

**Information Collection Request 1941.03
for the Evaluation of PrintSTEP**

PART A OF THE SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title: Evaluation of the PrintSTEP State Pilot Program

1(b) Short Characterization/Abstract

PrintSTEP, which stands for “Printers’ Simplified Total Environmental Partnership,” was initiated as part of the EPA’s “Common Sense Initiative,” the goal of which was to create environmental protection strategies that are cleaner for the environment and cheaper and smarter for industry and taxpayers. Representatives from federal, state, and local governments, industry, environmental justice groups, and labor organizations developed PrintSTEP by redesigning the permitting process currently in effect for this industry. PrintSTEP is a single enforceable agreement that regulates a printing facility’s air, water, and hazardous waste streams all at once. It combines environmental requirements for printing facilities into one system, and addresses both federal and state requirements. It is a voluntary pilot program and it does not change the existing environmental emissions or release standards for the printing industry. Instead, it changes the process of implementing those standards to improve efficiency and environmental performance. This alternative regulatory scheme incorporates meaningful public involvement in the regulatory process, provides printers with one regulatory agreement for all media, provides flexibility for printers to make many types of process changes without additional paperwork, and promotes pollution prevention practices. Details of the PrintSTEP program are included in three project documents: a *State Guide* for the pilot states, a *Plain Language Workbook Template* for participating printers, and a *Community Handbook* for interested community members.

Current Status of Pilot Programs:

The two active pilot states are Missouri and New Hampshire, which entered into EPA cooperative agreements to test the PrintSTEP concepts in a pilot project. Missouri’s pilot is focused in St. Louis, MO, while New Hampshire’s pilot is state-wide. With regard to affected entities, a total of 56 printing facilities are participating in the PrintSTEP pilot in these two states. In order to join the pilot, in the past, these printers prepared and submitted to their state agency a single PrintSTEP application (covering their waste water, storm water, hazardous waste and air emissions). All PrintSTEP applications were made available for public review, and for several applications, community members were given an opportunity to provide comments.

Both states have already documented successes at the start of implementation of their PrintSTEP pilots. In New Hampshire, 47 printers are participating in the state-wide pilot. All but one of these printers were out of compliance when first contacted by the DES. However, as a result of joining PrintSTEP, all of the participants are now in compliance with regard to their wastewater, stormwater, hazardous waste and emissions requirements.

New Hampshire sees the following accomplishments as “early successes” of their PrintSTEP pilot:

- 1) Achieved 20% participation of the printing sector statewide;
- 2) Brought small businesses into compliance not otherwise in compliance;
- 3) Promoted environmental awareness within this sector;
- 4) Established communication base with every printer in New Hampshire;
- 5) Gave the printers a condensed version of applicable regulations in the PrintSTEP “plain language workbook”;
- 6) Provided operational flexibility; and
- 7) Implemented NH’s first self-certification program.

Missouri achieved similar successes early on in the implementation of their pilot which is occurring in St. Louis, MO. During the initial application process, the MO PrintSTEP Coordinator toured the 9 participating printing facilities to review and advise printers on their permitting, air quality, hazardous waste review, solid waste recycling, wastewater and stormwater procedures. The MO DNR has already documented eight examples which demonstrate how the multi-media regulatory approach can save printers and regulatory agencies time and money, as well as improve environmental quality.

Current Status of PrintSTEP Evaluation:

As a pilot project, EPA must conduct a thorough evaluation to determine the results of the pilots following full implementation and to share lessons learned with other states which may want to implement PrintSTEP-like programs. Under the cooperative agreements with EPA, the pilots are supposed to take place over a two-year period. This is a change from the status of the program when EPA submitted the original ICR proposal; at that time, EPA expected the PrintSTEP pilots to last 3 years. (Nonetheless, as discussed below, the basic components of the evaluation have remained the same, namely, there’s a baseline survey, mid-point review and end-of-pilot survey.) The evaluation of the PrintSTEP pilot program aims to systematically identify the impacts the program has had on three types of stakeholders: printers, community residents, and the state government agencies administering the program. A primary goal of the evaluation is to answer the question: What difference has PrintSTEP made to each of these three types of stakeholders?

The evaluation encompasses a baseline survey, a mid-point review and an end-of-pilot (or post-pilot) survey to be administered by an EPA contractor, along with a community survey and interviews with the PrintSTEP coordinators in MO and NH. The baseline survey and mid-point review were addressed in the existing ICR and will have already been completed by the time the existing ICR expires on October 31, 2004. (The draft and incomplete baseline assessment is included in appendix 1; there is still additional data which must be added to the baseline and that will be completed under the existing ICR. The mid-point review is going to be completed shortly before the expiration of the existing ICR.) In addition, the state grantees have already completed the survey of community members (also addressed under the existing ICR). The experiences of the pilot states will be evaluated through in-depth interviews with the PrintSTEP coordinators in NH and MO; this latter information collection is not included in the ICR as fewer than 10

interviews will be conducted in both states.

