\$0	1	40	\$1,200	
6. Permit Administration							
(1) Developed specific permit requirements, and (2) Conducted other start-up activities associated with permit administration: Reviewed DD and cross-referenced regulations for applicability. Incorporated into the title V permit	40	\$30	\$0	1	40	\$1,200	
7. Monitoring	No costs estimated in this category.						
8. Enforcement	No costs estimated in this category.						
<i>Total Start-Up Costs</i>						120	\$3,600
<i>Total Annualized Start-Up Costs</i>							\$821
Recurring Activities							
9. Compliance Assistance	No costs estimated in this category.						
10. Permit Administration							
(1) Issue and/or review permits to affected entities.	4	\$30	\$0	1	4	\$120	
11. Monitoring	No costs estimated in this category.						
12. Enforcement	No costs estimated in this category.						
13. Other	No costs estimated in this category.						
<i>Total Recurring Costs</i>						4	\$120
<i>Total Annualized Costs</i>							\$941

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Nevada

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Nevada for administering the Organic Air Emission Standards Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4 hours	\$28	none estimated	0.3 activities annually	\$34
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4 hours	\$28	none estimated	0.1 activities annually	\$11
3	Permit Administration: Notification Reports: Technical Hours	1 hours	\$28	none estimated	8 activities annually	\$224
4	Permit Administration: Management Hours	0.5 hours	\$38	none estimated	1 activity annually	\$19
5	Permit Administration: Clerical Hours	1 hours	\$15	none estimated	1 activity annually	\$15
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8 hours	\$27	none estimated	2 activities annually	\$432
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	8 hours	\$27	\$315 (transportation and per diem)	2 activities annually	\$1,062
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	8 hours	\$27	none estimated	2 activities annually	\$432
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	16 hours	\$27	none estimated	2 activities annually	\$864
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	160 hours	\$27	none estimated	0.2 activities annually	\$864
11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	40 hours	\$27	\$315 (transportation and per diem)	0.2 activities annually	\$279
12	Enforcement Activities: Litigation: Legal Hours	2,080 hours	\$49	none estimated	0.04 activities annually	\$4,077
	Annual Activity Total					\$8,313 (214 hours)

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1997 and 2000) *SF-83 Supporting Statement, Air Emission Standards for Tanks, Surface Impoundments and Containers (Renewal)*.

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Nevada

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4 hours	\$28	none estimated	0.3 activities annually	\$34
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Nevada Executive Budget System FY2006 (NEBS)	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$46
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4 hours	\$28	none estimated	0.1 activities annually	\$11
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$15
3	Permit Administration: Notification Reports: Technical Hours	1 hours	\$28	none estimated	8 activities annually	\$224
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$304

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Management Hours	0.5 hours	\$38	none estimated	1 activity annually	\$19
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$21
5	Permit Administration: Clerical Hours	1 hours	\$15	none estimated	1 activity annually	\$15
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8 hours	\$27	none estimated	2 activities annually	\$432
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$608

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	8 hours	\$27	\$315 (transportation and per diem)	2 activities annually	\$1,062
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1238
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	8 hours	\$27	none estimated	2 activities annually	\$432
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$608
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	16 hours	\$27	none estimated	2 activities annually	\$864
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1216

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Nevada

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	160 hours	\$27	none estimated	0.2 activities annually	\$864
10	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS Follow-Up: They do perform this task.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1216
11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	40 hours	\$27	\$315 (transportation and per diem)	0.2 activities annually	\$279
11	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided): NEBS Follow-Up: They do perform this task.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$38	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$367
12	Enforcement Activities: Litigation: Legal Hours	2,080 hours	\$49	none estimated	0.04 activities annually	\$4,077
12	Did your state perform this activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Organic Air Emission Standards Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Organic Air Emission Standards Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Federal Register Review and ASTSHWMO conference in 1999 attended by 2 NDEP employees.	12 hours	\$38		2	\$912
2	NDEP updated authorization and adoption of federal rules	6	\$38		1	\$228
3						
4	EPA provided one-time training in 1999 for 1 1/2 days attended by 6 NDEP employees.	12 hours			6	\$2736

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5						
6	NDEP RCRA staff (~7 individuals) typically attend RCRA comprehensive training (e.g., McCoy) once every two years. Approximately 2 hours of this training is specific to organic emission standards	2	\$38	\$100	7	\$1232
7						
8						

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
9						
10						
11						
12						
13						

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Organic Air Emission Standards Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Organic Air Emission Standards Rule – e.g., 20 percent of the records entered into the database are related to the Organic Air Emission Standards Rule. We would also like to know if the Organic Air Emission Standards Rule replaced an existing state rule/requirement. For example, if you reported a burden for compliance inspections, but your state already required compliance inspections before the Organic Air Emission Standards Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Costs associated with inspections and travel reported in Step 1; Rows 6 through 9 include costs that would otherwise be incurred to conduct inspection/enforcement activities apart from the organic air emission standards rule. The number or frequency of inspections is not increased as a result of the organic air emission standards rule. Accordingly, the costs reported in Row 7 would be incurred even without the organic air emission rule implementation. The actual costs directly associated with organic air emissions standards as a result of additional preparation and time at the site are probably about 15% of the overall amounts reported in Rows 6,8 and 9. The additional costs reported in Step 4 represent costs directly linked to the organic air emission standards rule implementation, with the possible exception of the cost reported in Row 1 for attendance at the ASTSHWMO conference, which may have been attended in the the absence of the rule.

