

U.S. Environmental Protection Agency Information Collection Request

Title: Brownfields Competitive Grants and Noncompetitive Funding Programs

OMB Control Number: 2050-NEW

EPA ICR Number: 7789.01

Abstract: With this ICR, EPA's Office of Brownfields and Land Revitalization (OBLR) seeks authorization to collect information from grant applicants and noncompetitive funding requesters using several standard instruments (templates) that will streamline the data collection effort and improve the quality, efficiency, and fairness of the competitions and allocations. EPA estimates that all respondents who voluntarily respond to this information collection by electing to participate in the Brownfields Program have determined that the expected benefits of participation outweigh any burden associated with preparing the response.

This new ICR provides the burden estimate for activities associated with optional applicant use instruments, and EPA review of the submissions; and seeks approval for seven standard application/request templates. EPA's goal in providing these templates is to provide an example for applicants and requesters of how the information in an application or funding request can be presented. Applicants and requesters who choose not to use the sample formats for providing information will not be punished. However, when the information in an application or funding request is presented using a standard format, EPA staff can review applications and funding requests more efficiently.

EPA anticipates the respondent burden associated with this ICR to be 7,865 hours per year. The burden fully reflects the time it takes Brownfields Grant applicants to complete the instruments associated with applying for funding, as well as the time it takes state and Tribal response programs to complete the templates associated with requesting noncompetitive funding.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This is a request for a new Information Collection Request (ICR). This ICR describes the burden of activities for the collection of information from those organizations and entities that apply for cooperative agreements from EPA under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Brownfields Utilization, Investment, and Local Development (BUILD) Act (P.L. 115-141). Subtitle A of CERCLA, as amended, authorizes EPA to award grants or cooperative agreements to states, Tribal Nations, local governments, and other eligible entities to support the assessment and cleanup of brownfields properties, and subtitle C authorizes a noncompetitive \$50 million program to establish and enhance state and Tribal response programs. The

authority for these financial assistance programs is codified at CERCLA 104(k) and CERCLA 128(a) respectively. Congress appropriates specific amounts of funding for both programs in EPA’s State and Tribal Assistance Grant account.

OBLR manages the competitive grant competitions and noncompetitive funding requests nationally, in coordination with all ten EPA regions. Competitive Brownfields Grants include Multipurpose, Assessment, Revolving Loan Fund (RLF), Cleanup, and Job Training Grants. Noncompetitive Brownfields Grants include State and Tribal Response Program (CERCLA Section 128(a)) funding requests and RLF Supplemental funding requests. The competitions and solicitations for requests for noncompetitive funding occur throughout the fiscal year. Throughout the remainder of this document the term “application” will be used to encompass all requests for funding, both competitive applications and noncompetitive funding requests. See the chart below for the number of grant applications received by OBLR since Fiscal Year 2020.

Table 1: Brownfields Grant Applications Received by Fiscal Year				
	Job Training	Multipurpose, Assessment, Revolving Loan Fund, and Cleanup (MARC)	Section 128(a)	RLF Supplemental
FY 2020	51	435	174	31
FY 2021	34	414	170	28
FY 2022	22	419	169	42
FY 2023	43	455	169	22
FY 2024	23	367	171	33
Average	35	418	171	31

To streamline the competitive and noncompetitive award processes, OBLR has developed templates that applicants can use, but are not required to use, to respond to grant solicitations and request noncompetitive funding. These templates are an optional way for applicants to organize the information in their cover letter, also known as a Narrative Information Sheet, and narrative response. Additionally, these templates allow reviewers to find information more efficiently in an applicant’s response, and therefore improve the efficiency of reviews.

Information collected under this effort will allow EPA to evaluate applications for competitive assistance agreements, which is required by both CERCLA and EPA Competition Policy:

- EPA Order 5700.5A1: EPA's Policy for Competition of Assistance Agreements, Section 8.d. states “Program Offices need to ensure consistency among the provisions, instructions and requirements stated in an announcement (e.g., ensuring that the information required to be

submitted by applicants corresponds to the ranking factors as well as verifying that what is said in one section of the announcement is consistent with what is said in other sections).”

- CERCLA 104(k)(6) requires that at least one grant competition be conducted annually.

State and Tribal response program funding requests under Section 128(a) of CERCLA are exempt from EPA Order 5700.5A1: EPA's Policy for Competition of Assistance Agreements. Information collected under this effort will allow EPA to evaluate funding requests for noncompetitive assistance agreements.

