
**Information Collection Request for
Contaminant Occurrence Data
in Support of EPA's Third Six-Year Review of
National Primary Drinking Water Regulations**

November 2009

Prepared by:
The Cadmus Group, Inc.
57 Water Street
Watertown, MA 02472

Prepared for:
Nancy Parrotta, Project Officer
Shari Bauman, Work Assignment Manager
Karen Wirth, Alternate Work Assignment Manager
U.S. Environmental Protection Agency
Office of Ground Water and Drinking Water
Standards and Risk Management Division
1201 Constitution Ave, N.W.
Washington, D.C. 20004

TABLE OF CONTENTS

1	IDENTIFICATION OF THE INFORMATION COLLECTION.....	1
	1(a) Title and Number of the Information Collection.....	1
	1(b) Short Characterization.....	1
2	NEED FOR AND USE OF THE COLLECTION.....	3
	2(a) Need/Authority for the Collection.....	3
	2(b) Practical Utility/Users of the Data.....	3
3	NON-DUPLICATION, CONSULTATIONS AND OTHER COLLECTION CRITERIA.....	5
	3(a) Non-duplication.....	5
	3(b) Public Notice Required Prior to ICR Submission to OMB.....	5
	3(c) Consultations.....	5
	3(d) Effects of Less Frequent Collection.....	6
	3(e) General Guidelines.....	6
	3(f) Confidentiality.....	6
	3(g) Sensitive Questions.....	6
4	RESPONDENTS AND THE INFORMATION.....	7
	4(a) Respondents and NAICS/SIC Codes.....	7
	4(b) Information Requested.....	7
	4(b)(i) Data Items.....	7
	4(b)(ii) Respondent Activities.....	11
5	INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT.....	13
	5(a) Agency Activities.....	13
	5(b) Collection Methodology and Management.....	15
	5(c) Small Entity Flexibility.....	17
	5(d) Collection Schedule.....	18
6	ESTIMATING THE BURDEN AND COST OF THE COLLECTION.....	19
	6(a) Estimating Respondent Burden.....	20
	6(b) Estimating Respondent Costs.....	21
	6(c) Estimating Agency Burden and Costs.....	21
	6(c)(i) Agency Burden.....	22
	6(c)(ii) Agency Cost.....	23
	6(d) Estimating the Respondent Universe and Total Burden and Costs.....	24
	6(e) Bottom Line Burden Hours and Cost Tables.....	24
	6(f) Reasons for Change in Burden.....	25
	6(g) Burden Statement.....	25
	APPENDICES.....	27
	Appendix A: Detailed Burden and Cost for States.....	28
	Appendix B: Detailed Burden and Cost for EPA.....	32

LIST OF EXHIBITS

Exhibit 4-1: Occurrence Data to Be Requested.....8
Exhibit 4-2: Requested Data Categories.....9
Exhibit 6-1: Average Annual State Burden and Costs.....21
Exhibit 6-2: Annual EPA Burden and Costs.....23
Exhibit 6-3: Bottom Line Burden and Costs.....24
Exhibit A-1: Estimated State Burden for Occurrence Data Submission.....28
Exhibit A-2: Estimated 2012 Salaries and Overhead Costs from ASDWA State Resource Model
.....31
Exhibit B-1: Estimated Burden and Labor Costs to EPA for Occurrence Data Collection and
Analysis.....32

ACRONYMS

AMWA	Association of Metropolitan Water Agencies
AWWA	American Water Works Association
ASDWA	Association of State Drinking Water Administrators
CFR	Code of Federal Regulations
DQO	Data Quality Objective
DBPR	Disinfectants and Disinfection Byproducts Rule
EPA	Environmental Protection Agency
FBRR	Filter Backwash Recycling Rule
FR	Federal Register
FTP	File Transfer Protocol
GWR	Ground Water Rule
ICR	Information Collection Request
IESWTR	Interim Enhanced Surface Water Treatment Rule
MCL	Maximum Contaminant Level
mg/L	Milligrams per Liter
NAICS	North American Industry Classification System
NCOD	National Contaminant Occurrence Database
NPDWR	National Primary Drinking Water Regulation
O&M	Operation and Maintenance
OMB	Office of Management and Budget
PRA	Paperwork Reduction Act
PWS	Public Water System
PWSID	Public Water System Identification Number
PWSS	Public Water System Supervision
QA/QC	Quality Assurance/Quality Control
RFA	Regulatory Flexibility Act
SBA	Small Business Administration
SBREFA	Small Business Regulatory Enforcement Fairness Act
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
SWTR	Surface Water Treatment Rule
TCR	Total Coliform Rule

1 IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: Information Collection Request for Contaminant Occurrence Data in Support of EPA's Third Six-Year Review of National Primary Drinking Water Regulations

OMB Control Number: 2040-0275

EPA Tracking Number: 2231.02

1(b) Short Characterization

The Safe Drinking Water Act (SDWA), as amended in 1996, requires that the U.S. Environmental Protection Agency (EPA) review existing National Primary Drinking Water Regulations (NPDWRs) no less often than every six years and, if appropriate, revise them. EPA is currently completing its second Six-Year Review cycle (2003-2009) during which the Agency is performing a detailed review of 71 chemical NPDWRs which were promulgated prior to 2003. The occurrence assessments conducted for the second Six-Year Review were based on compliance monitoring data collected from 1998 to 2005 and voluntarily submitted by States¹ and other primacy agencies under the current Information Collection Request (ICR No. 2231.01, 71 FR 32340). EPA expects to publish the review results by the end of 2009.

EPA is issuing this Information Collection Request (ICR) as a one-time request for States to voluntarily submit historical regulated monitoring data in 2012. To comply with the 1995 Amendments to the Paperwork Reduction Act (PRA), this ICR estimates the potential cost to States for data submission across the 3-year ICR period of 2010-2012. This is the renewal of the current ICR No. 2231.01 (71 FR 32340).

With this ICR, EPA's Office of Water is requesting that States submit compliance monitoring data (occurrence data and treatment technique data) for public water systems (PWSs) to support the Agency's third Six-Year Review. Monitoring data from 2006 to 2011 will be requested for all regulated chemical and radiological contaminants, microbiological contaminants, as well as data from the Ground Water Rule (GWR), Surface Water Treatment Rules (SWTRs), Long Term 1 and 2 Enhanced Surface Water Treatment Rules (LT1 and LT2) and Interim Enhanced Surface Water Treatment Rule (IESWTR), Stage 1 and 2 Disinfectants and Disinfection Byproducts Rules (DBPRs), and Filter Backwash Recycling Rule (FBRR). This review cycle, hereafter referred to as Six-Year Review 3, encompasses the review cycle of 2009-2015. Through the Six-Year Review process, EPA reviews existing NPDWRs and evaluates whether potential revisions are appropriate to maintain or improve the health of those persons served by public water systems. These compliance monitoring records (including all results for analytical detections and non-detections) and other compliance summaries (e.g.,

¹ Throughout this document, the terms "State" or "States" are used to refer to the States, Tribal Programs and Territories.

sanitary survey and corrective action information) provide the data needed to conduct statistical estimates of national occurrence of each regulated contaminant and are used to evaluate regulation effectiveness. The review of this data will support EPA's decisions regarding whether revisions to existing regulations are appropriate. In addition, the 1996 SDWA Amendments require the Agency to maintain a national drinking water contaminant occurrence database (*i.e.*, the National Contaminant Occurrence Data (NCOD)) using occurrence data for both regulated and unregulated contaminants in PWSs. Thus, through this data collection, EPA will also be fulfilling some of its SDWA requirements as they relate to national occurrence data.

States can upload data using a designated, secure file transfer protocol (FTP) site. After receiving the data, EPA will conduct the necessary data review, editing, and quality assurance/quality control (QA/QC) across all State data sets to allow uniform assessments across all the data sets, and allow subsequent data management and analysis to provide an overview of occurrence estimates at the national level. States will be provided with the edited data and/or the log of the edits that were applied to the data upon request prior to the posting and storage of data in the NCOD. Following final QA/QC of data, a summary of the data will be made available to the public through NCOD and/or other appropriate mechanisms.

Although these data submissions are not required of the State agencies, EPA is required to conduct this ICR analysis because more than nine non-Federal entities will be asked to respond to these data requests. Because this is a data request, not a regulation, this ICR will remain separate from the Public Water System Supervision (PWSS) Program ICR, which includes burden and cost estimates for many other administrative activities and information collection requirements of SDWA.