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Organic Air Emission Standards Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Organic Air Emission Standards – e.g., 20 percent of the records entered into the database are related to the Organic Air Emission Standards Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Organic Air Emission Standards Rule might require that you travel to a site for inspections in instances where state regulations previously required only recordkeeping of self-inspections.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Oklahoma

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Oklahoma for administering the Organic Air Emission Standards Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	0.5 activities annually	\$62
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	0.2 activities annually	\$25
3	Permit Administration: Notification Reports: Technical Hours	1 hours	\$31	none estimated	15 activities annually	\$465
4	Permit Administration: Management Hours	1 hours	\$42	none estimated	1 activity annually	\$42
5	Permit Administration: Clerical Hours	2 hours	\$17	none estimated	1 activity annually	\$34
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8 hours	\$30	none estimated	4 activities annually	\$960
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	8 hours	\$30	\$315 (transportation and per diem)	4 activities annually	\$2,220
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	8 hours	\$30	none estimated	4 activities annually	\$960
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	16 hours	\$30	none estimated	4 activities annually	\$1,920
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	160 hours	\$30	none estimated	0.4 activities annually	\$1,920
11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	40 hours	\$30	\$315 (transportation and per diem)	0.4 activities annually	\$606
12	Enforcement Activities: Litigation: Legal Hours	2,080 hours	\$55	none estimated	0.1 activities annually	\$11,440
	Annual Activity Total					\$20,654 (469 hours)

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1997 and 2000) *SF-83 Supporting Statement, Air Emission Standards for Tanks, Surface Impoundments and Containers (Renewal)*.

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	0.5 activities annually	\$62
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Conversations with staff and salary/benefits information from our financial office.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$34	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$68
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	0.2 activities annually	\$25
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Conversations with staff and salary/benefits information from our financial office.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$34	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$28
3	Permit Administration: Notification Reports: Technical Hours	1 hours	\$31	none estimated	15 activities annually	\$465
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Conversations with staff and salary/benefits information from our financial office.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$34	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$510

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Management Hours	1 hours	\$42	none estimated	1 activity annually	\$42
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Conversations with staff and salary/benefits information from our financial office.	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2 hours	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$84
5	Permit Administration: Clerical Hours	2 hours	\$17	none estimated	1 activity annually	\$34
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Conversations with staff and salary/benefits information from our financial office.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8 hours	\$30	none estimated	4 activities annually	\$960
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Hour & labor costs based on conversations with staff and salary/benefits information from our financial office. Oklahoma has 3 TSD facilities with units subject to Subpart CC. Each TSD is inspected at least once/year. (8 hr * \$30/hr * 3 TSD/yr = \$720	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$720

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	8 hours	\$30	\$315 (transportation and per diem)	4 activities annually	\$2,220
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Hour & labor costs based on conversations with staff and salary/benefits information from our financial office. Oklahoma has 3 TSD facilities with units subject to Subpart CC. Each TSD is inspected at least once/year. Non-labor cost includes mileage (\$100/TSD) and 2 days lodging & per diem (\$224/TSD). $(2 \text{ hr} * \$30/\text{hr} * 3 \text{ TSD}/\text{yr}) + (\$224/\text{TSD} * 3 \text{ TSD}) = \852	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$224	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$852
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	8 hours	\$30	none estimated	4 activities annually	\$960
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Hour & labor costs based on conversations with staff and salary/benefits information from our financial office. Oklahoma has 3 TSD facilities with units subject to Subpart CC. Each TSD is inspected at least once/year. DEQ lab charges \$300 for Method 8260 analysis. Assume one sample is collected from one CC unit at one TSD each year for verification of CC compliance. $(8\text{hr} * \$30/\text{hr} * 3\text{TSD}/\text{yr}) + \$300 = \$1,020$.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$300	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,020
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	16 hours	\$30	none estimated	4 activities annually	\$1,920
9	Did your state perform this activity?	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low	<input type="checkbox"/> too low

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Oklahoma

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Hour & labor costs based on conversations with staff and salary/benefits information from our financial office. Oklahoma has 3 TSD facilities with units subject to Subpart CC. Each TSD is inspected at least once/year. (16 hr * \$30/hr * 3/yr) = \$1,440	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3	<input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,440
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Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	160 hours	\$30	none estimated	0.4 activities annually	\$1,920
10	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Hour & labor costs based on conversations with staff and salary/benefits information from our financial office. Oklahoma has 3 TSD facilities with units subject to Subpart CC. Each TSD is inspected at least once/year. Oklahoma has developed a very streamlined enforcement process whereby most routine notices of non-compliance are issued on-the-spot. Combining these with more formal actions requiring more time to develop results in an average of about 10 hours per TSD. (10 hr * \$30/hr * 3/yr) =	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 10	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$900