For that reason, this request for OMB approval only focuses on the end-of-pilot (or post-pilot) survey, which will need to be completed in final form at the conclusion of both pilots. This is the only remaining part of the evaluation subject to this information collection request. (The end-of-pilot survey could not be conducted under the existing ICR because there was an unexpected delay in the start-up of the state pilots.) Both pilots are expected to conclude by November 2005, with the end-of-pilot survey and final evaluation being completed by approximately April, 2006.

The results of the evaluation will be used by EPA and states interesting in implementing PrintSTEP-like programs in their states; there will be a “lessons learned” section of the evaluation report which will have applicability to any future pilot programs which EPA or the states decide to pursue. Additionally, the multi-stakeholder representatives (and their constituents) who contributed their time and expertise over the development of PrintSTEP will also use the evaluation results to assess their interest in participating in programs to expand the implementation of PrintSTEP concepts.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

To evaluate the effectiveness of the pilot project, information needs to be collected from the pilot project participants. Without a comprehensive evaluation, the ability of the pilot project to inform future policy (the purpose of conducting and sponsoring the pilot in the first place) would be lost.

Delegation 1-47 gives the Office of Enforcement and Compliance Assurance the authority “To approve grants and cooperative agreements aimed at fostering environmental enforcement and improving compliance with environmental law in the U.S. and foreign countries to public and private agencies, organizations, and institutions; colleges, universities, and other institutions of higher education; federally recognized tribal entities; private individuals, and to any others for activities including, but not limited to, training, studies, investigations, **surveys**, public education programs, and research, and to approve fellowships; where authorized under: Clean Air Act, Section 103; Clean Water Act, Section 104; Solid Waste Disposal Act, Section 8001; Federal Insecticide, Fungicide, and Rodenticide Act, Section 20; Toxic Substances Control Act, Section 10; Marine Protection, Research, and Sanctuaries Act, Section 203; Safe Drinking Water Act, Section 1442; Comprehensive Environmental Response, Compensation and Liability Act, Section 311; and Indian Environmental General Assistance Program Act, Section 11.”

2(b) Practical Utility/Users of the Data

It is expected that the evaluation results and lessons learned will be used by EPA to prepare a guide for developing, implementing and evaluating pilot programs. Also, the results and lessons learned will be shared with other states interested in establishing PrintSTEP-like programs in their states. The results will measure the success of the PrintSTEP concept and tools, and will be published in a final EPA report addressing what changes have taken place in PrintSTEP facilities, and whether or not those changes can be attributed to PrintSTEP. Quantitative and qualitative

results will be tabulated for the baseline, midpoint and end of the program, and the following research questions will be addressed in the final report:

- Does PrintSTEP effect emissions, wastes and discharges from printing (both overall and for each medium)?
- Has PrintSTEP changed printers' use of specific pollution prevention practices?
- Can states administer PrintSTEP as a multi-media program?
- Does PrintSTEP improve efficiency for the state regulators?
- Do printers have a better understanding of their regulatory requirements under PrintSTEP?
- Does PrintSTEP effect printers' ability to respond to market conditions?
- Does PrintSTEP provide an opportunity for meaningful public involvement?
- Is PrintSTEP cost-effective for all stakeholders?

Conducting and evaluating the PrintSTEP pilot contributes to most Agency goals, as stated in EPA's *Strategic Plan* (EPA 190 R-00-002). The *Strategic Plan* stresses EPA's promotion of innovative approaches such as PrintSTEP which "streamlined regulatory processes, cut paperwork, built more flexibility into regulations, established new voluntary programs and partnerships, and adopted new cross-Agency, cross-media perspectives on health and environmental problems."

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

The data requirements for the study have been carefully reviewed to ensure that the needed information cannot be obtained from other sources. The information requested either in the telephone interviews or the written portion of the evaluation is not available through any other source within the EPA, nor is it available through sources outside the Agency. This pilot project has not been previously conducted, and therefore, has not been evaluated.

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

In compliance with the 1995 Paperwork Reduction Act, EPA solicited public comments during a 60-day period prior to submission of the ICR to OMB. EPA issued a Federal Register notice announcing the ICR and providing a burden estimate on May 13, 2004, FR Volume 69, Number 93, page 26599. No comments were received before the comment period ended on July 12, 2004.

3(c) Consultations

The research design, data collection instruments and data collection plan were developed by Abt Associates Inc., under U.S. EPA contracts 68-W6-0021 and 68-W-99-039. The work was done with close consultation and significant input from U.S. EPA and the PrintSTEP stakeholder representative group. This group included representatives of the parties from whom the information is to be obtained, namely printers and community members. This group was directly involved with designing the evaluation strategy and data collection instruments, ensuring that: the

environmental benefit of the pilot project is thoroughly tracked; the data collection instruments are technically sound; the instructions are clear; the terminology is coherent, unambiguous, and understandable to respondents; respondent burden is minimized; and the data is obtainable, but has not been collected previously. Additionally, the contractor's survey research professionals reviewed the survey instruments to check that items are unambiguous, unbiased, non-repetitive, and properly sequenced, skip patterns are clear, and answer categories are mutually exclusive and collectively exhaustive.

