Information Collection Request for the Proposed Revised Total Coliform Rule

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APPENDIX

Appendix A. Revised Total Coliform Rule Spreadsheets

LIST OF FIGURES

ACRONYMS

AIP	Agreement in Principle
BLS	Bureau of Labor Statistics
CFR	Code of Federal Regulations
CWS	Community Water System
EA	Economic Analysis
ECI	Employee Cost Index
EPA	Environmental Protection Agency
FACA	Federal Advisory Committee Act
FILS	Federal Information Locator System
FOIA	Freedom of Information Act
FR	Federal Register
GWR	Ground Water Rule
ICR	Information Collection Request
MCL	Maximum Contaminant Level
MCLG	Maximum Contaminant Level Goal
NAICS	North American Industry Classification System
NCWS	Noncommunity Water System
NPDWR	National Primary Drinking Water Regulation
O&M	Operation and Maintenance
OGWDW	Office of Ground Water and Drinking Water
OMB	Office of Management and Budget
PN	Public Notification
PRA	Paperwork Reduction Act
PWS	Public Water System
PWSS	Public Water System Supervision
RCRA	Resource Conservation and Recovery Act
RFA	Regulatory Flexibility Analysis
RTCR	Revised Total Coliform Rule
SBARP	Small Business Advocacy Review Panel
SBREFA	Small Business Regulatory Enforcement Fairness Act
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
SIC	Standard Industrial Classification
TCR	Total Coliform Rule
TCRDSAC	Total Coliform Rule/Distribution System Advisory Committee

1 IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: Information Collection Request for the Proposed Revised Total Coliform Rule

OMB Control Number: 2040-AD94

EPA ICR Number: 1895.06

Note: This Information Collection Request (ICR) covers only the first three years after rule promulgation. The description of reporting and recordkeeping burden required for the full rule implementation, which exceeds the 3-year period for this ICR, is provided for informational purposes only. The costs and burden associated with the 3-year period of this ICR is described in Section 6 while the costs and burden of the 10-year full implementation period is provided in Appendix A.

1(b) Short Characterization

The proposed Revised Total Coliform Rule (RTCR) requires information collection regarding the effectiveness of treatment, the integrity of the distribution system, and the possible presence of fecal contamination. All public water systems (PWSs) are included in this information collection. The proposed RTCR uses total coliforms as an indicator to start an evaluation process that, where necessary, will require the PWS to correct sanitary defects. Under the proposed RTCR, *E. coli* will remain a regulated contaminant with a maximum contaminant level goal (MCLG) of zero and a maximum contaminant level (MCL) based on the presence of total coliforms and/or *E. coli*. All fecal coliform provisions (including the MCLG and MCL) are removed in the proposed RTCR. The intent of the proposed RTCR is to better address the 1989 Total Coliform Rule (TCR) objectives and enhance the multi-barrier approach to protecting public health, especially with respect to smaller ground water PWSs.

A large portion of the data collection under the proposed RTCR will involve monitoring, assessments, corrective actions, and public notification. Under the proposed RTCR, PWSs would continue to monitor for total coliforms and *E. coli* in the distribution system. All PWSs that meet certain trigger conditions (either a Level 1 or Level 2 trigger) are required to complete a Level 1 or Level 2 assessment and submit an assessment form to the state[1] within a specified time period. For corrective actions not completed within the specified time period, PWSs must submit to the state a timetable for completing the corrective actions. Additionally, PWSs would continue to be required to provide public notification for violations (the level of notification depends on the degree of public health implication of the violation). Some state activities under the proposed RTCR include review and revision of PWSs' sample siting plans; review of PWSs' sampling results; review of completed assessment forms; consultation and coordination with PWSs to determine the appropriate corrective action to be implemented; review of PWSs' certification of public notification; and recordkeeping of PWSs' submissions.

[1]The term "state" in the context of this ICR refers to any state or other primacy agency that has oversight authority for drinking water programs.

PWSs and states have monitoring, reporting, and recordkeeping requirements under the national primary drinking water regulations (NPDWRs) (see 40 CFR[2] 141.402, 40 CFR 141.403, 40 CFR 142.405, 40 CFR 142.14, 40 CFR 142.15). All affected PWSs shall maintain and report to the state information documenting compliance with the treatment and monitoring requirements under the NPDWRs. States shall maintain records essential for program implementation and oversight. These records, retained in the Safe Drinking Water Information System (SDWIS), allow the Environmental Protection Agency (EPA) to track PWS compliance with NPDWRs.

Data collected under the Safe Drinking Water Act (SDWA) are used by EPA's Office of Ground Water and Drinking Water (OGWDW), and other EPA programs such as Superfund and Resource Conservation and Recovery Act (RCRA). The data may also be used by the Farmers Home Administration, the Department of the Interior, the Department of Housing and Urban Development, the U.S. Army Corps of Engineers, White House Task forces, the Federal Emergency Management Agency, the Food and Drug Administration, public interest groups, and many private companies and individuals.

This ICR presents the burden and costs of the proposed RTCR to PWSs and states during the first three years following rule promulgation. For this 3-year ICR period, the average annual net change respondent burden and cost to PWSs and states is estimated at 839,526 hours and $23,767,060. The annual net change burden and cost to PWSs is estimated at 747,848 hours and $20,171,639. The estimated net change annual state burden for this ICR is 91,678 hours, at an estimated annual net change cost of $3,595,421. All costs estimated are labor costs. There are no operation and maintenance (O&M) or capital costs for the 3-year period covered by this ICR. The net change burden and cost estimates are discussed in greater detail in Section 6 of this document.

Beyond the first three years after rule promulgation (when PWSs and states need to comply with the rule), the burden and costs associated with complying with the rule for states and PWSs will be captured in the Microbial Rules ICR (for monitoring burden and costs) and the Public Water System Supervision (PWSS) ICR (for public notification reporting and recordkeeping burden and costs). Since there are ongoing reporting and recordkeeping requirements under the current TCR, Appendix A of this ICR shows the net change in the reporting and recordkeeping burden and costs to be incurred by PWSs under the proposed RTCR. Note that these calculations are for informational purposes only and are not part of this ICR.

The total number of respondents for this ICR is 154,894; 154,837 respondents are PWSs and 57 respondents are states and territories. The average annual net change in the number of responses for PWSs is 103,225 and averages 2.0 responses per respondent annually. The average annual net change in the number of responses for states is 51,669 and averages 906.5 responses per respondent annually.

This ICR was prepared in accordance with the November 2005 version of EPA's Guide to Writing Information Collection Requests Under the Paperwork Reduction Act (PRA) of 1995

[2] Title 40 of the Code of Federal Regulations

(or "ICR Handbook") prepared 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 the Office of Management and Budget's (OMB) implementing guidelines.

2 NEED FOR AND USE OF THE COLLECTION

The following sections describe the need for this information collection and the legal authority under which this information will be collected. Section 4 contains a summary of the major recordkeeping and reporting requirements for the proposed RTCR.

2(a) Need/Authority for the Collection

The proposed RTCR achieves the objectives of the 1989 TCR more effectively and efficiently, taking into account the changes in regulatory framework for implementing the SDWA over the past 20 years and experience with the TCR since it was promulgated in 1989.

The information collected under the proposed RTCR is required by EPA to carry out its monitoring and enforcement responsibilities under the SDWA. Without comprehensive, up-to-date information on drinking water contamination, EPA would not be able to meet the SDWA statutory requirements.

Section 1401(1)(D) of the SDWA requires that an NPDWR

> *contains criteria and procedures to assure a supply of drinking water which dependably complies with such maximum contaminant levels; including accepted methods for quality control and testing procedures to insure compliance with such levels and to insure proper operation and maintenance of the system...*

This section also authorizes EPA to require PWSs and laboratories to use EPA-approved methods and quality assurance criteria for collecting and analyzing water samples.

Section 1445(a)(1)(A) of the SDWA requires that persons subject to the NPDWR requirements

> *establish and maintain such records, make such reports, conduct such monitoring, and provide such information as the Administrator may reasonably require by regulation to assist the Administrator in establishing regulations under this subchapter, in determining whether such person has acted or is acting in compliance with this subchapter...*

2(b) Use/Users of the Data

Once compliance with the RTCR begins, each PWS maintains PWS-level records on the analytical results of monitoring actions and corrective actions taken and of the reports or written communications with the state regarding violations, assessments, corrective actions, and public notification (see 40 CFR 141.31 and 141.33). PWSs will use the data collected from this ICR and from the Microbial Rules ICR and PWSS ICR, when the rules goes into compliance, to:

- Determine system-specific needs
- Evaluate the effectiveness of treatment
- Determine the integrity of the distribution system
- Signal the possible presence of fecal contamination
- Correct significant deficiencies
- Alert the public through notices in the mass media or water bills when PWSs are not in compliance with Federal and state regulations

States are required to maintain records compiled from PWS respondents (40 CFR 142.14). States can use these records to track PWS monitoring, compliance violations, and enforcement activities. States can also track schedules for PWSs trying to achieve compliance. States are required to report the number of violations to SDWIS, which will help them target PWSs for compliance and take the necessary remedial action. SDWIS is a Federal information system that allows EPA and the states to store and retrieve information over time. Trends in compliance data can be evaluated at the PWS level, at the state level, and at the national program level. Usually, these data are used by EPA for maintaining oversight of the drinking water program (including supporting the Six-Year Review of NPDWRs mandated by SDWA) and for supporting Federal enforcement actions in cases where states fail to enforce.

The states and EPA have a number of critical questions to answer as part of their supervision of PWSs. Information and data collected from this ICR and from the Microbial Rules ICR and PWSS ICR can be used to answer these questions, some of which are listed below.

At the PWS level:

- Does a PWS have Level 1 or Level 2 triggers requiring Level 1 or Level 2 assessments?
- Does the result of a Level 1 or a Level 2 assessment indicate the presence of (a) sanitary defect(s) that require(s) corrective actions?
- For PWSs not in compliance, why are they not in compliance and how can compliance be achieved?

- What is the threat to public health of a PWS that is not in compliance?

At the national and state level:

- What are the national and state compliance trends?

- What changes in national policy or regulation may be needed to increase the national compliance rate?

- Is noncompliance a function of location, size, or other identifiable variable?

Requests for PWS data and related statistical analyses are frequent. Requests for SDWIS data are often received under the Freedom of Information Act (FOIA). Approximately 200 FOIA requests are received per year. EPA also maintains an Internet access point for SDWIS data at their "Envirofacts" Internet site.

3 NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

The following sections verify and affirm that this ICR satisfies the PRA requirements, meets the OMB data-collection guidelines, has public support, and does not duplicate another collection.

3(a) Non-duplication

EPA has searched the Federal Information Locator System (FILS) in an effort to ensure nonduplication of the data collection efforts. The information collected under the proposed RTCR is needed to determine a PWS's risk of microbial contamination and to evaluate the PWS's compliance. To the best of EPA's knowledge, data required by this proposed rule are not available from any other source.

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

Since this ICR is part of a proposed rule, public notice is not required prior to its submission to OMB. Instead, a notice for public comment for the ICR is included in the preamble of the proposed RTCR. Based on public comment received on the proposed rule, modifications will be made to the rule and underlying analyses prior to promulgation of the final rule. Where appropriate, these modifications will also be reflected in this ICR. A full discussion of public comments on the proposed RTCR, as well as EPA's responses, will be provided in a separate document which will be available in the public docket established for this rulemaking once the final rule is published.

3(c) Consultations

EPA noticed its intent to revise the 1989 TCR in July 2003 (68 FR 42908, July 18, 2003). To support the revisions of the TCR, EPA held several outreach activities and consultations. One of these outreach activities is a technical workshop that EPA held in Washington, DC, from January 30 to February 1, 2007 to discuss available information on the current TCR and available information regarding risks in distribution systems.

In June 2007, EPA established the Total Coliform Rule / Distribution System Advisory Committee in accordance with the provisions of the Federal Advisory Committee Act (FACA), to provide recommendations to EPA on revisions to the 1989 TCR and on what information about distribution systems is needed to better understand and address public health impacts from potential degradation of drinking water quality in distribution systems. The committee members agreed on and signed the Agreement in Principle (AIP) that contains the advisory committee's recommendations on revisions to the TCR that will improve implementation while maintaining or improving public health protection and distribution system water quality. The provisions of the proposed RTCR are based on the AIP.

EPA has also committed in the AIP to hold a stakeholder meeting no less than once per year to engage stakeholders in the development of the proposed RTCR. EPA held two stakeholder meetings, the first one in April 2009 and the second one in May 2010, to provide draft proposed regulation updates and an opportunity for stakeholders to provide feedback on the development of the proposed RTCR.

As mandated by SDWA, EPA also consulted with the Science Advisory Board, the National Drinking Water Advisory Council, and the Secretary of the US Department of Health and Human Services on the proposed RTCR. EPA also consulted with Tribal governments in accordance with Executive Order 13175: *Consultation and Coordination with Tribal Governments*. EPA also convened a Small Business Advocacy Review Panel (SBARP) to look at the impacts of the proposed RTCR on small entities. A more detailed discussion on this latter consultation can be found in Section 5(c) of this ICR. EPA considered the recommendations it got from these consultations in developing the proposed RTCR.

3(d) Effects of Less Frequent Collection

During the three-year period covered by this ICR, EPA requires no reporting and recordkeeping associated with complying with the proposed RTCR.

For compliance with the proposed RTCR (which happens beyond the three years covered by this ICR) EPA has determined that the monitoring frequencies for total coliforms and *E. coli* required of PWSs under the proposed RTCR are appropriate since less frequent data collection may fail to identify, in a timely manner, significant contaminant concentrations that may threaten the health and safety of drinking water consumers. EPA has considered alternatives for a wide range of frequency and burden estimates for data collection. EPA has selected the approach that requires the least frequent collection possible while maintaining its public health protection objectives.

3(e) General Guidelines

This ICR was prepared in accordance with the November 2005 ICR Handbook prepared 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.

3(f) Confidentiality

No confidential information will be collected as a result of this ICR.

3(g) Sensitive Questions

No information of a sensitive nature will be collected as a result of this ICR.

4 RESPONDENTS AND INFORMATION REQUESTED

The following sections provide information on the respondents and the information they are requested to provide.

4(a) Respondents/NAICS Codes

Under the proposed RTCR, respondents to the monitoring, reporting, and recordkeeping requirements include the operators and owners of PWSs, which include noncommunity water systems (NCWSs). The North American Industry Classification System (NAICS) Code for investor-owned water systems is 22131; the Standard Industrial Classification (SIC) Code is 4941. The NAICS Code for both publicly owned water systems and state agencies is 92411 and the SIC Code is 9511. State officials serve in a role of respondent when reporting compliance data to EPA.

PWSs are defined as those systems that provide piped water for human consumption and have at least 15 service connections or regularly serve at least 25 people at least 60 days per year. A community water system (CWS) is a PWS that serves at least 15 connections used by year-round residents or regularly serves at least 25 year-round residents. NCWSs, by definition, are all other PWSs. NCWSs include transient systems and non-transient systems. Non-transient systems serve the same 25 people at least 6 months per year (40 CFR 141.2).

4(b) Information Requested

4(b)(i) Data Items

States

During the first three years after rule promulgation, states need not comply with the proposed RTCR since the compliance date is three years after promulgation. Therefore, EPA requires no reporting and recordkeeping from states with regards to RTCR compliance. EPA, however, expects states to prepare and submit their primacy applications during this period. In addition to the general requirements contained in 40 CFR 142.16, EPA requires a state's primacy application to contain information specific to the RTCR. This information includes:

- The baseline and reduced monitoring provisions of the proposed RTCR the state will adopt and how the state will implement those provisions;

- Written descriptions of the following:

    - Frequency and process used to review and revise sample siting plans;
    - Criteria for reduced monitoring;
    - Process for implementing the new assessment and corrective action provisions of the proposed RTCR;

- Criteria and process for invalidating routine or repeat samples;
- Criteria and process for approval of individuals allowed to conduct Level 1 and Level 2 assessments;
- Procedure for performing special monitoring evaluations during sanitary surveys for ground water systems serving 1,000 persons or fewer to determine whether systems are on an appropriate monitoring schedule;
- Process of identifying seasonal systems and determining their monitoring schedule and start-up procedures;
- Additional criteria for reduced monitoring; and
- Procedures for seasonal systems to start-up operations at the beginning of each system.

The following are the reporting and recordkeeping requirements for states beyond the first three years after rule promulgation (when PWSs need to comply with the RTCR). The costs and burden determination to comply with these requirements are not included in this ICR.

In addition to the reporting requirements specified in 40 CFR 142.15, the proposed RTCR requires states to report the following to EPA (see proposed RTCR §142.15(c)(3)).

- A list of systems that the state is allowing to monitor under a reduced monitoring frequency.

In addition to those already specified in 40 CFR 142.14, states are required to keep records of the following (see §142.14(a)(10)):

- Any decision to waive or extend the 24-hour time limit for collecting samples following either a total coliform-positive routine sample, invalidation, or a high turbidity measurement;

- Any decision to allow a system to waive the requirement for three routine samples the month following a total coliform-positive sample;

- Any decision to invalidate a total coliform-positive sample;

- Completed and approved Level 1 and/or Level 2 assessments, including reports from the system that corrective action has been completed;

- Any decision to reduce the total coliform monitoring frequency for a community water system serving 1,000 persons or fewer to less than once per month;

- Any decision to reduce the total coliform monitoring frequency for a noncommunity water system using only ground water and serving 1,000 persons or fewer to less than once per quarter;

- Any decision to reduce the total coliform monitoring frequency for a noncommunity water system using only ground water and serving more than 1,000 persons during any month the system serves 1,000 persons or fewer; and

- Any decision to allow a system to forgo *E. coli* testing of a total coliform-positive sample if that system assumes that the total coliform-positive sample is *E. coli*- positive.

Public Water Systems

During the first three years after rule promulgation, PWSs need not comply with the RTCR since the compliance date is three years after promulgation. Therefore, EPA requires no reporting and recordkeeping from PWSs with regards to RTCR compliance. EPA, however, expects that PWSs will start revising their sample siting plans as necessary so that they will be available for state review and revision when the systems have to comply with the rule.

The following are the reporting and recordkeeping requirements for PWSs beyond the first three years after rule promulgation (when PWSs need to comply with the RTCR). The costs and burden determination to comply with these requirements are not included in this ICR.

In addition to the reporting requirements specified in 40 CFR 141.31, PWSs are required by the proposed RTCR to report the following to the states (see §141.861(a)):

- *E. coli* MCL violation by no later than the end of the next business day after it learns of the violation, and provide public notification;

- *E. coli*-positive sample by no later than the end of the next business day after the PWS learns of the analytical result;

- Treatment technique violation for total coliforms by no later than the end of the next business day after the PWS learns of the violation. The PWS must provide public notification;

- Completion of each scheduled corrective action for corrections not completed by the time of submission of the assessment form; and

- Monitoring violation within 10 days after the PWS discovers the violation. The PWS must provide public notification.

In addition to the recordkeeping requirements for PWSs specified in 40 CFR 141.33, PWSs are required by the proposed RTCR to keep records of the following (see §141.861(b)):

- Any assessment form, documentation of corrective actions completed as a result of assessments, or other available summary documentation of the sanitary defects and corrective actions taken for state review.

4(b)(ii) Respondent Activities

States

During the first three years after rule promulgation, the only activities that take place are state primacy application and start-up activities, which include:

- Reading and understanding the rule;
- Adopting the rule and developing state program that will support implementation of the rule;
- Modifying data management system;
- Training staff; and
- Reviewing PWS sample siting plans and providing recommendations for revisions to PWSs.

Beyond the first three years, when PWSs need to comply with the RTCR, EPA expects the states to be involved in the following incremental activities (note that these activities are not part of the cost and burden determination for this ICR). Figure 4.1 shows the schedule of information collection and other compliance activities under the proposed RTCR.