The total annual burden and costs to the 56 potential State respondents associated with this ICR is estimated to be 756 hours and \$37,922 per year over the 3-year ICR period of 2010-2012, or 13.5 hours and \$677 per year per State. All respondent costs are for labor activities associated with the time it takes to read and understand the request for compliance monitoring data, compile and submit existing data in an electronic format, and respond to questions regarding these data. This represents the "cost burden" as reported in the official Office of Management and Budget (OMB) inventory. Note that these costs are for labor; there are no capital costs associated with the activities covered by this ICR. Estimated burden and labor cost varies across States, depending on their current data storage system (*i.e.*, State Drinking Water Information System/State version (SDWIS/State) vs. proprietary data systems) and expected participation levels. No burden to PWSs is associated with this data collection.

Over the ICR years of 2010-2012, EPA is expected to incur an average annual cost of \$272,444 for labor associated with this program, including: extracting or downloading State data; initial data screenings and conversion to uniform structures; communicating and coordinating with States; and data management and analysis.

2 NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Through the Six-Year Review process, the Agency reviews existing NPDWRs and evaluates whether potential revisions are appropriate to maintain or improve the health of those persons served by public water systems. Section 1412(b)(9) of SDWA States: "The Administrator shall, not less often than every 6 years, review and revise, as appropriate, each national primary drinking water regulation promulgated under this title. Any revision of a national primary drinking water regulation shall be promulgated in accordance with this section, except that each revision shall maintain, or provide for greater, protection of the health of persons." Compliance monitoring data provide information critical to these assessments. Without an understanding of where and at what levels these contaminants are occurring in public drinking water, EPA cannot assess the risk to public health and whether potential revisions are likely to maintain or improve public health protection. In addition, other compliance data (including sanitary survey and corrective action information) can help in evaluating the effectiveness of current regulations.

Section 1445(g)(1) requires EPA to "assemble and maintain a national drinking water contaminant occurrence database, using information on the occurrence of both regulated and unregulated contaminants in public water systems..." Section 1445(g)(6) requires that for regulated contaminants, the database (*i.e.*, NCOD) include "information on the detection of the contaminant at a quantifiable level in public water systems." This includes levels which are less than or equal to the maximum contaminant level (MCL) for a specific contaminant. Prior to the establishment of NCOD, only data related to MCL violations were being stored on a national-level.

2(b) Practical Utility/Users of the Data

This ICR supports the collection of compliance monitoring data (contaminant occurrence data and treatment technique information) from States for all regulated chemical and radiological contaminants, microbiological contaminants, as well as data from the GWR, SWTRs, DBPRs, and FBRR. A list of the occurrence data to be requested is provided as Exhibit 4-1. The occurrence data will be used to derive detailed statistical estimates of national occurrence of these regulated contaminants. EPA's specific goal in evaluating contaminant occurrence is to estimate the national number of PWSs at which the individual regulated contaminants occur at levels of health concern and/or the feasible level of measurement, and to evaluate the number of people exposed to these levels. This information, in conjunction with other contaminant-specific analyses conducted as part of the Six-Year Review (e.g., health assessment, technology, implementation issues, etc.), will provide EPA with information to determine whether or not it is appropriate to consider revisions to a regulation to maintain or provide for greater protection of human health. The monitoring data (including sanitary survey and corrective action information) will provide EPA with information to evaluate regulation effectiveness.

The primary user of the information collected under this ICR will be EPA's Office of Water. Other users of this information may include the following:

- Primacy agencies, which include State regulators, Indian Tribes, and, in some instances, EPA Regional Administrators
- PWS managers
- Staff from other EPA programs
- Federal Emergency Management Administration
- Centers for Disease Control and Prevention
- Military bases
- Rural Development Administration/Farmers Home Administration
- Department of Interior
- Department of Housing and Urban Development
- U.S. Army Corps of Engineers
- White House task forces
- American Water Works Association (AWWA)
- Association of Metropolitan Water Agencies (AMWA)
- National Rural Water Association
- National Association of Water Companies
- Association of State Drinking Water Administrators (ASDWA)
- Natural Resources Defense Council
- Consumers Federation of America
- Small Business Administration
- Other environmental and industry groups
- News organizations
- Private industries
- Individuals.

3 NON-DUPLICATION, CONSULTATIONS AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

EPA has made an effort to ensure that data collection activities associated with this ICR are not duplicated. Though these monitoring data have already been collected by States to comply with existing regulations and/or to investigate State and local contamination concerns, this information has not been collected and analyzed at the national-level. This data request only targets the transmittal of *existing* electronic data from States to EPA. Thus, the final compilation and analysis of this information is not unnecessarily duplicative of information otherwise available to the Agency.

In addition, SDWIS/FED contains some inventory-related data elements that EPA is requesting be submitted with each data record. As discussed in Section 4(b), EPA will give States the option of reporting all requested data elements or having the Agency access inventory data from SDWIS/FED based on the Federal public water system identification (PWSID) number.

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

Following public notice of the proposed data collection effort on September 11, 2009 (74 FR 46767), EPA did not receive any public comments during the comment period related to this ICR. As no public comments were submitted related to this ICR, no changes to the data collection format were necessary. Although no public comments were submitted on the ICR, as noted in the September 11, 2009 notice, EPA has updated this ICR to reflect the slight modification of the scope, revised burden hours, and updated labor costs.

3(c) Consultations

EPA first consulted with stakeholders regarding the Six-Year Review process during its development of a protocol during 1999 and 2000. A summary of the deliberative process and initial approach to occurrence analysis can be found in the docket for EPA's final announcement of the Six-Year Review process on July 18, 2003, entitled: "National Primary Drinking Water Regulations; Announcement of Completion of EPA's Review of Existing Drinking Water Standards" (68 FR 42908).

To prepare for Six-Year Review 3, EPA used information from the previous Six-Year Review process and collected information from States on which States were currently using or are planning to use SDWIS/State.

3(d) Effects of Less Frequent Collection

EPA is required by SDWA to conduct a Six-Year Review of existing NPDWRs. The information requested under this ICR is being collected on a one-time basis for the Six-Year Review 3 to meet the SDWA statutory requirements.

3(e) General Guidelines

This ICR was prepared in accordance with the November 2005 version of the ICR Handbook developed by EPA's Office of Environmental Information, Office of Information Collection, Collection Strategies Division. The ICR Handbook provides the most current instructions for ICR preparation to ensure compliance with the 1995 PRA Amendments and OMB's implementing guidelines.

This data collection is a request, not a requirement, and EPA is taking an approach that minimizes burden to the respondents. In addition, this collection does not violate any of the OMB guidelines for information collection activities.

3(f) Confidentiality

This information collection does not require respondents to disclose confidential information.

3(g) Sensitive Questions

No questions of a sensitive nature are included in any of the information collection requirements outlined in this ICR.

4 RESPONDENTS AND THE INFORMATION

4(a) Respondents and NAICS/SIC Codes

Data associated with this ICR are collected and maintained by State drinking water agencies. The North American Industry Classification System (NAICS) code for State agencies that include drinking water programs are classified as 92411 (Administration of Air and Water Resources and Solid Waste Management Programs) or 92312 (Administration of Public Health Programs). There will be no burden included for water systems, because systems will not be asked to collect, submit, or review new data, and will not be affected by the States' efforts for the data submission.

4(b) Information Requested

This ICR covers reporting activities that will take place in response to a specific EPA data call-in to State drinking water programs. Though this is not a requirement, the ICR is necessary to estimate reporting burden and costs to the States. This ICR summarizes the data items and respondent activities associated with the reporting effort. All data being called-in are historic (*i.e.*, data already exist); no States or PWSs will be required to collect any new data. Further, no recordkeeping burden will be imposed on the States as a result of this request (*i.e.*, States are already required to maintain these records as part of NPDWRs).

4(b)(i) Data Items

EPA is requesting that States voluntarily submit compliance monitoring data and treatment technique information collected by PWSs during January 2006 through December 2011 for the occurrence data listed in Exhibit 4-1. This request only includes existing data that the States have already stored in electronic format. The requested data include analytical detections and non-detections for routine compliance monitoring samples (including repeat and confirmation samples) and other compliance summaries (including sanitary survey and corrective action information), as well as any special study sampling results that States choose to submit.