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Oklahoma

11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	40 hours	\$30	\$315 (transportation and per diem)	0.4 activities annually	\$606
11	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Hour & labor costs based on conversations with staff and salary/benefits information from our financial office. Oklahoma has 3 TSD facilities with units subject to Subpart CC. Each TSD is inspected at least once/year. Assume one TSD/yr will require a follow-up site visit not involving an overnight stay, resulting in a mileage cost of \$100. (40 hr * \$30/hr * 3/yr) + \$100/yr = \$3,700.	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$100	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 3	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$3,700
12	Enforcement Activities: Litigation: Legal Hours	2,080 hours	\$55	none estimated	0.1 activities annually	\$11,440
12	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): Hour & labor costs based on conversations with staff and salary/benefits information from our financial office. Oklahoma has 3 TSD facilities with units subject to Subpart CC. Each TSD is inspected at least once/year. Staff attorney estimates 25 hr/wk spent on RCRA issues @ 50 wk/yr = 1,250 hr/yr on RCRA issues, 40% of which is on CC issues (1,000 hr/yr). Oklahoma currently has 1 TSD with significant CC issues. (1,000 hr * \$55/hr * 1/yr) = \$55,000.	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1,000 hours	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 1	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$55,000

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Organic Air Emission Standards Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Organic Air Emission Standards Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Item 1.1 Federal Register notices are reviewed daily to see if any new hazardous waste rules have been published.	0.2 hrs/day	\$35/hr	-	250 days/year	\$1,750
2	Items 2.1, 2.2, 3.1, 3.2 These items involve annual revisions of DEQ rules to incorporate by reference the federal hazardous waste regulations. We do this once per year.	50 hrs	\$35/hr	-	1 rulemaking/year	\$1,750
3	Items 4.1, 4.2, 4.3 Each staff member attends at least one training class per year, generally for a week (40 hrs/member x 7 members).	280 hrs	\$30/hr Avg. salary of all staff.	\$3500/year Travel, per diem, etc. for all 7 staff	1 training/year	\$11,900
4	Item 6.1 Each staff member estimates approx. 1/2 hrs per day is spent responding to inquiries that are related to RCRA but not directly related to enforcement (e.g. questions from the public, media, or facilities)	0.5 hrs/day	\$30/hr	-	250 days/year	\$3,750

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Item 11.1 Estimate of time spent reviewing new federal regulations, reviewing current inspection checklists, updating checklists as needed, revising procedures as needed, etc.	1 hr/day	\$35/hr	-	250 days/yr	\$8,750
6	Items 12.1 - 12.5. Already included within the Enforcement activity summaries.					
7	Item 7.1-Dev. permit req. Item 7.3-Staff training Item 8.1-Peer review documents Item 8.2-Verify data sources	24 hours 6 x 16 hours 4 hours *	\$34 \$34 \$34 *	\$0 6 x \$2000 \$0 *	1/yr 1/yr 3/yr *	\$816/yr \$15,264/yr \$408/yr * - included in 8.1 above
8	Item 8.6-Issue &/or review permits Item 8.7-Other activities, e.g. training Item 9.3-Other monitoring activities	16 16 -	\$34 \$34 -	\$0 \$2,000 Purchase of monitoring equip. shared w/others	1/yr 0.5/yr 0	\$544/yr \$1,272/yr \$0

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Organic Air Emission Standards Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Organic Air Emission Standards Rule – e.g., 20 percent of the records entered into the database are related to the Organic Air Emission Standards Rule. We would also like to know if the Organic Air Emission Standards Rule replaced an existing state rule/requirement. For example, if you reported a burden for compliance inspections, but your state already required compliance inspections before the Organic Air Emission Standards Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

To the greatest extent possible, all costs identified in Steps 2 - 4 are 100% reflective of Subpart CC costs, except as follows:

Step 4, Row 3: Assume 20% of total is for CC issues

Step 4, Row 4: Assume 1% of total is for CC issues.

Step 4, Row 5: Assume 10% of total is for CC issues.

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Organic Air Emission Standards Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Organic Air Emission Standards – e.g., 20 percent of the records entered into the database are related to the Organic Air Emission Standards Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Organic Air Emission Standards Rule might require that you travel to a site for inspections in instances where state regulations previously required only recordkeeping of self-inspections.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

Follow-up Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Oklahoma

Your Estimates of the Cost Items in Step 2:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost	Percentage Attributable to Subpart CC
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4	\$34	\$0	0.5	\$68	100%
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4	\$34	\$0	0.2	\$27	100%
3	Permit Administration: Notification Reports: Technical Hours	1	\$34	\$0	15	\$510	100%
4	Permit Administration: Management Hours	2	\$42	\$0	1	\$84	100%
5	Permit Administration: Clerical Hours	2	\$17	\$0	1	\$34	100%
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	4	\$30	\$0	100	\$12,000	100%
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	2	\$30	\$45	100	\$10,450	100%
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	4	\$30	\$20,000	100	\$32,000	100%
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	see row 10	see row 10	see row 10	see row 10	see row 10	100%
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	10	\$30	\$0	100	\$30,000	100%
11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	10	\$30	\$0	100	\$30,000	100%
12	Enforcement Activities: Litigation: Legal Hours	25	\$55	\$0	50	\$68,750	100%
	Annual Activity Total					\$183,923 (4,272 hours)	