In addition to the above, with regard to this request for an extension, EPA consulted with members of the public and affected parties, including the following individuals:

- Gary Jones
Graphic Arts Technical Foundation (GATF)
200 Deer Run Road
Sewickley, PA 15143
412-741-6860, Ext 608
Fax - 412-741-2311
- Tara Olson
Technical Specialist
NH DES - Small Business Technical Assistance Program
360 Corporate Drive
Portsmouth, NH 03801
603-436-1139
tolson@des.state.nh.us
- Bill Hernlund
MO Department of Natural Resources
314-416-2960

They acknowledged that the extent, size and complexity of each individual printers' business and environmental emissions would affect the amount of time it would take for a printer to complete a survey, so that the amount of time to complete a survey might vary for each individual printer involved in the PrintSTEP program. They supported the suggested and average costs and burdens outlined in this document.

3(d) Effects of Less Frequent Collection

Under the existing ICR, survey data has already been collected as part of the baseline survey from the majority of the 56 participating printers in NH and MO. In addition, under the existing ICR and before the time it expires, mid-point data will have been collected from the 56 participating printers. Under the existing ICR, data has also been collected by the state grantees from some of the stakeholders/community members. As a result, this information collection request is necessary only for purposes of completing the end-of-pilot survey of the 56 participating printers. The data for the end-of-pilot survey will be collected **once** and cannot be collected less than this.

Eliminating the end-of-pilot survey would jeopardize the entire evaluation because we would not have final results data.

3(e) General Guidelines

This information collection adheres to the general guidelines set forth by the Office of Management and Budget (OMB).

3(f) Confidentiality

All survey respondents will be assured that the information they provide will be used only for the purpose of this research. No data will be released in a form that can identify individual respondents.

Prior to beginning the telephone surveys as part of the end-of-pilot survey, all respondents will receive an advance letter from their local trade association and/or the state environmental agency. The letter will discuss EPA's sponsorship of the survey, explain the importance and intended applications of the survey and request the respondent's cooperation. The advance letter will indicate that the respondent will soon receive a telephone call from a survey research firm, and will also stress that the respondent's contribution to the survey is voluntary.

Prominent in the advance letter will be an assurance from EPA and the contractor collecting the data that information will be presented in aggregate form only without individual identifiers. This assurance will be reiterated proceeding the administration of the telephone interviews.

Several steps will be taken to ensure confidentiality of individual responses. The survey will be conducted by the survey research firm's staff who will employ the following procedures:

- All employees sign a blanket confidentiality agreement at the time of hire;
- Access to data files containing unique identifiers is limited through password protection;
- Internal ID encoding will be used instead of individual identifiers; and
- No data on individual respondents will be released or identifiable in any published reports or analyses; information will be presented in aggregations only. EPA staff will not receive any records linking respondents' names to survey identification codes.

3(g) Sensitive Questions

Sensitive questions are defined in the ICR instructions as "questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private." This information collection does not include sensitive questions.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondent/Standard Industrial Classification (SIC) Codes

For the printer's data collection, respondents will be employed in the 56 printing facilities

participating in the PrintSTEP pilot.

Parts of NAICS 323: *Printing and Related Support Activities* will be affected by this evaluation. In terms of SIC codes, affected facilities may include:

- SIC code 27 - Printing and Publishing
- SIC code 2396 -Automotive Trimmings, Apparel Findings and Related Articles (e.g., printing and embossing on fabric articles)
- SIC code 3999 - Manufacturing Industries, Not Elsewhere Classified (e.g., printing of eyeglass frames).

4(b) Information Requested

Information already collected under existing ICR:

The *PrintSTEP Evaluation Strategy* was developed in close consultation and with significant input from the PrintSTEP stakeholder representative group. This group included representatives of the parties from whom the information is to be obtained, namely printers, community members, and state environmental agencies. Additionally, environmental justice representatives were included in this group. The group was involved with designing the evaluation strategy and data collection instruments, ensuring that: the environmental benefit of the pilot is thoroughly tracked; the data collection instruments are technically sound; the instructions are clear; the terminology is coherent, unambiguous, and understandable to respondents; respondent burden is minimized; and the data is obtainable, but has not been collected previously. The research approach was designed to minimize respondent burden as well as to minimize data collection costs to the government.

As stated previously, the following components of the evaluation were completed or will be completed under the existing ICR:

1) Baseline survey (to be completed under existing ICR): Via a phone survey, most of the printers participating in the pilot responded to questions regarding their pre-PrintSTEP requirements, their understanding of regulations, and their motivation to join PrintSTEP. In addition, written information was supplied by participating printers. The pilot states collected information on the printers' environmental releases and wastes from PrintSTEP applications that printers submitted when joining PrintSTEP. (This will be used for comparison purposes with the environmental release data to be obtained from printers as part of the end-of-pilot survey. Printers provide annual updates of this information to the state.) The application includes quantitative information such as quantity and type of hazardous waste generated annually, pounds or gallons of VOC-containing and HAP-containing materials used per year, and pollution prevention practices employed. Also, printers recorded an indicator of their level of production (e.g., sales, square feet of printed material, etc.) so that changes in environmental impact related to changes in production can be accounted for in the analysis. To evaluate whether or not PrintSTEP is more cost-effective for printers than the traditional regulatory process, additional written information regarding the costs of participating in PrintSTEP was collected as a fax-back form following the telephone interview.