Note that although this data collection is not a requirement, certain parameters are essential for the Agency to uphold high standards of data quality and analytical integrity. EPA has identified the data categories (see Exhibit 4-2) that the Agency will request that States provide with their data results. In general, these data elements are based on those used for the second Six-Year Review and the data elements needed for the GWR, SWTRs, DBPRs, and FBRR. Although some of the inventory-related data elements listed in Exhibit 4-2 are available from SDWIS/FED, compliance monitoring data stored and maintained by States typically includes most, if not all, of those data elements. EPA expects that it would be a greater burden for States to remove specific, otherwise available data elements from their compliance monitoring records than to simply submit complete compliance monitoring data sets "as is." However, for States that elect to submit a subset of data, EPA has identified essential data categories that the Agency needs to most effectively evaluate the occurrence data. If States elect

to submit their data with only these data categories, EPA will use the PWSID number to acquire additional system-specific data from SDWIS/FED, and appropriate supplemental information, where needed.

Exhibit 4-: Occurrence Data to Be Requested		
<i>Chemical Contaminants (Phase I, II, IIB, and V Rules; Arsenic Rule; Lead and Copper Rule)</i>		
Acrylamide	1,1-Dichloroethylene	Methoxychlor
Alachlor	cis-1,2-Dichloroethylene	Monochlorobenzene (Chlorobenzene)
Antimony	trans-1,2-Dichloroethylene	Nitrate (as N)
Arsenic	Dichloromethane (Methylene chloride)	Nitrite (as N)
Asbestos	1,2-Dichloropropane	Oxamyl (Vydate)
Atrazine	Di(2-ethylhexyl) adipate (DEHA)	Pentachlorophenol
Barium	Di(2-ethylhexyl) phthalate (DEHP)	Picloram
Benzene	Dinoseb	Polychlorinated biphenyls (PCBs)
Benzo[a]pyrene	Diquat	Selenium
Beryllium	Endothall	Simazine
Cadmium	Endrin	Styrene
Carbofuran	Epichlorohydrin	2,3,7,8-TCDD (Dioxin)
Carbon tetrachloride	Ethylbenzene	Tetrachloroethylene
Chlordane	Ethylene dibromide (EDB)	Thallium
Chromium (total)	Fluoride	Toluene
Copper	Glyphosate	Toxaphene
Cyanide	Heptachlor	2,4,5-TP (Silvex)
2,4-D	Heptachlor epoxide	1,2,4-Trichlorobenzene
Dalapon	Hexachlorobenzene	1,1,1-Trichloroethane
1,2-Dibromo-3-chloropropane (DBCP)	Hexachlorocyclopentadiene	1,1,2-Trichloroethane
1,2-Dichlorobenzene (<i>o</i> -Dichlorobenzene)	Lead	Trichloroethylene
1,4-Dichlorobenzene (<i>p</i> -Dichlorobenzene)	Lindane	Vinyl chloride
1,2-Dichloroethane (Ethylene dichloride)	Mercury (inorganic)	Xylenes (total)
<i>Radiological Contaminants</i>		
Combined Radium-226/228; and Radium-226 & Radium-228 (<i>if available</i>)	Gross beta	Tritium
	Iodine-131	Uranium
Gross alpha	Strontium-90	
<i>Microbiological Contaminants</i>		
Total coliforms	Fecal coliforms	<i>Escherichia coli</i> (<i>E. coli</i>)

Exhibit 4-: Occurrence Data to Be Requested		
<i>Disinfectants and Disinfection Byproducts Rules (DBPRs)</i>		
Total Trihalomethanes (TTHMs):	Haloacetic Acids (HAA5):	Bromate
Chloroform	Monochloroacetic acid	Chlorite
Bromodichloromethane	Dichloroacetic acid	Chlorine
Dibromochloromethane	Trichloroacetic acid	Chloramines
Bromoform	Bromoacetic acid	Chlorine dioxide
	Dibromoacetic acid	
<i>Ground Water Rule (GWR)</i>		
<i>Escherichia coli (E. coli)</i>	Enterococci	Coliphage
<i>Surface Water Treatment Rules (SWTRs)</i>		
Chlorine	<i>Cryptosporidium</i>	Heterotrophic Plate Count (HPC)
Chloramines	<i>Giardia lamblia</i>	
<i>Filter Backwash Recycling Rule (FBRR)</i>		
No specific occurrence data collected; see Exhibit 4- for data elements for FBRR		

Exhibit 4-2: Requested Data Categories	
Data Category	Description
<i>System-Specific Information</i>	
Public Water System Identification Number (PWSID)	The code used to identify each PWS. The code begins with the standard 2-character postal State abbreviation or Region code; the remaining 7 numbers are unique to each PWS in the State.
System Name	Name of the PWS.
Federal Public Water System Type Code	A code to identify whether a system is: <ul style="list-style-type: none"> • Community Water System; • Non-transient Non-community Water System; or • Transient Non-community Water System.
Population Served	Highest average daily number of people served by a PWS, when in operation.
Federal Source Water Type	Type of water at the source. Source water type can be: <ul style="list-style-type: none"> • Ground water; or • Surface water; or • Ground water under the direct influence of surface water (GWUDI) (Note: Some States may not distinguish GWUDI from surface water sources. In those States, a GWUDI source should be reported as a surface water source type.)
Sanitary Survey Information	Site visit information for TCR, GWR, and SWTRs, including: site visit type, date completed, associated deficiencies identified, corrective actions taken.
<i>Treatment Information</i>	
Water System Facility	System facility data, including: treatment plant identification number, treatment plant information, treatment unit process/objectives, facility flow, treatment train (train or flow of water through treatment units within the treatment plant).
Filtration Type	Information relating to system filtration, including: filtration status, types of filtration (e.g., unfiltered, conventional filtration, and other permitted values)

Exhibit 4-2: Requested Data Categories	
Data Category	Description
Treatment Technique Information	Information pertaining to treatment processes. Types of treatment technique information including: coagulant/coagulant aid type and dose, disinfectant concentration (amounts, types, primary and secondary types of disinfection, disinfection profile/bench mark data), log of viral inactivation/removal, contact time, contact value, pH, temperature.
Filter Backwash Information	Information about filter backwash that is returned to the treatment plant influent (e.g., information on: recycle/schematic status, alternative return location, corrective action requirements, and recycle flows and frequency).
Sample-Specific Information	
Sampling Point Identification Code	A sampling point identifier established by the State, unique within each applicable facility, for each applicable sampling location (e.g., entry point to the distribution system). This information enables occurrence assessments that address intra-system variability.
Sample Identification Number	Identifier assigned by State or the laboratory that uniquely identifies a sample.
Sample Collection Date	Date the sample is collected, including month, day and year.
Sample Type	Indicates why the sample is being collected (e.g., compliance, routine, repeat, confirmation, additional routine samples, duplicate, special, special duplicate, etc.).
Sample Analysis Type Code	Code for type of water sample collected. <ul style="list-style-type: none"> • Raw (Untreated) water sample • Finished (Treated) water sample <p><i>For lead and copper only:</i></p> <ul style="list-style-type: none"> • Source • Tap <p><i>For TCR Repeats only; indicator of sampling location relative to sample point where positive sample was originally collected:</i></p> <ul style="list-style-type: none"> • Upstream • Downstream • Original
Contaminant	Contaminant name, 4-digit SDWIS contaminant identification number, or Chemical Abstracts Service (CAS) Registry Number for which the sample is being analyzed.
Sample Analytical Result - Sign	The sign indicates whether the sample analytical result was: <ul style="list-style-type: none"> • (<) "less than" means the contaminant was not detected or was detected at a level "less than" the minimum reporting level (MRL). • (=) "equal to" means the contaminant was detected at a level "equal to" the value reported in "Sample Analytical Result - Value." <p><i>(Not required for TCR data)</i></p>
Sample Analytical Result - Value	Actual numeric (decimal) value of the analysis for the chemical results, or the MRL if the analytical result is less than the contaminant's MRL. <i>For the TCR, results will indicate presence/absence.</i>

Exhibit 4-2: Requested Data Categories	
Data Category	Description
Sample Analytical Result - Unit of Measure	Unit of measurement for the analytical results reported (usually expressed in either µg/L or mg/L for chemicals; or pCi/l or mrem/yr for radiological contaminants). <i>(Not required for TCR data)</i>
Sample Analytical Method Number	EPA identification number of the analytical method used to analyze the sample for a given contaminant.
Minimum Reporting Level (MRL) - Value	MRL refers to the lowest concentration of an analyte that may be reported. <i>(Not required for TCR data)</i>
MRL - Unit of Measure	Unit of measure to express the concentration value of a contaminant's MRL. <i>(Not required for TCR data)</i>
Source Water Monitoring Information	Total organic carbon (TOC), including percent TOC removal, TOC removal summary, pH, alkalinity, monitoring data entered as individual results or included in DBP (or monthly operating report (MOR)) summary records, alternative compliance criteria.
Sample Summary Reports	Sample summaries for DBPRs, SWTRs, and LCR associated with analytical result records. Values used for compliance determination [e.g., turbidity (combined effluent/individual effluent), disinfectant residual levels in treatment plant and distribution system, treatment technique information, HPC, etc.]

