

EPA/Delegated Tribes FTE

FTE Estimate	Tasks	Explanation of changes
0.45	Registration, including online registration system	Burden will be slightly higher the first year but overall the burden will decrease in subsequent years. No change made.
0.70	Misc approvals & oversight related to reporting & recordkeeping	Increase in FTEs expected to be within rounding error. No change made.
0.50	Non-Title V operating permits	Increase in FTEs expected to be within rounding error. No change made.
2.75	Nez Perce Burn Permit Program	
1.00	Umatilla Burn Permit Program	
0.20	Database Development	
0.10	Delegations	
5.70	TOTAL	

EPA Average Annual Burden and Costs

Total Hours	\$/Hour	Annual EPA Cost
Original FARR		
11,856	\$62.31	\$738,747

Small Entity Estimates

Rule #	Orig FARR	Estimated # of Respondents	Estimated # of Small Entities	Comments
49.122	Orig FARR	1	1	Assumed all Tribal governments were small entities.
49.126	Orig FARR	100	86	Assumed all the simple sources and construction sources were small entities.
49.130	Orig FARR	117	108	Assumed all but T5 sources were small entities.
49.131	Orig FARR	3	3	Assumed all were small entities.
49.132	Orig FARR	1040	1014	For large open burns (farms and businesses), assumed 85%* were small entities. For small open burns (individuals), assumed all were small entities.
49.133	Orig FARR	200	170	Assumed 85%* of farms were small entities.
49.134	Orig FARR	15	8	For Governmental entities, assumed 50% were federal (large) and 50% were tribal (small).
	Orig FARR	10	8	For logging industry businesses, assumed 75% were small entities.

Explanation of changes

Five tribes have already received delegation under 49.122 and few additional tribes are expected to request delegation. For purposes of this ICR, it is assumed that one additional tribe will request delegation in the next 3 years.

Used the same proportion of sources (simple, moderately complex) from the previous ICR, and applied to the revised total of 100 sources.

Although no sources are currently listed under section 49.131, we conservatively assume the number of requests for permission to perform open burning for firefighting training to be 3 per year under the original FARR.

Determination of 2017 Federal Salary Rates ¹ and Total Hourly Cost

Wage rate of Permit Staff, GS 11 Step 5 ²		\$35.42
Wage rate of Supervisory Staff, GS 13 Step 5 ²	\$50.49	+
Factor: 0.091 ³	x <u>0.091</u>	\$4.59
Wage rate of Support Staff, GS 6 Step 5 ²	\$21.54	+
Factor: 0.091 ⁴	x <u>0.091</u>	\$1.96
Annual Applicable Salary of Permit, Supervisor and Support Staff		<hr/> \$41.97
Benefits (36.45 percent of salary) ⁵		+\$15.30
General Overhead (12 percent of salary) ⁵		<hr/> +\$5.04
Total Hourly Cost		\$62.31

¹ The salary levels shown for the positions indicated are assumed to represent the average of the for EPA, Tribal and SEE program staff allocated to the respective position classification.

² U.S. Office of Personnel Management. "Salary Table 2017-SEA", General Schedule incorporating <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/SEA.r>

³ Based on an administrator managing a staff of 10 technicians and one support staff person, i.e., where: $1/11 = 0.091$

⁴ Based on one support staff person assisting 10 technicians and one manager, i.e., a $1/11$ ratio =

⁵ OMB Circular A-76. "Figure C1 - Table of Standard A-76 Costing Factors"; and OMB Circular No. A-76 Revised, May 29, 2003, reflecting OMB Memorandum M-07-02. Applicable to FY 07. <http://www.whitehouse.gov/omb/circulars/index.html>

In OMB Circular A-76, Figure C1:

- The term Benefits is identified as "Civilian Position Full Fringe Benefit Cost Factor"; and
- The term General Overhead is identified as "Overhead Factor."

Annual salary	Hours	Hourly rate
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\$73,681	2,080	\$35.42
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\$105,018	2,080	\$50.49
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\$44,805	2,080	\$21.54
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combined salaries

ing locality pay.

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a 1/11 ratio,

: 0.091