- Tracking compliance;
- Analyzing and reviewing PWS data;
- Making determinations concerning PWS monitoring requirements;
- Responding to PWSs with positive samples (for the calculations shown in Appendix A, note that the net change in burden and costs for states to review PWSs monitoring results

is zero because the TCR methodology is calculated on a per PWS basis and the total number of PWSs is the same for modeling under the TCR and proposed RTCR);

- Recordkeeping;

- Reviewing completed assessment forms and consulting with the PWS about the assessment form;

- Reviewing and coordinating with PWSs to determine the optimal corrective action to be implemented; and

- Providing consultation, reviewing the public notification certification, and filing the report of the violation.

Public Water Systems

During the first three years after rule promulgation, EPA anticipates PWSs to perform start-up activities, which include:

- Reading and understanding the rule;

- Planning, and mobilization; and

- Revising existing sampling plans to identify sampling locations and collection schedules that are representative of water throughout the distribution system.

Beyond the first three years, when PWSs need to comply with the RTCR, EPA anticipates PWSs to be involved in the following incremental activities (note that these activities are not part of the cost and burden determination for this ICR). Figure 4.1 shows the schedule for information collection and other compliance activities under the proposed RTCR.

- Conducting routine, additional routine, and repeat coliform monitoring.[3]

- Completing a Level 1 assessment if the PWS experiences a Level 1 trigger, and submitting a timetable to the state to identify sanitary defects detected, corrective actions completed, and a timetable for any corrective actions not already completed.

- Completing a Level 2 assessment if the PWS experiences a Level 2 trigger, and submitting a timetable for any corrective actions not already completed.

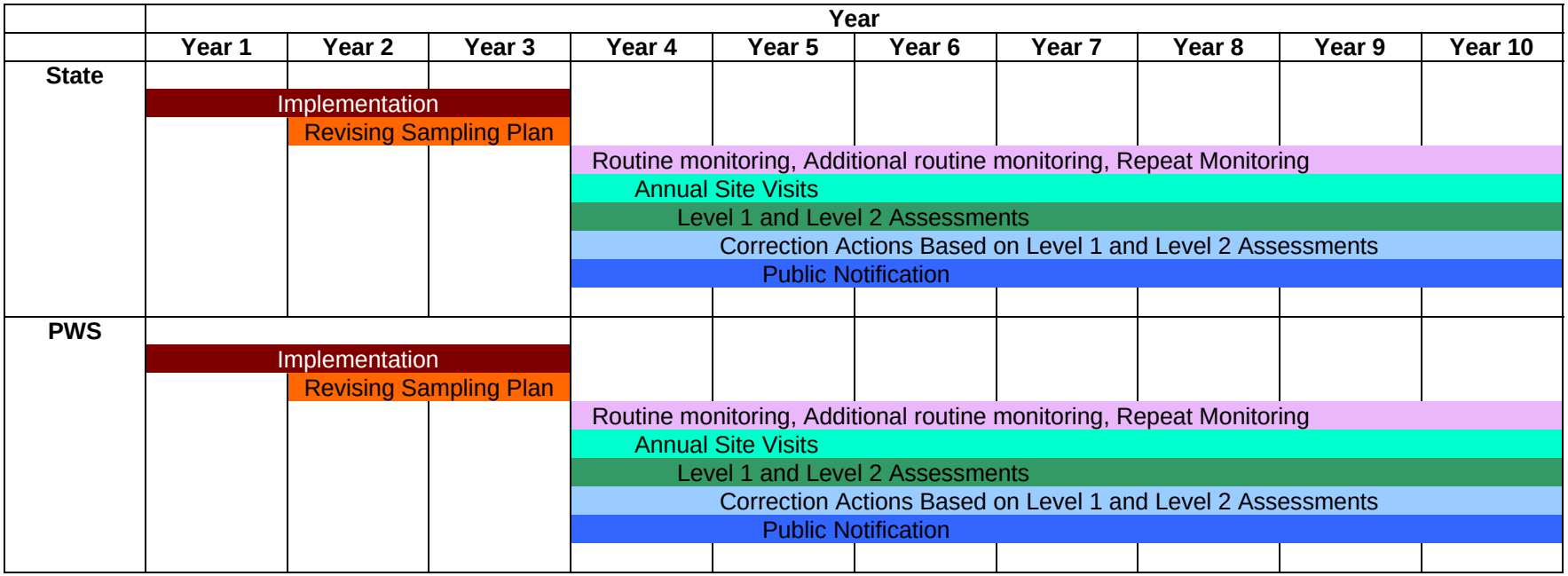
[3] For the calculations shown in Appendix A, note that the net change in reporting and recordkeeping burden and costs for PWSs to submit monitoring results to States is zero because the TCR methodology is calculated on a per PWS basis and the total number of PWSs is the same for modeling under the TCR and proposed RTCR.

- Correcting sanitary defects found through the performance of Level 1 or Level 2 assessments.[4]

- Developing and distributing Tier 1 public notices when *E. coli* MCL violations occur.

[4] For the calculations shown in Appendix A, note that only the net change in the number of corrective actions performed under the proposed RTCR is accounted for. EPA estimates that additional corrective actions would be performed for only 10% of the assessments undertaken as a result of the proposed RTCR. EPA estimates that corrective actions found through Level 1 assessments would result in corrective actions that focus more on transient solutions than on permanent fixes to the PWS. Corrective actions taken as a result of Level 2 assessments are expected to find a higher proportion of structural/technical issues resulting in material fixes to the PWSs and distribution system.

Figure 4.1: Implementation Schedule



Note: Activities occurring in Year 10 continue throughout the remaining years of analysis

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

The following sections describe EPA activities related to analyzing, maintaining, and distributing the information collected.

5(a) EPA Activities

The EPA will be responsible for promulgating the RTCR once it has been finalized and overseeing its implementation. Implementation of monitoring requirements will rely extensively on state governments in those states that have assumed primacy under section 1413 of the SDWA and §142.16 of the proposed RTCR. The EPA will be involved in the following activities:

- Developing the RTCR and guidance materials;
- Reviewing and analyzing data submissions from the states; and
- Processing and maintaining the SDWIS.

These are all general activities that are covered under the PWSS Program ICR, and therefore, are not included in the EPA burden and costs estimates for this ICR.

5(b) Collection Methodology and Management

Upon compliance, states will send their records of PWSs' violations and whether a PWS had a sanitary survey to SDWIS. EPA will modify SDWIS and data verification procedures to accommodate the new information from the proposed RTCR.

EPA will check data quality by doing the following:

- Developing standard operating procedures for each rule;
- Editing the data submitted for content and required format in SDWIS;
- Sending rejected data back to the states for error corrections;
- Requiring states to resubmit corrected data;
- Data verification audit of states based on data verification protocol established by EPA; and
- Conducting a review of states annually for corrective actions.

EPA plans to modify its existing data verification process to:

- Include the number of PWSs with discrepancies;
- Include onsite verification in states and PWSs, if necessary, every 2 to 3 years;
- Train states on data verification procedures so they can conduct self-audits;
- Include timeliness reviews;
- Incorporate proposed RTCR-related activities into EPA Regional quarterly/annual reviews; and
- Include a regional check with states within six months of the previous data verification.

SDWIS runs on an IBM ES9000 12 way processor using mainframe edit programs (in JCL). EPA defines information requirements and states update the data in batch file mode in a pre-defined format. The public may access the violations data in SDWIS through the Internet at *http://www.epa.gov/enviro/html/sdwis/sdwis_query.html*.

5(c) Small Entity Flexibility

In developing this ICR (and for the subsequent renewal of the Microbial Rules ICR and PWSS ICR), EPA considered the requirement of the Small Business Regulatory Enforcement Fairness Act (SBREFA) to minimize the burden of information collections on small entities. EPA considers small entities to be PWSs serving fewer than 10,000 people (63 FR 44524, August 19, 1998).

The proposed RTCR will have the greatest impact on small PWSs. Under the Regulatory Flexibility Act (RFA), 5 U.S.C. 601 et seq., as amended by SBREFA, EPA generally is required to conduct a regulatory flexibility analysis that describes the impact of a regulatory action on small entities. To assess this impact, EPA conducted outreach to small entities and convened a Small Business Advocacy Review Panel (SBARP) in February 2008 to obtain advice and recommendations of representatives of the small entities that potentially would be subject to the proposed rule's requirements. These recommendations are discussed below.

5(c)(i) Small Business Advocacy Review Panel Recommendations

The Panel recommended to use total coliforms as a trigger for investigation and/or corrective action, to balance monitoring requirements and costs with risk, to further differentiate requirements with other related rules, and to consider reporting and recordkeeping costs in estimating burden.

EPA considered the Panel's recommendations in developing the proposed RTCR. The proposed RTCR eliminates the MCLG and MCL for total coliforms and instead uses total coliforms as an indicator of the potential pathway of contamination into the distribution system. PWSs that may be vulnerable to fecal contamination (as indicated by their monitoring results)

are required to do an assessment and if necessary, appropriate corrective action. Other provisions of the proposed RTCR also result in reduced costs for many small PWSs and address the recommendations of the Panel mentioned previously. These provisions include:

- Reduced routine monitoring for qualifying PWS serving 1,000 persons or fewer.
- Reduced number of repeat samples required.
- Reduced additional routine monitoring for PWS serving 4,100 or fewer people.
- Reduced public notification requirements for all systems, including small systems.
- Reductions in corrective actions over time as a result of enhanced system performance for all small systems.

Furthermore, consistent with the Panel recommendation to evaluate which parameters are most appropriate for routine monitoring and as potential triggers for investigative and corrective actions, EPA is conducting a review of existing models for total coliform and *E. coli* analysis and is evaluating its Alternative Test Procedure protocol for approving new methods. EPA is also one of the founding members of a Research Information Collection Partnership that is considering research and information needs to evaluate potential indicators of distribution system contamination.

5(d) Collection Schedule

The RTCR is scheduled to be promulgated in 2012, with monitoring beginning 3 years after promulgation. Figure 4.1 illustrates the information collection periods for compliance with the proposed RTCR over the first 10 years following rule promulgation.

6 ESTIMATING BURDEN AND COST OF COLLECTION

The following sections discuss costs and burden for all information collection, recordkeeping, and reporting requirements for the proposed RTCR.

6(a) Estimating Respondent Burden and Cost

The following sections discuss the costs and burden faced by PWSs and states. Note that the majority of the monitoring, recordkeeping, and reporting burden occurs beyond the 3-year period of the ICR. Exhibits A.34 and A.37, located in Appendix A, include a ten-year time frame showing the burden and costs beyond the initial period covered by the ICR. This reflects the reality of rule implementation. Figure 6.1 presents a summary of estimated responses, burden, and costs for the 3-year window of the ICR.

Figure 6.1: Average Annual Net Change Burden and Costs for the Proposed RTCR ICR

Respondent Type	Annual Burden Hours	Cost				Annual Responses
		Annual Labor Cost	Annual O&M Cost	Annual Capital Cost	Total Annual Cost	
PWSs	747,848	$ 20,171,639	$ -	$ -	$ 20,171,639	103,225
States and Territories	91,678	$ 3,595,421	$ -	$ -	$ 3,595,421	51,669
TOTAL	**839,526**	**$ 23,767,060**	**$ -**	**$ -**	**$ 23,767,060**	**154,894**

Notes:
1) Detail may not add exactly to total due to independent rounding.
2) "Annual Burden Hours" reflects an annual average for all system sizes over the 3-year ICR period.

6(a)(i) Burden and Cost to PWSs

Information collection activities of PWSs required under the proposed RTCR will result in average annual net change national labor costs of $20.2 million and a corresponding annual net change burden of 747,848 person-hours as shown in Figure 6.1 and in Exhibits A.34 and A.37. The exhibits also include annual net change costs and burden up to 10 years following rule promulgation.

The net change burden and costs are estimated for start-up activities, including reading the rule and training staff. The assumptions and methodologies used in deriving these estimates are discussed in the following section.

6(a)(i)(a) Start-Up Activities

Start-up activities are estimated at a one-time expense of $60.5 million (Exhibit A.37) and 2.2 million burden hours (Exhibits A.34). Start-up activities include reading the final rule to become familiar with the requirements and performing additional or transitional implementation activities such as training staff to on rule requirements. Additionally, all PWSs will incur one-time costs to revise existing sampling plans to identify sampling locations and collection schedules that are representative of water throughout the distribution system.

For costing purposes, EPA estimates the labor needs and hourly labor rates of PWSs and states for two labor categories: managerial and technical. For PWSs, all analyses use labor rates presented in EPA's document, *Labor Costs for National Drinking Water Rules*[5]. The technical and managerial wage rates vary with PWS size and include fringe benefits. To account for the general composition of staff at PWSs of smaller sizes (e.g., PWSs serving 3,300 or fewer), EPA uses only the technical rate. For PWSs serving more than 3,300 people, EPA uses a ratio of 80 percent technical labor to 20 percent managerial labor to arrive at a labor cost, or weighted labor rate. A full description of the derivation of the labor rates used is provided in the *Technology and Cost Document for the Proposed Revised Total Coliform Rule*[6]. The weighted labor rates ($2007) are shown in Exhibit A.1.

6(a)(i)(b) Annual Activities

In the tenth year of rule implementation, a net savings of $1.5 million (Exhibit A.37) and 0.09 million burden hours (Exhibit A.34) is expected for annual PWS activity costs and burden, respectively. Included in this category are costs and burden to revise sampling plans; to conduct routine monitoring, additional routine monitoring, and repeat monitoring; to perform Level 1 and Level 2 assessments; to perform reporting and recordkeeping related to corrective actions; and to provide public notification. The net change cost and burden estimates for PWS annual activities are shown in Exhibits A.34 and A.37. These net change costs are for data collection and review and will occur outside of the three years covered by this ICR.

6(a)(ii) Burden and Cost to States

Total annual average net change state labor cost is $3.6 million, and the annual average net change burden is 91,678 hours for the three years covered by this ICR.

6(a)(ii)(a) Start-Up Activities

States are estimated to incur a one-time cost of $10.8 million (Exhibit A.37) and a one-time burden of 275,033 hours (Exhibit A.34). For states, the administrative and field engineer labor rates from the *2001 State Drinking Water Needs Analysis*[7] are used in the proposed RTCR

[5] US Environmental Protection Agency. 2003. *Labor Costs for National Drinking Water Rules*.

[6] US Environmental Protection Agency. 2010. Technology and Cost Document for the Proposed Revised Total Coliform Rule. EPA 815-R-10-002.

Association of State Drinking Water Administrators (ASDWA). 2001. *Drinking water program resource needs assessment.* Version 9. November 27, 2001.

Economic Analysis (EA) (as used in the Ground Water Rule (GWR) EA[8]). These rates include a 60 percent overhead rate and were inflated to 2007$ using the Employee Cost Index (ECI). The state labor rates in 2007$ are $39.22 for an administrative state employee and $43.58 for a state field engineer. EPA assumes that the state field engineer would conduct annual site visits, and the administrative state employee would work with PWSs on all remaining aspects of the proposed RTCR. Because this separation between field engineer and administrative employee is used, the 80/20 weighting ratio between technical and managerial rates is not used to develop state costs.

6(a)(ii)(b) Annual Activities

In the tenth year after promulgation, a net savings of $0.54 million (Exhibit A.37) and 0.01 million burden hours (Exhibit A.34) is expected annually for states to respond to positive sample results; to review completed assessment forms required to be filed by PWSs and consult with PWSs about their assessment form; to review and coordinate with PWSs to determine the appropriate corrective action to be implemented; and to provide consultation, review the public notification certification, and file the report of the violation. States must also submit information to SDWIS to assist both EPA and states in tracking PWS compliance (see Exhibits A.34 and A.37).

State net change costs and burden for activities occurring outside of the 3-year ICR window are calculated in the same way as state net change start-up costs and burden. The administrative state employee labor rate is used for all rule activities under the proposed RTCR.

6(b) Time Frame for Cost and Burden Estimates

To provide a coherent understanding of how the burden for the rule will occur, the time frame for rule implementation is described below.

In the first 3 years, EPA has estimated that states will adopt regulations for transitional implementation of the proposed RTCR and will apply for program primacy approval, and that states and PWSs will conduct transitional start-up activities for implementing the proposed RTCR, such as training, and data management system modifications.

States are expected to incur one-time costs to review sampling plans and recommend any revisions to PWSs. PWSs are expected to revise sampling plans before monitoring begins. For modeling purposes costs are split between years 2 and 3 of the 25-year compliance period (monitoring is required starting in year 4).

Beginning in the fourth year following promulgation, PWSs would begin routine, additional routine, and repeat monitoring. Additionally, EPA expects that, beginning in the fourth year, PWSs would be required to correct sanitary defects found through the performance of Level 1 or Level 2 assessments. Reporting and recordkeeping burden from corrective actions resulting from Level 1 and Level 2 assessments would also begin in the fourth year following promulgation. For each corrective action performed, states would incur recordkeeping and

[8] US Environmental Protection Agency. 2006. Economic Analysis for the Final Ground Water Rule. EPA-815-R-06.014.

reporting burden to review and coordinate with PWSs. Revised public notification activities would also begin in the fourth year following promulgation.

6(c) Estimating EPA Burden and Cost

EPA's costs include those incurred by both regional offices and headquarters to process, analyze, and maintain SDWIS data. These costs cannot be derived on a per rule basis but are presented as an overall program cost in the PWSS Program ICR. Headquarters personnel who design and administer SDWIS believe that the net additional cost of the regulations proposed here is not significantly greater than that of the PWSS Program.

The EPA also performs the role attributed to states and territories, for those states and territories over which it has primacy. This cost is included as part of the total burden and cost for states.

6(d) Respondent Universe

There are a total of 154,837 PWSs and 57 states and territories considered for this ICR.

6(e) Bottom Line Burden Hours and Costs

This section provides a description of bottom line estimates for implementation of the proposed RTCR. The bottom line net change burden hours and costs for PWSs and states are the summaries of the hours and costs collectively incurred for all additional activities under the proposed RTCR in comparison to the current TCR. The first part of this section describes the estimated average annual net change costs and hourly burdens for respondents to the rule. The second part discusses the potential net change cost and burden to EPA. Figure 6.2 presents a summary of the average annual net change respondent burden over three years for PWSs and states. All additional exhibits relating to this ICR are in Appendix A.

Figure 6.2: Bottom Line Average Annual Net Change Burden and Costs for the 3-Year ICR Period

Annual Number of Respondents	**51,669**	(=)	
	51,612	(+)	PWSs
	57		States
Total Annual Responses	**154,894**	(=)	
	103,225	(+)	Public water system responses
	51,669		State responses
Annual Number of Responses per Public Water System	**2.00**	(=)	
	103,225	(/)	Total annual PWS responses (from above)
	51,612		Total annual number of PWS respondents (from above)
Annual Number of Responses per State	**906.5**	(=)	
	51,669	(/)	Total annual state responses (from above)
	57		Total annual number of state respondents (from above)
Total Annual Respondent Burden Hours	**839,526**	(=)	
	747,848	(+)	PWS hours
	91,678		State hours
Hours per Response for Public Water Systems	**7.2**	(=)	
	747,848	(/)	Total PWS annual hours (from above)
	103,225		Total PWS responses (from above)
Hours per Response for States	**1.77**	(=)	
	91,678	(/)	Total state annual hours (from above)
	51,669		Total state responses (from above)
Annual O&M and Capital Cost	**$0**	(=)	
	$0	(+)	PWS O&M costs
	$0		State O&M costs
Total Annual Respondent Cost	**$23,767,060**	(=)	
	$20,171,639	(+)	PWS costs
	$3,595,421		State costs
Total Annual Hours (resp. plus Agency)	**839,526**	(=)	
	839,526	(+)	Total respondent hours (from above)
	0		Total EPA hours
Total Annual Cost (resp. plus Agency)	**$23,767,060**	(=)	
	$23,767,060	(+)	Total respondent cost
	$0		Total EPA cost

Notes:
1) Detail may not add exactly to totals due to rounding.