4(b)(ii) Respondent Activities

Potential respondents to this information collection are assumed to include 56 State drinking water agencies listed in Exhibit A-1 in Appendix A. Activities needed to respond to the information collection include reading and understanding EPA's request, compiling and submitting the requested drinking water contaminant data in electronic format, and communication and coordination with EPA. No record keeping requirements are associated with this information collection request. Each of these respondent activities is described in more detail below.

Reading/Understanding EPA's Request

EPA will send a letter to 56 States that explains the purpose of the data collection, the specific information EPA is requesting, and the procedure for submitting these data.

Compiling and Submitting Monitoring Data

EPA is asking States to compile and submit data that have already been collected from water systems, and which already exist in electronic format. EPA is not expecting States or water systems to collect new data in response to this reporting request or to enter hard copy data into an electronic format. All data will be submitted using security protocol to a designated FTP site.

To facilitate the consistency and quality of data across States, EPA will ask States to: provide a brief description of the basic format and structure of each data set, and definitions of all data elements, column/row headings, codes, acronyms, etc., used in each data set; submit the data in a format with each analytical result occupying a discrete row accompanied by the system inventory and sample-specific data items (*i.e.*, those listed in Exhibit 4-2 in section 4(b)(i)); and submit the data in a EPA-compatible file format, such as Dbase (.dbf), Access tables (.mdb), comma or tab delimited files (.csv or .txt), or Excel (.xls). It is expected that the data from States using or are planning to use SDWIS/State will more closely match the needed data formats and elements, and thus are assumed to have less burden for submissions than non-SDWIS States. To ease this burden, EPA will provide extraction scripts to use with the SDWIS/State database. However, all States will have the option of submitting data "as is", thus, the assumption of higher burden for non-SDWIS States is a conservative (highest possible cost) assumption. If States submit only the minimum data element information, EPA will extract the additional inventory information from SDWIS/FED, and appropriate supplemental information, where needed, based on the PWSID number.

EPA also assumes that some States will choose not to submit data at this time; such States are assumed to incur no burden related to this data request beyond the initial reading of the request.

Follow-up with EPA

Based on the Agency's experience with occurrence information provided by States for the Six-Year Review 2, EPA expects that it may need to contact some States' data management staff to address questions regarding the data quality such as possibly incorrect units of measurement, outlier values, incorrect, missing, or undefined data elements, or other possible data problems. This follow-up may be minimal or may not be needed for those States that provide their data in the requested format with an explanation of their codes, headers, etc. It is assumed that these communications and confirmations will be handled primarily through telephone and e-mail.

5 INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

EPA Headquarters will conduct the following activities associated with the collection of regulated monitoring data:

- Extract or download data;
- Initial data screening/conversion to uniform structures;
- Communicate and coordinate with States; and
- Data management and analysis, including
 - Quality assurance/quality control and review/edit data;
 - Data analysis and report of findings; and
 - Record keeping.

Each of these activities is discussed in more detail below.

Extract or Download Data

EPA's data extraction/downloading activities will depend to some degree on the type of data system used in each State, and on the level of State participation. EPA assumes that data from States that use or are planning to use SDWIS/State will most closely reflect the data elements and format being requested due to the use of the provided database extraction scripts. Data from States using other databases are more likely to differ from the requested format. In cases where States do not provide all of the requested data, EPA will, where possible, extract the needed additional inventory information from SDWIS/FED, and appropriate supplemental information, where needed. EPA assumed that it will take longer to extract or download all needed information for non-SDWIS States. All States, regardless of type of data system, will submit their data using security protocol to a designated FTP site.

Initial Data Screening/Conversion to Uniform Structures

Each data set will be reviewed to determine if it contains the appropriate contaminants, basic data elements, and definitions of any special (State-specific) codes needed to conduct a consistent analysis for this study. The data set structure will be assessed and converted, if needed, into an appropriate structure, with each analytical result occupying a discrete row accompanied by the sample-specific data items. Data formatting work will be done using Microsoft® Access with the aid of specialized programs written in Visual Basic.

Communication and Coordination with States

Based on the Agency's experience with data submitted in response to Six-Year Review 2, EPA will need to communicate and coordinate with States to assist with successful data submission, to resolve data editing and QA/QC issues, and to address any other data set questions that EPA or the State may have.

Data Management and Analysis

Data management and analysis includes: quality assurance/quality control and data review/editing; data analysis and report of findings; and record keeping. These activities take place after the initial State data sets have been made uniform, and the data sets have been combined to be analyzed on a per contaminant basis (versus a per State basis).

Quality Assurance/Quality Control and Review/Editing of Data: An important objective regarding the data to be called-in and subsequently used for the Six-Year Review 3 contaminant occurrence analyses is development of a consistent and repeatable data management approach. Consistent data editing, and QA/QC assessments (e.g., identification of obvious incorrect units, outliers, duplicate entries, etc.) across all State data received will allow the individual State data sets to be aggregated, and jointly evaluated, to provide an overview of national occurrence patterns for individual contaminants.

Uniform, detailed QA/QC assessments will be conducted on the State compliance monitoring data sets. The only data requested and used will be from State drinking water programs (*i.e.*, official compliance monitoring data from the regulated drinking water program). All compliance monitoring samples are collected by trained PWS staff and analytical results are generated by laboratories that are certified for drinking water programs. Therefore, some assumptions are made regarding the general quality of the raw compliance monitoring data received from the States. Data problems will certainly exist, but efforts will be taken to reduce the problems and increase the dependability and quality of the State occurrence data used in these analyses.

The number of systems with compliance monitoring data in each State will be checked against total system inventory numbers from SDWIS/FED, and other more appropriate supplemental information, where needed. The number of analytical records per system (per contaminant) will also be evaluated to assess completeness of the submitted analytical records. Contaminant-specific analytical values are also assessed as part of the QA/QC review. For example, the assessment of the range of all analytical values for a specific contaminant supports identification of possible analytical unit errors or the presence of outliers. Identified errors that do not have straight-forward solutions will be addressed through consultations with State data management staff to ensure consistent and appropriate interpretations. Once data quality issues are resolved, each data set will be converted into a consistent format. As part of the data QA/QC procedures, all edits or changes made to the raw monitoring data will be documented.

Data Analysis and Report of Findings: For the second Six-Year Review, EPA developed and used a data management and two-staged analytical approach to assess data

representativeness and to analyze the compliance monitoring data from 45 States. This approach will also be used for the third Six-Year Review for the chemical, radiological and microbiological contaminants. States' compliance monitoring data will be assessed and compiled into a data set that is indicative of national occurrence. The national data set will be analyzed using a two-staged analytical approach. The "Stage 1" analysis provides simple, non-parametric estimates of the percent of PWSs (and the total population served by those PWSs) with at least one analytical result exceeding specific threshold values. The "Stage 2" analysis estimates long-term mean concentrations of contaminants in all systems (and the corresponding affected populations) nationwide above levels of regulatory interest. A national contaminant occurrence report will then be prepared that describes the national contaminant occurrence dataset compiled, the data management procedures conducted to develop the national dataset, and the statistical analytical methods employed (using the national dataset) to generate national estimates of regulated contaminant occurrence in public drinking water systems.

The compliance summaries (including sanitary survey and corrective action information) collected for the Ground Water Rule, Surface Water Treatment Rules, Long Term 1 and 2 Enhanced Surface Water Treatment Rule (LT1 and LT2) and Interim Enhanced Surface Water Treatment Rule (IESTR), Stage 1 and 2 Disinfectants and Disinfection Byproducts Rules (DBPRs), and Filter Backwash Recycling Rule (FBRR) will be evaluated to determine regulation effectiveness.