Originally, a control group was going to be used as part of the evaluation. However, it was determined that printers who are not participating in PrintSTEP had no incentive to participate in a control group. As a result, a different approach was used. State data bases comparing air and hazardous waste data for non-participating printers were utilized in order to create a pool of data for comparison purposes.

Finally, representatives of the state agencies participating in PrintSTEP were interviewed in order to discuss how they interacted with and regulated printers prior to the implementation of the pilot in the state. Fewer than 10 representatives were interviewed as part of this.

2) Mid-point review (to be completed under existing ICR): The mid-point review included interviews with printers on their experiences to date in the PrintSTEP pilot. In addition, the state agencies participating in the pilots interviewed stakeholders at the state level in order to determine their perspectives on PrintSTEP.

Information to be collected which is the focus of this ICR request:

This ICR request focuses on the **end-of-pilot survey**, which encompasses:

- **Telephone survey of 56 PrintSTEP printers:** All printers who volunteer to participate in the pilot will be contacted to complete a telephone survey at the end of the pilot to obtain their comments on the pilot. (The draft telephone survey form is in appendix 2; insignificant changes to format may be incorporated; any such changes would not increase the amount of time necessary to complete the survey.)
- **Written information from 56 PrintSTEP printers:** Written information will be supplied by participating printers. The pilot states collected information on the printers' environmental releases and wastes from PrintSTEP applications that printers submitted when joining PrintSTEP. (This will be used for comparison purposes with the environmental release data to be obtained from printers as part of the end-of-pilot survey.) Printers will provide annual updates of this information to the state. The application includes quantitative information such as quantity and type of hazardous waste generated annually, pounds or gallons of VOC-containing and HAP-containing materials used per year, and pollution prevention practices employed. Also, printers recorded an indicator of their level of production (e.g., sales, square feet of printed material, etc.) so that changes in environmental impact related to changes in production can be accounted for in the analysis. To evaluate whether or not PrintSTEP is more cost-effective for printers than the traditional regulatory process, additional written information regarding the costs of participating in PrintSTEP will be collected as a fax-back form following the telephone interview. (The draft fax-back form for the end-of-pilot survey is in appendix 3.)
- **Discussions with the 2 PrintSTEP coordinators from the 2 state agencies in NH and MO who are administering the current PrintSTEP pilots.** The discussions will focus

on what the PrintSTEP coordinators thought of the pilot and the work entailed on the state agency's part in order to implement the pilot in their state.

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

5(a) Agency Activities

The EPA will be responsible for directing the work of the survey research contractor for the data collection and analysis. The Agency will also facilitate the transfer of data from the pilot states to the contractor, as the states are providing EPA with the database of written data collected, coded by facility identification code, rather than facility name.

5(b) Collection Methodology and Management

The 56 PrintSTEP program participants are volunteers. They were identified by each state through outreach and applied to and were accepted into the pilot program. In Missouri, the pilot is being implemented only in the St. Louis area. In New Hampshire, the pilot is state-wide.

The printers' survey will be conducted using a programmer survey tool where responses are translated directly into a database. This technique was selected as the most cost-effective means to minimize data processing time and data entry errors, to reduce the burden on the respondents by reducing the need for follow-up calls. A review of the survey instruments by the survey research contractor to EPA indicates that the printer's survey will take approximately 12 minutes.

Only cost information will be collected from the PrintSTEP printers by the fax-back form (the rest of the written data from participating printers will be submitted to state agencies as a routine part of the PrintSTEP program). At the conclusion of the telephone interview, the interviewer will explain the written information required and will email or fax the form to the respondent. This method will simplify the return process for the respondent. Entry and coding of written portions will be done by the states, and entry and coding of the telephone survey and fax-back information will be done by the survey research firm contracted by EPA.

This combination of telephone survey and written information was considered the least burdensome for facilities without losing the reliability or accuracy of the information collected. The telephone survey, which is expected to last approximately 12 minutes, focuses on collecting the more subjective information. Quantitative information on costs is collected in written format for convenience (fax-back or email-back) and accuracy (the respondent may have to consult with their records or coworkers to answer these questions).

