

Clean Watersheds Needs Survey

Office of Wastewater Management

EPA ICR Number 0318.12

OMB CONTROL NUMBER 2040-0050

October 6, 2011

SUPPORTING STATEMENT

A. JUSTIFICATION

SECTION 1 IDENTIFICATION OF THE INFORMATION COLLECTION

TITLE: Clean Watersheds Needs Survey (CWNS) (Renewal)

ICR NUMBER: 0318.12

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ABSTRACT:

The Clean Watersheds Needs Survey (CWNS) is required by Clean Water Act (CWA) Sections 205(a) and 516. It is a periodic inventory of existing and projected publicly owned wastewater treatment works (POTWs) and other water pollution control facilities in the United States, as well as an estimate of how many POTWs need to be built. The CWNS is a joint effort of EPA and the States. The Survey records cost and technical data associated with POTWs and other water pollution control facilities, existing and projected, in the United States. The State respondents who provide this information to EPA are State agencies responsible for environmental pollution control. No confidential information is used, nor is sensitive information protected from release under the Public Information Act. EPA achieves national consistency in the final results through the application of uniform guidelines and validation techniques.

SECTION 2 NEED FOR AND USE OF THE COLLECTION

NEED FOR THE COLLECTION:

EPA provides an estimate of POTWs construction and other water pollution control requirements for each State, Territory, and the District of Columbia to Congress under CWA Section 516, which says in part: “The Administrator in cooperation with the States, including water pollution control agencies and other water pollution control planning agencies, shall make (a) a detailed estimate of the cost of carrying out the provisions of this Act; (b) a detailed estimate, biennially revised, of the cost of construction of all needed POTWs in each of the States.”

Further, CWA Section 604(a) states the Clean Water State Revolving Funds shall be allocated in accordance with CWA Section 205. CWA Section 205 provides that allotments shall be made only in accordance with a revised cost estimate made and submitted to Congress in accordance with CWA Section 516 and only after such revised cost estimate shall be approved by law specifically enacted hereafter.

USE OF THE COLLECTION:

In addition to CWA Section 205 uses of the data for funds allotment, Congress utilizes the data to assist deliberations on specific legislation and funding measures related to water pollution control. Additional uses of the data include:

- Local, state, and other uses of the data for NPDES permit writing, Total Maximum Daily Load analyses, and other environmental program support
- Wastewater treatment technology and environmental measures support related to EPA’s Sustainable Infrastructure Initiative
- Private industry efforts to target technical support for facilities
- Baseline data for EPA, Department of Homeland Security, and other agencies for use in more specialized reports and for providing program focus.

At the end of each CWNS, a report is written and published highlighting the national results of the survey and describing the methodology used to collect, document, and quality assure all of the State data included therein. The Report includes many tables and graphs. The appendices of the Report are detailed state-by-state and national summary tables. The Report and the detailed graphs and tables are publicly available at <http://www.epa.gov/cwns/>.

SECTION 3 NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

NONDUPLICATION:

EPA avoids duplication of effort in a number of ways. To begin each new Survey, EPA provides each State their exact inventory of data from the preceding survey to update and revise, with EPA updating only the cost data for inflation. States also have access to technical and cost data contained in the CWNS data system from previous Surveys. This eliminates the need for States to provide information which has already been approved and ensures national consistency. States and EPA Regions are informed of the data and document update procedures at the CWNS Kickoff Meeting and via web seminars and other electronic communications.

The new Data Entry Portal for CWNS 2008 was developed in the EPA Enterprise Portal to provide many features that avoid duplication of effort. The system provides ability to:

- Transfer wastewater discharge permit data from EPA's Permit Compliance System and EPA's Integrated Compliance Information System directly into the CWNS 2008 data system,
- Click on locations in the internet WATERS Lite Viewer mapping tool and have the location data transferred into the CWNS 2008 data system,
- Incorporate data from EPA's Impaired Waters and Clean Water State Revolving Fund Benefits databases,
- Have local communities update their CWNS information, and
- Upload and comment upon documents to minimize effort related to data and document quality assurance reviews (EPA is scanning and posting in the system documents submitted in prior surveys)

In addition to system enhancements, required data elements were reduced between CWNS 2004 and CWNS 2008. Data quality assurance methods have also been streamlined to require less respondent time while preserving data quality assurance.