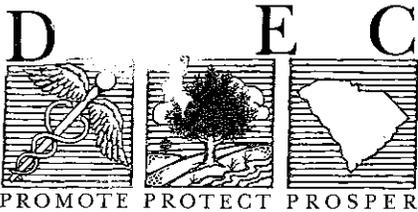
Follow-up Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Oklahoma

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost	Percentage Attributable to Subpart CC
1	Item 1.1 Federal Register notices are reviewed daily to see if any new hazardous waste rules have been published.	0.2 hrs/day	\$35/hr	-	250 days/year	\$1,750	100%
2	Items 2.1,2.2,3.1,3.2 These items involve annual revisions of DEQ rules to incorporate by reference the federal hazardous waste	50 hrs	\$35/hr	-	1 rulemaking/year	\$1,750	100%
3	Items 4.1, 4.2,4.3 Each staff member attends at least one training class per year, generally for a week (40 hrs/member x 7 members.	280 hrs	\$30/hr Avg. salary of all staff.	\$3500/year Travel, per diem, etc. for all 7 staff	1 training/year	\$11,900	20%
4	Item 6.1 Each staff member estimates approx. 1/2 hrs per day is spent responding to inquiries that are related to RCRA but not directly	0.5 hrs/day	\$30/hr	-	250 days/year	\$3,750	1%

Follow-up Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Oklahoma

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost	Percentage attributable to Subpart CC
5	Item 11.1 Estimate of time spent reviewing new federal	1 hr/day	\$35/hr	-	250 days/yr	\$8,750	10%
6							
7	Item 7.1-Dev. permit req.	24 hours	\$34	\$0	1/yr	\$816/yr	100%
	Item 7.3-Staff training	6 x 16 hours	\$34	6 x \$2000	1/yr	\$15,264/yr	100%
	Item 8.1-Peer review documents	4 hours	\$34	\$0	3/yr	\$408/yr	100%
	Item 8.2-Verify data sources	*	*	*	*	*included above	100%
8	Item 8.6-Issue &/or review permits	16	\$34	\$0	1/yr	\$544/yr	100%
	Item 8.7-Other activities, e.g. training	16	\$34	\$2,000	0.5/yr	\$1,272/yr	100%
	Item 9.3-Other monitoring activities	-	-	Purchase of monitoring equip. shared w/others	0	\$0	100%



2600 Bull Street
Columbia, SC 29201-1708

August 17, 2006

Mr. Matt LaPenta
Abt Associates Inc.
55 Wheeler Street
Cambridge, Massachusetts 02138-1168

RE: EPA Study of Costs States Incur in Administering Delegated Environmental Programs – Organic Air Emissions at Hazardous Waste TSDFs and Generators

Dear Matt:

I have attached a completed questionnaire (steps 2 – 4) detailing South Carolina's estimate of costs incurred administering the Organic Air Emission Standards for Tanks, Surface Impoundments, and Containers at Hazardous Waste Treatment, Storage, and Disposal Facilities and Hazardous Waste Generators (59 Federal Register 62896, 12/06/1994).

After reviewing the 12 cost categories that were used in the EPA's regulatory impact analysis, we estimate the costs and time burden incurred by South Carolina for these regulations to be approximately \$26,493 and 749.5 hours. This is less than the EPA's estimate of \$44,222 and 1,022 hours. However, we also identified 28 additional cost categories that were omitted from EPA's analysis. The estimated costs and time burden incurred by South Carolina for these additional cost categories are approximately \$356,540 and 3,157 hours. Therefore, the total cost and time burden South Carolina incurs to administer the referenced regulations amounts to approximately \$383,033 and 3,906.5 hours. This is significantly greater than EPA's estimates.

Please do not hesitate to contact me if you have any questions regarding South Carolina's estimates of costs incurred in administering the organic air emissions regulations for hazardous waste TSDFs and generators. I can be reached at 803-896-4185 or by email at scaturdm@dhec.sc.gov

Sincerely,

David Scaturo, P.E., P.G.
Manager, RCRA Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

Attachment

cc: Robin Stephens, EQC Administration
Cheryl Coleman, Director, Compliance & Enforcement Division
Richard Haynes, P.E., Director, Waste Management Division

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in South Carolina

Step 2: Comment on EPA's Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA's regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA's estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It's OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., "from conversations with key staff members").