Record Keeping: EPA will store and track: the original raw (before QA/QC) data sets that it receives from States; final data sets used for the Six-Year Review 3 analyses; and logs of all data QA/QC and editing conducted on the original data sets. After final review, formatting, and analysis of the data collected through this ICR, a summary of the data will be made available to the public through the NCOD, as was done with the data collected and analyzed for the Six-Year Review 2.

5(b) Collection Methodology and Management

Through the Six-Year Review process, the Agency reviews and assesses risks to human health posed by existing drinking water contaminants. The collection of the occurrence data, and the quantity, coverage, representativeness, treatment techniques and management of the data collected pursuant to this ICR is an important component of the planned Six-Year Review 3 process.

EPA considered developing a nationally representative probabilistic survey in lieu of requesting data from all States. EPA assessed numerous survey designs that were intended to meet different data quality objectives (DQOs) and found no single design that would allow the Agency to acquire a nationally representative aggregation of compliance monitoring data and treatment technique information for all NPDWRs in an efficient or reasonable manner.² The potential problems associated with survey design are explained in more detail as follows:

² A list of these contaminants is provided in Exhibit 4-1 in section 4(b)(i).

- The significant within- and between-system variance differences likely present when considering all the regulated contaminants would result in a wide range of confidence intervals and precision terms based on the surveyed systems' data. Conversely, to design a single survey so that the individual contaminant with the most variable occurrence data still meets minimum DQOs would require a survey that included tens of thousands of systems.
- A survey would require data requests either directly from thousands of individual systems (requesting submission of six years of historic compliance monitoring data); or from States (to extract the system-level data for each of the systems selected in the survey). Further, the Agency would expect an increased non-response rate if data were requested directly from systems.
- Based on the Agency's experience working with the 45 States that submitted complete compliance monitoring data sets for Six-Year Review 2, EPA anticipates that the burden on the States may be smaller when simply requesting all data records, as compared to requesting dozens or hundreds of specific records for select individual PWSs.
- Monitoring schedules can vary across contaminants and across systems, and can be quarterly, annual, triennial, or every nine years. Actual contaminant-specific sampling frequencies are unknown, and therefore, are difficult to address in any survey design. (Different sampling frequencies are attributed to waiver programs and historical results showing contaminant occurrence (or lack of occurrence).)

An alternative to a single survey for all NPDWRs would be multiple surveys for groups of related contaminants as well as treatment techniques. However, the Agency anticipates that the burden for EPA, the States, and/or systems may be significant for designing, implementing, and managing multiple surveys.

The information described in the previous sections will be collected by EPA and made available to the public upon request, as required by the Freedom of Information Act (40 CFR, Chapter 1, Part 2). A summary of the data, after a complete and thorough QA/QC review, will be available to the public through EPA's NCOD.

For the previous Six-Year Review 2, EPA received data sets through electronic FTP, e-mail, or mailed/shipped compact discs. For Six-Year Review 3, all States are being asked to submit their data through a secure FTP site. FTP is being specified for several reasons: this information collection is potentially significantly larger in scale than the previous collections; the FTP site to be used offers a high level of data security; and EPA anticipates that most, if not all, States will have computer/internet resources which will allow them to submit data sets electronically.

Regarding data set file formats, EPA will request that non-SDWIS/State users submit their data sets in one of the following EPA-compatible file formats: Dbase (.dbf); Access tables (.mdb); comma or tab delimited files (such as .csv or .txt), or; Excel (.xls). In addition, EPA's

preferred data set structure is for the data to be formatted with each analytical result occupying a discrete row accompanied by the system inventory and sample-specific data items listed above in 4(b)(i). EPA will also request that non-SDWIS/State users provide: a brief description of the basic format and structure of each data set; and definitions of all data elements, column/row headings, codes, acronyms, etc., used in each data set. EPA anticipates that this information will reduce the amount of time needed for questions and clarification later. States have the option of submitting the requested data "as is," by simply copying the compliance monitoring records in whatever structure or condition they are currently stored in, and submitting that copy of the electronic data to EPA. If States only submit the minimum data element information, EPA will extract the additional inventory information from SDWIS/FED, based on the PWSID number.

Other communications and confirmations (regarding data set follow-up questions with State data management staff, etc.) will be primarily handled through telephone and e-mail.

5(c) **Small Entity Flexibility**

Since only State drinking water agencies will be asked to submit existing electronic data to EPA, no small entities, and specifically no small PWSs, will incur burden as a result of this data request.

In developing this ICR, EPA considered the requirements of the Small Business Regulatory Enforcement Fairness Act (SBREFA) to minimize the burden of information collections on small entities. Small entities include "small businesses," "small organizations," and "small government jurisdictions." No State drinking water agency qualifies as a small entity, as defined under the Regulatory Flexibility Act (RFA), and summarized below.³

- A **small business** is any business that is independently owned and operated and not dominant in its field as defined by the Small Business Administration (SBA) regulations under Section 3 of the Small Business Act.
- A **small organization** is any non-profit enterprise that is independently owned and operated and not dominant in its field.
- A **small governmental jurisdiction** is the government of a city, county, town, township, village, school district or special district that has a population of fewer than 50,000. This definition may also include Indian tribes.

The major requirement under SBREFA is a regulatory flexibility analysis of all rules that have a "significant economic impact on a substantial number of small entities." Since this data request is not part of a rule, and does not affect any small entities as defined above, this ICR is not subject to SBREFA.

³ These definitions were taken from section 601 of the RFA.

5(d) Collection Schedule

EPA is issuing this ICR as a one-time data request from the States for regulated monitoring data for 2006-2011. States will be responding to this request in 2012. Data analysis is expected to continue through 2015, when EPA plans to release its final review results for Six-Year 3.

6 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section describes the estimated average annual burden and costs for the information collection activities in support of Six-Year Review 3. For this data submission, PWSs have no burden and costs; this is discussed further in Section 6(a). The burden and cost estimates for State drinking water primacy agencies are discussed in detail in Section 6(b). The Agency's burden and cost estimates are outlined in Section 6(c).

To estimate the costs, EPA made assumptions about the burden associated with activities that would likely be needed to fulfill the request. To the extent possible, assumptions were based on similar activities for past data collections. EPA emphasizes that the per-respondent estimates represent the average burden and cost over the 3-year period covered by this ICR (2010-2012). Some respondents may incur higher costs and some will fall below the average. Summary burden and cost estimates for States and EPA are provided in Exhibits 6-1 and 6-2. Detailed estimation tables for States and EPA are provided in Appendices A and B, respectively.

Estimates of State and EPA burden are influenced by State data management capabilities and the likelihood of submitting the requested data. EPA's assessments of individual State data capabilities and likeliness to participate are based on Agency experience conducting data verifications in State program offices, as well as other direct knowledge of data capabilities and resources. To estimate burden, the Agency organized States into 4 categories of expected burden level, as follows:

Submit occurrence data using proprietary software - 7 States. These States are expected to spend the most time reading and considering the request for data, as they may need to identify which of their data elements correspond to those requested. For similar reasons, compilation and submission of their occurrence data and treatment technique information, and follow up with EPA is expected to be the highest. EPA expects that Agency burden, which is estimated primarily on a per State basis, will be higher for these States.

Submit occurrence data using a combination of SDWIS/State software and proprietary software - 9 States. These States are expected to spend more time reading and considering the request for data, as they may need to identify which of their data elements from which data system correspond to those requested. For similar reasons, compilation and submission of their occurrence data and treatment technique information, and follow up with EPA is expected to be somewhat higher than States using only SDWIS/State. EPA expects that Agency burden, which is estimated primarily on a per State basis, will be higher for these States.

Submit occurrence data using SDWIS/State software - 38 States. Those with or planning to use SDWIS/State are expected to spend less time than States with proprietary software. Reading and considering the request for data is expected to be less time consuming, as the SDWIS/State data elements will correspond closely to those requested. Compilation and submission of their occurrence data and treatment technique

information, and follow up with EPA is also expected to be easier for these States. EPA will provide the States with extraction scripts for SDWIS/State database, thus expected to be easier for these States. EPA expects that Agency burden, which is estimated primarily on a per State basis, will be lower for these States.