CONSULTATIONS

EPA, with input from an advisory CWNS Workgroup composed of State and EPA Regional representatives, refines the approaches and methodologies used in each Survey. The CWNS 2012 Workgroup was established in November 2009 following an October 2009 invitation to a list of State environmental department commissioners provided by the Environmental Council of the States. Recommendations made by the CWNS 2008 Workgroup at the end of the 2008 Survey, along with recommendations from the CWNS 2012 Workgroup, informed the refined methods for the CWNS 2012 data collection addressed by this ICR. The CWNS 2012 Workgroup provided input on updating the eligibility criteria, data collection/submission methodologies, and the CWNS Data Entry Portal. As with past surveys, the updated criteria, methodologies and data system guidance will be published in a detailed user manual for State and EPA Regional CWNS Coordinators.

EFFECTS OF LESS FREQUENT COLLECTION

The Needs Survey was initially conducted every two years. In 1994, a survey was mandated for the collection of drinking water infrastructure needs. Therefore, after the completion of the CWNS 1992, the CWNS began being conducted every four years, alternating with the drinking water survey.

Each item in the CWNS is necessary to accomplish one or more goals of the Clean Water Act (CWA). Failure to update the information could put EPA, States and Regions in the position of being unable to respond in a timely and accurate manner to the Report's CWA mandates. The CWA and state revolving fund allotment formula is overdue for reauthorization by Congress and the needs data submitted by States may play an important role in determining the appropriation of funds. The Needs Survey data also play a major part in evaluating costs for regulations such as stormwater rules and in related reports such as the Water and Wastewater Infrastructure Gap Analysis Report. Additionally, the data need regular updating to support the variety of additional uses described at the end of Section 2.

GENERAL GUIDELINES

The Survey follows OMB's general guidelines.

CONFIDENTIALITY

No confidential information is used.

SENSITIVE QUESTIONS

The Needs Survey does not ask for information considered sensitive or which appears to fall within the types of confidential data protected from release under the Public Information Act.

SECTION 4 THE RESPONDENTS AND THE INFORMATION REQUESTED

RESPONDENTS/NAICS CODES

The North American Industry Classification System (NAICS) information for the respondents affected by this collection activity are as follows:

<u>Establishment</u>	<u>Group Number</u>	<u>Industry Number</u>
Water Pollution Control	924	924110
Sewage Plants and Systems	221	221320

INFORMATION REQUESTED

The types of data that will be collected relate to wastewater infrastructure and the costs thereof, including publicly-owned wastewater treatment and conveyance systems that need to be built or upgraded to control wastewater, stormwater, nonpoint source discharges, and combined sewer / sanitary sewer overflows.

SECTION 5 THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

AGENCY ACTIVITIES

Every four years, the data are collected, reviewed and summarized over a two-year time period to give EPA sufficient time to complete review and verification and to prepare the final report. The States and Regions also review the collected data during this time. Specifically, the States are responsible for:

- Collecting, reviewing and updating the data on municipal wastewater treatment facilities, stormwater, and non-point source projects,
- Submitting proper documentation where necessary,
- Justifying certain specified categories of need that are based on construction cost curves, and
- Addressing questions about populations served anomalies.

EPA Headquarters is responsible for:

- Managing the Survey and its data base to ensure national consistency,
- Setting national documentation standards and identifying data sources,
- Reviewing documentation to ensure its acceptability and updating records,

- Assigning proper basis of estimates to all cost estimates and applying EPA Cost Curve procedures where appropriate,
- Reviewing and approving new facility data submitted by the States,
- Performing quality assurance checks on needs and population data,
- Deleting needs estimates for facilities that cannot be properly documented in accordance with the established list of acceptable criteria, and
- Preparing the final Report to Congress and disseminating Survey information over the internet (<http://www.epa.gov/cwns/>).