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	1 activity annually	\$124
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): <i>\$35,000 annual salary + 30% Fringe = \$22/hr</i>	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$22</i>	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$88</i>
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	1 activity annually	\$124
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$22</i>	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$88</i>
3	Permit Administration: Notification Reports: Technical Hours	1 hours	\$31	none estimated	32 activities annually	\$992
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): <i>31 Generators + 13 Permits = 44</i>	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$22</i>	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>44</i>	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: <i>\$968</i>

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in South Carolina

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Management Hours	2 hours	\$42	none estimated	1 activity annually	\$84
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 8 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$ 336
5	Permit Administration: Clerical Hours	4 hours	\$17	none estimated	1 activity annually	\$68
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8 hours	\$30	none estimated	9 activities annually	\$2,160
6	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): 20% of 31 Generators + 13 Permits = ± 19	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 0.5 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 19	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$ 285

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in South Carolina

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	8 hours	\$30	\$315 (transportation and per diem)	9 activities annually	\$4,995
7	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): No per diem	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 6 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$60 per activity	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 19	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$ 4,560 *
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	8 hours	\$30	none estimated	9 activities annually	\$2,160
8	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 19	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$1,140
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	16 hours	\$30	none estimated	9 activities annually	\$4,320
9	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 19	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$9,120

* [(6 hrs x \$30) + \$60] x 19 activities = \$4,560

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in South Carolina

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	160 hours	\$30	none estimated	1 activity annually	\$4,800
10	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 20 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$ 2,400
11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	40 hours	\$30	\$315 (transportation and per diem)	1 activity annually	\$1,515
11	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided): No per diem	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 5 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$60 per activity	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$ 840 **
12	Enforcement Activities: Litigation: Legal Hours	2,080 hours	\$55	none estimated	0.2 activities annually	\$22,880
12	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 60 hrs	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$6,600

** $[(5 \text{ hrs} \times \$30) + \$60] \times 4 \text{ activities} = \840

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Organic Air Emission Standards Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Organic Air Emission Standards Rule for which EPA did not estimate costs. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe:

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in South Carolina

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.
Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.
Please describe:

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.
Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.
Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.
Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.
Please describe:

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in South Carolina

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Permitting & Regulation Development

Step 4. Estimates of Omitted Costs Identified in Step 3 for Organic Air Emission Standards Rule in South Carolina.

Row	Description	Time Burden (per activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Cost	Number of Activities	Total Cost
1	1.1 Review Federal Register notices in order to decide whether to apply for delegated authority.	40	\$30	N/A	1	\$1,200
2	2.2 Amended state laws to incorporate the requirements of the new regulation.	1500 ¹	\$30	N/A	1	\$45,000
3	3.3 Met with stakeholders, responded to stakeholder concerns	64 ²	\$30	N/A	44	\$84,480
4	4.1 Developed internal guidance and procedures for implementing the new regulation.	200 ³	\$30	N/A	1	\$6,000
5	4.2 Attend EPA or non-EPA training for implementing new regulation.	200 ³	\$30	N/A	1	\$6,000
6	4.3 Conducted internal training.	200 ³	\$30	N/A	1	\$6,000
7	7.1 Developed specific permit requirements.	64 ²	\$30	N/A	13	\$24,960
8	8.1 Conduct regular reviews of submitted documents and supporting materials.	64 ²	\$30	N/A	13	\$24,960
9	8.2 Verify data sources on a regular basis.	64 ²	\$30	N/A	13	\$24,960
10	8.3 Consult regularly with facilities about the permitting process.	64 ²	\$30	N/A	13	\$24,960
11	8.4 Issue notification to affected entities regarding permits.	64 ²	\$30	N/A	13	\$24,960
12	8.5 Provide opportunities for public and stakeholders to comment on the permitting process.	64 ²	\$30	N/A	13	\$24,960
13	8.6 Issue and/or review permits to affected entities.	64 ²	\$30	N/A	13	\$24,960

¹ 15 hours x 2 people x 50 weeks = 1500 hours (2 days per week for one year)

² 4 hours x 16 weeks = 64 hours (4 hours per week for 4 months)

³ 8 hours x 25 weeks = 200 hours (1 day per week for 6 months)

Monitoring, Compliance & Enforcement

Step 4. Provide Estimates of Omitted Costs Identified in Step 3

Here you reported 16 hours (4 people, 4 hours each), \$30/hour, 4 activities and a total cost of \$480 (16 hours* \$30/hour). I just want to confirm that the total labor burden is in fact 16 and not 64 (=16*4). Is that right?

Follow-Up: Should be \$1,920.