5(c) Small Entity Flexibility

Respondents in the proposed data collection will include a few large printing establishments as well as small establishments located in PrintSTEP pilot areas. Printers of every size are allowed to participate in the program, and surveying the printers is the only way to obtain information that is representative of the effectiveness of PrintSTEP. The information obtained from all of these businesses, and looking at comparable data from non-participating printers, is critical in evaluating

the PrintSTEP program. Every effort has been made to minimize the burden on respondents. Specifically, respondent burdens for small entities (and all other respondents) will be minimized in the following ways:

- The survey was designed to be brief (12 minutes) by asking a limited set of questions which focus on only the pertinent issues of the evaluation.
- The questions in the survey only ask for information that cannot be obtained from other sources.
- The survey will be conducted using Computer Assisted Telephone Interviewing (CATI) by experienced interviewers. The CATI programs move the interviewer swiftly and accurately through skip patterns within the instrument, reducing errors and the need for follow-up calls.

5(d) Collection Schedule

Information collection requested by EPA for the end-of-pilot survey will begin after approval of the ICR and after the conclusion of the two-year pilot program (most likely during the November 2005 through April 2006 timeframe).

A final report will be completed within approximately three months of completing the post-pilot data collection. This report will include an analysis of the results from the information collected from printers, stakeholders, and the pilot states.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Respondent Burden

The focus of this ICR is on the end-of-pilot survey, the final component of the PrintSTEP evaluation. The other two components of the PrintSTEP evaluation (meaning the baseline assessment and mid-point review) are being completed under the existing ICR. For background information only, the respondent burden and costs for the baseline and mid-point review are provided in the charts in this ICR even though they are not subject to the ICR. Thus far, for the baseline survey, of the 56 participating printers, 48 (or 86%) completed the telephone survey and 28 (or 50%) completed the fax-back form. However, more printers from NH are still expected to complete the survey and fax-back form so these numbers are likely to increase. The reason for this ICR proposal is the end-of-pilot survey.

The 56 participating printers are expected to be included in the end-of-pilot survey. Under this ICR proposal, the major data to be collected as part of the end-of-pilot survey include the following:

- Participating printers' environmental performance relative to the baseline, including their use of pollution prevention practices. (Data will be collected through: 1) interviews with printers; 2) PrintSTEP progress reports submitted to the state agencies at the end of the pilot, which include updated application information; and 3) state database data on non-participating printers.)

- Printers' satisfaction with PrintSTEP and suggestions for program improvements. (Data will be collected through interviews with printers.)
- Costs to printers as a result of participating in PrintSTEP versus a traditional regulatory approach. (Data will be collected through a fax-back form associated with end of pilot interviews.)

The telephone portion of the printer's end-of-pilot survey is expected to take approximately 12 minutes to complete. The written information on environmental releases and wastes, plus cost information, is expected to take 5.5 hours for printers to complete. For PrintSTEP printers, this environmental release information will be collected by the states through the PrintSTEP annual reports (or updates to the information in the original applications). The total for the **end-of-pilot survey** is 319 hours. The estimates of respondent burden for the end-of-pilot survey are shown under item # 3 in the table below.

It should be noted that the **annual** burden would be approximately 106 hours for participating printers.

6(a) Total Respondent Burden for Participating Printers

Respondent Type	Estimated number of respondents	Time to complete state background questionnaire	Time to respond to telephone survey (hrs)	Time to complete written response (hrs)	Total respondent burden (hrs)
1. Baseline survey (To be completed under existing ICR - NOT subject to ICR proposal)					
Printers responding to state mailing	700	0.2	na	na	140
PrintSTEP printer	56		0.2	5.5	319
Comparison printer	0		0.2	5.5	0
2. Mid point review (To be completed under existing ICR - NOT subject to ICR proposal)					
PrintSTEP printer	56		0.2	5.5	319
Comparison printer	0		0.2	5.5	0
Community member	0		0.25	0.00	0
3. End-of-Pilot survey (Focus of ICR proposal)					
PrintSTEP printer	56		0.2	5.5	319
Comparison printer	0		0.2	5.5	0
Total for all 3 surveys					1098
Total for ICR proposal for participating printers					319

The annual burden for the participating printers would be approximately 106 hours.

Respondent Burden for Participating States: In addition to the printers, the 2 state PrintSTEP coordinators from the NH DES and MO DNR who are implementing the 2 PrintSTEP pilots would be interviewed. In addition, there are some other burdens associated with the end-of-pilot data collection; the state PrintSTEP coordinators assist the participating printers in their states by answering questions and providing assistance with calculations associated with any changes in environmental emissions. The summary of burden per state is outlined below and then a total is

provided.

For NH DES to assist with the annual updates from the printers, the estimated time is 2 hours per 47 printers, or 94 hours total to assist the printers with their annual updates/reports. Then, in order for NH DES to answer the end-of-pilot survey questions, the estimate is 1 hour. Finally, in order to search the state data bases to provide data on non-participating printers for comparison purposes, the estimate is 8 hours, making the total for NH DES approximately 103 hours.