- CERCLA Section 128(a) lays out the statutory requirements for State and Tribal Response programs to receive funding.
- CERCLA 104(k)(5)(A)(ii) authorizes EPA to award noncompetitive supplemental funding to existing RLF cooperative agreement recipients and lays out the criteria for awarding supplemental funding.

EPA staff and Federal partners that review Brownfields Grants will use the information gathered under this ICR to review grant applications and funding requests. This ICR is necessary to help the Brownfields Program conduct objective and unbiased reviews of applications submitted under solicitations for Multipurpose, Assessment, Revolving Loan Fund, Cleanup (MARC), and Job Training (JT) Grant competitions. This ICR is also necessary to streamline funding requests for the State and Tribal Response Programs and RLF Supplemental Funding.

This ICR augments the ICR entitled “General Administrative Requirements for Assistance Programs” (OMB Control Number 2030-0020; EPA ICR Number 0938.23), which accounts for the burden and collection of information under EPA’s General Regulation for Assistance Programs that establishes the minimum management requirements for all recipients of EPA grants or cooperative agreements (assistance agreements). This new ICR provides the burden estimate for activities associated with optional applicant use of instruments, and EPA review of the submissions; and seeks approval for seven standard application/request templates. EPA’s goal in providing these request templates is to provide an example for applicants and requesters of how the information in an application or funding request can be presented. Applicants and requesters who choose not to use the sample formats for providing information will not be punished. However, when the information in an application or funding request is presented using a standard format, EPA staff can review applications and funding requests more efficiently.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

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

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

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

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

- (1) establish or enhance a response program that includes elements such as:
 - a. Surveys and inventories of brownfield sites.
 - b. Oversight and enforcement authorities including legislation, regulations, procedures, or guidance that would establish or enhance the legal structure of the program.
 - c. Opportunities for public participation in the process of developing a public record for cleanup decisions and other site activities.
 - d. Approval of cleanup plans and verifications that response actions are complete.
 - e. Site-specific assessment and cleanup activities at brownfield sites.
- (2) capitalize a revolving loan fund for brownfields remediation under CERCLA 104(k)(3);
- (3) purchase environmental insurance, develop a risk sharing or indemnity pool, or other insurance mechanisms for the response program; and
- (4) assist small communities, Indian tribes, rural areas, or disadvantaged areas in carrying out activities described in section 9604(k)(7)(A) of this title with respect to brownfield sites.

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

While the Agency collects basic pre-award information from applicants as part of its Federal stewardship responsibilities to design and execute a merit review process for applications under 2 CFR Part 200 Subpart C—Pre-Federal Award Requirements and Contents of Federal Awards, OBLR needs additional information from applicants to qualify and objectively select applicants for funding in accordance with CERCLA 104(k) and CERCLA 128(a). The information collected under this ICR is intended to reduce uncertainty about the format of an applicant’s responses to a Brownfields Notice of Funding Opportunity and simplify the application review process.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Applicants for competitive Brownfields Multipurpose, Assessment, Revolving Loan Fund, Cleanup, and Job Training Grants must apply electronically through www.grants.gov based on the www.grants.gov instructions in the Notice of Funding Opportunity. If an organization has no access to the Internet or access is very limited, they may request an exception for the remainder of this calendar year the

solicitation is issued by following the procedures outlined at www.epa.gov/grants/exceptionsgrantsgov-submission-requirement.

Grants.gov, originally called the EGrants Initiative, was a mandate of the President's Fiscal Year 2002 Management Agenda, which directed agencies to "...allow applicants for Federal Grants to apply for and ultimately manage grant funds online through a common Web site, simplifying grants management and eliminating redundancies."

Grants.gov implements the requirement in the Federal Financial Assistance Management Improvement Act, Public Law 106107, to develop a simple, unified source to electronically find, apply, and manage grant opportunities. Grants.gov is the central Federal electronic portal created in response to the Act.

Grants.gov Workspace allows an applicant to create an application package from an opportunity posted on Grants.gov. The applicant can complete the application within Workspace or download the application forms and complete the package offline based on agency instructions. The application package generally includes a standard set of OMB approved forms. After an applicant completes the required application package, they can be submitted electronically to Grants.gov, which transmits the application to the funding agency.

The Office of Grants and Debarment has constructed an electronic repository for Pre-Award activities within the Agency's Next Generation Grants System (NGGS) which receives, as the funding agency, the applications data and stores them for program retrieval and review. As applications are selected for funding, the data will be migrated and processed through other downstream activities within NGGS for eventual award.