Row #	Description	Time Burden (per activity)	Labor Cost	Non-Labor Costs	# of Activities	Total Costs
1	4.2 Attended training provided by EPA	96 ¹	\$30	N/A	1	\$2,880
2	4.3 Provided internal training to District (regional) staff	120 ²	\$30	N/A	1	\$3,600
3	4.1 Developed internal guidance and procedures for implementing the new regulation.	80 ³	\$30	N/A	1	\$2,400
4	5.i Conducted outreach programs for affected entities	16 ⁴	\$30	N/A	4	\$480
5	6.1 Respond regularly to letters, phone calls, e-mails or other inquiries in order to assist affected entities	4 ⁵	\$30	N/A	40	\$4,800
6	6.2 Conduct on-going training (during CEIs)	15 ⁶	\$30	N/A	9	\$4,050
7	9.2 Purchased new equipment for monitoring process					
8	11.1 Established new procedures for enforcing the new regulation	24 ⁷	\$30	N/A	1	\$420
9	12.1 Conduct and review regular inspection reports for regulatory enforcement purposes	2	\$30	N/A	9	\$540
10	12.2 Issue warnings and/or citations for violations	3	\$30	N/A	3	\$270
11	12.3 Take legal actions to enforce the regulation	100 ⁸	\$55	N/A	2	\$11,000
12	12.4 Collect fines for violations	20	\$30	N/A	2	\$1,200
13	12.5 Keep records of enforcement actions	10	\$30	N/A	2	\$600
14	12.6 Provide notifications of enforcement actions	10	\$30	N/A	2	\$600
15	12.7 Report enforcement activities to EPA	5	\$30	N/A	5	\$300

This is a typo, it should be 720, right?

Follow-Up: Should be \$720.

I think this was a typo and it should be \$750 = 5*30*5. Is that right?

Follow-Up: Should be \$750.

¹ 4 people X 24 hours = 96 hours (4 people attended one 3 day training session)
² 15 people X 8 hours = 120 hours (12 inspectors a one day internal training)
³ 2 people X 40 hours = 80 hours (2 people X 1 day X 4 hours per day for 10 weeks)
⁴ 4 people X 4 hours = 16 hours (4 people X 4 hours X 1 day)
⁵ 4 people X 1 hour = 4 hours (on-going)
⁶ 15 people X 1 hour = 15 hours (completed during inspections)
⁷ 3 people X 8 hours = 24 hours (3 people X 4 hours X 2 days)
⁸ This activity involves Bureau staff, upper management and the Office of General Counsel

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Virginia

Step 1: Review Cost Estimates from EPA's Regulatory Impact Analysis:

This table summarizes the estimated cost to Virginia for administering the Organic Air Emission Standards Rule based on EPA's regulatory impact analysis. On the following pages, we ask you to comment on these estimates.

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	1 activity annually	\$124
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	0.5 activities annually	\$62
3	Permit Administration: Notification Reports: Technical Hours	1 hours	\$31	none estimated	28 activities annually	\$868
4	Permit Administration: Management Hours	2 hours	\$42	none estimated	1 activity annually	\$84
5	Permit Administration: Clerical Hours	3 hours	\$17	none estimated	1 activity annually	\$51
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8 hours	\$30	none estimated	8 activities annually	\$1,920
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	8 hours	\$30	\$315 (transportation and per diem)	8 activities annually	\$4,440
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	8 hours	\$30	none estimated	8 activities annually	\$1,920
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	16 hours	\$30	none estimated	8 activities annually	\$3,840
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	160 hours	\$30	none estimated	1 activity annually	\$4,800
11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	40 hours	\$30	\$315 (transportation and per diem)	1 activity annually	\$1,515
12	Enforcement Activities: Litigation: Legal Hours	2,080 hours	\$55	none estimated	0.1 activities annually	\$11,440
	Annual Activity Total					\$31,064 (767 hours)

Source: Abt Associates Inc.'s calculation based on estimates in EPA's (1997 and 2000) *SF-83 Supporting Statement, Air Emission Standards for Tanks, Surface Impoundments and Containers (Renewal)*.

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Virginia

Step 2: Comment on EPA’s Regulatory Impact Analysis Estimates:

Instructions for Step 2: The table beginning below and continuing on the following pages asks you to comment on the cost estimates based on EPA’s regulatory impact analysis. For each cost category that EPA analyzed, please indicate whether you incurred costs for that activity and then, to the extent possible, comment on the reasonableness of EPA’s estimates (too low, too high, or about right). If possible, provide an alternative estimate and describe the basis for your estimate in the left hand box. It’s OK if these estimates are not based on hard sources (e.g. budget requests, financial reports), but we would like to know how you arrived at an estimate (e.g., “from conversations with key staff members”).

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1	Permit Administration: Review Waste Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	1 activity annually	\$124
1	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: n/a	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 2	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don’t know Your estimate: \$248
2	Permit Administration: Control Device Exceedance Reports: Technical Hours	4 hours	\$31	none estimated	0.5 activities annually	\$62
2	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: n/a	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 2	<input checked="" type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$124 Follow-Up: \$248
3	Permit Administration: Notification Reports: Technical Hours	1 hours	\$31	none estimated	28 activities annually	\$868
3	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don’t know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: n/a	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: 2	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don’t know Your estimate: \$62

Step 2 (continued): Comment on EPA's Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
4	Permit Administration: Management Hours	2 hours	\$42	none estimated	1 activity annually	\$84
4	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
5	Permit Administration: Clerical Hours	3 hours	\$17	none estimated	1 activity annually	\$51
5	Did your state perform this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
6	Enforcement Activities: Compliance Inspections: Select Site and Review Permit: Enforcement Hours	8 hours	\$30	none estimated	8 activities annually	\$1,920
6	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: n/a	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$240