Will not submit data - 2 States. States that do not have the requested data stored electronically or those that are considered generally not likely to submit data are expected only to spend a minimal amount of time considering the request. No further burden is assumed. EPA will incur no burden for these States.

6(a) Estimating Respondent Burden

The average annual respondent burden (in labor hours) for States is shown in Exhibit 6-1. Appendix A provides detail of the estimated respondent burden for States to complete the activities described in section 4(b)(ii). There is no burden for public water systems. Over the ICR years of 2010-2012, EPA estimates a total average annual respondent burden of 756 hours for activities associated with this reporting effort; or an average of 13.5 hours per State (756 hours divided by 56 States). This estimate includes costs for reading and understanding EPA's request, compiling and submitting the data to EPA, and any needed follow-up with the Agency to address questions regarding the data.

Reading/Understanding EPA's Request

The Agency assumes that all States will read EPA's request letter. A one-time burden for States that will submit data with proprietary software is estimated at 7 hours; States with SDWIS/State are estimated to spend 4 hours; those States with a mix of proprietary software for some rules, and SDWIS/State for others is estimated at 5 hours; and States that will not submit data are estimated to spend 1 hour.

Compiling and Submitting Monitoring Data

State burden for this reporting activity is likely to vary widely depending on the level of effort each State chooses to invest. All States will follow a security protocol when submitting data through a designated FTP site. Burden for States that will submit with proprietary software is estimated at 44 hours. Those States with a mix of proprietary software for some rules, and SDWIS/State for others is estimated at 34 hours. States with SDWIS/State are estimated to spend 24 hours.

Follow-up with EPA

EPA expects that those States that use or are planning to use SDWIS/State or provide their data in the requested format with an explanation of their codes, headers, etc. will need to spend little follow-up time with EPA. States submitting data with proprietary database software, (and particularly those that send their data "as is") are expected to need more time on follow-up clarifications with EPA. States with proprietary software are estimated to spend 13 hours of

follow-up time with EPA. Those States with a mix of proprietary software for some rules, and SDWIS/State for others is estimated at 11 hours. States with SDWIS/State are estimated to only to require 8 hours of follow-up.

6(b) Estimating Respondent Costs

Exhibit 6-1 shows the annual average costs for States over the ICR period of 2010-2012. Appendix A provides detailed cost and burden estimations for the information collection activities covered by this ICR. Average annual labor costs for all States for this ICR period are estimated to be \$37,922. Respondents will not incur capital or operations and maintenance (O&M) costs associated with this ICR. EPA estimates each State will incur an annual average labor cost of \$677 for this data collection effort.

State labor costs are based on information provided in the "2001 ASDWA Drinking Water Program Resource Needs Self Assessment." In 2000, the United States General Accounting Office used a previous version of this model to estimate nationwide drinking water program needs for Congress. The tool was later updated and improved based on comments from 27 States. To make the model easier to use, ASDWA established suggested salary and benefit ranges (*i.e.*, default values), resource needs for the various NPDWRs, and other key variables. Labor costs per hour are based on the default annual rates for 2010 that are provided in the model.

Exhibit 6-: Average Annual State Burden and Costs (for ICR period of 2010-2012)				
Number of States	Burden Hours		Labor Costs	
	All States	Per State	All States	Per State
56	756	13.5	\$37,922	\$677

6(c) Estimating Agency Burden and Costs

EPA's drinking water program in Headquarters will incur burden and costs for the coordination and implementation of this data collection effort. Cost and burden estimates for EPA's activities associated with this request are detailed in Exhibit 6-2 and Appendix B.

6(c)(i) Agency Burden

For the 3-year ICR period (2010-2012), EPA estimates that the average annual burden to the Agency will be 3,149 hours. This estimate includes burden incurred by EPA or its contractors for the activities outlined in Section 5(a) above. EPA burden is estimated based on similar activities conducted during the Six-Year 2 occurrence data analysis.

Extract or Download Data

EPA is estimating its data extraction and downloading burden based on the types of data systems that States use to submit data. To coordinate and download files to its database, including special consideration for security protocols, EPA estimates that it will need:

- 11 hours per State for those 38 States that use or are planning to use SDWIS/State, and
- 17 hours per State for the 16 States that use either all proprietary, or a mix of proprietary and SDWIS/State.

Initial Data Screening/Conversion to Uniform Structures

EPA's data screening and conversion is also estimated on a per State basis. Based on its experience during Six-Year 2, EPA assumes that burden to review the data and to convert it into a consistent format will be influenced primarily by whether the data are stored in SDWIS/State or another proprietary database. EPA estimates that it will need:

- 36 hours per State for those 38 States that use or are planning to use SDWIS/State; and
- 71 hours per State for the 16 States that use either all proprietary, or a mix of proprietary and SDWIS/State.

Communication and Coordination with States

EPA assumes that the need to communicate and coordinate with States to ensure successful data submission and interpretation will require less burden for those State with SDWIS/State than for those with a proprietary database. EPA estimates that it will need:

- 6 hours per State for those 38 States that use or are planning to use SDWIS/State; and
- 11 hours per State for the 16 States that use either all proprietary, or a mix of proprietary and SDWIS/State.

Data Management and Analysis

Data management and analysis activities include: quality assurance/quality control and review/editing of data; data analysis and report of findings; and record keeping. Although some of these tasks take place after State data sets have been combined for analysis on a per contaminant basis (versus a per State basis), EPA has estimated a "per State" burden with the assumptions that 54 States will participate, and that 45 contaminants will be fully analyzed. Based on prior similar activities, EPA estimates 100 contractor and 30 EPA hours for each of 45 contaminants that will be analyzed for occurrence. To present this on a per State basis (as all other activities are shown), this 5,850 hours (130 hours x 45 contaminants) is divided by 54 States (*i.e.*, the number of States expected to participate), which equals approximately 108 hours per State. However, because burden for the occurrence analyses and treatment techniques will not vary greatly with the addition or subtraction of State data sets, burden would not be reduced or increased by the approximately 108 hours with each addition or subtraction of a State. This is because the analyses are conducted on a per contaminant basis, and the amount of data analyzed in each does not greatly factor into the amount of time needed to run the analyses, and write-up the outcome. In addition, burden for this activity is not influenced by whether data came from SDWIS/State or another database, because data at this step in the process has already been cleaned and converted to uniform structures.

6(c)(ii) Agency Cost

For the ICR period of 2010-2012, EPA's 3,149 annual burden hours are associated with annual labor costs of \$272,444 to collect and analyze the occurrence data and treatment technique information, and evaluate and report on the findings. Direct EPA per hour labor costs were derived using the Office of Personnel Management January 2009 General Schedule (GS) Pay Scale for government employees in the D.C. area. EPA used the GS-13 Step 5 salary of \$98,518 per year, and by adding the standard government overhead factor of 1.6 (as well as a 3% inflation factor per year to account for 2012 salaries), the average hourly rate is estimated to be \$82.81 per hour. Contracted labor costs are based on historical hourly costs pertaining to the management and analysis of occurrence data, which were approximately \$87.24 per hour.

Exhibit 6-: Annual EPA Burden and Costs (for ICR period of 2010-2012)				
Activity	EPA Burden Per State		Annual EPA¹	
	<i>(38 SDWIS States)</i>	<i>(16 Non-SDWIS States)</i>	Burden	Cost
Extract/download data	11.0	17.0	230	\$19,906
Initial data screening/conversion to uniform structures	36.0	71.0	835	\$72,739
Communicate, coordinate with States	6.0	11.0	135	\$11,669

Exhibit 6-: Annual EPA Burden and Costs (for ICR period of 2010-2012)				
Activity	EPA Burden Per State		Annual EPA¹	
	<i>(38 SDWIS States)</i>	<i>(16 Non-SDWIS States)</i>	<i>Burden</i>	<i>Cost</i>
Data Mgt and Analysis: <i>QA/QC; review/edit data; analyze/report findings; record keeping</i>	108.3	108.3	1,950	\$168,130
Total	161	207	3,149	\$272,444

¹ Burden is calculated by: per State burden, times number of States, all divided by the 3 ICR years. Cost is calculated by burden times the hourly labor rates (EPA or Contractor, as appropriate). See Appendix B, Exhibit B-1, for details on EPA burden and cost estimations.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The only respondents for this ICR are States. This ICR estimates the number of State potential respondents at 56. The total burden and costs for these respondents are summarized in Section 6(b) and Exhibit 6-1. Agency burden and costs are detailed in Section 6(c) and in Exhibit 6-2.