EPA Regions are responsible for:

- Promoting States' full participation in CWNS,
- Assisting States with state-specific data collection / update methodologies,
- Assisting States in addressing States' submissions evaluated by EPA as not meeting CWNS criteria, and
- Arranging Regional briefings on conduct of the data collection and results of the survey.

COLLECTION METHODOLOGY AND MANAGEMENT

EPA consistently has used current technology to complete the Survey. In 1974, the data were collected on 35-page questionnaires (EPA-1 Form), manually completed by the States. This method placed a large burden on State and EPA regional personnel and resources. In 1976, the EPA-1 Form was redesigned and considerably reduced in size and was made computer compatible. In 1983, the EPA-1 Form was reviewed and revised to two pages which were computer compatible. Subsequent Surveys were conducted in a similar manner. The 1986 Survey preprinted information for States to update on one -page fact sheets which were easier to use than the computerized EPA-1 Form. Since 1988, the Needs Survey review and update process are computerized to further reduce the workload for the States and Regions in collecting and updating facility data.

In response to terms of clearance of ICR (#0318.10), EPA, in partnership with States, made several enhancements to the database to streamline data entry, including reducing data element requirements and integrating with other EPA datasets. EPA has also strengthened procedures to ensure outdated information is removed from the database.

While reviewing data, EPA reviews supporting documentation submitted by States to ensure that data entered in the system meets CWNS eligibility criteria and is consistent with data in the documents. CWNS eligibility criteria are:

1. A description of the water quality impairment and information on the potential source. The problem description should include specific pollutant source information. A general statement about water quality impairment does not meet this criterion.
2. The location of the problem, included as a latitude/longitude point, or in the case of a nonpoint source (NPS) project, as a polygon (of the project location and/or the beneficial receiving waters).
3. One or more specific pollution control measures or BMPs used to address the problem.
4. The capital cost to implement each pollution control measure or BMP. General estimates for the problem area were not permitted; only site-specific data are acceptable to generate the costs.

5. The source of the costs (e.g., an engineer's estimate, facility plan, cost of comparable practices, estimates from equipment suppliers) for each solution.
6. The total capital costs for all pollution control measures and BMPs documented for a facility (all costs will be converted to January 1, 2012, dollars for CWNS 2012.)
7. For all needs entered into CWNS, if a facility / NPS project need is greater than \$20 million (January 1, 2012 dollar base), the documentation date needs to be January 1, 2006, or more current; for all other facility / NPS project needs, the documentation date needs to be January 1, 2002, or more current.

In addition to these criteria, the CWNS user manual lists a set of document types that are pre-approved for use in documenting needs and related costs. Cost curves are utilized to estimated costs for a small portion of documented needs that do not have well documented costs.

SMALL ENTITY FLEXIBILITY

Collection of information associated with the Needs Survey does not involve small businesses. The primary respondents are the States, usually the State Water Pollution Control Agency or the Department of Environmental Protection. EPA allows States to submit simplified forms for their data from communities of 10,000 and less.

COLLECTION SCHEDULE

The CWNS 2012 data collection and entry period will be November 1, 2011 through October 26, 2012. Data quality assurance and analysis activities will be performed November 2012 through February 2013. The Report will be developed and submitted to OMB for review in Summer 2013.

SECTION 6 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

ESTIMATING RESPONDENT COSTS

The average cost to States of staff compensation and benefits is estimated to be \$40.32 per hour (Department of Labor, May 2008), the annual State burden hour estimate of 7,424 hours equates to overall State costs of \$299,335. The average cost to Local Facilities of staff compensation and benefits is estimated to be \$42.17 per hour (Department of Labor, May 2008), the annual wastewater facility burden hour estimate of 1,680 hours equates to overall wastewater facility costs of \$70,849. There are no additional costs beyond costs associated with the above burden hour estimate.