EPA requires the use of Grants.gov as the EPA standard for the submission of initial applications for competitive and noncompetitive assistance agreement awards.

Requests for noncompetitive brownfields funding, including Revolving Loan Fund Supplemental Requests and Section 128(a) State and Tribal Response Program Funding Requests, are submitted electronically via email to Regional Brownfields contacts listed in the funding request instructions.

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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

Exhibit 1: Grant Burdens Covered Under Other Agency ICRs

Task/Burden	Authority	Agency Approved ICR
Preliminary Grant Proposal	2 CFR Part 200	OMB 2030-0020
Final Grant Proposal	2 CFR Part 200	OMB 2030-0020
Budget Sheets	2 CFR Part 200	OMB 2030-0020

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

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

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

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less frequent collection may not enable EPA to qualify, evaluate, and award assistance agreements efficiently and would lessen OBLR's ability to maintain an annual schedule of awarding competitive and noncompetitive grants in accordance with CERCLA 104(k) and 128(a). In consideration of the burden imposed on applicants, the instruments covered under this ICR are meant to reduce the burden by providing sample templates to applicants on how to organize the information in an application.

7. GENERAL GUIDELINES

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

The information collection is consistent with the guidelines set forth in 5 CFR 1320.6 of the Paperwork Reduction Act Guidelines. There are no known special circumstances that would require reporting on an alternative timeline or methodology.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

60-Day FR Notice: Pending.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

For this ICR, EPA reached out to nine current or former grant recipients to ask about the burden associated with completing the draft templates included in this ICR. EPA received input from one Job Training Grant recipient, one Multipurpose Grant recipient, one Assessment Grant recipient, two Cleanup Grant recipients, one RLF Grant recipient, one RLF Supplemental Grant recipient, and two 128(a) recipients, including one state and one Tribe for consultation on the burden associated with the providing the required information to EPA under CERCLA 104(k) and CERCLA 128(a).

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

No payment or gift is given to respondents.

10. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. RESPONDENT BURDEN HOURS & LABOR COSTS

Questions about sensitive issues that are normally considered private (e.g., religious beliefs, sexual attitudes, and behavior) will not be included in the information collections covered by this ICR. *Provide estimates of the hour burden of the collection of information. The statement should:*

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
 - *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
 - *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*
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12a. Respondents/NAICS Codes

Respondents include entities applying for competitive brownfields grants and/or noncompetitive funding. CERCLA 104(k) and CERCLA 128(a) establishes the types of entities that are eligible to receive brownfields grants and funding. Almost all respondents will fall within one of the following categories:

- General Purpose Unit of Local Government.
- Land Clearance Authority or another quasi-governmental entity
- Government Entity Created by State Legislature.
- Regional Council established under governmental authority or group of General Purpose Units of Local Government established under Federal, state or local law.
- Redevelopment Agency that is chartered or otherwise sanctioned by a state.
- State.
- Federally recognized Indian Tribe other than in Alaska
- Alaska Native Regional Corporation, Alaska Native Village Corporation, and Metlakatla Indian Community.
- Nonprofit organizations.

- Limited liability corporation in which all managing members are 501(c)(3) nonprofit organizations or limited liability corporations whose sole members are 501(c)(3) nonprofit organizations.
- Limited partnership in which all general partners are 501(c)(3) nonprofit organizations or limited corporations whose sole members are 501(c)(3) nonprofit organizations.
- Qualified community development entity as defined in section 45D(c)(1) of the Internal Revenue Code of 1986.

12b. Information Requested

The information requested is all related to EPA's Brownfields program, but specific information requested varies depending on which type of grant the applicant is applying for.

12c. Respondent Activities

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

- 128(a) Funding Request Template: Completed once annually by states and Tribal entities requesting funding.
- RLF Supplemental Request From: Completed annually to request supplemental funding.
- RLF Supplemental Request Tables: Completed annually to request supplemental funding.
- Brownfields Competitive Grants Narrative Tables Template: Completed up to three times annually depending on the number of grant types an entity is applying for.
- Narrative Information Sheet Template: Completed up to three times annually depending on the number of grant types an entity is applying for.
- Revolving Loan Fund and Cleanup Cost Share Waiver Request Template: Completed up to once annually.
- Brownfields Cleanup Grant \$500,000 Limit Waiver Request Template: Completed up to once annually.

