

## MEMORANDUM

**TO:** Rich Leukroth, OPPT/CCD

**FROM:** Wendy Hoffman, OPPT/EETD/EPAB

**SUBJECT:** Calculation of Paperwork Reduction Act (PRA) Burden Estimate for the Incineration ECAs

**DATE:** October 20, 2004

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This memo presents the information I used to calculate the PRA burden estimates for the two incineration ECAs.

- During the week of December 1, 2003, John Blouin (EETD) spoke to Philip Taylor of the University of Dayton Research Institute's (UDRI) Thermal Decomposition Laboratory, where the thermal "burn" tests will be conducted. Dr. Taylor told John that studies of this type are currently costing between \$100,000 and \$150,000 each. See email from John Blouin to Wendy Hoffman, dated 12/12/2003 (attached).
- I used the higher end of the range, \$150,000, for the estimated cost of each study, for a total of \$300,000 for both the fluoropolymer and telomer incineration studies.
- I then followed EPAB's standard methodology of taking 25 percent of the cost of the laboratory study as administrative costs attributable to the Paperwork Reduction Act. I then converted those costs into labor hours using a weighted average wage rate of \$43.31 from the most recent Section 4 Test Rule ICR (EPA ICR 1139) made up of a 20/60/20 managerial/technical/clerical mix.

The current ICR expires at the end of October. The proposed ICR has already received public comment and the final version is now being prepared at EPA. EPA has requested an extension from OMB for the current ICR until January 2005. I am attaching the most recent version of the Section 6 Estimating the Burden and Cost of the Collection, which contains updated wage rates.

- The calculations are as follows:  $\$300,000 \times .25 = \$75,000$ . Then,  $\$75,000$  divided by  $\$43.31 = 1,732$  hours for both ECAs, or 866 hours for each. Each ECA has four respondents, so I calculated the per respondent burden for each ECA by dividing the total burden by four (= 216.5 hours).
- The total number of administrative burden hours for ECAs allocated in the ICR for the next three-year period is 6,175, so the two incineration ECAs do not exceed that number.