

## Response to OMB comments to ICR package

*1) Please make clear in the up-front instructions that participation is strictly voluntary.*

The text on the first page of the questionnaire has been changed in response to this comment. This point will also be emphasized during the first contact phone call with the DWTPs.

*2) On p 6, para 3, you say that in many cases info is CBI, so you can't get it from another office within the agency. Later, on p 19, Sec 3(f), you say that none of the info is CBI. Which is correct. Please clarify. Also, further clarification to the respondent on the extent to which you will protect confidentiality would be helpful. If respondent makes claim of CBI, will you defend it if FOIA'd?*

The use of CBI may not be the best word choice on pg 6. The paragraph was written in response to comments that we are asking the DWTPs to supply information they may have already supplied in other formats. DWTPs are required to report a great deal of information to both the federal, state and/or tribal authorities that are directly responsible for permitting and monitoring compliance, as well as to federal authorities under programs such as the Unregulated Contaminant Monitoring Regulation (UCMR). Some of this information may be CBI (such as plant financial documents) or restricted due to homeland security issues (such as detailed plant designs that list dimensions and construction materials). Since this project is being conducted under the auspices of EPA's Office of Research and Development rather than the EPA's Office of Water, we do not have access or authority to request even the non-CBI information that may be present in these state, tribal or federal files (for example the UCMR data the DWTPs may have submitted). Therefore, we need to ask questions that may appear to be somewhat redundant, as the DWTPs have submitted the information in previous documents to other agencies, or even other parts of the EPA. The questions we are asking are not CBI, which is why the response on pg 19 is correct.

Our primary confidentiality concern is the DWTP location/identity, not any CBI information (which we are not asking them to provide). This will be the first large scale drinking water occurrence study for many of the chemicals on our analyte list. Thus, we cannot predict how often these chemicals will be detected, if at all, nor at what concentrations they may be present. Consequently, many utilities may be hesitant to participate if any detections of these unregulated chemicals in their DWTP are made publically available. To attempt to ease this concern, we are planning to only release the data in presentations and publications in a form such that the plants cannot be identified (DWTP 1, DWTP 2, etc). Only the personnel directly working on the project and their immediate supervisors will know the identity of the sampled DWTPs. However, if we are FOIA'd to supply the identities of the utilities we will be forced to comply (I currently have a question in with the Office of General Council on this issue, however I can find no obvious exception we can use in the 9 exemption policy [http://www.epa.gov/foia/foia\\_exemptions.htm](http://www.epa.gov/foia/foia_exemptions.htm)). In this scenario, the DWTPs will be informed of the FOIA request, and they will be given a copy of the information that will be released. If requested, team personnel will assist the DWTPs in preparing materials for their consumers and

the media to help interpret the data. The potential for FOIA and our response to it will be explained during the initial phone interview, and will be supplied in writing to the DWTPs. Paragraph 3 on pg 6 and paragraph 1 on pg 7 have been rewritten in response to this comment.

*3) The burden calculation assumes that both the telephone and written surveys will go to 50 DWTPs. However, since the telephone interview is a screener it seems likely it may be given to many more than the 50 plants that actually wind up participating (in order to achieve a sample of 50). Please revise the burden and number of respondents accordingly.*

We currently have the funding to sample fewer than 25 locations, however, substantial interest has been expressed by higher level EPA management to consider expanding the scope of the project size if additional funding can be identified. The project team felt it prudent to build this potential expanded size into the current ICR, given the high Agency interest in this topic. The supporting statement has been amended to account for an additional 25 DWTPs which may be contacted for the phone interview, but may either not meet the study criteria or choose not to participate. Specifically, Sections 6(e) and 6(f) as well as Table 3 have been amended to account for an additional 25 hours of Operations Executive time which may be spent during a phone interview. This change will allow for up to 75 DWTPs to be contacted for phone interviews, with a maximum of 50 DWTPs fully participating in the study.

*Survey, p 4: "Pumpage at sampling (mgd)" is confusing. Do you mean the ave flow rate at the sampling point, or the instantaneous flow rate at the time of sampling, or something else? Please clarify.*

The specific survey questions you mention here were drafted by a drinking water engineer on the project team using the terminology that he (and presumably the DWTP operators) would be familiar with. With this question, we are trying to understand how close to plant capacity they are running (for example, if the plant is designed for a maximum of 10 mgd, are they running at 9 mgd or 2 mgd?). By suggesting the units of mgd (millions of gallons per day) rather than cfm (cubic feet per minute), the DWTP should realize we are after the daily production and not the instantaneous flow. No changes were made based on this comment.

*Survey, p 4: Please clarify what is meant by "Is there a disinfectant residual present in the filter?" What filter? The term "disinfectant residual" is usually used to describe the finished water. In what sense would it be present in a filter?*

*Survey, P 5: Please clarify what is meant by "Is a disinfectant residual applied to the GAC?" See prev comment. Do you mean "...to the finished water after GAC treatment?"*

To answer both of these questions, some DWTPs chlorinate either at the beginning or in the middle of treatment. Sand filters and GAC treatment beds both resemble swimming pools with the sand/carbon at the bottom with the water to be treated on top. If a DWTP chlorinated the water before or during either of these steps, a chlorine residual could be present in the water. Thus, in these systems, the water even before it is finished can have residual chlorine. We ask the DWTPs to supply the finished water residual in the 5<sup>th</sup> question on page 6 of the questionnaire. No changes were made based on these comments.

*Survey, p 6: Re, "If chloramines are used, describe how they result..."  
Not clear what "result" means here. Do you mean "how they are introduced..." Clarify.*

We agree this question could be unclear. The desire is to find out how the chloramine is produced. We have changed the word "result" to "are produced".