For the MO DNR, the amount of time is less because there are only 9 participating printers in the St. Louis pilot (versus NH's pilot which is state-wide). For MO, it will take approximately 4 hours total to assist with the annual updates from the printers. Then, in order for MO DNR to answer the end-of-pilot survey questions, the estimate is 1 hour. Finally, in order to search the state data bases to provide data on non-participating printers for comparison purposes, the estimate is 4 hours, making the total for MO DNR approximately 9 hours. (Again, this difference is based on the fact that 47 printers are participating in NH, while only 9 are participating in MO.)

So, the state total burden is approximately 112 hours and the annual state burden is approximately 37 hours.

Combined Respondent Burden for Participating Printers and State Agencies:

When you combine the burden (outlined above) for participating printers and state agencies, the approximate total burden is 431 hours **or an annual burden of approximately 143 hours. This amounts to an annual burden of 2.46 or 2.5 hours per respondent.**

The combined annual burden of all respondent categories is as follows:

- a. Participating printers - approximately 106 hours annual burden**
- b. Participating states - approximately 37 hours annual burden**
- c. Combined burden of all respondent categories - approx. 143 hours annual burden**

6(b) Respondent Costs

The PrintSTEP evaluation utilizes the telephone interviews and written data collection forms to collect all the data necessary from the respondent. There are no capital, operations, or maintenance costs associated with this information collection. At this time, it is assumed that no payment or gift will be provided to respondents. Under the proposed ICR, the only cost to the respondents resulting from the end-of-pilot survey is their time, as shown in the table below for participating printers under item # 3 ("End-of-Pilot survey"). The estimated cost for participating printers for the end-of-pilot survey is 5.7 hours for each of the 56 printers at a cost of \$43.12 per hour, for a total of \$ 13,764 for participating printers for this ICR proposal. (The annual total cost is \$4,588.) For the 2 participating state coordinators, the cost is approximately \$ 25.00 per hour (based on salary rates and overhead provided under cooperative agreement applications to EPA), for a total of \$ 2,800 (and an annual cost of \$933). **When you combine the estimated cost for both the printers and the state coordinators, the grand total is \$16,564 (or \$5,521**

on an annual basis).

The chart below provides more detail on total costs to participating printers.

Total Respondent Costs for Participating Printers

Respondent Type	Estimated number of respondents	Time to respond to information request (hr/printer)	Total respondent burden (hrs)	Estimated avg. compensation of respondent (\$/hr) ¹	Total respondent burden in monetary terms (\$)
1. Baseline survey					
(To be completed under existing ICR - NOT subject to ICR proposal)					
Printers responding to state mailing	700	0.2	140	\$43.12	\$6,037
PrintSTEP printer	56	5.7	319	\$43.12	\$13,764
Comparison printer	0	5.7	0	\$43.12	\$0
2. Mid point review					
(To be completed under existing ICR - NOT subject to ICR proposal)					
PrintSTEP printer	56	5.7	319	\$43.12	\$13,764
Comparison printer	0	5.7	0	\$43.12	\$0
Community member	0	0.25	0	\$27.95	\$0
3. End-of-Pilot survey					
(Focus of ICR request)					
PrintSTEP printer	56	5.7	319	\$43.12	\$13,764
Comparison printer	0	5.7	0	\$43.12	\$0
Total for All 3 surveys					\$47,329
Total for ICR proposal for participating printers					\$13,764

¹Compensation data is from the U.S. Department of Labor's Bureau of Labor Statistics' *Employer Costs for Employee Compensation Summary, March 2004*. (<http://stats.bls.gov/news.release/ecec.toc.htm>) Printers' compensation from *Table 11. Private industry, by occupational group and full-time and part-time status, compensation for Professional and Related*. Community member compensation from *Table 1. Civilian workers, by major occupational and industry group, compensation for All Workers*. Compensation includes wages and salaries, and benefits (paid leave, supplemental pay, insurance, retirement and savings, and legally required benefits). An additional loading factor of 17% of wages is included for overhead. This overhead rate is used in EPA economic analyses for two major rulemakings: *Wage Rates for Economic Analyses of the Toxics Release Inventory Program*, June 10, 2002, and the *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report*, August 2002. This overhead loading is based on the following study: Heiden Associates, *Final Report: A Study of Industry Compliance Costs Under the Final Comprehensive Assessment Information Rule*, Prepared for the Chemical Manufacturers Association, December 14, 1989.

The annual cost for the time of participating printers would be approximately \$ 4,588.

Comprehensive Summary of Respondent Burden Hours and Costs on an Annual Basis

Taking into account the previous explanation of respondent burden hours and costs on an annual basis, the following list summarizes the total for both hours and costs on an annual basis:

Total number of annual respondents: 58 (including 56 printers and 2 states)

Total annual respondent burden:

Participating printers: 106 hours annual burden

Participating states: 37 hours annual burden

Total combined: 143 hours annual burden

Total annual burden per respondent: Approximately 2.5 hours

Total annual capital/startup cost: \$ 0

Total annual cost for O & M: \$ 0

Total annual respondent cost for their time:

Participating printers: \$ 4,588

Participating states: \$ 933

Total cost: \$ 5,521 annual respondent cost for their time

6(c) Estimating Agency Burden and Cost

The current contracted cost to the federal government is approximately \$ 74,000 for project management and implementation of the evaluation (e.g. phone surveys, preparation of data files, and analysis and reporting of results). So, the annual contractor cost for this would be approximately \$24,666. (The pilot states are responsible for sharing the annual reports/updates to the original applications from the printers; that cost is reflected in the previous section under respondent costs.) The annual labor costs for the part-time EPA employee who works on PrintSTEP on a part-time basis would be approximately \$ 4,166. So, the EPA annual labor costs would be (\$24,666 plus \$ 4,166 for) a total of approximately \$ 28,832

6(e) Reasons for Change in Burden

The control group was eliminated and there are a total of 56 printers who are participating in the evaluation in a total of two states.