Burden for State Government and Local Facility Participation in Data Collection

This table summarizes burden estimates across all States.

ACTIVITY	State			Local Facilities			State / Local Totals	
	LABOR Hours / Respondent / Year	TOTAL Respondent Hours/Year [56 Respondents / Year]	TOTAL Labor Costs / Yr. [at \$40.32 / hr.]	LABOR Hours / Respondent / Year	TOTAL Respondent Hours / Year [4,144 Respondents / Year]	TOTAL Labor Costs/Yr. [at \$42.17 / hr.]	Total Hours	TOTAL Respondent Costs / Year
1) Obtain access & training for the Data Entry Portal (DEP)	2.7	148	\$5,987				148	\$5,987
2) Manage others' access to the DEP	1.3	74	\$2,993				74	\$2,993
3) Working with primary data suppliers	27.8	1,559	\$62,860				1,559	\$62,860
4) Compiling data from data suppliers	27.8	1,559	\$62,860				1,559	\$62,860
5) Data Entry & Document Submission	55.7	3,118	\$125,721	0.33	1,680	\$70,849	4,798	\$196,570
6) Data Quality Assurance Activities	17.2	965	\$38,914				965	\$38,914
Annual Totals	132.6	7,424	\$299,335	0.33	1,680	\$70,849	9,104	\$370,184
3-Year Totals	398	22,272	\$898,006	1.00	5,040	\$212,547	27,312	\$1,110,553

ESTIMATED AGENCY BURDEN AND COSTS

The annualized estimate for the total cost to the Federal Government is \$929,320; to include \$90,000 for CWNS system maintenance at EPA’s computing facility, \$535,000 for contractor support, and \$304,320 in EPA employee compensation and benefits cost.

ACTIVITY	AGENCY Labor Hours / Year [FTE]	AGENCY Labor Costs / Year [\$126.8K / FTE]	CONTRACT Costs / Year	AGENCY Computing Facility Costs / Year	TOTAL AGENCY Costs / Year
Contract Management	0.30	\$38,040	\$10,000		\$48,040
Regional Assistance to States	0.35	\$44,380			\$44,380
Plan, Implement, & Manage Survey	0.30	\$38,040	\$30,000		\$68,040
Provide Logistics Support	0.05	\$6,340	\$15,000		\$21,340
Refine Modeling Approaches	0.05	\$6,340	\$30,000		\$36,340
Provide Data Entry Portal support	0.15	\$19,020	\$205,000	\$90,000	\$314,020
Provide Technical Support	0.15	\$19,020	\$40,000		\$59,020
Workgroup Facilitation & Support	0.10	\$12,680	\$20,000		\$32,680
Review, Q/A, and Reconcile Data	0.10	\$12,680	\$110,000		\$122,680
Market and promote CWNS	0.30	\$38,040	\$15,000		\$53,040
Prepare Final Report	0.45	\$57,060	\$25,000		\$82,060
Develop & Maintain Web Reports	0.10	\$12,680	\$35,000		\$47,680
Annual Totals	2.40	\$304,320	\$535,000	\$90,000	\$929,320
3-Year Totals	7.20	\$912,960	\$1,605,000	\$270,000	\$2,787,960

REASONS FOR CHANGE IN BURDEN

The estimated burden for this ICR is nearly the same as the previous ICR approved by OMB. There is a slight increase of 298 hours in the total estimated respondent burden. The 298 hour increase is the net result of an increase of 190 State burden hours combined with an increase of 108 hours in Local Facility burden hours.

BURDEN STATEMENT

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1.5 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop,

acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements which have subsequently changed; 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.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2003-0019, which is available for public 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 through <http://www.regulations.gov>. Use www.regulations.gov to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID No. EPA-HQ-OW-2003-0019 and OMB control number 2040-0050 in any correspondence.