6(e)(i) Bottom Line Burden and Cost Estimates for Respondents

For this ICR, EPA estimates that PWSs will have an annual net change respondent burden of 747,848 hours and an annual net change respondent costs of $20.2 million. EPA estimates that states will have an annual net change respondent burden of 91,678 hours and a

corresponding average annual net change respondent costs of $3.6 million. Therefore, the total average annual net change respondent burden is estimated to be 839,526 burden hours and the corresponding total average annual net change respondent labor costs are estimated to be $23.8 million. See Figure 6.2. There are neither capital costs nor O&M costs during the 3-year ICR period.

6(e)(ii) Bottom Line Estimate for EPA

As mentioned previously in Section 6c, the costs and burden incurred by EPA to process, analyze, and maintain SDWIS are presented as part of the PWSS Program ICR. Additional costs that are likely to be incurred by EPA for tribes and the state of Wyoming are included in the tally for the costs and burden to states and territories because most costs are estimated on a per system basis and because the number of PWSs on tribal land or in Wyoming affected by various provisions of the rule is uncertain.

6(f) Reasons for Change in Burden

The primary goal of the proposed RTCR is to achieve the objectives of the 1989 TCR more effectively and efficiently, taking into account the changes in regulatory framework for implementing the SDWA over the past 20 years and experience with the TCR since it was promulgated in 1989. National burden estimates increase primarily because PWS requirements are being strengthened under the proposed RTCR.

6(g) Burden Statement

The annual net change public reporting and recordkeeping burden for this collection of information is estimated to average 14.5 hours per PWS respondent per year and 1608.4 hours per state respondent per year for the 3-year ICR period.[9]

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 PWSs 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 EPA'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 Number EPA-HQ-OW-2008-0878, which is available for online viewing at

[9] The average burden hours were calculated by dividing the annual burden hours (from Figure 6.1) by the annual number of respondents (from Figure 6.2), e.g., for PWSs, 747,848 ÷51,612 =.14.5.

www.regulations.gov, or in person viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, 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 Water Docket is (202) 566-2426. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, to access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When 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 Officer for EPA. Please include the EPA Docket ID Number (EPA-HQ-OW-2008-0878) and the OMB Control Number 2040-AD94 in any correspondence.

Appendix A

Matrix of Appendix A Contents

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	PWS Unit Burden and Cost Estimates (TCR)	A.3
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	PWS Unit Burden and Cost Estimates (TCR)	A.7
	State Unit Burden and Cost Estimates (AIP)	A.8
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Exhibit A.1 Labor Rates

PWS Labor Rates

PWS Size (population served)	Weighted Labor Rate ($/hour)
< 100	$ 25.10
101 - 500	$ 27.03
501 - 1,000	$ 28.96
1,001 - 4,100	$ 29.73
4,101 - 33,000	$ 36.00
33,001 - 96,000	$ 36.39
96,001 - 500,000	$ 41.01
500,001-1 Million	$ 41.01
> 1 Million	$ 41.01

Note: Labor rates for each size category are assumed to be the same regardless of system type (CWS, NTNCWS, and TNCWS).

Source: Proposed RTCR T&C Document (EPA 815-R-10-002).

State Labor Rates

Cost Assumptions: Labor Rate Components

Cost Element	Base Hourly Labor Cost	ECI in Year of Data	ECI 2007	2007 Labor Cost
	A	B	C	D=A*(C/B)
State Employee - Administrative	$ 33.60	92.7	108.2	$ 39.22
State Employee - Field Engineer	$ 37.34	92.7	108.2	$ 43.58

Sources:

(A) Economic Analysis for the Final Ground Water Rule (USEPA. 2006. EPA-815-R-06.014).

(B) ECI for state employee from the Bureau of Labor Statistics (BLS) (2008) from 2003 (State and local government; Total compensation; All workers, not seasonally adjusted). www.bls.gov.

(C) ECI for state employee from BLS (2008) from 2007 (State and local government; Total compensation; All workers, not seasonally adjusted). www.bls.gov.

Exhibit A.2 PWS Unit Burden and Cost Estimates for Implementation Activities (AIP)

PWS Size (Population Served)	Labor Cost (per hour)	Read and Understand Rule (hours/system)	Planning and Mobilization (hours/system)	Unit Burden	Unit Cost
	A	B	C	B + C	D=A*(B+C)
Community Water Systems (CWSs) - SW					
≤100	$ 25.10	4.0	8.0	12.0	$ 301.20
101-500	$ 27.03	4.0	8.0	12.0	$ 324.36
501-1,000	$ 28.96	4.0	8.0	12.0	$ 347.52
1,001-4,100	$ 29.73	4.0	8.0	12.0	$ 356.76
4,101-33,000	$ 36.00	4.0	8.0	12.0	$ 432.00
33,001-96,000	$ 36.39	4.0	8.0	12.0	$ 436.68
96,001-500,000	$ 41.01	4.0	8.0	12.0	$ 492.12
500,001-1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
> 1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
Community Water Systems (CWSs) - GW					
≤100	$ 25.10	4.0	8.0	12.0	$ 301.20
101-500	$ 27.03	4.0	8.0	12.0	$ 324.36
501-1,000	$ 28.96	4.0	8.0	12.0	$ 347.52
1,001-4,100	$ 29.73	4.0	8.0	12.0	$ 356.76
4,101-33,000	$ 36.00	4.0	8.0	12.0	$ 432.00
33,001-96,000	$ 36.39	4.0	8.0	12.0	$ 436.68
96,001-500,000	$ 41.01	4.0	8.0	12.0	$ 492.12
500,001-1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
> 1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
Nontransient Noncommunity Water Systems (NTNCWSs) - SW					
≤100	$ 25.10	4.0	8.0	12.0	$ 301.20
101-500	$ 27.03	4.0	8.0	12.0	$ 324.36
501-1,000	$ 28.96	4.0	8.0	12.0	$ 347.52
1,001-4,100	$ 29.73	4.0	8.0	12.0	$ 356.76
4,101-33,000	$ 36.00	4.0	8.0	12.0	$ 432.00
33,001-96,000	$ 36.39	4.0	8.0	12.0	$ 436.68
96,001-500,000	$ 41.01	4.0	8.0	12.0	$ 492.12
500,001-1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
> 1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
Nontransient Noncommunity Water Systems (NTNCWSs) - GW					
≤100	$ 25.10	4.0	8.0	12.0	$ 301.20
101-500	$ 27.03	4.0	8.0	12.0	$ 324.36
501-1,000	$ 28.96	4.0	8.0	12.0	$ 347.52
1,001-4,100	$ 29.73	4.0	8.0	12.0	$ 356.76
4,101-33,000	$ 36.00	4.0	8.0	12.0	$ 432.00
33,001-96,000	$ 36.39	4.0	8.0	12.0	$ 436.68
96,001-500,000	$ 41.01	4.0	8.0	12.0	$ 492.12
500,001-1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
> 1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
Transient Noncommunity Water Systems (TNCWSs) - SW					
≤100	$ 25.10	4.0	8.0	12.0	$ 301.20
101-500	$ 27.03	4.0	8.0	12.0	$ 324.36
501-1,000	$ 28.96	4.0	8.0	12.0	$ 347.52
1,001-4,100	$ 29.73	4.0	8.0	12.0	$ 356.76
4,101-33,000	$ 36.00	4.0	8.0	12.0	$ 432.00
33,001-96,000	$ 36.39	4.0	8.0	12.0	$ 436.68
96,001-500,000	$ 41.01	4.0	8.0	12.0	$ 492.12
500,001-1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
> 1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
Transient Noncommunity Water Systems (TNCWSs) - GW					
≤100	$ 25.10	4.0	8.0	12.0	$ 301.20
101-500	$ 27.03	4.0	8.0	12.0	$ 324.36
501-1,000	$ 28.96	4.0	8.0	12.0	$ 347.52
1,001-4,100	$ 29.73	4.0	8.0	12.0	$ 356.76
4,101-33,000	$ 36.00	4.0	8.0	12.0	$ 432.00
33,001-96,000	$ 36.39	4.0	8.0	12.0	$ 436.68
96,001-500,000	$ 41.01	4.0	8.0	12.0	$ 492.12
500,001-1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12
> 1 Million	$ 41.01	4.0	8.0	12.0	$ 492.12

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

(B), (C) EPA estimates based on best professional judgement.

Exhibit A.3 PWS Unit Burden and Cost Estimates for Implementation Activities (TCR)

PWS Size (Population Served)	Labor Cost (per hour)	Read and Understand Rule (hours/system)	Planning and Mobilization (hours/system)	Unit Burden	Unit Cost
	A	B	C	B + C	D=A*(B+C)
Community Water Systems (CWSs) - SW					
≤100	$ 25.10	-	-	-	$ -
101-500	$ 27.03	-	-	-	$ -
501-1,000	$ 28.96	-	-	-	$ -
1,001-4,100	$ 29.73	-	-	-	$ -
4,101-33,000	$ 36.00	-	-	-	$ -
33,001-96,000	$ 36.39	-	-	-	$ -
96,001-500,000	$ 41.01	-	-	-	$ -
500,001-1 Million	$ 41.01	-	-	-	$ -
> 1 Million	$ 41.01	-	-	-	$ -
Community Water Systems (CWSs) - GW					
≤100	$ 25.10	-	-	-	$ -
101-500	$ 27.03	-	-	-	$ -
501-1,000	$ 28.96	-	-	-	$ -
1,001-4,100	$ 29.73	-	-	-	$ -
4,101-33,000	$ 36.00	-	-	-	$ -
33,001-96,000	$ 36.39	-	-	-	$ -
96,001-500,000	$ 41.01	-	-	-	$ -
500,001-1 Million	$ 41.01	-	-	-	$ -
> 1 Million	$ 41.01	-	-	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - SW					
≤100	$ 25.10	-	-	-	$ -
101-500	$ 27.03	-	-	-	$ -
501-1,000	$ 28.96	-	-	-	$ -
1,001-4,100	$ 29.73	-	-	-	$ -
4,101-33,000	$ 36.00	-	-	-	$ -
33,001-96,000	$ 36.39	-	-	-	$ -
96,001-500,000	$ 41.01	-	-	-	$ -
500,001-1 Million	$ 41.01	-	-	-	$ -
> 1 Million	$ 41.01	-	-	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - GW					
≤100	$ 25.10	-	-	-	$ -
101-500	$ 27.03	-	-	-	$ -
501-1,000	$ 28.96	-	-	-	$ -
1,001-4,100	$ 29.73	-	-	-	$ -
4,101-33,000	$ 36.00	-	-	-	$ -
33,001-96,000	$ 36.39	-	-	-	$ -
96,001-500,000	$ 41.01	-	-	-	$ -
500,001-1 Million	$ 41.01	-	-	-	$ -
> 1 Million	$ 41.01	-	-	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - SW					
≤100	$ 25.10	-	-	-	$ -
101-500	$ 27.03	-	-	-	$ -
501-1,000	$ 28.96	-	-	-	$ -
1,001-4,100	$ 29.73	-	-	-	$ -
4,101-33,000	$ 36.00	-	-	-	$ -
33,001-96,000	$ 36.39	-	-	-	$ -
96,001-500,000	$ 41.01	-	-	-	$ -
500,001-1 Million	$ 41.01	-	-	-	$ -
> 1 Million	$ 41.01	-	-	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - GW					
≤100	$ 25.10	-	-	-	$ -
101-500	$ 27.03	-	-	-	$ -
501-1,000	$ 28.96	-	-	-	$ -
1,001-4,100	$ 29.73	-	-	-	$ -
4,101-33,000	$ 36.00	-	-	-	$ -
33,001-96,000	$ 36.39	-	-	-	$ -
96,001-500,000	$ 41.01	-	-	-	$ -
500,001-1 Million	$ 41.01	-	-	-	$ -
> 1 Million	$ 41.01	-	-	-	$ -

Notes:

(B), (C) Under the TCR option, systems will not incur additional implementation burden to implement the proposed RTCR.

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

Exhibit A.4 State Unit Burden and Cost Estimates for Implementation Activities & Annual Administ (AIP)

State Burden and Cost Estimates for Implementation Activities (AIP)

Compliance Activity	Labor Cost (per hour) A	Hours B	FTEs C=B/2,080	Cost D=A*B
Read and Understand Rule	$ 39.22	15	0.01	$ 588
Regulation Adoption and Program Development	$ 39.22	260	0.13	$ 10,197
Initial Laboratory Certification	$ 39.22	-	-	$ -
Modify Data Management Systems	$ 39.22	520	0.25	$ 20,393
PWS Training and Technical Assistance	$ 39.22	520	0.25	$ 20,393
Staff Training	$ 39.22	130	0.06	$ 5,098
Per State Total		1,445		$ 56,670
National Totals (57 States/Primacy Agencies)		82,365		$ 3,230,201

Notes: Detail may not add due to independent rounding.

Sources: (A) Labor rate for state employee from Exhibit A.1

(B) Labor hours for start-up activities are based on GWR estimates. Because the proposed RTCR is a revision of the existing TCR, one fourth of the State unit start up burden from GWR is used in the proposed RTCR.

(C) Full-time equivalent (FTE) assumes individual working 40 hours per week, 52 weeks per year.

State Burden and Cost Estimates for Annual Administrative Activities (AIP)

Annual Administrative Activities

Compliance Activity	Labor Cost (per hour) A	Hours B	FTEs C=B/2,080	Cost D=A*B
Coordination with EPA	$ 39.22	-	-	$ -
Lab Certification	$ 39.22	-	-	$ -
Ongoing Technical Assistance	$ 39.22	-	-	$ -
SDWIS Reporting	$ 39.22	-	-	$ -
Recordkeeping	$ 39.22	-	-	$ -
Staff Training	$ 39.22	-	-	$ -
Per State Total		-		$ -
National Totals (57 States/Primacy Agencies)		-		$ -

Notes: Detail may not add due to independent rounding.

Sources: (A) Labor rate for state employee from Exhibit A.1.

(B) Under the AIP, states will not incur additional annual administration burden for ongoing implementation of the proposed RTCR.

(C) Full-time equivalent (FTE) assumes individual working 40 hours per week, 52 weeks per year.

Exhibit A.5 State Unit Burden and Cost Estimates for Implementation Activities & Annual Administ (TCR)

State Burden and Cost Estimates for Implementation Activities (TCR)

Compliance Activity	Labor Cost (per hour) A	Hours B	FTEs C=B/2,080	Cost D=A*B
Read and Understand Rule	$ 39.22	-	-	$ -
Regulation Adoption and Program Development	$ 39.22	-	-	$ -
Initial Laboratory Certification	$ 39.22	-	-	$ -
Modify Data Management Systems	$ 39.22	-	-	$ -
PWS Training and Technical Assistance	$ 39.22	-	-	$ -
Staff Training	$ 39.22	-	-	$ -
Per State Total		-		$ -
National Totals (57 States/Primacy Agencies)		-		$ -

Notes: Detail may not add due to independent rounding.

Sources: (A) Labor rate for state employee from Exhibit A.1.

(B) Under the TCR, states will not incur additional implementation burden to implement the proposed RTCR.

(C) Full-time equivalent (FTE) assumes individual working 40 hours per week, 52 weeks per year.

State Burden and Cost Estimates for Annual Administrative Activities (TCR)

Annual Administrative Activities

Compliance Activity	Labor Cost (per hour) A	Hours B	FTEs C=B/2,080	Cost D=A*B
Coordination with EPA	$ 39.22	-	-	$ -
Lab Certification	$ 39.22	-	-	$ -
Ongoing Technical Assistance	$ 39.22	-	-	$ -
SDWIS Reporting	$ 39.22	-	-	$ -
Recordkeeping	$ 39.22	-	-	$ -
Staff Training	$ 39.22	-	-	$ -
Per State Total		-		$ -
National Totals (57 States/Primacy Agencies)		-		$ -

Notes: Detail may not add due to independent rounding.

Sources: (A) Labor rate for state employee from Exhibit A.1.

(B) Under the TCR, states will not incur additional annual administration burden for ongoing implementation of the proposed RTCR.

(C) Full-time equivalent (FTE) assumes individual working 40 hours per week, 52 weeks per year.

Exhibit A.6 PWS Unit Burden and Cost Estimates for Revising Sampling Plan (AIP)

PWS Size (Population Served)	Labor Cost (per hour)	Revise Sampling Plan (hours/system)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 25.10	2.0	$ 50.20
101-500	$ 27.03	2.0	$ 54.06
501-1,000	$ 28.96	4.0	$ 115.84
1,001-4,100	$ 29.73	4.0	$ 118.92
4,101-33,000	$ 36.00	6.0	$ 216.00
33,001-96,000	$ 36.39	8.0	$ 291.12
96,001-500,000	$ 41.01	8.0	$ 328.08
500,001-1 Million	$ 41.01	8.0	$ 328.08
> 1 Million	$ 41.01	8.0	$ 328.08
Community Water Systems (CWSs) - GW			
≤100	$ 25.10	2.0	$ 50.20
101-500	$ 27.03	2.0	$ 54.06
501-1,000	$ 28.96	4.0	$ 115.84
1,001-4,100	$ 29.73	4.0	$ 118.92
4,101-33,000	$ 36.00	6.0	$ 216.00
33,001-96,000	$ 36.39	8.0	$ 291.12
96,001-500,000	$ 41.01	8.0	$ 328.08
500,001-1 Million	$ 41.01	8.0	$ 328.08
> 1 Million	$ 41.01	8.0	$ 328.08
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 25.10	2.0	$ 50.20
101-500	$ 27.03	2.0	$ 54.06
501-1,000	$ 28.96	4.0	$ 115.84
1,001-4,100	$ 29.73	4.0	$ 118.92
4,101-33,000	$ 36.00	6.0	$ 216.00
33,001-96,000	$ 36.39	8.0	$ 291.12
96,001-500,000	$ 41.01	8.0	$ 328.08
500,001-1 Million	$ 41.01	8.0	$ 328.08
> 1 Million	$ 41.01	8.0	$ 328.08
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 25.10	2.0	$ 50.20
101-500	$ 27.03	2.0	$ 54.06
501-1,000	$ 28.96	4.0	$ 115.84
1,001-4,100	$ 29.73	4.0	$ 118.92
4,101-33,000	$ 36.00	6.0	$ 216.00
33,001-96,000	$ 36.39	8.0	$ 291.12
96,001-500,000	$ 41.01	8.0	$ 328.08
500,001-1 Million	$ 41.01	8.0	$ 328.08
> 1 Million	$ 41.01	8.0	$ 328.08
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 25.10	2.0	$ 50.20
101-500	$ 27.03	2.0	$ 54.06
501-1,000	$ 28.96	4.0	$ 115.84
1,001-4,100	$ 29.73	4.0	$ 118.92
4,101-33,000	$ 36.00	6.0	$ 216.00
33,001-96,000	$ 36.39	8.0	$ 291.12
96,001-500,000	$ 41.01	8.0	$ 328.08
500,001-1 Million	$ 41.01	8.0	$ 328.08
> 1 Million	$ 41.01	8.0	$ 328.08
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 25.10	2.0	$ 50.20
101-500	$ 27.03	2.0	$ 54.06
501-1,000	$ 28.96	4.0	$ 115.84
1,001-4,100	$ 29.73	4.0	$ 118.92
4,101-33,000	$ 36.00	6.0	$ 216.00
33,001-96,000	$ 36.39	8.0	$ 291.12
96,001-500,000	$ 41.01	8.0	$ 328.08
500,001-1 Million	$ 41.01	8.0	$ 328.08
> 1 Million	$ 41.01	8.0	$ 328.08

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

(B) Labor hours for revising sampling plan reflect EPA estimate.