6(f) Burden Statement

The annual public reporting and record-keeping burden for this collection of information is estimated to average 2.5 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers

for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. OECA-2004-0027 which is available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center is (202) 566-1752. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. OECA-2004-0027 and OMB control number 2020-0023 in any correspondence.

PART B OF THE SUPPORTING STATEMENT

1. SURVEY OBJECTIVES, KEY VARIABLES, AND OTHER PRELIMINARIES

1(a) Survey Objectives

Because PrintSTEP is a multifaceted program, it has a variety of goals. The PrintSTEP Project Team identified seven types of expected outcomes, each of which has several components:

- ▶ enhanced environmental protection;
- ▶ increased use of pollution prevention practices;
- ▶ simplified regulatory process for printers;
- ▶ improved efficiency of administration for state governments;
- ▶ enhanced public involvement;
- ▶ participants realize benefits and are motivated to participate in PrintSTEP; and
- ▶ cost effectiveness for all stakeholders.

This broad set of expected outcomes will require a range of distinct data collection and analysis activities. Data for the end-of-year pilot will be gathered from printer's updates to program applications/annual reports and telephone interviews. The specific data collection activities are described below.

Printers: Telephone Survey and Updates to PrintSTEP Applications/Annual Reports

It is critical to the evaluation to understand how printers view the PrintSTEP program, how the costs of participating compare to the costs of not participating, and what changes participating printers have made as a result of their participation in the program. The 56 participating printers

will be interviewed by telephone at the end of the pilot. The post-pilot survey concentrates on changes to the production process and measures of environmental impact -- areas where any impacts are not likely to be fully evident earlier in the program.

The telephone survey will be combined with written information from updates to the PrintSTEP application to collect the data needed. The annual updates will complement the telephone interviews by providing written data on environmental releases before and after pilot implementation. Information on costs incurred related to PrintSTEP or traditional environmental regulation will be collected via a fax-back form that will be sent to the printer at the completion of the telephone interview. An EPA contractor will conduct the telephone survey of participating printers. Any updates to the PrintSTEP applications will be collected by the pilot states as part of the PrintSTEP process.

1(b) Key Variables

Key variables, described in the PrintSTEP *Evaluation Strategy* include: the ease in completing the PrintSTEP application (already covered under the existing ICR); the use of the technical assistance available to PrintSTEP participants; the level of interest in implementing pollution prevention practices; and the level of public involvement for each printer.

1(c) Statistical Approach

A census will be conducted, therefore this section is not relevant.

1(d) Feasibility

It is not anticipated that the printers will have any serious problems or delays answering the questions in the telephone survey portion of the data collection or submitting any updates to the original application.

2. SURVEY DESIGN

2(a) Target Population and Coverage

The population of interest for this evaluation is printers participating in the PrintSTEP pilot program. Fifty-six printers are participating in the program. For such a small population, a census is considered most appropriate in producing robust, defensible, results. Additionally, a census will eliminate errors associated with a skewed sampling response.

2(b) Sample Design

As described above, a census, rather than a sample, of all participants will be conducted.

2(c) Precision Requirements

Because a census will be conducted, any differences or similarities among values are actual and not due to the chance selection of a non-representative subpopulation for a survey sample.

Steps are also being taken to minimize another type of bias, known as strategic responses. Strategic responses occur where respondents alter their answers in an attempt to influence

conclusions drawn from the survey overall or from their response in particular. Strategic response can be particularly problematic if respondents perceive that the survey outcome may directly alter regulatory requirements. To reduce bias and strategic responses, interviewers will: provide context for the survey, guarantee anonymity, use neutral wording, use open ended questions (these will be limited to maintain cost-effectiveness of the survey), and rotate the order of the response prompts (to avoid predisposition to selection of the first or last prompts).

2(d) Questionnaire Design

The survey instruments were developed by Abt Associates Inc., under a previous contract, U.S. EPA contract 68-W6-0021. The work was done with close consultation and significant input from U.S. EPA and the PrintSTEP stakeholder representative group. This group included representatives of the parties from whom the information is to be obtained, namely printers and community members. This group was directly involved with designing the evaluation strategy and data collection instruments, ensuring that: the environmental benefit of the pilot is thoroughly tracked; the data collection instruments are technically sound; the instructions are clear; the terminology is coherent, unambiguous, and understandable to respondents; respondent burden is minimized; and the data is obtainable, but has not been collected previously. Additionally, the contractor's survey research professionals reviewed the survey instruments to check that items are unambiguous, unbiased, nonrepetitive, and properly sequenced, skip patterns are clear, and answer categories are mutually exclusive and collectively exhaustive.