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Virginia

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
7	Enforcement Activities: Compliance Inspections: Travel to and from site: Enforcement Hours	8 hours	\$30	\$315 (transportation and per diem)	8 activities annually	\$4,440
7	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 6	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: N/A	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$360
8	Enforcement Activities: On-Site Inspection: Enforcement Hours	8 hours	\$30	none estimated	8 activities annually	\$1,920
8	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: N/A	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$240
9	Enforcement Activities: Prepare Inspection Report: Enforcement Hours	16 hours	\$30	none estimated	8 activities annually	\$3,840
9	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 4	<input type="checkbox"/> too low <input checked="" type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: N/A	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: 2	<input type="checkbox"/> too low <input type="checkbox"/> about right <input checked="" type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate: \$240

Request for Information on the Costs of Administering the Organic Air Emission Standards Rule in Virginia

Step 2 (continued): Comment on EPA’s Regulatory Impact Analysis Estimates:

Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
10	Enforcement Activities: Notice of Non Compliance: Enforcement Hours	160 hours	\$30	none estimated	1 activity annually	\$4,800
10	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
11	Enforcement Activities: Follow-up enforcement: Enforcement Hours	40 hours	\$30	\$315 (transportation and per diem)	1 activity annually	\$1,515
11	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:
12	Enforcement Activities: Litigation: Legal Hours	2,080 hours	\$55	none estimated	0.1 activities annually	\$11,440
12	Did your state perform this activity? <input type="checkbox"/> Yes <input type="checkbox"/> No Your comments and basis for estimates (if provided):	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input checked="" type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:	<input type="checkbox"/> too low <input type="checkbox"/> about right <input type="checkbox"/> too high <input type="checkbox"/> don't know Your estimate:

Step 3: Identify Activities Omitted from EPA's Analysis

Step 3 Instructions: This checklist lists administrative activities for which EPA did not estimate costs in its Organic Air Emission Standards Rule analysis, but which you may have needed to perform for rule administration (note that some of the items that EPA specifically identified, as described above, may be encompassed in general activities below). Please check the box for any activities that your state performed for administering the Organic Air Emission Standards Rule *for which EPA did not estimate costs*. After finishing Step 3, please describe the costs associated with these omitted activities using the Step 4 Table.

1. Tracking EPA's Rulemaking Process

- 1.1 Reviewed the Federal Register notices and/or other documents in order to decide whether to apply for delegated authority.
- 1.2 Attended EPA meetings/conferences regarding this rule.
- 1.3 Attended other non-EPA meetings/conferences regarding this rule.
- 1.4 Provided EPA directly with comments on the proposed rule.
- 1.5 Provided EPA with comments on the proposed rule through a third party (e.g., ECOS).
- 1.6 Conducted other start-up activities associated with tracking EPA's rulemaking process.

Please describe:

2. Obtaining Additional Delegated Authority

- 2.1 Performed tasks other than those identified above in order to decide whether to apply for delegated authority.
- 2.2 Amended state laws to incorporate the requirements of the new regulation.
- 2.3 Incurred litigation costs associated with the change in state laws.
- 2.4 Conducted other start-up activities associated with obtaining additional delegated authority.

Please describe:

3. Designing implementation plan

- 3.1 Designed alternative standards to those in the federal regulation.
- 3.2 Performed activities related to obtaining EPA approval for the state implementation plan.
- 3.3 Met with stakeholders and/or responded to stakeholder concerns regarding this rule.
- 3.4 Conducted other start-up activities associated with designing implementation plans.

Please describe:

4. General start-up activities

- 4.1 Developed internal guidance and procedures for implementing the new regulation.
- 4.2 Attended EPA training or other non-EPA sponsored training for implementing the new regulations.
- 4.3 Conducted internal training.
- 4.4 Conducted other start-up activities.

Please describe:

5. Compliance assistance, start-up activities

- 5.1 Conducted outreach programs for affected entities.
- 5.2 Conducted public outreach programs to create awareness.
- 5.3 Developed training programs to help affected entities comply with the new regulation.
- 5.4 Conducted other start-up activities associated with compliance assistance.

Please describe: Compliance determination on a conservation vent

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

6. Compliance assistance, recurring activities

- 6.1 Respond regularly to letters, phone calls, emails or other inquiries in order to assist affected entities.
- 6.2 Conduct on-going training (in addition to the initial start-up period)
- 6.3 Conducted other recurring activities associated with compliance assistance.

Please describe:

7. Permit administration, start-up activities

- 7.1 Developed specific permit requirements.
- 7.2 Developed additional infrastructure for permit administration because of this rule.
- 7.3 Conducted other start-up activities associated with permit administration.

Please describe: Reviewed DD and cross-referenced regulations for applicability. Incorporated into Title V permit.