Exhibit A.7 PWS Unit Burden and Cost Estimates for Revising Sampling Plan (TCR)

PWS Size (Population Served)	Labor Cost (per hour)	Revise Sampling Plan (hours/system)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Community Water Systems (CWSs) - GW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -

Notes:

(B) Under the TCR, systems are not required to revise their sampling plans.

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

Exhibit A.8 State Unit Burden and Cost Estimates for Revising Sampling Plan (AIP)

PWS Size (Population Served)	Labor Cost (per hour)	Review and Revise Sampling Plan (hours/system)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 39.22	1.0	$ 39.22
101-500	$ 39.22	1.0	$ 39.22
501-1,000	$ 39.22	2.0	$ 78.44
1,001-4,100	$ 39.22	2.0	$ 78.44
4,101-33,000	$ 39.22	3.0	$ 117.65
33,001-96,000	$ 39.22	4.0	$ 156.87
96,001-500,000	$ 39.22	4.0	$ 156.87
500,001-1 Million	$ 39.22	4.0	$ 156.87
> 1 Million	$ 39.22	4.0	$ 156.87
Community Water Systems (CWSs) - GW			
≤100	$ 39.22	1.0	$ 39.22
101-500	$ 39.22	1.0	$ 39.22
501-1,000	$ 39.22	2.0	$ 78.44
1,001-4,100	$ 39.22	2.0	$ 78.44
4,101-33,000	$ 39.22	3.0	$ 117.65
33,001-96,000	$ 39.22	4.0	$ 156.87
96,001-500,000	$ 39.22	4.0	$ 156.87
500,001-1 Million	$ 39.22	4.0	$ 156.87
> 1 Million	$ 39.22	4.0	$ 156.87
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 39.22	1.0	$ 39.22
101-500	$ 39.22	1.0	$ 39.22
501-1,000	$ 39.22	2.0	$ 78.44
1,001-4,100	$ 39.22	2.0	$ 78.44
4,101-33,000	$ 39.22	3.0	$ 117.65
33,001-96,000	$ 39.22	4.0	$ 156.87
96,001-500,000	$ 39.22	4.0	$ 156.87
500,001-1 Million	$ 39.22	4.0	$ 156.87
> 1 Million	$ 39.22	4.0	$ 156.87
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 39.22	1.0	$ 39.22
101-500	$ 39.22	1.0	$ 39.22
501-1,000	$ 39.22	2.0	$ 78.44
1,001-4,100	$ 39.22	2.0	$ 78.44
4,101-33,000	$ 39.22	3.0	$ 117.65
33,001-96,000	$ 39.22	4.0	$ 156.87
96,001-500,000	$ 39.22	4.0	$ 156.87
500,001-1 Million	$ 39.22	4.0	$ 156.87
> 1 Million	$ 39.22	4.0	$ 156.87
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 39.22	1.0	$ 39.22
101-500	$ 39.22	1.0	$ 39.22
501-1,000	$ 39.22	2.0	$ 78.44
1,001-4,100	$ 39.22	2.0	$ 78.44
4,101-33,000	$ 39.22	3.0	$ 117.65
33,001-96,000	$ 39.22	4.0	$ 156.87
96,001-500,000	$ 39.22	4.0	$ 156.87
500,001-1 Million	$ 39.22	4.0	$ 156.87
> 1 Million	$ 39.22	4.0	$ 156.87
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 39.22	1.0	$ 39.22
101-500	$ 39.22	1.0	$ 39.22
501-1,000	$ 39.22	2.0	$ 78.44
1,001-4,100	$ 39.22	2.0	$ 78.44
4,101-33,000	$ 39.22	3.0	$ 117.65
33,001-96,000	$ 39.22	4.0	$ 156.87
96,001-500,000	$ 39.22	4.0	$ 156.87
500,001-1 Million	$ 39.22	4.0	$ 156.87
> 1 Million	$ 39.22	4.0	$ 156.87

Sources:

(A) Labor rates for state employee from Exhibit A.1.

(B) Labor hours for reviewing and revising sampling plan reflect EPA estimate.

Exhibit A.9 State Unit Burden and Cost Estimates for Revising Sampling Plan (TCR)

PWS Size (Population Served)	Labor Cost (per hour)	Review and Revise Sampling Plan (hours/system)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 39.22	-	$ -
101-500	$ 39.22	-	$ -
501-1,000	$ 39.22	-	$ -
1,001-4,100	$ 39.22	-	$ -
4,101-33,000	$ 39.22	-	$ -
33,001-96,000	$ 39.22	-	$ -
96,001-500,000	$ 39.22	-	$ -
500,001-1 Million	$ 39.22	-	$ -
> 1 Million	$ 39.22	-	$ -
Community Water Systems (CWSs) - GW			
≤100	$ 39.22	-	$ -
101-500	$ 39.22	-	$ -
501-1,000	$ 39.22	-	$ -
1,001-4,100	$ 39.22	-	$ -
4,101-33,000	$ 39.22	-	$ -
33,001-96,000	$ 39.22	-	$ -
96,001-500,000	$ 39.22	-	$ -
500,001-1 Million	$ 39.22	-	$ -
> 1 Million	$ 39.22	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 39.22	-	$ -
101-500	$ 39.22	-	$ -
501-1,000	$ 39.22	-	$ -
1,001-4,100	$ 39.22	-	$ -
4,101-33,000	$ 39.22	-	$ -
33,001-96,000	$ 39.22	-	$ -
96,001-500,000	$ 39.22	-	$ -
500,001-1 Million	$ 39.22	-	$ -
> 1 Million	$ 39.22	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 39.22	-	$ -
101-500	$ 39.22	-	$ -
501-1,000	$ 39.22	-	$ -
1,001-4,100	$ 39.22	-	$ -
4,101-33,000	$ 39.22	-	$ -
33,001-96,000	$ 39.22	-	$ -
96,001-500,000	$ 39.22	-	$ -
500,001-1 Million	$ 39.22	-	$ -
> 1 Million	$ 39.22	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 39.22	-	$ -
101-500	$ 39.22	-	$ -
501-1,000	$ 39.22	-	$ -
1,001-4,100	$ 39.22	-	$ -
4,101-33,000	$ 39.22	-	$ -
33,001-96,000	$ 39.22	-	$ -
96,001-500,000	$ 39.22	-	$ -
500,001-1 Million	$ 39.22	-	$ -
> 1 Million	$ 39.22	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 39.22	-	$ -
101-500	$ 39.22	-	$ -
501-1,000	$ 39.22	-	$ -
1,001-4,100	$ 39.22	-	$ -
4,101-33,000	$ 39.22	-	$ -
33,001-96,000	$ 39.22	-	$ -
96,001-500,000	$ 39.22	-	$ -
500,001-1 Million	$ 39.22	-	$ -
> 1 Million	$ 39.22	-	$ -

Notes:

(B) Reviewing and revising sampling plans is not required under the TCR.

Sources:

(A) Labor rates for state employee from Exhibit A.1.

Exhibit A.10 Lab Costs by Size Category (AIP)

System Size (Population Served)	Routine Monitoring			Routine with Additional Monitoring (Yrs 4-25: SW systems, GW >1,000)			Routine with Additional Monitoring Yrs 4-8 (GW ≤1,000)			Routine with Additional Monitoring Yrs 9-25 (GW ≤1,000)			Repeat Monitoring		
	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
Community Water Systems (CWSs) - SW															
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99							0.50	$ 12.55	$ 27.46
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04							0.50	$ 13.52	$ 27.47
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09							0.75	$ 21.72	$ 27.49
1,001-4,100	0.75	$ 22.30	$ 27.49	0.75	$ 22.30	$ 27.49							0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40							0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75							1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
Community Water Systems (CWSs) - GW															
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 27.46
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 27.47
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 27.49
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 30.15							0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40							0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75							1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
Nontransient Noncommunity Water Systems (NTNCWSs) - SW															
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99							0.50	$ 12.55	$ 27.46
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04							0.50	$ 13.52	$ 27.47
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09							0.75	$ 21.72	$ 27.49
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 30.15							0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40							0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75							1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
Nontransient Noncommunity Water Systems (NTNCWSs) - GW															
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 27.46	0.50	$ 12.55	$ 27.46	0.50	$ 12.55	$ 27.46
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 27.47	0.50	$ 13.52	$ 27.47	0.50	$ 13.52	$ 27.47
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 27.49	0.75	$ 21.72	$ 27.49	0.75	$ 21.72	$ 27.49
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 30.15							0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40							0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75							1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
Transient Noncommunity Water Systems (TNCWSs) - SW															
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99							0.50	$ 12.55	$ 27.46
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04							0.50	$ 13.52	$ 27.47
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09							0.75	$ 21.72	$ 27.49
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 30.15							0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40							0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75							1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
Transient Noncommunity Water Systems (TNCWSs) - GW															
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 27.46	0.50	$ 12.55	$ 27.46	0.50	$ 12.55	$ 27.46
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 27.47	0.50	$ 13.52	$ 27.47	0.50	$ 13.52	$ 27.47
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 27.49	0.75	$ 21.72	$ 27.49	0.75	$ 21.72	$ 27.49
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 30.15							0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40							0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75							1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62							1.45	$ 59.46	$ 11.62

Source:

Unit burden and costs derived from Proposed RTCR T&C Document.

Exhibit A.11 Lab Costs by Size Category (TCR)

System Size (Population Served)	Routine Monitoring			Routine with Additional Monitoring			Repeat Monitoring		
	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)	Unit Burden	Unit Cost (Labor)	Unit Cost (O&M)
	A	B	C	D	E	F	G	H	I
Community Water Systems (CWSs) - SW									
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 25.35	0.50	$ 12.55	$ 26.14
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 25.36	0.50	$ 13.52	$ 26.15
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 25.37	0.75	$ 21.72	$ 26.16
1,001-4,100	0.75	$ 22.30	$ 27.49	0.75	$ 22.30	$ 25.37	0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
Community Water Systems (CWSs) - GW									
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 25.35	0.50	$ 12.55	$ 26.14
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 25.36	0.50	$ 13.52	$ 26.15
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 25.37	0.75	$ 21.72	$ 26.16
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 25.37	0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
Nontransient Noncommunity Water Systems (NTNCWSs) - SW									
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 25.35	0.50	$ 12.55	$ 26.14
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 25.36	0.50	$ 13.52	$ 26.15
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 25.37	0.75	$ 21.72	$ 26.16
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 25.37	0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
Nontransient Noncommunity Water Systems (NTNCWSs) - GW									
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 25.35	0.50	$ 12.55	$ 26.14
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 25.36	0.50	$ 13.52	$ 26.15
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 25.37	0.75	$ 21.72	$ 26.16
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 25.37	0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
Transient Noncommunity Water Systems (TNCWSs) - SW									
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 25.35	0.50	$ 12.55	$ 26.14
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 25.36	0.50	$ 13.52	$ 26.15
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 25.37	0.75	$ 21.72	$ 26.16
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 25.37	0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
Transient Noncommunity Water Systems (TNCWSs) - GW									
≤100	0.50	$ 12.55	$ 37.99	0.50	$ 12.55	$ 25.35	0.50	$ 12.55	$ 26.14
101-500	0.50	$ 13.52	$ 38.04	0.50	$ 13.52	$ 25.36	0.50	$ 13.52	$ 26.15
501-1,000	0.75	$ 21.72	$ 38.09	0.75	$ 21.72	$ 25.37	0.75	$ 21.72	$ 26.16
1,001-4,100	0.75	$ 22.30	$ 30.15	0.75	$ 22.30	$ 25.37	0.75	$ 22.30	$ 27.49
4,101-33,000	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40	0.75	$ 27.00	$ 25.40
33,001-96,000	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75	1.00	$ 36.39	$ 17.75
96,001-500,000	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
500,001-1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62
> 1 Million	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62	1.45	$ 59.46	$ 11.62

Source:

Unit burden and costs derived from Proposed RTCR T&C Document[1].

[1] US Environmental Protection Agency. 2010. Technology and Cost Document for the Proposed Revised Total Coliform Rule. EPA 815-R-10-002.

Exhibit A.12 PWS Unit Burden and Cost Estimates for Annual Site Visits (AIP)

PWS Size (Population Served)	Labor Cost (per hour)	Annual Site Visit (hours/PWS)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 25.10	23.0	$ 577.30
101-500	$ 27.03	23.0	$ 621.69
501-1,000	$ 28.96	24.0	$ 695.04
1,001-4,100	$ 29.73	48.0	$ 1,427.04
4,101-33,000	$ 36.00	71.0	$ 2,556.00
33,001-96,000	$ 36.39	121.0	$ 4,403.19
96,001-500,000	$ 41.01	252.0	$ 10,334.52
500,001-1 Million	$ 41.01	252.0	$ 10,334.52
> 1 Million	$ 41.01	252.0	$ 10,334.52
Community Water Systems (CWSs) - GW			
≤100	$ 25.10	23.0	$ 577.30
101-500	$ 27.03	23.0	$ 621.69
501-1,000	$ 28.96	24.0	$ 695.04
1,001-4,100	$ 29.73	48.0	$ 1,427.04
4,101-33,000	$ 36.00	71.0	$ 2,556.00
33,001-96,000	$ 36.39	121.0	$ 4,403.19
96,001-500,000	$ 41.01	252.0	$ 10,334.52
500,001-1 Million	$ 41.01	252.0	$ 10,334.52
> 1 Million	$ 41.01	252.0	$ 10,334.52
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 25.10	21.0	$ 527.10
101-500	$ 27.03	21.0	$ 567.63
501-1,000	$ 28.96	21.0	$ 608.16
1,001-4,100	$ 29.73	29.0	$ 862.17
4,101-33,000	$ 36.00	71.0	$ 2,556.00
33,001-96,000	$ 36.39	121.0	$ 4,403.19
96,001-500,000	$ 41.01	252.0	$ 10,334.52
500,001-1 Million	$ 41.01	252.0	$ 10,334.52
> 1 Million	$ 41.01	252.0	$ 10,334.52
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 25.10	21.0	$ 527.10
101-500	$ 27.03	21.0	$ 567.63
501-1,000	$ 28.96	21.0	$ 608.16
1,001-4,100	$ 29.73	29.0	$ 862.17
4,101-33,000	$ 36.00	71.0	$ 2,556.00
33,001-96,000	$ 36.39	121.0	$ 4,403.19
96,001-500,000	$ 41.01	252.0	$ 10,334.52
500,001-1 Million	$ 41.01	252.0	$ 10,334.52
> 1 Million	$ 41.01	252.0	$ 10,334.52
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 25.10	21.0	$ 527.10
101-500	$ 27.03	21.0	$ 567.63
501-1,000	$ 28.96	21.0	$ 608.16
1,001-4,100	$ 29.73	29.0	$ 862.17
4,101-33,000	$ 36.00	71.0	$ 2,556.00
33,001-96,000	$ 36.39	121.0	$ 4,403.19
96,001-500,000	$ 41.01	252.0	$ 10,334.52
500,001-1 Million	$ 41.01	252.0	$ 10,334.52
> 1 Million	$ 41.01	252.0	$ 10,334.52
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 25.10	21.0	$ 527.10
101-500	$ 27.03	21.0	$ 567.63
501-1,000	$ 28.96	21.0	$ 608.16
1,001-4,100	$ 29.73	29.0	$ 862.17
4,101-33,000	$ 36.00	71.0	$ 2,556.00
33,001-96,000	$ 36.39	121.0	$ 4,403.19
96,001-500,000	$ 41.01	252.0	$ 10,334.52
500,001-1 Million	$ 41.01	252.0	$ 10,334.52
> 1 Million	$ 41.01	252.0	$ 10,334.52

Notes:

Under the AIP, only PWSs conducting annual routine monitoring are required to undergo annual site visits.

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

(B) Labor hours for revising sampling plan reflect EPA estimate.

Exhibit A.13 PWS Unit Burden and Cost Estimates for Annual Site Visits (TCR)

PWS Size (Population Served)	Labor Cost (per hour)	Annual Site Visit (hours/PWS)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Community Water Systems (CWSs) - GW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 25.10	-	$ -
101-500	$ 27.03	-	$ -
501-1,000	$ 28.96	-	$ -
1,001-4,100	$ 29.73	-	$ -
4,101-33,000	$ 36.00	-	$ -
33,001-96,000	$ 36.39	-	$ -
96,001-500,000	$ 41.01	-	$ -
500,001-1 Million	$ 41.01	-	$ -
> 1 Million	$ 41.01	-	$ -

Notes:

(B) Under the TCR, PWSs are not required to undergo annual site visits.

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

Exhibit A.14 State Unit Burden and Cost Estimates for Annual Site Visits (AIP)

PWS Size (Population Served)	Labor Cost (per hour)	Annual Site Visit (hours/PWS)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 43.58	23.0	$ 1,002.42
101-500	$ 43.58	23.0	$ 1,002.42
501-1,000	$ 43.58	24.0	$ 1,046.00
1,001-4,100	$ 43.58	48.0	$ 2,092.01
4,101-33,000	$ 43.58	71.0	$ 3,094.43
33,001-96,000	$ 43.58	121.0	$ 5,273.60
96,001-500,000	$ 43.58	252.0	$ 10,983.04
500,001-1 Million	$ 43.58	252.0	$ 10,983.04
> 1 Million	$ 43.58	252.0	$ 10,983.04
Community Water Systems (CWSs) - GW			
≤100	$ 43.58	23.0	$ 1,002.42
101-500	$ 43.58	23.0	$ 1,002.42
501-1,000	$ 43.58	24.0	$ 1,046.00
1,001-4,100	$ 43.58	48.0	$ 2,092.01
4,101-33,000	$ 43.58	71.0	$ 3,094.43
33,001-96,000	$ 43.58	121.0	$ 5,273.60
96,001-500,000	$ 43.58	252.0	$ 10,983.04
500,001-1 Million	$ 43.58	252.0	$ 10,983.04
> 1 Million	$ 43.58	252.0	$ 10,983.04
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 43.58	21.0	$ 915.25
101-500	$ 43.58	21.0	$ 915.25
501-1,000	$ 43.58	21.0	$ 915.25
1,001-4,100	$ 43.58	29.0	$ 1,263.92
4,101-33,000	$ 43.58	71.0	$ 3,094.43
33,001-96,000	$ 43.58	121.0	$ 5,273.60
96,001-500,000	$ 43.58	252.0	$ 10,983.04
500,001-1 Million	$ 43.58	252.0	$ 10,983.04
> 1 Million	$ 43.58	252.0	$ 10,983.04
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 43.58	21.0	$ 915.25
101-500	$ 43.58	21.0	$ 915.25
501-1,000	$ 43.58	21.0	$ 915.25
1,001-4,100	$ 43.58	29.0	$ 1,263.92
4,101-33,000	$ 43.58	71.0	$ 3,094.43
33,001-96,000	$ 43.58	121.0	$ 5,273.60
96,001-500,000	$ 43.58	252.0	$ 10,983.04
500,001-1 Million	$ 43.58	252.0	$ 10,983.04
> 1 Million	$ 43.58	252.0	$ 10,983.04
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 43.58	21.0	$ 915.25
101-500	$ 43.58	21.0	$ 915.25
501-1,000	$ 43.58	21.0	$ 915.25
1,001-4,100	$ 43.58	29.0	$ 1,263.92
4,101-33,000	$ 43.58	71.0	$ 3,094.43
33,001-96,000	$ 43.58	121.0	$ 5,273.60
96,001-500,000	$ 43.58	252.0	$ 10,983.04
500,001-1 Million	$ 43.58	252.0	$ 10,983.04
> 1 Million	$ 43.58	252.0	$ 10,983.04
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 43.58	21.0	$ 915.25
101-500	$ 43.58	21.0	$ 915.25
501-1,000	$ 43.58	21.0	$ 915.25
1,001-4,100	$ 43.58	29.0	$ 1,263.92
4,101-33,000	$ 43.58	71.0	$ 3,094.43
33,001-96,000	$ 43.58	121.0	$ 5,273.60
96,001-500,000	$ 43.58	252.0	$ 10,983.04
500,001-1 Million	$ 43.58	252.0	$ 10,983.04
> 1 Million	$ 43.58	252.0	$ 10,983.04

Notes:

Under the AIP, states are only required to conduct annual site visits for systems conducting annual routine monitoring.