12d. Respondent Burden Hours and Labor Costs

The estimated burden of respondents is presented in Tables 2.a. and 2.b. below.

Table 2.a. – Annual Respondent Burden and Cost for State/Tribal/Local Government Respondents

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year*	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
State and Tribal Funding Request	21.58	\$121.14	\$2,614.28	169	3,647	\$441,814

RLF Supplemental Request Template	3.625	\$144.59	\$524.15	27	96	\$14,152.05
RLF Supplemental Tables	2.375	\$146.34	\$347.57	27	64	\$9,384.39
Competitive Grants (MARC + JT) Sample Narrative Tables	5.6	\$145.39	\$813.54	390	2180	\$317,280.60
Narrative Information Sheet Template	3.125	\$149.41	\$466.92	390	1218	\$182,098.80
RLF and Cleanup Cost Share Waiver Request	1.77	\$146.46	\$259.43	21	37	\$5,419.02
Cleanup Grant \$500,000 Limit Waiver Request	1.44	\$141.09	\$203.74	23	33	\$4,655.97
TOTAL				1,074	7,275	\$974,804.83
AVERAGE TOTAL COST PER BURDEN HOUR					\$133.99	

* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

** Figures may not sum due to rounding.

Table 2.a. – Annual Respondent Burden and Cost for Nonprofit Respondents

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year*	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
RLF Supplemental Request Template	3.625	\$144.59	\$524.15	4	16	\$2,096.60
RLF Supplemental Tables	2.375	\$146.34	\$347.57	4	10	\$1,390.28
Competitive Grants (MARC + JT) Sample Narrative Tables	5.6	\$145.39	\$813.54	63	355	\$51,253.02
Narrative Information Sheet Template	3.125	\$149.41	\$466.92	63	198	\$29,415.96
RLF and Cleanup Cost Share Waiver Request	1.77	\$146.46	\$259.23	3	5	\$733.30
Cleanup Grant \$500,000 Limit Waiver Request	1.44	\$141.09	\$203.74	4	6	\$846.54

TOTAL				141	590	\$85,735.70
AVERAGE TOTAL COST PER BURDEN HOUR				\$145.31		

* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

** Figures may not sum due to rounding.

To estimate the unit burden (hours) and hourly rate for this information collection activity, EPA relied on its extensive experience working closely with Brownfields recipients, as well as in-depth interviews with two current cooperative agreement recipients submitting the 128(a) Request Form, one recipient submitting the RLF Supplemental Request Template and Tables, six recipients submitting the Competitive Grants Narrative Tables, six recipients submitting the Narrative Information Sheet, two recipients submitting the RLF and Cleanup Cost Share Waiver Request, and two recipients submitting Cleanup Grant \$500,000 Limit Waiver. Those interviewed were shown draft copies of applicable instruments and asked to estimate: (1) the number of hours that would be required to perform each task; and (2) the labor mix required to perform each task (e.g., percentage of management, technical, clerical). The data gathered from these interviews were then analyzed to estimate the unit burden and labor mix. For all instruments, the unit labor cost (dollars) for this burden estimate is a weighted hourly rate based upon the estimated labor mix and wage rates gathered from the U.S. Bureau of Labor Statistics (BLS).

On the 128(a) Funding Request Template, consultations indicate that the average applicants will incur 35 percent of its burden with executive/managerial staff labor, 30 percent with professional specialty staff labor, and 35 percent with administrative staff labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in March of 2024 for a weighted hourly rate of \$121.14.

On the RLF Supplemental Request Template, consultations indicate that the average applicants will incur 17 percent of its burden with executive/managerial staff labor, 76 percent with professional specialty staff labor, and seven percent with Finance staff labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in March of 2024 for a weighted hourly rate of \$144.59.

On the RLF Supplemental Tables instrument, consultations indicate that the average applicants will incur 45 percent of its burden with executive/managerial staff labor, 58 percent with professional specialty staff labor, and 11 percent with finance staff labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in March of 2024 for a weighted hourly rate of \$146.34.

On the Competitive Grants Narrative Tables template, consultations indicate that the average applicants will incur 32 percent of its burden with executive/managerial staff labor, 65 percent with professional specialty staff labor, two percent with finance staff labor, and one percent with administrative staff labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in March of 2024 for a weighted hourly rate of \$149.39.

On the Narrative Information Sheet template, consultations indicate that the average applicants will incur 61 percent of its burden with executive/managerial staff labor, 31 percent with professional specialty staff labor, three percent with finance staff labor, and one percent with administrative staff labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in March of 2024 for a weighted hourly rate of \$149.41.