3. PRETESTS AND PILOT TESTS

Under the existing ICR, the printer's survey instrument was subject to a pretest at the contractor's Survey Research Center. The pretest was conducted to verify the survey instrument will collect all of the data required to meet the objectives of the survey in the most efficient manner.

4. COLLECTION METHODS AND FOLLOW-UP

4(a) Collection Methods

The printers' survey will be conducted using Computer Assisted Telephone Interviewing (CATI) by experienced interviewers. The CATI programs move the interviewer swiftly and accurately through skip patterns within the instrument. This technique was selected as the most cost-effective means to minimize data processing time and data entry errors, and to reduce the burden on the respondents by reducing the length of the call, and the need for follow-up calls. Review of the survey instruments by a survey research contractor indicates that the printer's survey will take approximately 12 minutes.

Only cost information will be collected from the PrintSTEP printers by fax-back form (the rest of the written data from participating printers will be submitted to state agencies as a normal part of the PrintSTEP program). The interviewer will explain the written information required during the interview and will email or fax the form to the respondent. This method will simplify the return process for the respondent. Entry and coding of the telephone survey will be done by the survey research firm.

This combination of telephone survey and written information was considered the least burdensome for facilities without losing the reliability or accuracy of the information collected. The telephone survey is expected to last less than 15 minutes and it focuses on collecting the more subjective information. Quantitative information is collected in a written format for convenience (fax-back or email-back) and accuracy (the respondent may have to consult with their records or coworkers to complete answer these questions). Data collection procedures also include:

Interviewer requirements/training. The contractor's interviewing staff come from a variety of backgrounds and are hired based on their verbal skills, knowledge and experience with computers, work experience related to survey research, and attention to detail. Interviewers attend basic training that covers all aspects of standard interviewing practices, including verbatim reading, refusal aversion, how to probe and record open end responses, establishing rapport, appropriate pacing and delivery and CATI system instruction. Prior to the start of the field period, interviewers participate in a project briefing to provide them with an overview of the study, a question by question review of the instrument, CATI practice, and role playing.

Field testing. The survey was previously administered from the contractor's Survey Research Center. An experienced manager of telephone interview surveys was and will be on-site, handling survey tasks from the initial establishment of a field organization to the monitoring of survey response. Careful quality control over all aspects of data collection and preparation is an integral part of these activities.

4(b) Survey Response and Follow-up

The target response rate is 90% for printers. Interview survey data will be recorded using Computer Assisted Telephone Interviewing (CATI) by experienced interviewers. Responses are entered into the computer by the interviewer during the interview to minimize data processing time and data entry errors. To maximize response, several methods will be employed. First, interviewers are trained in identifying and contacting the most appropriate respondent. In the case of printers, this includes techniques to find the replacement contact when the original contact is no longer with the company. The survey is designed to be brief (approximately 12 minutes) to reduce burden and improve response rates. PrintSTEP printers will know about the survey before they answer questions and their state agency or trade associations will likely be sending advance letters stressing the survey is brief and is important to the success of the pilot project as a whole

5. ANALYZING AND REPORTING SURVEY RESULTS

5(a) Data Preparation

As described above, the printers' survey will be conducted using Computer Assisted Telephone Interviewing (CATI) by experienced interviewers. Responses are entered into the computer by the interviewer during the interview to minimize data processing time and data entry errors. Data from the fax-back forms will be entered by contractor staff. The contractor maintains an in-house staff of trained and experienced coders who have worked on many kinds of surveys to assure data preparation of the highest quality. 100% key verification is carried out to ensure accurate data entry. Each pilot state is responsible for entering the information from the printers' applications (for PrintSTEP printers) or the equivalent form (for the comparison group).

5(b) Analysis

An analysis of the survey results will be included in the final report evaluation addressing what changes have taken place in the PrintSTEP facilities, and whether or not those changes can be attributed to PrintSTEP. All information will be presented as aggregate results and the facility names of respondents will not be identified. Quantitative and qualitative results will be tabulated.

The contractor's analysts and statisticians reviewing the survey results will prepare summary statistics for each question, and will conduct a thorough analysis of the data with respect to the questions posed in the survey objectives. Trends in the data will be identified using a statistical analysis program (SAS) to run a wide range of analyses including, but not limited to, correlation matrices. Analyses will be performed to examine how the survey objectives (e.g., changes environmental releases/wastes, changes in pollution prevention practices) are influenced by the pilot state, facility size, or type of printing process. Additional analyses will examine relationships among the objectives, such as the influence of public involvement on reductions in environmental releases/wastes.

5(c) Reporting Results

The final report will likely be posted on-line and will also be available in hard copy.