8. Permit administration, recurring activities

- 8.1 Conduct regular reviews of submitted documents and supporting materials.
- 8.2 Verify data sources on a regular basis.
- 8.3 Consult regularly with facilities about the permitting process.
- 8.4 Issue notifications to affected entities regarding permits.
- 8.5 Provide opportunities for the public and/or stakeholders to comment on ongoing permitting processes.
- 8.6 Issue and/or review permits to affected entities.
- 8.7 Conducted other recurring activities associated with permit administration.

Please describe:

9. Monitoring, start-up activities

- 9.1 Developed a system for monitoring affected entities.
- 9.2 Purchased new equipment for monitoring purposes.
- 9.3 Conducted other start-up activities associated with monitoring.

Please describe:

10. Monitoring, recurring activities

- 10.1 Collect data from monitoring on a continuous basis.
- 10.2 Review collected data on a regular basis.
- 10.3 Record and store monitoring data.
- 10.4 Report monitoring data.
- 10.5 Incur additional recurring costs associated with monitoring activities.
- 10.6 Conducted other recurring activities associated with monitoring.

Please describe:

11. Enforcement, start-up activities

- 11.1 Established new procedures for enforcing the new regulation.
- 11.2 Purchased new equipment for enforcing the new regulation
- 11.3 Conducted other start-up activities associated with enforcement.

Please describe:

Step 3 (continued): Identify Activities Omitted from EPA's Analysis

12. Enforcement, recurring activities

- 12.1 Conduct and review regular inspections for regulatory enforcement purposes.
- 12.2 Issue warnings and/or citations for violations.
- 12.3 Take legal actions to enforce the regulation.
- 12.4 Collect fines for violations.
- 12.5 Keep records of enforcement actions.
- 12.6 Provide notifications of enforcement actions.
- 12.7 Report enforcement activities to EPA.
- 12.8 Incur additional recurring costs associated with enforcement activities.
- 12.9 Conducted other recurring activities associated with enforcement.

Please describe:

13. Other, recurring activities

- 13.1 Incur additional recurring burdens that were not listed above.

Please describe:

Step 4: Provide Estimates of Omitted Costs Identified in Step 3

Step 4 Instructions: In the table beginning below and continuing on the following page, please provide your best estimates of the costs for any “omitted cost” items you identified in Step 3. Approximations are OK, but please describe how you arrived at your estimates. If the format of this table is not appropriate please feel free to attach your estimates in the format that best suits you.

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
1						
2						
3						
4	Create checklist for inspections	40	\$31		1	\$1240

Step 4 (continued): Provide Estimates of Omitted Costs Identified in Step 3

Your Estimates of the Cost for “Omitted Cost” Items Identified in Step 3						
Row #	Description	Time Burden (per-activity)	Labor Cost (hourly wage plus fringe, 2006\$)	Non-Labor Costs	Number of Activities	Total Cost
5	Compliance determination on conservation vent	40	\$31		1	\$1240
6						
7	Review DD and related regulations for applicability	40 hrs	\$31		1	\$1240
8	Permit re-issuance	4	\$31		1	\$124

Step 5: Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Instructions: In this section we ask questions about whether any of the burdens you reported in Steps 2–4 might have been incurred without the rule, are partially attributable to another rule, or offset costs associated with another rule.

For our analysis, we need to estimate only those costs that directly result from the EPA rules. In this section please describe cases where the burdens, or portions of the burdens, that you reported in Steps 2–4 might have been incurred without the rule, or are partially attributable to another rule. For example, if you reported the costs of developing a new recordkeeping database for the Organic Air Emission Standards Rule, but that database is also used to keep records related to another rule, please estimate how much of the burden you reported is attributable to the Organic Air Emission Standards Rule – e.g., 20 percent of the records entered into the database are related to the Organic Air Emission Standards Rule. We would also like to know if the Organic Air Emission Standards Rule replaced an existing state rule/requirement. For example, if you reported a burden for compliance inspections, but your state already required compliance inspections before the Organic Air Emission Standards Rule, then please indicate that here.

Step 5, Question 1: Were any of the activities for which you reported costs above already being performed before the rule (or were partially being performed before the rule)? For example, a federal rule might have some of the same requirements as a state level regulation that you implemented before the federal rule.

Yes No

If yes, please describe those activities here:

Step 5 (continued): Identify Baseline Activities: review burdens reported above and consider whether any activities might have been performed without the rule

Step 5, Question 2: Did any of the activities for which you reported costs above include burdens associated with another rule? For example, if you reported the costs of developing a new recordkeeping database for the Organic Air Emission Standards Rule, but that database is also used to keep records related to another rule, we would like you to indicate how much of the burden you reported is attributable to the Organic Air Emission Standards – e.g., 20 percent of the records entered into the database are related to the Organic Air Emission Standards Rule.

Yes No

If yes, please describe those activities here:

Step 5, Question 3: Did any of the activities for which you reported costs above make performing some other regulatory activity unnecessary? For example, the Organic Air Emission Standards Rule might require that you travel to a site for inspections in instances where state regulations previously required only recordkeeping of self-inspections.

Yes No

If yes, please describe the burden associated with that regulatory activity that is no longer necessary here.

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Final Report, September 14, 2007

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