On the RLF and Cleanup Cost Share Waiver Request template, consultations indicate that the average applicants will incur 41 percent of its burden with executive/managerial staff labor, 50 percent with professional specialty staff labor, eight percent with finance staff labor, and one percent with administrative staff labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in March of 2024 for a weighted hourly rate of \$146.46.

On the Cleanup Grant \$500,000 Limit Waiver template, consultations indicate that the average applicants will incur 12 percent of its burden with executive/managerial staff labor, 77 percent with professional specialty staff labor, eight percent with finance staff labor, and four percent with administrative staff labor. This labor mix was applied to BLS, National Compensation Survey (NCS) data issued in March of 2024 for a weighted hourly rate of \$141.09.

Not all Brownfields Grant applicants will fill out all of these templates when applying for funding.

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Start-up costs to apply for a Brownfields Grant or submit a funding request are minimal and are a part of the customary and usual expenses incurred by applicants. There are no capital costs related to applying for Brownfields Grants and funding. Therefore, total start-up and capital costs are zero. There are no operation and maintenance costs required.

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

EPA incurs a burden in the process of reviewing and evaluating the information covered by this ICR. This burden includes:

- Working with states and Tribal Nations to develop CERCLA 128(a) Funding Requests and reviewing requests
- Reviewing and evaluating RLF Supplemental Request Template
- Reviewing and evaluating RLF Supplemental Request Tables
- Reviewing and evaluating Brownfields Competitive Grants Narrative Tables
- Reviewing Narrative Information Sheets
- Reviewing and evaluating Revolving Loan Fund and Cleanup Cost Share Waiver Requests
- Reviewing and evaluating the final Brownfields Cleanup Grant \$500,000 Limit Waiver Requests

14b. Agency Labor Cost

The estimated burden associated with EPA activities is presented in Table 3.

Table 3 – Annual Agency Burden and Cost

Activity	Unit Burden (Hours)	Unit Labor Cost (Dollars)*	Total Unit Cost (Dollars)*	Average Number of Responses/Year*	Total Burden Hours/Year**	Total Cost/Year (Dollars)**
Develop and Review State and Tribal CERCLA 128(a) Funding Request	1	\$59.89	\$59.89	169	169	\$10,122
Review and Evaluate RLF Supplemental Request	1	\$58.57	\$58.57	31	31	\$1816
Review and Evaluate RLF Supplemental Request Tables	0.25	\$63.85	\$15.96	31	8	\$495
Review and Evaluate Competitive Grants Narrative Tables	0.5	\$58.57	\$29.28	453	227	\$13,266

Review Narrative Information Sheets	0.5	\$64.90	\$32.45	453	227	\$14,700
Review and Evaluate RLF and Cleanup Cost Share Waivers	0.33	\$50.19	\$16.71	24	8	\$401
Reviewing and Evaluate Cleanup Grant \$500,000 Limit Waivers	0.33	\$50.19	\$16.73	27	9	\$452
TOTAL				1,188	679	\$41,252
AVERAGE TOTAL COST PER BURDEN HOUR					\$60.75	

* Unit Labor Cost in Dollars reflects a “loaded” rate for benefits and overhead.

** Figures may not sum due to rounding.

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

The weighted hourly rate utilized in the Federal burden estimate is based upon the following composite:

GS Level	Percent	Hourly Wage Rate*
GS 9, Step 1	23%	\$24.60
GS 11, Step 1	29%	\$29.76
GS 13, Step 1	34%	\$42.41
GS 14, Step 1	13%	\$50.12
Weighted Rate		\$56.99

*Rates for 2024 General Schedule (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/GS.aspx>)

14c. Agency Non-Labor Costs

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

15) REASONS FOR CHANGE IN BURDEN

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

This is a new ICR and therefore there is no change or adjustment in the burden or capital/O&M cost estimates.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Results from this ICR will not be published formally. Results are used to evaluate applications for competitive brownfields grants and requests for noncompetitive funding. Copies of applications may be posted publicly on EPA's website for a period of time after the selected applications are announced. Applicants are asked to clearly indicate which portion(s) of the application they are claiming as confidential, privileged, or sensitive information to be redacted before posting.

17) DISPLAY OF EXPIRATION DATE

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

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18) CERTIFICATION STATEMENT

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

EPA does not request an exception to the certification of this information collection.