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and costs for this ICR are shown in Exhibit 6-3. This includes the burden and costs to the 56 States that are affected by this ICR, as well as the burden and cost to EPA for this collection and analysis.

Exhibit 6-: Bottom Line Burden and Costs (for ICR period of 2010-2012)		
	Total	Average Per Year over 2010-2012
Number of Respondents	56 States	n/a
Total Responses	56	18.7
Number of Responses per State	1	0.3
Total State Burden Hours	2,268	756
Hours per Response (Total hours from above/Number of Respondents from above)	40.5	13.5
State O&M Costs	\$0	\$0
Total State Costs (Labor plus O&M costs)	\$113,765	\$37,922
National Total of Hours (States plus Agency)	11,716	3,905
National Total of Costs (States plus Agency)	\$931,098	\$310,366

6(f) Reasons for Change in Burden

This ICR is a one-time data collection effort in support of the Six-Year Review 3. This ICR is a renewal of ICR No. 2231.01 (71 FR 32340). The change in burden hours and costs reflect the slight modification in the scope (*i.e.*, to request data for several additional rules such as Ground Water Rule (GWR), Surface Water Treatment Rules (SWTRs), Long Term 1 and 2 Enhanced Surface Water Treatment Rule (LT1 and LT2) and Interim Enhanced Surface Water Treatment Rule (IESTR), Stage 1 and 2 Disinfectants and Disinfection Byproducts Rules (DBPRs), and Filter Backwash Recycling Rule (FBRR).

6(g) Burden Statement

The reporting burden for data collections included in this ICR is detailed above. The total annual respondent burden (for years 2010-2012) imposed by these collections is estimated to be 756 hours, or 13.5 hours per respondent per year. Because this is a one-time data request for this Six-Year Review, there is only one response per respondent, and all burdens and costs related to this response are included in these estimates. The Agency expects that most, if not all, respondent activities will take place during 2012. Estimates include time for submitting data to EPA and addressing questions raised by the Agency regarding the submitted information.

Burden means the total time, effort, or financial resources expended by people to generate, maintain, retain, 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 request for information collection 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. EPA-HQ-OW-2005-0019, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West Building, Room 3334, 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 Docket is (202) 566-2426. An electronic version of the public docket is available through [regulations.gov](http://www.regulations.gov). Use [regulations.gov](http://www.regulations.gov) 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. EPA-HQ-OW-2005-0019 and OMB control number 2040-0275 in any correspondence.

APPENDICES

Appendix A: Detailed Burden and Cost for States

Exhibit A-1: Estimated State Burden for Occurrence Data Submission								
State	Likely to Submit Data?	Average Burden Per State				Labor Costs		
		Reading EPA Request	Compiling, Submitting Data	Follow-up with EPA	Total Burden	State Program Size	Cost per Hour	Labor Cost per State
	(a)	(b)	(c)	(d)	(e)= (b)+(c)+ (d)	(f)	(g)	(h)=(e)*(g)
Alabama	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Alaska	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
American Samoa	Likely/Non-SS	7	44	13	64	vs	\$46.40	\$2,969
Arizona	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Arkansas	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
California	Likely/SS	4	24	8	36	vl	\$80.34	\$2,892
Colorado	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Connecticut	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Delaware	Likely/SS	4	24	8	36	vs	\$46.40	\$1,670
District of Columbia	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Florida	Likely/Non-SS	7	44	13	64	l	\$56.83	\$3,637
Georgia	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Guam	Likely/SS	4	24	8	36	vs	\$46.40	\$1,670
Hawaii	Likely/SS	4	24	8	36	vs	\$46.40	\$1,670
Idaho	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Illinois	Likely/SS	4	24	8	36	l	\$56.83	\$2,046
Indiana	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Iowa	Likely/ Mixed-SS	5	34	11	50	m	\$49.18	\$2,459
Kansas	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Kentucky	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Louisiana	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Maine	Likely/ Mixed-SS	5	34	11	50	s	\$45.65	\$2,283
Maryland	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Massachusetts	Likely/Non-SS	7	44	13	64	m	\$49.18	\$3,147
Michigan	Likely/SS	4	24	8	36	l	\$56.83	\$2,046
Minnesota	Likely/Non-SS	7	44	13	64	m	\$49.18	\$3,147
Mississippi	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Missouri	Likely/ Mixed-SS	5	34	11	50	m	\$49.18	\$2,459
Montana	Likely/	5	34	11	50	m	\$49.18	\$2,459

Exhibit A-1: Estimated State Burden for Occurrence Data Submission								
State	Likely to Submit Data?	Average Burden Per State				Labor Costs		
		Reading EPA Request	Compiling, Submitting Data	Follow-up with EPA	Total Burden	State Program Size	Cost per Hour	Labor Cost per State
	(a)	(b)	(c)	(d)	(e)= (b)+(c)+ (d)	(f)	(g)	(h)=(e)*(g)
	Mixed-SS							
Nebraska	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Nevada	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
New Hampshire	Likely/Non-SS	7	44	13	64	m	\$49.18	\$3,147
New Jersey	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
New Mexico	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
New York	Likely/SS	4	24	8	36	l	\$56.83	\$2,046
North Carolina	Likely/SS	4	24	8	36	l	\$56.83	\$2,046
North Dakota	Likely/SS	4	24	8	36	vs	\$46.40	\$1,670
Northern Mariana Islands	Likely/SS	4	24	8	36	vs	\$46.40	\$1,670
Ohio	Likely/SS	4	24	8	36	l	\$56.83	\$2,046
Oklahoma	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Oregon	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
Pennsylvania	Unlikely	1	0	0	1	l	\$56.83	\$57
Puerto Rico	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Rhode Island	Likely/Mixed-SS	5	34	11	50	vs	\$46.40	\$2,320
South Carolina	Likely/SS	4	24	8	36	m	\$49.18	\$1,770
South Dakota	Likely/Non-SS	7	44	13	64	s	\$45.65	\$2,922
Tennessee	Likely/Mixed-SS	5	34	11	50	m	\$49.18	\$2,459
Texas	Likely/SS	4	24	8	36	vl	\$80.34	\$2,892
Utah	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Vermont	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Virginia	Likely/Mixed-SS	5	34	11	50	l	\$56.83	\$2,841
Virgin Islands	Likely/Mixed-SS	5	34	11	50	vs	\$46.40	\$2,320
Washington	Unlikely	1	0	0	1	l	\$56.83	\$57
West Virginia	Likely/SS	4	24	8	36	s	\$45.65	\$1,643
Wisconsin	Likely/Non-SS	7	44	13	64	l	\$56.83	\$3,637
Wyoming	Likely/Mixed-SS	5	34	11	50	vs	\$46.40	\$2,320

Exhibit A-1: Estimated State Burden for Occurrence Data Submission								
State	Likely to Submit Data?	Average Burden Per State				Labor Costs		
		Reading EPA Request	Compiling, Submitting Data	Follow-up with EPA	Total Burden	State Program Size	Cost per Hour	Labor Cost per State
	(a)	(b)	(c)	(d)	(e)= (b)+(c)+ (d)	(f)	(g)	(h)=(e)*(g)
TOTAL		248	1,526	494	2,268			\$113,765
		<i>Annual Ave. 2010-2012</i>			756.0			\$37,922
		<i>Annual Ave. Per State 2010-2012</i>			13.5			\$677

(a) States divided into four major groups: likely to provide data (indicated by "Likely/SS" (38 States), "Likely/Mixed-SS" (9 States) or "Likely/Non-SS" (7 States)); and those that are unlikely to provide data (indicated by "Unlikely" (2 States)). Likely/SS (SDWIS/State) means State stores all or most of (or are planning to store all or most) data using SDWIS/State. Likely/Non-SS means State provided data to EPA for the second Six-Year Review and had a strong record of electronic reporting, but does not use SDWIS/State for all data management. Likely/Mixed-SS means State uses a combination of proprietary software and SDWIS/State to store data. All others assigned "Unlikely." Total of 56 potential participating States.

(b-e) Average burdens based on estimated level of involvement and likely knowledge of the data. EPA assumes highest burden for States that are likely to submit data but that do not have SDWIS/State; States with SDWIS/State are assigned a mid-level amount of burden for these activities, as these States are likely to "on average" have more knowledge of the needed data. EPA expects that States that are unlikely to participate may spend a small amount of time considering the request, and none beyond that.