Sources:

(A) Labor rates for state employee from Exhibit A.1.

(B) Labor hours for revising sampling plan reflect EPA estimate.

Exhibit A.15 State Unit Burden and Cost Estimates for Annual Site Visits (TCR)

PWS Size (Population Served)	Labor Cost (per hour)	Annual Site Visit (hours/PWS)	Unit Cost
	A	B	C=A*B
Community Water Systems (CWSs) - SW			
≤100	$ 43.58	-	$ -
101-500	$ 43.58	-	$ -
501-1,000	$ 43.58	-	$ -
1,001-4,100	$ 43.58	-	$ -
4,101-33,000	$ 43.58	-	$ -
33,001-96,000	$ 43.58	-	$ -
96,001-500,000	$ 43.58	-	$ -
500,001-1 Million	$ 43.58	-	$ -
> 1 Million	$ 43.58	-	$ -
Community Water Systems (CWSs) - GW			
≤100	$ 43.58	-	$ -
101-500	$ 43.58	-	$ -
501-1,000	$ 43.58	-	$ -
1,001-4,100	$ 43.58	-	$ -
4,101-33,000	$ 43.58	-	$ -
33,001-96,000	$ 43.58	-	$ -
96,001-500,000	$ 43.58	-	$ -
500,001-1 Million	$ 43.58	-	$ -
> 1 Million	$ 43.58	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - SW			
≤100	$ 43.58	-	$ -
101-500	$ 43.58	-	$ -
501-1,000	$ 43.58	-	$ -
1,001-4,100	$ 43.58	-	$ -
4,101-33,000	$ 43.58	-	$ -
33,001-96,000	$ 43.58	-	$ -
96,001-500,000	$ 43.58	-	$ -
500,001-1 Million	$ 43.58	-	$ -
> 1 Million	$ 43.58	-	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - GW			
≤100	$ 43.58	-	$ -
101-500	$ 43.58	-	$ -
501-1,000	$ 43.58	-	$ -
1,001-4,100	$ 43.58	-	$ -
4,101-33,000	$ 43.58	-	$ -
33,001-96,000	$ 43.58	-	$ -
96,001-500,000	$ 43.58	-	$ -
500,001-1 Million	$ 43.58	-	$ -
> 1 Million	$ 43.58	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - SW			
≤100	$ 43.58	-	$ -
101-500	$ 43.58	-	$ -
501-1,000	$ 43.58	-	$ -
1,001-4,100	$ 43.58	-	$ -
4,101-33,000	$ 43.58	-	$ -
33,001-96,000	$ 43.58	-	$ -
96,001-500,000	$ 43.58	-	$ -
500,001-1 Million	$ 43.58	-	$ -
> 1 Million	$ 43.58	-	$ -
Transient Noncommunity Water Systems (TNCWSs) - GW			
≤100	$ 43.58	-	$ -
101-500	$ 43.58	-	$ -
501-1,000	$ 43.58	-	$ -
1,001-4,100	$ 43.58	-	$ -
4,101-33,000	$ 43.58	-	$ -
33,001-96,000	$ 43.58	-	$ -
96,001-500,000	$ 43.58	-	$ -
500,001-1 Million	$ 43.58	-	$ -
> 1 Million	$ 43.58	-	$ -

Notes:

(B) Under the TCR, states are not required to conduct annual site visits.

Sources:

(A) Labor rates for state employee from Exhibit A.1.

Exhibit A.16 PWS Unit Burden and Cost Estimates for Level 1 and Level 2 Assessments (AIP)

PWS Size (Population Served)	Labor Cost (per hour)	Level 1 Assessments		Level 2 Assessments			
		Non-Acute Trigger (single trigger) (hours)	Unit Cost	Acute Violations (hours)	Unit Cost	Level 2 Triggers (triggered by multiple Level 1s) (hours)	Unit Cost
	A	B	C=A*B	D	E=A*D	F	G=A*F
Community Water Systems (CWSs) - SW							
≤100	$ 25.10	19.0	$ 476.90	23.0	$ 577.30	22.0	$ 552.20
101-500	$ 27.03	19.0	$ 513.57	23.0	$ 621.69	22.0	$ 594.66
501-1,000	$ 28.96	20.0	$ 579.20	24.0	$ 695.04	23.0	$ 666.08
1,001-4,100	$ 29.73	31.0	$ 921.63	48.0	$ 1,427.04	46.0	$ 1,367.58
4,101-33,000	$ 36.00	41.0	$ 1,476.00	71.0	$ 2,556.00	69.0	$ 2,484.00
33,001-96,000	$ 36.39	68.0	$ 2,474.52	121.0	$ 4,403.19	116.0	$ 4,221.24
96,001-500,000	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
500,001-1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
> 1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
Community Water Systems (CWSs) - GW							
≤100	$ 25.10	19.0	$ 476.90	23.0	$ 577.30	22.0	$ 552.20
101-500	$ 27.03	19.0	$ 513.57	23.0	$ 621.69	22.0	$ 594.66
501-1,000	$ 28.96	20.0	$ 579.20	24.0	$ 695.04	23.0	$ 666.08
1,001-4,100	$ 29.73	31.0	$ 921.63	48.0	$ 1,427.04	46.0	$ 1,367.58
4,101-33,000	$ 36.00	41.0	$ 1,476.00	71.0	$ 2,556.00	69.0	$ 2,484.00
33,001-96,000	$ 36.39	68.0	$ 2,474.52	121.0	$ 4,403.19	116.0	$ 4,221.24
96,001-500,000	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
500,001-1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
> 1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
Nontransient Noncommunity Water Systems (NTNCWSs) - SW							
≤100	$ 25.10	7.0	$ 175.70	21.0	$ 527.10	9.0	$ 225.90
101-500	$ 27.03	7.0	$ 189.21	21.0	$ 567.63	9.0	$ 243.27
501-1,000	$ 28.96	7.0	$ 202.72	21.0	$ 608.16	9.0	$ 260.64
1,001-4,100	$ 29.73	8.0	$ 237.84	29.0	$ 862.17	10.0	$ 297.30
4,101-33,000	$ 36.00	41.0	$ 1,476.00	71.0	$ 2,556.00	69.0	$ 2,484.00
33,001-96,000	$ 36.39	68.0	$ 2,474.52	121.0	$ 4,403.19	116.0	$ 4,221.24
96,001-500,000	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
500,001-1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
> 1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
Nontransient Noncommunity Water Systems (NTNCWSs) - GW							
≤100	$ 25.10	7.0	$ 175.70	21.0	$ 527.10	9.0	$ 225.90
101-500	$ 27.03	7.0	$ 189.21	21.0	$ 567.63	9.0	$ 243.27
501-1,000	$ 28.96	7.0	$ 202.72	21.0	$ 608.16	9.0	$ 260.64
1,001-4,100	$ 29.73	8.0	$ 237.84	29.0	$ 862.17	10.0	$ 297.30
4,101-33,000	$ 36.00	41.0	$ 1,476.00	71.0	$ 2,556.00	69.0	$ 2,484.00
33,001-96,000	$ 36.39	68.0	$ 2,474.52	121.0	$ 4,403.19	116.0	$ 4,221.24
96,001-500,000	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
500,001-1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
> 1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
Transient Noncommunity Water Systems (TNCWSs) - SW							
≤100	$ 25.10	7.0	$ 175.70	21.0	$ 527.10	9.0	$ 225.90
101-500	$ 27.03	7.0	$ 189.21	21.0	$ 567.63	9.0	$ 243.27
501-1,000	$ 28.96	7.0	$ 202.72	21.0	$ 608.16	9.0	$ 260.64
1,001-4,100	$ 29.73	8.0	$ 237.84	29.0	$ 862.17	10.0	$ 297.30
4,101-33,000	$ 36.00	41.0	$ 1,476.00	71.0	$ 2,556.00	69.0	$ 2,484.00
33,001-96,000	$ 36.39	68.0	$ 2,474.52	121.0	$ 4,403.19	116.0	$ 4,221.24
96,001-500,000	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
500,001-1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
> 1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
Transient Noncommunity Water Systems (TNCWSs) - GW							
≤100	$ 25.10	7.0	$ 175.70	21.0	$ 527.10	9.0	$ 225.90
101-500	$ 27.03	7.0	$ 189.21	21.0	$ 567.63	9.0	$ 243.27
501-1,000	$ 28.96	7.0	$ 202.72	21.0	$ 608.16	9.0	$ 260.64
1,001-4,100	$ 29.73	8.0	$ 237.84	29.0	$ 862.17	10.0	$ 297.30
4,101-33,000	$ 36.00	41.0	$ 1,476.00	71.0	$ 2,556.00	69.0	$ 2,484.00
33,001-96,000	$ 36.39	68.0	$ 2,474.52	121.0	$ 4,403.19	116.0	$ 4,221.24
96,001-500,000	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
500,001-1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38
> 1 Million	$ 41.01	159.0	$ 6,520.59	252.0	$ 10,334.52	238.0	$ 9,760.38

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

(B), (D), (F) Proposed RTCR T&C Document[1].

[1] US Environmental Protection Agency. 2010. Technology and Cost Document for the Proposed Revised Total Coliform Rule. EPA 815-R-10-002.

Exhibit A.17 PWS Unit Burden and Cost Estimates for Level 1 and Level 2 Assessments (TCR)

PWS Size (Population Served)	Labor Cost (per hour)	Activities Similar to Level 1 Assessments		Activities Similar to Level 2 Assessments			
		Non-Acute Violations (single violation) (hours)	Unit Cost	Acute Violations (hours)	Unit Cost	Non-Acute Violations (multiple violations) (hours)	Unit Cost
	A	B	C=A*B	D	E=A*D	F	G=A*F
Community Water Systems (CWSs) - SW							
≤100	$ 25.10	$ 11.0	$ 276.10	$ 14.0	$ 351.40	$ 14.0	$ 351.40
101-500	$ 27.03	$ 11.0	$ 297.33	$ 14.0	$ 378.42	$ 14.0	$ 378.42
501-1,000	$ 28.96	$ 13.0	$ 376.48	$ 15.0	$ 434.40	$ 15.0	$ 434.40
1,001-4,100	$ 29.73	$ 22.0	$ 654.06	$ 29.0	$ 862.17	$ 29.0	$ 862.17
4,101-33,000	$ 36.00	$ 30.0	$ 1,080.00	$ 36.0	$ 1,296.00	$ 36.0	$ 1,296.00
33,001-96,000	$ 36.39	$ 59.0	$ 2,147.01	$ 75.0	$ 2,729.25	$ 75.0	$ 2,729.25
96,001-500,000	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
500,001-1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
> 1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
Community Water Systems (CWSs) - GW							
≤100	$ 25.10	$ 11.0	$ 276.10	$ 14.0	$ 351.40	$ 14.0	$ 351.40
101-500	$ 27.03	$ 11.0	$ 297.33	$ 14.0	$ 378.42	$ 14.0	$ 378.42
501-1,000	$ 28.96	$ 13.0	$ 376.48	$ 15.0	$ 434.40	$ 15.0	$ 434.40
1,001-4,100	$ 29.73	$ 22.0	$ 654.06	$ 29.0	$ 862.17	$ 29.0	$ 862.17
4,101-33,000	$ 36.00	$ 30.0	$ 1,080.00	$ 36.0	$ 1,296.00	$ 36.0	$ 1,296.00
33,001-96,000	$ 36.39	$ 59.0	$ 2,147.01	$ 75.0	$ 2,729.25	$ 75.0	$ 2,729.25
96,001-500,000	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
500,001-1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
> 1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
Nontransient Noncommunity Water Systems (NTNCWSs) - SW							
≤100	$ 25.10	$ 4.0	$ 100.40	$ 6.0	$ 150.60	$ 6.0	$ 150.60
101-500	$ 27.03	$ 4.0	$ 108.12	$ 6.0	$ 162.18	$ 6.0	$ 162.18
501-1,000	$ 28.96	$ 4.0	$ 115.84	$ 6.0	$ 173.76	$ 6.0	$ 173.76
1,001-4,100	$ 29.73	$ 4.0	$ 118.92	$ 6.0	$ 178.38	$ 6.0	$ 178.38
4,101-33,000	$ 36.00	$ 30.0	$ 1,080.00	$ 36.0	$ 1,296.00	$ 36.0	$ 1,296.00
33,001-96,000	$ 36.39	$ 59.0	$ 2,147.01	$ 75.0	$ 2,729.25	$ 75.0	$ 2,729.25
96,001-500,000	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
500,001-1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
> 1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
Nontransient Noncommunity Water Systems (NTNCWSs) - GW							
≤100	$ 25.10	$ 4.0	$ 100.40	$ 6.0	$ 150.60	$ 6.0	$ 150.60
101-500	$ 27.03	$ 4.0	$ 108.12	$ 6.0	$ 162.18	$ 6.0	$ 162.18
501-1,000	$ 28.96	$ 4.0	$ 115.84	$ 6.0	$ 173.76	$ 6.0	$ 173.76
1,001-4,100	$ 29.73	$ 4.0	$ 118.92	$ 6.0	$ 178.38	$ 6.0	$ 178.38
4,101-33,000	$ 36.00	$ 30.0	$ 1,080.00	$ 36.0	$ 1,296.00	$ 36.0	$ 1,296.00
33,001-96,000	$ 36.39	$ 59.0	$ 2,147.01	$ 75.0	$ 2,729.25	$ 75.0	$ 2,729.25
96,001-500,000	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
500,001-1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
> 1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
Transient Noncommunity Water Systems (TNCWSs) - SW							
≤100	$ 25.10	$ 4.0	$ 100.40	$ 6.0	$ 150.60	$ 6.0	$ 150.60
101-500	$ 27.03	$ 4.0	$ 108.12	$ 6.0	$ 162.18	$ 6.0	$ 162.18
501-1,000	$ 28.96	$ 4.0	$ 115.84	$ 6.0	$ 173.76	$ 6.0	$ 173.76
1,001-4,100	$ 29.73	$ 4.0	$ 118.92	$ 6.0	$ 178.38	$ 6.0	$ 178.38
4,101-33,000	$ 36.00	$ 30.0	$ 1,080.00	$ 36.0	$ 1,296.00	$ 36.0	$ 1,296.00
33,001-96,000	$ 36.39	$ 59.0	$ 2,147.01	$ 75.0	$ 2,729.25	$ 75.0	$ 2,729.25
96,001-500,000	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
500,001-1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
> 1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
Transient Noncommunity Water Systems (TNCWSs) - GW							
≤100	$ 25.10	$ 4.0	$ 100.40	$ 6.0	$ 150.60	$ 6.0	$ 150.60
101-500	$ 27.03	$ 4.0	$ 108.12	$ 6.0	$ 162.18	$ 6.0	$ 162.18
501-1,000	$ 28.96	$ 4.0	$ 115.84	$ 6.0	$ 173.76	$ 6.0	$ 173.76
1,001-4,100	$ 29.73	$ 4.0	$ 118.92	$ 6.0	$ 178.38	$ 6.0	$ 178.38
4,101-33,000	$ 36.00	$ 30.0	$ 1,080.00	$ 36.0	$ 1,296.00	$ 36.0	$ 1,296.00
33,001-96,000	$ 36.39	$ 59.0	$ 2,147.01	$ 75.0	$ 2,729.25	$ 75.0	$ 2,729.25
96,001-500,000	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
500,001-1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17
> 1 Million	$ 41.01	$ 108.0	$ 4,429.08	$ 117.0	$ 4,798.17	$ 117.0	$ 4,798.17

Note:

(F) EPA assumes that the burden incurred by operators to assess their PWSs following a second non-acute violation is equal to the burden incurred by an assessment following an acute violation.

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

(B), (D), (F) Proposed RTCR T&C Document[1].

[1] US Environmental Protection Agency. 2010. Technology and Cost Document for the Proposed Revised Total Coliform Rule. EPA 815-R-10-002.

Exhibit A.18 State Unit Burden and Cost Estimates for Level 1 and Level 2 Assessments (AIP)

PWS Size (Population Served)	Labor Cost (per hour)	Level 1 Assessments		Level 2 Assessments			
		Non-Acute Trigger (single trigger) (hours)	Unit Cost	Acute Violations (hours)	Unit Cost	Level 2 Triggers (triggered by multiple Level 1s) (hours)	Unit Cost
	A	B	C=A*B	D	E=A*D	F	G=A*F
Community Water Systems (CWSs) - SW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Community Water Systems (CWSs) - GW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Nontransient Noncommunity Water Systems (NTNCWSs) - SW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Nontransient Noncommunity Water Systems (NTNCWSs) - GW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Transient Noncommunity Water Systems (TNCWSs) - SW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Transient Noncommunity Water Systems (TNCWSs) - GW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74

Sources:

(A) Labor rates for state employee from Exhibit A.1.

(B), (D), (E) Labor hour assumptions based on best professional judgement.

Exhibit A.19 State Unit Burden and Cost Estimates for Level 1 and Level 2 Assessments (TCR)

PWS Size (Population Served)	Labor Cost (per hour)	Level 1 Assessments: Non-Acute Violations (single violation) (hours)	Level 1 Assessments: Unit Cost	Level 2 Assessments: Acute Violations (hours)	Level 2 Assessments: Unit Cost	Level 2 Assessments: Non-Acute Violations (multiple violations) (hours)	Level 2 Assessments: Unit Cost
	A	B	C=A*B	D	E=A*D	F	G=A*F
Community Water Systems (CWSs) - SW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Community Water Systems (CWSs) - GW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Nontransient Noncommunity Water Systems (NTNCWSs) - SW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Nontransient Noncommunity Water Systems (NTNCWSs) - GW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Transient Noncommunity Water Systems (TNCWSs) - SW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
Transient Noncommunity Water Systems (TNCWSs) - GW							
≤100	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
101-500	$ 39.22	1.0	$ 39.22	2.0	$ 78.44	2.0	$ 78.44
501-1,000	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
1,001-4,100	$ 39.22	2.0	$ 78.44	4.0	$ 156.87	4.0	$ 156.87
4,101-33,000	$ 39.22	3.0	$ 117.65	6.0	$ 235.31	6.0	$ 235.31
33,001-96,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
96,001-500,000	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
500,001-1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74
> 1 Million	$ 39.22	4.0	$ 156.87	8.0	$ 313.74	8.0	$ 313.74

Sources:

(A) Labor rates for state employee from Exhibit A.1.

(B), (D), (E) Labor hour assumptions based on best professional judgement.