(f-h) Average hourly State labor costs are from the "2001 ASDWA Drinking Water Program Resource Needs Self Assessment". To make the cost assessment model easier to use, ASDWA established suggested salary and benefit ranges (*i.e.*, default values) for different sized State programs (very small, small, medium, large, very large; as indicated by initials). See Exhibit A-2, which illustrates the basic model assumptions that were used here to estimate hourly labor costs.

Exhibit A-2: Estimated 2012 Salaries and Overhead Costs from ASDWA State Resource Model				
State Size (a)	Professional Staff	Support Staff	Hourly Ave. ~ 80% Prof and 20% Support	Hourly Rate (adjusted for overhead at 23%)
	<i>(adjusted for fringe benefits at 22% of base salary)</i>			
Very Small (applies to 9 States, including VI, GU, AS, NM)	\$72,710	\$48,643	\$37.72	\$46.40
Small (applies to 12 States, including DC and PR)	\$72,938	\$42,279	\$37.11	\$45.65
Medium (applies to 23 total)	\$77,989	\$47,875	\$39.98	\$49.18
Large (applies to 10 total)	\$88,047	\$63,640	\$46.20	\$56.83
Very Large (applies to 2 total)	\$129,607	\$69,450	\$65.32	\$80.34

(a) State labor costs are from the "2001 ASDWA Drinking Water Program Resource Needs Self Assessment". In 2000, the United States General Accounting Office used a previous version of this model to estimate nationwide drinking water program needs for Congress. The tool was later updated and improved based on comments from 27 States. To make the model easier to use, ASDWA established suggested salary and benefit ranges (*i.e.*, default values), resource needs for the various NPDWRs, and other key variables. These hourly estimates are based on the default annual rates for 2010 that are provided in the model. These default rates are estimated forward from 2010 to 2012 using a 3% inflation factor. The model assumes 1,800 work hours per full-time equivalent employee. Hourly rate labor costs are adjusted to account for fringe benefits (*i.e.*, holidays, sick days, vacation, pension, health, dental, and life insurance); and overhead (*i.e.*, office space, furniture, utilities, copiers, fax machines, postage, basic computing needs, etc.).

Appendix B: Detailed Burden and Cost for EPA

Exhibit B-1: Estimated Burden and Labor Costs to EPA for Occurrence Data Collection and Analysis											
Activity	SDWIS and Non-SDWIS States		Contractor Burden					Contractor Labor Cost			
	<i>Est. # of SDWIS States to Respond</i>	<i>Est. # of Non-SDWIS States to Respond</i>	<i>Est. Contractor Hours per SDWIS State</i>	<i>Est. Contractor Hours per Non-SDWIS State</i>	<i>Est. Total Contractor Hours for SDWIS States</i>	<i>Est. Total Contractor Hours for Non-SDWIS States</i>	<i>Est. Total Contractor Hours for All States</i>	<i>Cost per Hour for Contractural Labor</i>	<i>Est. Total Contractor Labor Cost for SDWIS States</i>	<i>Est. Total Contractor Labor Cost for Non-SDWIS States</i>	<i>Est. Total Contractor Labor Cost for All States</i>
	(a)	(b)	(c)	(d)	(e)=(a)*(c)	(f)=(b)*(d)	(g)=(e)+(f)	(h)	(i)=(e)*(h)	(j)=(f)*(h)	(k)=(i)+(j)
<i>Extract or download data (r)</i>	38	16	9	15	342	240	582	\$87.24	\$29,837	\$20,938	\$50,776
<i>Initial data screening/conversion to uniform structures</i>	38	16	35	70	1,330	1,120	2,450	\$87.24	\$116,034	\$97,713	\$213,746
<i>Communicate and coordinate with the States</i>	38	16	5	10	190	160	350	\$87.24	\$16,576	\$13,959	\$30,535
<i>Data Management and Analysis: QA/QC; review/edit data; analyze/report findings; record keeping</i>	38	16	83	83	3,167	1,333	4,500	\$87.24	\$276,271	\$116,324	\$392,595
TOTAL	38	16	132	178	5,029	2,853	7,882	\$87.24	\$438,718	\$248,934	\$687,652

Exhibit B-1: Estimated Burden and Labor Costs to EPA for Occurrence Data Collection and Analysis (continued)

Activity	EPA Burden					EPA Labor Cost				EPA and Contractor Totals			
	Est. EPA Hours per SDWIS State	Est. EPA Hours for Non-SDWIS States	Est. Total EPA Hours for SDWIS States	Est. Total EPA Hours for Non-SDWIS States	Est. Total EPA Hours for All States	Cost per Hour for EPA Staff	Est. Total EPA Labor Cost for SDWIS States	Est. Total EPA Labor Cost for Non-SDWIS States	Est. Total EPA Labor Cost for All States	Est. Total EPA and Contractor Burden Per SDWIS State	Est. Total EPA and Contractor Burden Per Non-SDWIS State	Est. Total EPA and Contractor Burden for All States	Est. Total EPA and Contractor Labor Cost for All States
	(l)	(m)	(n)=(a)*(l)	(o)=(b)*(m)	(p)=(n)+(o)	(q)	(r)=(n)*(q)	(s)=(o)*(q)	(t)=(r)+(s)	(u)=(c)+(l)	(v)=(d)+(m)	(u)=(g)+(p)	(v)=(k)+(t)
Extract or download data (r)	2	2	76	32	108	\$82.81	\$6,294	\$2,650	\$8,944	11.0	17.0	690	\$59,719
Initial data screening/conversion to uniform structures	1	1	38	16	54	\$82.81	\$3,147	\$1,325	\$4,472	36.0	71.0	2,504	\$218,218
Communicate and coordinate with the States	1	1	38	16	54	\$82.81	\$3,147	\$1,325	\$4,472	6.0	11.0	404	\$35,007
Data Management and Analysis: QA/QC; review/edit data; analyze/report findings; record keeping	25	25	950	400	1,350	\$82.81	\$78,670	\$33,124	\$111,794	108.3	108.3	5,850	\$504,389
TOTAL	29	29	1,102	464	1,566	\$82.81	\$91,257	\$38,424	\$129,681	161	207	9,448	\$817,333
										Annual Ave. 2010-2012		3,149	\$272,444

(c, d, l, m, u, v) Estimates for Data Management and Analysis assume: 100 contractor hours for each of 45 contaminants for which occurrence will be analyzed. To show this on a per State basis, as all other activities are shown, this 4,500 hours (100 hours x 45 contaminants) is divided by 54 States (i.e., the maximum number of States expected to participate), which equals 83.3 hours per State. Similarly, 30 EPA hours for each of the 45 contaminants are shown as 25 hours per State. Thus, total estimated burden per State for this activity is approximately 108 hours. However, burden for the analyses will not vary greatly with the addition or subtraction of State data sets; and burden would not be reduced or increased by the approximate 108 hours with each addition or subtraction of a State. The other 3 listed aspects of EPA burden (data download, screening, and communication) will vary directly on a per State basis. Because these 3 other burden items are

collectively smaller (at 53/State for SDWIS/States from columns (c) and (l), and 99/State for Non-SDWIS/State from columns (d) and (m)) than the data analysis burden, the "per State" burden will increase as the number of participating States decreases.

(h) Contractor costs are based on historical hourly costs pertaining to the management and analysis of occurrence data, which were approximately \$87.24 per hour.

(q) EPA internal labor costs are estimated using the federal government general schedule (GS) pay scale; assuming a labor level of GS 13, Step 5, and taken from the Washington-Baltimore-Northern Virginia, DC-MD-VA-WV-PA rate schedule effective January 2009 (see the U.S. Office of Personnel Management website: www.opm.gov). With these assumptions, labor and contractor rates were based on a 2,080 hour work year, with a \$98,518 annual salary during 2009 (most current available) plus 60 percent overhead, and then carried forward to 2012 using a 3% inflation factor, to arrive at \$82.81 per hour.

(r) For the majority of the NPDWR data being requested, there are approximately 38 States are using or planning to use SDWIS/State for data storage and management, and 16 using a proprietary data system or a combination of SDWIS/State and a proprietary data system. For estimation purposes, EPA makes the conservative assumption that State burdens will vary with their primary data system (*i.e.*, the 16 States using primarily a proprietary data system or a combination of data systems are assumed to incur more burden than if they were primarily using SDWIS/State).