Exhibit A.20 PWS Compliance Forecast for Level 1 and Level 2 Corrective Actions (AIP)

PWS Size (Population Served)	PWS Flushing	Sampler Training	Replace/Repair of Distribution System Components	Maintenance of Adequate Pressure	Maintenance of appropriate Hydraulic Residence Time	Storage Facility Maintenance	Booster Disinfection	connection Control and Backflow Prevention Program	Addition or Upgrade of On-line Monitoring and Control	Addition of Security Measures	Development and Implementation of an Operations Plan
	A	B	C	D	E	F	G	H	I	J	K
Level 1 Compliance Forecast											
≤100	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
101-500	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
501-1,000	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
1,001-4,100	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
4,101-33,000	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
33,001-96,000	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
96,001-500,000	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
500,001-1 Million	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
> 1 Million	39%	15%	12%	9%	8%	6%	4%	1%	3%	1%	2%
Level 2 Compliance Forecast											
≤100	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
101-500	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
501-1,000	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
1,001-4,100	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
4,101-33,000	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
33,001-96,000	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
96,001-500,000	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
500,001-1 Million	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%
> 1 Million	15%	4%	18%	15%	15%	11%	8%	2%	6%	2%	4%

Source:

(A) - (K) Percent of PWSs performing corrective actions based on Level 1 and Level 2 assessments reflect EPA estimate.

Exhibit A.21 PWS Compliance Forecast for Level 1 and Level 2 Corrective Actions (TCR)

PWS Size (Population Served)	PWS Flushing	Sampler Training	Replace/Repair of Distribution System Components	Maintenance of Adequate Pressure	Maintenance of appropriate Hydraulic Residence Time	Storage Facility Maintenance	Booster Disinfection	connection Control and Backflow Prevention Program	Addition or Upgrade of On-line Monitoring and Control	Addition of Security Measures	Development and Implementation of an Operations Plan
	A	B	C	D	E	F	G	H	I	J	K
Level 1 Compliance Forecast											
≤100	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
101-500	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
501-1,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1,001-4,100	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4,101-33,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
33,001-96,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
96,001-500,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
500,001-1 Million	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
> 1 Million	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Level 2 Compliance Forecast											
≤100	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
101-500	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
501-1,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
1,001-4,100	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4,101-33,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
33,001-96,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
96,001-500,000	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
500,001-1 Million	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
> 1 Million	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Source:

(A) - (K) Percent of PWSs performing corrective actions based on Level 1 and Level 2 assessments reflect EPA estimate.

Exhibit A.22 Weighted R&R Burden Estimates for Corrective Actions

PWS Size (Population Served)	Level 1 Corrective Actions				Level 2 Corrective Actions			
	Weighted Unit Burden - PWS		Weighted Unit Burden - State		Weighted Unit Burden - PWS		Weighted Unit Burden - State	
	TCR	AIP	TCR	AIP	TCR	AIP	TCR	AIP
	A	B	D	E	G	H	J	K
Community Water Systems (CWSs) - SW								
≤100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
101-500	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
501-1,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
1,001-4,100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
4,101-33,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
33,001-96,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
96,001-500,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
500,001-1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
> 1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
Community Water Systems (CWSs) - GW								
≤100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
101-500	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
501-1,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
1,001-4,100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
4,101-33,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
33,001-96,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
96,001-500,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
500,001-1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
> 1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
Nontransient Noncommunity Water Systems (NTNCWSs) - SW								
≤100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
101-500	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
501-1,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
1,001-4,100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
4,101-33,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
33,001-96,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
96,001-500,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
500,001-1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
> 1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
Nontransient Noncommunity Water Systems (NTNCWSs) - GW								
≤100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
101-500	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
501-1,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
1,001-4,100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
4,101-33,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
33,001-96,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
96,001-500,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
500,001-1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
> 1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
Transient Noncommunity Water Systems (TNCWSs) - SW								
≤100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
101-500	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
501-1,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
1,001-4,100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
4,101-33,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
33,001-96,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
96,001-500,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
500,001-1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
> 1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
Transient Noncommunity Water Systems (TNCWSs) - GW								
≤100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
101-500	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
501-1,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
1,001-4,100	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
4,101-33,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
33,001-96,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
96,001-500,000	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
500,001-1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50
> 1 Million	0.00	0.50	0.00	0.50	0.00	0.50	0.00	0.50

Sources:

(A) - (L) Weighted unit costs for corrective actions based on compliance forecasts (Exhibits D.1 - D.4 of the proposed RTCR EA[1]) and unit costs (Exhibits D.5 - D.7 of the proposed RTCR EA).

[1]US Environmental Protection Agency. 2010. Economic Analysis for the Proposed Revised Total Coliform Rule (EPA 815-R-10-001).

Exhibit A.23 Weighted R&R Unit Cost Estimates for Corrective Actions

PWS Size (Population Served)	Level 1 Corrective Actions				Level 2 Corrective Actions			
	Weighted Unit Costs - PWS		Weighted Unit Costs - State		Weighted Unit Costs - PWS		Weighted Unit Costs - State	
	TCR	AIP	TCR	AIP	TCR	AIP	TCR	AIP
	A	B	D	E	G	H	J	K
Community Water Systems (CWSs) - SW								
≤100	$ -	$ 12.55	$ -	$ 19.61	$ -	$ 12.55	$ -	$ 19.61
101-500	$ -	$ 13.52	$ -	$ 19.61	$ -	$ 13.52	$ -	$ 19.61
501-1,000	$ -	$ 14.48	$ -	$ 19.61	$ -	$ 14.48	$ -	$ 19.61
1,001-4,100	$ -	$ 14.87	$ -	$ 19.61	$ -	$ 14.87	$ -	$ 19.61
4,101-33,000	$ -	$ 18.00	$ -	$ 19.61	$ -	$ 18.00	$ -	$ 19.61
33,001-96,000	$ -	$ 18.20	$ -	$ 19.61	$ -	$ 18.20	$ -	$ 19.61
96,001-500,000	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
500,001-1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
> 1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
Community Water Systems (CWSs) - GW								
≤100	$ -	$ 12.55	$ -	$ 19.61	$ -	$ 12.55	$ -	$ 19.61
101-500	$ -	$ 13.52	$ -	$ 19.61	$ -	$ 13.52	$ -	$ 19.61
501-1,000	$ -	$ 14.48	$ -	$ 19.61	$ -	$ 14.48	$ -	$ 19.61
1,001-4,100	$ -	$ 14.87	$ -	$ 19.61	$ -	$ 14.87	$ -	$ 19.61
4,101-33,000	$ -	$ 18.00	$ -	$ 19.61	$ -	$ 18.00	$ -	$ 19.61
33,001-96,000	$ -	$ 18.20	$ -	$ 19.61	$ -	$ 18.20	$ -	$ 19.61
96,001-500,000	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
500,001-1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
> 1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
Nontransient Noncommunity Water Systems (NTNCWSs) - SW								
≤100	$ -	$ 12.55	$ -	$ 19.61	$ -	$ 12.55	$ -	$ 19.61
101-500	$ -	$ 13.52	$ -	$ 19.61	$ -	$ 13.52	$ -	$ 19.61
501-1,000	$ -	$ 14.48	$ -	$ 19.61	$ -	$ 14.48	$ -	$ 19.61
1,001-4,100	$ -	$ 14.87	$ -	$ 19.61	$ -	$ 14.87	$ -	$ 19.61
4,101-33,000	$ -	$ 18.00	$ -	$ 19.61	$ -	$ 18.00	$ -	$ 19.61
33,001-96,000	$ -	$ 18.20	$ -	$ 19.61	$ -	$ 18.20	$ -	$ 19.61
96,001-500,000	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
500,001-1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
> 1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
Nontransient Noncommunity Water Systems (NTNCWSs) - GW								
≤100	$ -	$ 12.55	$ -	$ 19.61	$ -	$ 12.55	$ -	$ 19.61
101-500	$ -	$ 13.52	$ -	$ 19.61	$ -	$ 13.52	$ -	$ 19.61
501-1,000	$ -	$ 14.48	$ -	$ 19.61	$ -	$ 14.48	$ -	$ 19.61
1,001-4,100	$ -	$ 14.87	$ -	$ 19.61	$ -	$ 14.87	$ -	$ 19.61
4,101-33,000	$ -	$ 18.00	$ -	$ 19.61	$ -	$ 18.00	$ -	$ 19.61
33,001-96,000	$ -	$ 18.20	$ -	$ 19.61	$ -	$ 18.20	$ -	$ 19.61
96,001-500,000	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
500,001-1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
> 1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
Transient Noncommunity Water Systems (TNCWSs) - SW								
≤100	$ -	$ 12.55	$ -	$ 19.61	$ -	$ 12.55	$ -	$ 19.61
101-500	$ -	$ 13.52	$ -	$ 19.61	$ -	$ 13.52	$ -	$ 19.61
501-1,000	$ -	$ 14.48	$ -	$ 19.61	$ -	$ 14.48	$ -	$ 19.61
1,001-4,100	$ -	$ 14.87	$ -	$ 19.61	$ -	$ 14.87	$ -	$ 19.61
4,101-33,000	$ -	$ 18.00	$ -	$ 19.61	$ -	$ 18.00	$ -	$ 19.61
33,001-96,000	$ -	$ 18.20	$ -	$ 19.61	$ -	$ 18.20	$ -	$ 19.61
96,001-500,000	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
500,001-1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
> 1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
Transient Noncommunity Water Systems (TNCWSs) - GW								
≤100	$ -	$ 12.55	$ -	$ 19.61	$ -	$ 12.55	$ -	$ 19.61
101-500	$ -	$ 13.52	$ -	$ 19.61	$ -	$ 13.52	$ -	$ 19.61
501-1,000	$ -	$ 14.48	$ -	$ 19.61	$ -	$ 14.48	$ -	$ 19.61
1,001-4,100	$ -	$ 14.87	$ -	$ 19.61	$ -	$ 14.87	$ -	$ 19.61
4,101-33,000	$ -	$ 18.00	$ -	$ 19.61	$ -	$ 18.00	$ -	$ 19.61
33,001-96,000	$ -	$ 18.20	$ -	$ 19.61	$ -	$ 18.20	$ -	$ 19.61
96,001-500,000	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
500,001-1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61
> 1 Million	$ -	$ 20.51	$ -	$ 19.61	$ -	$ 20.51	$ -	$ 19.61

Sources:

(A) - (L) Weighted unit costs for corrective actions based on compliance forecasts (Exhibits D.1 - D.4 of the proposed RTCR EA[1]) and unit costs (Exhibits D.5 - D.7 of the proposed RTCR EA).

[1]US Environmental Protection Agency. 2010. Economic Analysis for the Proposed Revised Total Coliform Rule (EPA 815-R-10-001).

Exhibit A.24 PWS Unit Burden and Cost Estimates for Public Notification

			Tier 1 (acute)						Tier 2 (non-acute)					
PWS Size (Population Served)	Labor Cost (per hour)	Average Number of Service Connections per System	Preparation (labor) (hours/ violation)	Distribution (labor) (hours/ violation)	Unit Burden	(O&M Cost/ notice) ($/service connection)	Unit Cost (Labor)	Unit Cost (O&M)	Preparation (labor) (hours/ violation)	Distribution (labor) (hours/ violation)	Unit Burden	Distribution (O&M Cost/notice) ($/service connection)	Unit Cost (Labor)	Unit Cost (O&M)
	A	B	C	D	E	F	G=A*E	H=B*F	I	J	K	L	M=A*K	N=B*I
Community Water Systems (CWSs) - SW														
≤100	$ 25.10	440	8.5	12.0	20.5	$ 0.05	$ 514.55	$ 22.00	3.5	9.0	12.5	$ 0.05	$ 313.75	$ 22.00
101-500	$ 27.03	387	8.5	12.0	20.5	$ 0.05	$ 554.12	$ 19.33	3.5	9.0	12.5	$ 0.05	$ 337.88	$ 19.33
501-1,000	$ 28.96	303	8.5	12.0	20.5	$ -	$ 593.68	$ -	3.5	30.0	33.5	$ 0.26	$ 970.16	$ 78.89
1,001-4,100	$ 29.73	850	8.5	12.0	20.5	$ -	$ 609.47	$ -	3.5	30.0	33.5	$ 0.26	$ 995.96	$ 221.04
4,101-33,000	$ 36.00	4,288	9.2	12.0	21.2	$ -	$ 763.66	$ -	3.5	30.0	33.5	$ 0.25	$ 1,206.00	$ 1,053.65
33,001-96,000	$ 36.39	17,273	10.0	12.0	22.0	$ -	$ 800.58	$ -	3.5	30.0	33.5	$ 0.23	$ 1,219.07	$ 3,972.81
96,001-500,000	$ 41.01	56,465	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	30.0	33.5	$ 0.23	$ 1,373.84	$ 12,986.84
500,001-1 Million	$ 41.01	205,609	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	30.0	33.5	$ 0.23	$ 1,373.84	$ 47,290.14
> 1 Million	$ 41.01	448,564.1	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	30.0	33.5	$ 0.23	$ 1,373.84	$ 103,169.73
Community Water Systems (CWSs) - GW														
≤100	$ 25.10	41	8.5	12.0	20.5	$ 0.05	$ 514.55	$ 2.07	3.5	9.0	12.5	$ 0.05	$ 313.75	$ 2.07
101-500	$ 27.03	99	8.5	12.0	20.5	$ 0.05	$ 554.12	$ 4.93	3.5	9.0	12.5	$ 0.05	$ 337.88	$ 4.93
501-1,000	$ 28.96	315	8.5	12.0	20.5	$ -	$ 593.68	$ -	3.5	30.0	33.5	$ 0.26	$ 970.16	$ 81.91
1,001-4,100	$ 29.73	756	8.5	12.0	20.5	$ -	$ 609.47	$ -	3.5	30.0	33.5	$ 0.26	$ 995.96	$ 196.65
4,101-33,000	$ 36.00	3,495	9.0	12.0	21.0	$ -	$ 757.48	$ -	3.5	30.0	33.5	$ 0.25	$ 1,206.00	$ 870.93
33,001-96,000	$ 36.39	16,366	10.0	12.0	22.0	$ -	$ 800.58	$ -	3.5	30.0	33.5	$ 0.23	$ 1,219.07	$ 3,764.10
96,001-500,000	$ 41.01	50,564	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	30.0	33.5	$ 0.23	$ 1,373.84	$ 11,629.67
500,001-1 Million	$ 41.01	209,220	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	30.0	33.5	$ 0.23	$ 1,373.84	$ 48,120.66
> 1 Million	$ 41.01	473,641	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	30.0	33.5	$ 0.23	$ 1,373.84	$ 108,937.51
Nontransient Noncommunity Water Systems (NTNCWSs) - SW														
≤100	$ 25.10	128	8.5	12.0	20.5	$ 0.05	$ 514.55	$ 6.39	3.5	9.0	12.5	$ 0.05	$ 313.75	$ 6.39
101-500	$ 27.03	21	8.5	12.0	20.5	$ 0.05	$ 554.12	$ 1.04	3.5	9.0	12.5	$ 0.05	$ 337.88	$ 1.04
501-1,000	$ 28.96	46	8.5	12.0	20.5	$ -	$ 593.68	$ -	3.5	9.0	12.5	$ 0.05	$ 362.00	$ 2.29
1,001-4,100	$ 29.73	47	8.5	12.0	20.5	$ -	$ 609.47	$ -	3.5	9.0	12.5	$ 0.05	$ 371.63	$ 2.35
4,101-33,000	$ 36.00	176	8.7	12.0	20.7	$ -	$ 745.36	$ -	3.5	9.0	12.5	$ 0.05	$ 450.00	$ 8.08
33,001-96,000	$ 36.39	94	10.0	12.0	22.0	$ -	$ 800.58	$ -	3.5	9.0	12.5	$ 0.02	$ 454.88	$ 1.87
96,001-500,000	$ 41.01	2,181	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ 43.62
500,001-1 Million	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -
> 1 Million	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -
Nontransient Noncommunity Water Systems (NTNCWSs) - GW														
≤100	$ 25.10	4	8.5	12.0	20.5	$ 0.05	$ 514.55	$ 0.21	3.5	9.0	12.5	$ 0.05	$ 313.75	$ 0.21
101-500	$ 27.03	8	8.5	12.0	20.5	$ 0.05	$ 554.12	$ 0.41	3.5	9.0	12.5	$ 0.05	$ 337.88	$ 0.41
501-1,000	$ 28.96	11	8.5	12.0	20.5	$ -	$ 593.68	$ -	3.5	9.0	12.5	$ 0.05	$ 362.00	$ 0.56
1,001-4,100	$ 29.73	42	8.5	12.0	20.5	$ -	$ 609.47	$ -	3.5	9.0	12.5	$ 0.05	$ 371.63	$ 2.09
4,101-33,000	$ 36.00	130	8.7	12.0	20.7	$ -	$ 744.94	$ -	3.5	9.0	12.5	$ 0.05	$ 450.00	$ 6.02
33,001-96,000	$ 36.39	75	10.0	12.0	22.0	$ -	$ 800.58	$ -	3.5	9.0	12.5	$ 0.02	$ 454.88	$ 1.50
96,001-500,000	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -
500,001-1 Million	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -
> 1 Million	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -
Transient Noncommunity Water Systems (TNCWSs) - SW														
≤100	$ 25.10	9	8.5	12.0	20.5	$ 0.05	$ 514.55	$ 0.44	3.5	9.0	12.5	$ 0.05	$ 313.75	$ 0.44
101-500	$ 27.03	30	8.5	12.0	20.5	$ 0.05	$ 554.12	$ 1.51	3.5	9.0	12.5	$ 0.05	$ 337.88	$ 1.51
501-1,000	$ 28.96	49	8.5	12.0	20.5	$ -	$ 593.68	$ -	3.5	9.0	12.5	$ 0.05	$ 362.00	$ 2.45
1,001-4,100	$ 29.73	58	8.5	12.0	20.5	$ -	$ 609.47	$ -	3.5	9.0	12.5	$ 0.05	$ 371.63	$ 2.88
4,101-33,000	$ 36.00	57	8.8	12.0	20.8	$ -	$ 747.00	$ -	3.5	9.0	12.5	$ 0.05	$ 450.00	$ 2.55
33,001-96,000	$ 36.39	-	10.0	12.0	22.0	$ -	$ 800.58	$ -	3.5	9.0	12.5	$ 0.02	$ 454.88	$ -
96,001-500,000	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -
500,001-1 Million	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -
> 1 Million	$ 41.01	2	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ 0.04
Transient Noncommunity Water Systems (TNCWSs) - GW														
≤100	$ 25.10	5	8.5	12.0	20.5	$ 0.05	$ 514.55	$ 0.27	3.5	9.0	12.5	$ 0.05	$ 313.75	$ 0.27
101-500	$ 27.03	15	8.5	12.0	20.5	$ 0.05	$ 554.12	$ 0.76	3.5	9.0	12.5	$ 0.05	$ 337.88	$ 0.76
501-1,000	$ 28.96	30	8.5	12.0	20.5	$ -	$ 593.68	$ -	3.5	9.0	12.5	$ 0.05	$ 362.00	$ 1.51
1,001-4,100	$ 29.73	43	8.5	12.0	20.5	$ -	$ 609.47	$ -	3.5	9.0	12.5	$ 0.05	$ 371.63	$ 2.14
4,101-33,000	$ 36.00	39	8.7	12.0	20.7	$ -	$ 746.87	$ -	3.5	9.0	12.5	$ 0.05	$ 450.00	$ 1.77
33,001-96,000	$ 36.39	14	10.0	12.0	22.0	$ -	$ 800.58	$ -	3.5	9.0	12.5	$ 0.02	$ 454.88	$ 0.27
96,001-500,000	$ 41.01	9	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ 0.18
500,001-1 Million	$ 41.01	1	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ 0.02
> 1 Million	$ 41.01	-	10.0	12.0	22.0	$ -	$ 902.22	$ -	3.5	9.0	12.5	$ 0.02	$ 512.63	$ -

Notes:

(B) Service connections per system is consistent with SDWIS 2007 4th Quarter Freeze data. Data for certain size categories (e.g., <500, 501-1,000) may seem counterintuitive. EPA is investigating the SDWIS database for any data discrepancies.

(F), (J) used to derived TCR PN costs; (F) used to derive AIP PN costs.

Sources:

(A) Labor rates for PWSs from Exhibit A.1.

(B) SDWIS 2007 4th Quarter Freeze.

(C), (D), (G), (H) Labor hour assumptions based on best professional judgement as carried forward from the *Draft Information Collection Request for the Public Water System Supervision Program*[1]

(E), (I) Distribution cost assumptions based on best professional judgement as carried forward from the original PN ICR.

[1]US Environmental Protection Agency. 2008. Draft Information Collection Request for the Public Water System Supervision Program. OMB Control Number: 2040-0090. EPA Tracking Number: 0270.43.

Exhibit A.25 State Unit Burden and Cost Estimates for Public Notification

Labor Cost (per hour)	Tier 1 Consultation (labor) (hours/violation)	Tier 2 Consultation (labor) (hours/violation)	Receive/Review PN Certification (labor) (hours/violation)	File Reports (labor) (hours/violation)	Tier 1 Unit Burden	Tier 2 Unit Burden	Tier 1 Unit Cost	Tier 2 Unit Cost
A	B	C	D	E	F=B+D+E	G=C+D+E	H=A*(B+D+E)	I=A*(C+D+E)
$ 39.22	3.00	1.10	0.20	0.10	3.30	1.40	$ 129.42	$ 54.91

Sources:

(A) Labor rate for state employee from Exhibit A.1.

(B), (C), (D), (E) Labor hour assumptions based on best professional judgement as carried forward from the *Draft Information Collection Request for the Public Water System Supervision Program* [1]

[1]US Environmental Protection Agency. 2008. Draft Information Collection Request for the Public Water System Supervision Program. OMB Control Number: 2040-0090. EPA Tracking

Exhibit A.26 Respondents, Year by Year by Activity (AIP)

PWSs

Respondents	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	51,612	51,612	51,612	-	-	-	-	-	-	-
Revise Sampling Plan	-	77,419	77,419	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	154,837	154,837	154,837	154,837	154,837	154,837	154,837
Additional Routine Monitoring	-	-	-	1,511	1,478	1,451	1,422	1,442	1,299	1,260
Repeat Monitoring	-	-	-	5,052	4,967	4,885	4,753	4,778	4,851	4,817
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger (single trigger)	-	-	-	4,888	4,802	4,655	4,766	4,646	4,822	4,611
Level 2 Assessments - Acute Violations	-	-	-	630	571	583	590	561	535	569
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	2,576	2,150	1,960	1,757	1,659	1,844	1,762
Corrective Actions Based on Level 1 Assessments	-	-	-	454	477	449	486	480	497	454
Corrective Actions Based on Level 2 Assessments	-	-	-	337	240	251	243	218	225	233
Public Notification	-	-	-	630	571	583	590	561	535	569
PWSs with one/more Respondent Activities	51,612	129,031	129,031	154,837	154,837	154,837	154,837	154,837	154,837	154,837

States

Respondents	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	57	57	57	-	-	-	-	-	-	-
Revise Sampling Plan	-	57	57	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger	-	-	-	57	57	57	57	57	57	57
Level 2 Assessments - Acute Violations	-	-	-	57	57	57	57	57	57	57
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	57	57	57	57	57	57	57
Corrective Actions Based on Level 1 Assessments	-	-	-	57	57	57	57	57	57	57
Corrective Actions Based on Level 2 Assessments	-	-	-	57	57	57	57	57	57	57
Public Notification	-	-	-	57	57	57	57	57	57	57

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	51,612	129,031	129,031	154,837	154,837	154,837	154,837	154,837	154,837	154,837
States and Territories	57	57	57	57	57	57	57	57	57	57
Yearly Total	**51,669**	**129,088**	**129,088**	**154,894**	**154,894**	**154,894**	**154,894**	**154,894**	**154,894**	**154,894**

Exhibit A.27 Respondents, Year by Year by Activity (TCR)

PWSs

Respondents	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	-	-	-	-	-	-	-	-	-	-
Revise Sampling Plan	-	-	-	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	154,837	154,837	154,837	154,837	154,837	154,837	154,837
Additional Routine Monitoring	-	-	-	4,708	4,671	4,654	4,636	4,660	4,711	4,728
Repeat Monitoring	-	-	-	5,196	5,168	5,171	5,153	5,144	5,207	5,184
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Violation (single violation)	-	-	-	4,921	4,917	4,898	4,953	4,866	4,987	4,945
Level 2 Assessments - Acute Violations	-	-	-	667	720	739	685	742	751	688
Level 2 Assessments - Non-Acute Violations (multiple violations)	-	-	-	2,610	2,524	2,523	2,469	2,571	2,575	2,720
Corrective Actions Based on Level 1 Assessments	-	-	-	-	-	-	-	-	-	-
Corrective Actions Based on Level 2 Assessments	-	-	-	-	-	-	-	-	-	-
Public Notification	-	-	-	8,197	8,161	8,159	8,107	8,179	8,312	8,354
PWSs with one/more Respondent Activities	-	-	-	154,837	154,837	154,837	154,837	154,837	154,837	154,837

States

Respondents	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	-	-	-	-	-	-	-	-	-	-
Revise Sampling Plan	-	-	-	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Violation (single violation)	-	-	-	57	57	57	57	57	57	57
Level 2 Assessments - Acute Violations	-	-	-	57	57	57	57	57	57	57
Level 2 Assessments - Non-Acute Violations (multiple violations)	-	-	-	57	57	57	57	57	57	57
Corrective Actions Based on Level 1 Assessments	-	-	-	-	-	-	-	-	-	-
Corrective Actions Based on Level 2 Assessments	-	-	-	-	-	-	-	-	-	-
Public Notification	-	-	-	57	57	57	57	57	57	57

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	-	-	-	154,837	154,837	154,837	154,837	154,837	154,837	154,837
States and Territories	-	-	-	57	57	57	57	57	57	57
Yearly Total	**-**	**-**	**-**	**154,894**	**154,894**	**154,894**	**154,894**	**154,894**	**154,894**	**154,894**

Exhibit A.28 AIP Net Change Respondents, Year by Year by Activity

PWSs

Respondents	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	51,612	51,612	51,612	-	-	-	-	-	-	-
Revise Sampling Plan	-	77,419	77,419	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	(3,197)	(3,193)	(3,203)	(3,215)	(3,219)	(3,412)	(3,468)
Repeat Monitoring	-	-	-	(143)	(200)	(286)	(400)	(366)	(356)	(367)
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger (single trigger)	-	-	-	(32)	(115)	(243)	(187)	(219)	(165)	(334)
Level 2 Assessments - Acute Violations	-	-	-	(37)	(148)	(155)	(95)	(180)	(216)	(119)
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	(34)	(375)	(563)	(712)	(912)	(731)	(958)
Corrective Actions Based on Level 1 Assessments	-	-	-	454	477	449	486	480	497	454
Corrective Actions Based on Level 2 Assessments	-	-	-	337	240	251	243	218	225	233
Public Notification	-	-	-	(7,567)	(7,590)	(7,576)	(7,516)	(7,617)	(7,777)	(7,784)
PWSs with one/more Respondent Activities	51,612	129,031	129,031	-	-	-	-	-	-	-

States

Respondents	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	57	57	57	-	-	-	-	-	-	-
Revise Sampling Plan	-	57	57	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger	-	-	-	-	-	-	-	-	-	-
Level 2 Assessments - Acute Violations	-	-	-	-	-	-	-	-	-	-
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	-	-	-	-	-	-	-
Corrective Actions Based on Level 1 Assessments	-	-	-	57	57	57	57	57	57	57
Corrective Actions Based on Level 2 Assessments	-	-	-	57	57	57	57	57	57	57
Public Notification	-	-	-	-	-	-	-	-	-	-

Exhibit A.29 Responses, Year by Year by Activity (AIP)

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	51,612	51,612	51,612	-	-	-	-	-	-	-
Revise Sampling Plan	-	77,419	77,419	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	3,553,465	3,553,488	3,553,505	3,553,520	3,553,516	3,599,332	3,599,332
Additional Routine Monitoring	-	-	-	36,209	35,391	34,725	33,987	34,467	31,443	30,483
Repeat Monitoring	-	-	-	121,084	118,946	116,896	113,621	114,240	117,425	116,552
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger (single trigger)	-	-	-	4,888	4,802	4,655	4,766	4,646	4,822	4,611
Level 2 Assessments - Acute Violations	-	-	-	630	571	583	590	561	535	569
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	2,576	2,150	1,960	1,757	1,659	1,844	1,762
Corrective Actions Based on Level 1 Assessments	-	-	-	454	477	449	486	480	497	454
Corrective Actions Based on Level 2 Assessments	-	-	-	337	240	251	243	218	225	233
Public Notification	-	-	-	630	571	583	590	561	535	569
Yearly Total	**51,612**	**129,031**	**129,031**	**3,720,273**	**3,716,636**	**3,713,608**	**3,709,559**	**3,710,350**	**3,756,656**	**3,754,566**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	57	57	57	-	-	-	-	-	-	-
Revise Sampling Plan	-	77,419	77,419	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger	-	-	-	4,888	4,802	4,655	4,766	4,646	4,822	4,611
Level 2 Assessments - Acute Violations	-	-	-	630	571	583	590	561	535	569
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	2,576	2,150	1,960	1,757	1,659	1,844	1,762
Corrective Actions Based on Level 1 Assessments	-	-	-	454	477	449	486	480	497	454
Corrective Actions Based on Level 2 Assessments	-	-	-	337	240	251	243	218	225	233
Public Notification	-	-	-	630	571	583	590	561	535	569
Yearly Total	**57**	**77,476**	**77,476**	**9,515**	**8,811**	**8,482**	**8,432**	**8,126**	**8,456**	**8,199**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	51,612	129,031	129,031	3,720,273	3,716,636	3,713,608	3,709,559	3,710,350	3,756,656	3,754,566
States and Territories	57	77,476	77,476	9,515	8,811	8,482	8,432	8,126	8,456	8,199
Yearly Total	**51,669**	**206,506**	**206,506**	**3,729,788**	**3,725,447**	**3,722,089**	**3,717,991**	**3,718,476**	**3,765,113**	**3,762,765**

Exhibit A.30 Responses, Year by Year by Activity (TCR)

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	-	-	-	-	-	-	-	-	-	-
Revise Sampling Plan	-	-	-	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	3,492,312	3,492,532	3,492,473	3,492,412	3,492,401	3,492,422	3,492,431
Additional Routine Monitoring	-	-	-	113,450	112,516	112,092	111,632	112,223	113,531	113,933
Repeat Monitoring	-	-	-	125,198	124,469	124,543	124,071	123,865	125,483	124,937
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Violation (single violation)	-	-	-	4,921	4,917	4,898	4,953	4,866	4,987	4,945
Level 2 Assessments - Acute Violations	-	-	-	667	720	739	685	742	751	688
Level 2 Assessments - Non-Acute Violations (multiple violations)	-	-	-	2,610	2,524	2,523	2,469	2,571	2,575	2,720
Corrective Actions Based on Level 1 Assessments	-	-	-	-	-	-	-	-	-	-
Corrective Actions Based on Level 2 Assessments	-	-	-	-	-	-	-	-	-	-
Public Notification	-	-	-	8,197	8,161	8,159	8,107	8,179	8,312	8,354
Yearly Total	**-**	**-**	**-**	**3,747,355**	**3,745,839**	**3,745,426**	**3,744,328**	**3,744,846**	**3,748,060**	**3,748,008**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	-	-	-	-	-	-	-	-	-	-
Revise Sampling Plan	-	-	-	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Violation (single violation)	-	-	-	4,921	4,917	4,898	4,953	4,866	4,987	4,945
Level 2 Assessments - Acute Violations	-	-	-	667	720	739	685	742	751	688
Level 2 Assessments - Non-Acute Violations (multiple violations)	-	-	-	2,610	2,524	2,523	2,469	2,571	2,575	2,720
Corrective Actions Based on Level 1 Assessments	-	-	-	-	-	-	-	-	-	-
Corrective Actions Based on Level 2 Assessments	-	-	-	-	-	-	-	-	-	-
Public Notification	-	-	-	8,197	8,161	8,159	8,107	8,179	8,312	8,354
Yearly Total	**-**	**-**	**-**	**16,395**	**16,322**	**16,318**	**16,213**	**16,357**	**16,625**	**16,707**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	-	-	-	3,747,355	3,745,839	3,745,426	3,744,328	3,744,846	3,748,060	3,748,008
States and Territories	-	-	-	16,395	16,322	16,318	16,213	16,357	16,625	16,707
Yearly Total	**-**	**-**	**-**	**3,763,750**	**3,762,160**	**3,761,744**	**3,760,542**	**3,761,203**	**3,764,685**	**3,764,715**

Exhibit A.31 AIP Net Change Responses, Year by Year by Activity

PWSs

Start-Up Activities	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**	**Year 6**	**Year 7**	**Year 8**	**Year 9**	**Year 10**
Implementation	51,612	51,612	51,612	-	-	-	-	-	-	-
Revise Sampling Plan	-	77,419	77,419	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	61,153	60,956	61,032	61,108	61,115	106,911	106,901
Additional Routine Monitoring	-	-	-	(77,241)	(77,124)	(77,367)	(77,646)	(77,756)	(82,088)	(83,450)
Repeat Monitoring	-	-	-	(4,114)	(5,523)	(7,647)	(10,450)	(9,625)	(8,058)	(8,385)
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger (single trigger)	-	-	-	(32)	(115)	(243)	(187)	(219)	(165)	(334)
Level 2 Assessments - Acute Violations	-	-	-	(37)	(148)	(155)	(95)	(180)	(216)	(119)
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	(34)	(375)	(563)	(712)	(912)	(731)	(958)
Corrective Actions Based on Level 1 Assessments	-	-	-	454	477	449	486	480	497	454
Corrective Actions Based on Level 2 Assessments	-	-	-	337	240	251	243	218	225	233
Public Notification	-	-	-	(7,567)	(7,590)	(7,576)	(7,516)	(7,617)	(7,777)	(7,784)
Yearly Total	**51,612**	**129,031**	**129,031**	**(27,082)**	**(29,202)**	**(31,818)**	**(34,769)**	**(34,496)**	**8,596**	**6,558**

States

Start-Up Activities	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**	**Year 6**	**Year 7**	**Year 8**	**Year 9**	**Year 10**
Implementation	57	57	57	-	-	-	-	-	-	-
Revise Sampling Plan	-	77,419	77,419	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger	-	-	-	(32)	(115)	(243)	(187)	(219)	(165)	(334)
Level 2 Assessments - Acute Violations	-	-	-	(37)	(148)	(155)	(95)	(180)	(216)	(119)
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	(34)	(375)	(563)	(712)	(912)	(731)	(958)
Corrective Actions Based on Level 1 Assessments	-	-	-	454	477	449	486	480	497	454
Corrective Actions Based on Level 2 Assessments	-	-	-	337	240	251	243	218	225	233
Public Notification	-	-	-	(7,567)	(7,590)	(7,576)	(7,516)	(7,617)	(7,777)	(7,784)
Yearly Total	**57**	**77,476**	**77,476**	**(6,880)**	**(7,510)**	**(7,836)**	**(7,781)**	**(8,231)**	**(8,168)**	**(8,508)**

Sum for PWSs and States

	Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 5**	**Year 6**	**Year 7**	**Year 8**	**Year 9**	**Year 10**
PWSs	51,612	129,031	129,031	(27,082)	(29,202)	(31,818)	(34,769)	(34,496)	8,596	6,558
States and Territories	57	77,476	77,476	(6,880)	(7,510)	(7,836)	(7,781)	(8,231)	(8,168)	(8,508)
Yearly Total	**51,669**	**206,506**	**206,506**	**(33,961)**	**(36,713)**	**(39,654)**	**(42,550)**	**(42,727)**	**428**	**(1,950)**

Exhibit A.32 Burden, Year by Year by Activity (AIP)

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	619,348	619,348	619,348	-	-	-	-	-	-	-
Revise Sampling Plan	-	192,750	192,750	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	3,186,637	3,186,649	3,186,658	3,186,665	3,186,663	3,209,398	3,209,398
Additional Routine Monitoring	-	-	-	18,383	17,966	17,621	17,255	17,493	15,972	15,490
Repeat Monitoring	-	-	-	89,727	88,493	87,178	84,513	85,003	86,230	85,775
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger (single trigger)	-	-	-	66,340	65,556	64,135	64,517	63,170	64,690	63,225
Level 2 Assessments - Acute Violations	-	-	-	16,302	15,016	15,251	15,302	14,625	14,058	14,666
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	34,953	28,688	26,285	23,198	21,959	23,223	22,428
Corrective Actions Based on Level 1 Assessments	-	-	-	227	239	225	243	240	248	227
Corrective Actions Based on Level 2 Assessments	-	-	-	168	120	126	121	109	112	116
Public Notification	-	-	-	12,939	11,732	11,977	12,124	11,528	10,988	11,695
Yearly Total	**619,348**	**812,098**	**812,098**	**3,425,678**	**3,414,459**	**3,409,454**	**3,403,938**	**3,400,791**	**3,424,918**	**3,423,021**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	27,428	27,428	27,428	-	-	-	-	-	-	-
Revise Sampling Plan	-	96,375	96,375	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger	-	-	-	6,223	6,127	5,972	6,068	5,936	6,112	5,903
Level 2 Assessments - Acute Violations	-	-	-	1,538	1,412	1,427	1,432	1,367	1,310	1,371
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	5,869	4,879	4,408	3,946	3,719	4,058	3,879
Corrective Actions Based on Level 1 Assessments	-	-	-	227	239	225	243	240	248	227
Corrective Actions Based on Level 2 Assessments	-	-	-	168	120	126	121	109	112	116
Public Notification	-	-	-	2,079	1,885	1,924	1,948	1,852	1,765	1,879
Yearly Total	**27,428**	**123,803**	**123,803**	**16,105**	**14,662**	**14,081**	**13,759**	**13,224**	**13,606**	**13,375**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	619,348	812,098	812,098	3,425,678	3,414,459	3,409,454	3,403,938	3,400,791	3,424,918	3,423,021
States and Territories	27,428	123,803	123,803	16,105	14,662	14,081	13,759	13,224	13,606	13,375
Yearly Total	**646,776**	**935,901**	**935,901**	**3,441,783**	**3,429,120**	**3,423,535**	**3,417,697**	**3,414,015**	**3,438,524**	**3,436,396**

Exhibit A.33 Burden, Year by Year by Activity (TCR)

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	-	-	-	-	-	-	-	-	-	-
Revise Sampling Plan	-	-	-	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	3,153,905	3,154,023	3,153,994	3,153,952	3,153,962	3,153,950	3,153,976
Additional Routine Monitoring	-	-	-	61,522	61,034	60,809	60,640	60,884	61,587	61,721
Repeat Monitoring	-	-	-	91,634	91,003	91,372	90,909	90,612	91,654	91,192
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Violation (single violation)	-	-	-	43,639	43,495	43,225	43,545	43,394	43,759	43,735
Level 2 Assessments - Acute Violations	-	-	-	6,927	7,110	7,321	6,927	7,412	7,479	6,923
Level 2 Assessments - Non-Acute Violations (multiple violations)	-	-	-	22,985	22,228	22,299	21,865	22,601	22,557	23,624
Corrective Actions Based on Level 1 Assessments	-	-	-	-	-	-	-	-	-	-
Corrective Actions Based on Level 2 Assessments	-	-	-	-	-	-	-	-	-	-
Public Notification	-	-	-	126,696	126,362	126,371	125,294	126,722	128,526	128,914
Yearly Total	**-**	**-**	**-**	**3,507,307**	**3,505,255**	**3,505,391**	**3,503,132**	**3,505,587**	**3,509,512**	**3,510,087**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	-	-	-	-	-	-	-	-	-	-
Revise Sampling Plan	-	-	-	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Violation (single violation)	-	-	-	6,294	6,278	6,251	6,314	6,227	6,347	6,318
Level 2 Assessments - Acute Violations	-	-	-	1,614	1,726	1,762	1,655	1,770	1,802	1,655
Level 2 Assessments - Non-Acute Violations (multiple violations)	-	-	-	5,921	5,740	5,737	5,634	5,831	5,843	6,147
Corrective Actions Based on Level 1 Assessments	-	-	-	-	-	-	-	-	-	-
Corrective Actions Based on Level 2 Assessments	-	-	-	-	-	-	-	-	-	-
Public Notification	-	-	-	12,744	12,792	12,826	12,650	12,859	13,065	13,002
Yearly Total	**-**	**-**	**-**	**26,573**	**26,536**	**26,576**	**26,253**	**26,687**	**27,057**	**27,122**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	-	-	-	3,507,307	3,505,255	3,505,391	3,503,132	3,505,587	3,509,512	3,510,087
States and Territories	-	-	-	26,573	26,536	26,576	26,253	26,687	27,057	27,122
Yearly Total	**-**	**-**	**-**	**3,533,881**	**3,531,791**	**3,531,967**	**3,529,385**	**3,532,274**	**3,536,569**	**3,537,209**

Exhibit A.34 AIP Net Change Burden, Year by Year by Activity

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	619,348	619,348	619,348	-	-	-	-	-	-	-
Revise Sampling Plan	-	192,750	192,750	-	-	-	-	-	-	-
Annual Activities										
Routine Monitoring	-	-	-	32,732	32,626	32,663	32,714	32,702	55,448	55,422
Additional Routine Monitoring	-	-	-	(43,139)	(43,068)	(43,189)	(43,385)	(43,391)	(45,615)	(46,231)
Repeat Monitoring	-	-	-	(1,907)	(2,510)	(4,194)	(6,397)	(5,609)	(5,424)	(5,418)
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger (single trigger)	-	-	-	22,702	22,061	20,910	20,973	19,776	20,931	19,489
Level 2 Assessments - Acute Violations	-	-	-	9,375	7,906	7,930	8,375	7,213	6,578	7,742
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	11,968	6,460	3,986	1,333	(642)	665	(1,196)
Corrective Actions Based on Level 1 Assessments	-	-	-	227	239	225	243	240	248	227
Corrective Actions Based on Level 2 Assessments	-	-	-	168	120	126	121	109	112	116
Public Notification	-	-	-	(113,757)	(114,630)	(114,394)	(113,170)	(115,194)	(117,537)	(117,219)
Yearly Total	**619,348**	**812,098**	**812,098**	**(81,630)**	**(90,796)**	**(95,937)**	**(99,194)**	**(104,796)**	**(84,593)**	**(87,066)**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	27,428	27,428	27,428	-	-	-	-	-	-	-
Revise Sampling Plan	-	96,375	96,375	-	-	-	-	-	-	-
Annual Activities										
Annual Administration	-	-	-	-	-	-	-	-	-	-
Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Additional Routine Monitoring	-	-	-	-	-	-	-	-	-	-
Repeat Monitoring	-	-	-	-	-	-	-	-	-	-
Annual Site Visits	-	-	-	-	-	-	-	-	-	-
Level 1 Assessments - Non-Acute Trigger	-	-	-	(72)	(151)	(279)	(245)	(290)	(235)	(415)
Level 2 Assessments - Acute Violations	-	-	-	(76)	(314)	(335)	(223)	(403)	(492)	(285)
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	-	-	-	(52)	(861)	(1,329)	(1,688)	(2,112)	(1,785)	(2,268)
Corrective Actions Based on Level 1 Assessments	-	-	-	227	239	225	243	240	248	227
Corrective Actions Based on Level 2 Assessments	-	-	-	168	120	126	121	109	112	116
Public Notification	-	-	-	(10,664)	(10,907)	(10,901)	(10,702)	(11,007)	(11,299)	(11,123)
Yearly Total	**27,428**	**123,803**	**123,803**	**(10,468)**	**(11,874)**	**(12,495)**	**(12,494)**	**(13,464)**	**(13,451)**	**(13,747)**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	619,348	812,098	812,098	(81,630)	(90,796)	(95,937)	(99,194)	(104,796)	(84,593)	(87,066)
States and Territories	27,428	123,803	123,803	(10,468)	(11,874)	(12,495)	(12,494)	(13,464)	(13,451)	(13,747)
Yearly Total	**646,776**	**935,901**	**935,901**	**(92,098)**	**(102,670)**	**(108,432)**	**(111,688)**	**(118,260)**	**(98,044)**	**(100,813)**

Exhibit A.35 Costs, Year by Year by Activity (AIP)

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	$ 16,583,083	$ 16,583,083	$ 16,583,083	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revise Sampling Plan	$ -	$ 5,382,834	$ 5,382,834	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Activities										
Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 114,740,703	$ 114,741,002	$ 114,741,211	$ 114,741,424	$ 114,741,362	$ 115,314,124	$ 115,314,134
Annual O&M	$ -	$ -	$ -	$ 86,127,063	$ 86,127,921	$ 86,128,567	$ 86,129,159	$ 86,128,996	$ 87,869,696	$ 87,869,700
Additional Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 472,804	$ 462,233	$ 453,486	$ 443,882	$ 449,595	$ 411,047	$ 398,865
Annual O&M	$ -	$ -	$ -	$ 1,002,609	$ 980,204	$ 962,124	$ 941,513	$ 954,735	$ 871,303	$ 845,220
Repeat Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 2,974,862	$ 2,940,039	$ 2,900,282	$ 2,807,430	$ 2,823,937	$ 2,846,541	$ 2,834,986
Annual O&M	$ -	$ -	$ -	$ 2,911,479	$ 2,853,698	$ 2,800,622	$ 2,725,902	$ 2,739,708	$ 2,832,274	$ 2,808,864
Annual Site Visits	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Level 1 Assessments - Non-Acute Trigger (single trigger)	$ -	$ -	$ -	$ 1,958,032	$ 1,937,902	$ 1,901,058	$ 1,908,547	$ 1,872,785	$ 1,911,304	$ 1,875,193
Level 2 Assessments - Acute Violations	$ -	$ -	$ -	$ 456,822	$ 423,116	$ 428,998	$ 428,818	$ 410,512	$ 396,425	$ 410,564
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	$ -	$ -	$ -	$ 935,043	$ 765,192	$ 699,973	$ 617,760	$ 584,200	$ 613,883	$ 593,125
Corrective Actions Based on Level 1 Assessments	$ -	$ -	$ -	$ 6,118	$ 6,424	$ 6,053	$ 6,526	$ 6,445	$ 6,643	$ 6,125
Corrective Actions Based on Level 2 Assessments	$ -	$ -	$ -	$ 4,413	$ 3,185	$ 3,302	$ 3,183	$ 2,859	$ 2,944	$ 3,040
Public Notification (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 344,640	$ 313,175	$ 319,301	$ 321,921	$ 306,014	$ 292,717	$ 309,775
Annual O&M	$ -	$ -	$ -	$ 755	$ 672	$ 673	$ 609	$ 617	$ 661	$ 581
Yearly Total	**$ 16,583,083**	**$ 21,965,917**	**$ 21,965,917**	**$ 211,589,947**	**$ 211,240,916**	**$ 211,025,677**	**$ 210,754,145**	**$ 210,715,133**	**$ 213,076,185**	**$ 212,959,816**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	$ 1,075,657	$ 1,075,657	$ 1,075,657	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revise Sampling Plan	$ -	$ 3,779,647	$ 3,779,647	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Activities										
Annual Adminstration	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Additional Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Repeat Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Site Visits	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Level 1 Assessments - Non-Acute Trigger (single trigger)	$ -	$ -	$ -	$ 244,039	$ 240,274	$ 234,195	$ 237,993	$ 232,807	$ 239,714	$ 231,518
Level 2 Assessments - Acute Violations	$ -	$ -	$ -	$ 60,333	$ 55,387	$ 55,969	$ 56,145	$ 53,625	$ 51,357	$ 53,750
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	$ -	$ -	$ -	$ 230,188	$ 191,341	$ 172,874	$ 154,773	$ 145,853	$ 159,143	$ 152,129
Corrective Actions Based on Level 1 Assessments	$ -	$ -	$ -	$ 8,906	$ 9,360	$ 8,805	$ 9,524	$ 9,411	$ 9,740	$ 8,906
Corrective Actions Based on Level 2 Assessments	$ -	$ -	$ -	$ 6,605	$ 4,712	$ 4,930	$ 4,759	$ 4,276	$ 4,405	$ 4,569
Public Notification	$ -	$ -	$ -	$ 81,545	$ 73,923	$ 75,469	$ 76,396	$ 72,635	$ 69,228	$ 73,689
Yearly Total	**$ 1,075,657**	**$ 4,855,303**	**$ 4,855,303**	**$ 631,615**	**$ 574,998**	**$ 552,242**	**$ 539,591**	**$ 518,608**	**$ 533,588**	**$ 524,561**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	$ 16,583,083	$ 21,965,917	$ 21,965,917	$ 211,589,947	$ 211,240,916	$ 211,025,677	$ 210,754,145	$ 210,715,133	$ 213,076,185	$ 212,959,816
States and Territories	$ 1,075,657	$ 4,855,303	$ 4,855,303	$ 631,615	$ 574,998	$ 552,242	$ 539,591	$ 518,608	$ 533,588	$ 524,561
Yearly Total	**$ 17,658,740**	**$ 26,821,220**	**$ 26,821,220**	**$ 212,221,562**	**$ 211,815,913**	**$ 211,577,919**	**$ 211,293,736**	**$ 211,233,741**	**$ 213,609,773**	**$ 213,484,376**

Exhibit A.36 Costs, Year by Year by Activity (TCR)

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revise Sampling Plan	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Activities										
Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 113,878,868	$ 113,882,117	$ 113,881,288	$ 113,880,077	$ 113,880,529	$ 113,879,965	$ 113,880,917
Annual O&M	$ -	$ -	$ -	$ 83,857,446	$ 83,865,318	$ 83,863,433	$ 83,860,971	$ 83,860,332	$ 83,861,680	$ 83,861,523
Additional Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 1,636,973	$ 1,623,937	$ 1,618,247	$ 1,614,660	$ 1,620,624	$ 1,638,225	$ 1,641,205
Annual O&M	$ -	$ -	$ -	$ 2,876,658	$ 2,852,959	$ 2,842,225	$ 2,830,568	$ 2,845,539	$ 2,878,687	$ 2,888,887
Repeat Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 3,019,569	$ 2,996,914	$ 3,014,249	$ 2,996,826	$ 2,984,797	$ 3,016,595	$ 3,000,672
Annual O&M	$ -	$ -	$ -	$ 2,938,162	$ 2,922,861	$ 2,919,650	$ 2,911,882	$ 2,907,984	$ 2,948,262	$ 2,935,477
Annual Site Visits	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Level 1 Assessments - Non-Acute Violation (single violation)	$ -	$ -	$ -	$ 1,310,676	$ 1,305,640	$ 1,298,575	$ 1,307,003	$ 1,303,572	$ 1,312,764	$ 1,313,184
Level 2 Assessments - Acute Violations	$ -	$ -	$ -	$ 198,033	$ 202,394	$ 207,912	$ 197,924	$ 210,383	$ 212,378	$ 197,442
Level 2 Assessments - Non-Acute Violations (multiple violations)	$ -	$ -	$ -	$ 613,818	$ 593,847	$ 595,562	$ 583,827	$ 603,118	$ 602,149	$ 629,325
Corrective Actions Based on Level 1 Assessments	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Corrective Actions Based on Level 2 Assessments	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Public Notification (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 3,485,616	$ 3,473,171	$ 3,473,257	$ 3,445,137	$ 3,483,391	$ 3,528,693	$ 3,540,146
Annual O&M	$ -	$ -	$ -	$ 837,477	$ 835,216	$ 834,213	$ 834,015	$ 835,083	$ 835,514	$ 838,114
Yearly Total	**$ -**	**$ -**	**$ -**	**$ 214,653,297**	**$ 214,554,375**	**$ 214,548,613**	**$ 214,462,891**	**$ 214,535,351**	**$ 214,714,914**	**$ 214,726,891**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revise Sampling Plan	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Activities										
Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Additional Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Repeat Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Site Visits	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Level 1 Assessments - Non-Acute Violation (single violation)	$ -	$ -	$ -	$ 246,851	$ 246,199	$ 245,148	$ 247,605	$ 244,192	$ 248,931	$ 247,786
Level 2 Assessments - Acute Violations	$ -	$ -	$ -	$ 63,305	$ 67,685	$ 69,106	$ 64,900	$ 69,435	$ 70,671	$ 64,925
Level 2 Assessments - Non-Acute Violations (multiple violations)	$ -	$ -	$ -	$ 232,216	$ 225,110	$ 225,013	$ 220,961	$ 228,700	$ 229,150	$ 241,057
Corrective Actions Based on Level 1 Assessments	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Corrective Actions Based on Level 2 Assessments	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Public Notification	$ -	$ -	$ -	$ 499,780	$ 501,694	$ 502,995	$ 496,124	$ 504,300	$ 512,370	$ 509,921
Yearly Total	**$ -**	**$ -**	**$ -**	**$ 1,042,153**	**$ 1,040,687**	**$ 1,042,263**	**$ 1,029,589**	**$ 1,046,626**	**$ 1,061,122**	**$ 1,063,689**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	$ -	$ -	$ -	$ 214,653,297	$ 214,554,375	$ 214,548,613	$ 214,462,891	$ 214,535,351	$ 214,714,914	$ 214,726,891
States and Territories	$ -	$ -	$ -	$ 1,042,153	$ 1,040,687	$ 1,042,263	$ 1,029,589	$ 1,046,626	$ 1,061,122	$ 1,063,689
Yearly Total	**$ -**	**$ -**	**$ -**	**$ 215,695,450**	**$ 215,595,062**	**$ 215,590,876**	**$ 215,492,480**	**$ 215,581,977**	**$ 215,776,036**	**$ 215,790,580**

Exhibit A.37 Net Change AIP Costs, Year by Year by Activity

PWSs

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	$ 16,583,083	$16,583,083	$16,583,083	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revise Sampling Plan	$ -	$ 5,382,834	$ 5,382,834	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Activities										
Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ 861,835	$ 858,885	$ 859,923	$ 861,346	$ 860,833	$ 1,434,159	$ 1,433,218
Annual O&M	$ -	$ -	$ -	$ 2,269,617	$ 2,262,602	$ 2,265,134	$ 2,268,188	$ 2,268,664	$ 4,008,015	$ 4,008,177
Additional Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ (1,164,170)	$ (1,161,704)	$ (1,164,761)	$ (1,170,779)	$ (1,171,029)	$ (1,227,179)	$ (1,242,340)
Annual O&M	$ -	$ -	$ -	$ (1,874,049)	$ (1,872,755)	$ (1,880,101)	$ (1,889,055)	$ (1,890,804)	$ (2,007,383)	$ (2,043,667)
Repeat Monitoring Samples (Labor + O&M)										
Labor	$ -	$ -	$ -	$ (44,707)	$ (56,875)	$ (113,967)	$ (189,396)	$ (160,860)	$ (170,054)	$ (165,686)
Annual O&M	$ -	$ -	$ -	$ (26,683)	$ (69,163)	$ (119,029)	$ (185,979)	$ (168,275)	$ (115,988)	$ (126,613)
Annual Site Visits	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Level 1 Assessments - Non-Acute Trigger (single trigger)	$ -	$ -	$ -	$ 647,356	$ 632,262	$ 602,483	$ 601,545	$ 569,213	$ 598,540	$ 562,008
Level 2 Assessments - Acute Violations	$ -	$ -	$ -	$ 258,789	$ 220,722	$ 221,086	$ 230,894	$ 200,129	$ 184,047	$ 213,122
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	$ -	$ -	$ -	$ 321,225	$ 171,344	$ 104,411	$ 33,933	$ (18,918)	$ 11,734	$ (36,200)
Corrective Actions Based on Level 1 Assessments	$ -	$ -	$ -	$ 6,118	$ 6,424	$ 6,053	$ 6,526	$ 6,445	$ 6,643	$ 6,125
Corrective Actions Based on Level 2 Assessments	$ -	$ -	$ -	$ 4,413	$ 3,185	$ 3,302	$ 3,183	$ 2,859	$ 2,944	$ 3,040
Public Notification (Labor + O&M)										
Labor	$ -	$ -	$ -	$ (3,140,976)	$ (3,159,996)	$ (3,153,957)	$ (3,123,216)	$ (3,177,377)	$ (3,235,976)	$ (3,230,371)
Annual O&M	$ -	$ -	$ -	$ (836,721)	$ (834,544)	$ (833,540)	$ (833,406)	$ (834,465)	$ (834,853)	$ (837,533)
Yearly Total	**$ 16,583,083**	**$21,965,917**	**$21,965,917**	**$ (2,717,955)**	**$ (2,999,613)**	**$ (3,202,962)**	**$ (3,386,215)**	**$ (3,513,586)**	**$ (1,345,350)**	**$ (1,456,719)**

States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Start-Up Activities										
Implementation	$ 1,075,657	$ 1,075,657	$ 1,075,657	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Revise Sampling Plan	$ -	$ 3,779,647	$ 3,779,647	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Activities										
Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Additional Routine Monitoring (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Repeat Monitoring Samples (Labor + O&M)										
Labor	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual O&M	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Annual Site Visits	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Level 1 Assessments - Non-Acute Trigger (single trigger)	$ -	$ -	$ -	$ (2,812)	$ (5,925)	$ (10,953)	$ (9,612)	$ (11,384)	$ (9,217)	$ (16,268)
Level 2 Assessments - Acute Violations	$ -	$ -	$ -	$ (2,972)	$ (12,298)	$ (13,137)	$ (8,754)	$ (15,809)	$ (19,314)	$ (11,175)
Level 2 Assessments - Level 2 Triggers (triggered by multiple Level 1s)	$ -	$ -	$ -	$ (2,029)	$ (33,768)	$ (52,140)	$ (66,187)	$ (82,847)	$ (70,007)	$ (88,928)
Corrective Actions Based on Level 1 Assessments	$ -	$ -	$ -	$ 8,906	$ 9,360	$ 8,805	$ 9,524	$ 9,411	$ 9,740	$ 8,906
Corrective Actions Based on Level 2 Assessments	$ -	$ -	$ -	$ 6,605	$ 4,712	$ 4,930	$ 4,759	$ 4,276	$ 4,405	$ 4,569
Public Notification	$ -	$ -	$ -	$ (418,235)	$ (427,770)	$ (427,526)	$ (419,728)	$ (431,665)	$ (443,141)	$ (436,232)
Yearly Total	**$ 1,075,657**	**$ 4,855,303**	**$ 4,855,303**	**$ (410,538)**	**$ (465,689)**	**$ (490,021)**	**$ (489,999)**	**$ (528,019)**	**$ (527,534)**	**$ (539,128)**

Sum for PWSs and States

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
PWSs	$ 16,583,083	$21,965,917	$21,965,917	$ (2,717,955)	$ (2,999,613)	$ (3,202,962)	$ (3,386,215)	$ (3,513,586)	$ (1,345,350)	$ (1,456,719)
States and Territories	$ 1,075,657	$ 4,855,303	$ 4,855,303	$ (410,538)	$ (465,689)	$ (490,021)	$ (489,999)	$ (528,019)	$ (527,534)	$ (539,128)
Yearly Total	**$ 17,658,740**	**$26,821,220**	**$26,821,220**	**$ (3,128,493)**	**$ (3,465,302)**	**$ (3,692,983)**	**$ (3,876,214)**	**$ (4,041,604)**	**$ (1,872,884)**	**$ (1,995,848)**