

### **Justification for Non-substantive Change**

Willingness to Pay Survey for Section 316(b) Existing Facilities Cooling Water Intake Structures  
EPA ICR 2402.03, OMB 2040-0283

OMB approved implementation of the Northeast region of the stated preference survey as a pilot study conducted in advance of other survey versions. EPA has completed fielding both the Northeast mail survey and non-response follow-up study. A preliminary model has been estimated for the Northeast region and weighting adjustments are being assessed based on the results of the non-response study. The remaining survey versions (Inland, Southeast, Pacific, and National) are still being fielded. Agency and contractor burden has been updated within this ICR based on the response rates observed during the Northeast pilot.

For the main mail survey in the Northeast region, EPA received a total of 399 completed surveys for a 30% response rate equal to the rate assumed during development of the sampling frame. EPA administered the non-response survey via Priority Mail and telephone. The initial target sample sizes were 73 and 36 for the Priority Mail and telephone subsamples, respectively, for 109 total non-response contacts. For the Priority Mail subsample, EPA randomly selected 146 non-responding households based on an anticipated 50% response rate ( $73/0.5$ ). The anticipated response rate was based on prior studies that administered surveys via Priority Mail. EPA actually received 48 completes from the Priority Mail sample giving a 33% response rate ( $48/146$ ). Because the Priority Mail response was lower than expected, the target number of telephone completes was increased to obtain the desired number of responses. EPA randomly selected 331 households for the telephone survey from the subset of households with matched telephone numbers that did not complete the main mail survey or Priority Mail questionnaire. Fifty-one of the households had been previously sent, but did not return a completed Priority Mail questionnaire. The other 280 households ( $330-51$ ) were sent a preview letter including a \$2 incentive one week before the first telephone attempt. The telephone survey was divided into replicates to potentially cut down on cost if the required number of completes was achieved early. EPA made up to 12 attempts to achieve telephone contacts with the selected households. EPA stopped telephone calls after reaching the 63 completes within the 331 selected households, for a response rate of 19%. Revised estimates of agency and contractor burden for the non-response study were calculated by adjusting previous estimates upward based on the ratio of

assumed response rates to response rates observed for the Northeast region (50%/33% for Priority Mail and 80%/19% for telephone). Respondent burden was unchanged because the target completes for the Priority Mail and telephone non-response samples were unchanged and estimated respondent burden is limited to time spent completing the survey.

This project will be undertaken by Abt Associates Inc. with funding of \$355,969 from EPA contract EP-C-07-023, which provides funds for the purpose of analyzing the economic benefits of the proposed rule for existing facilities subject to the section 316(b) regulation. Abt Associates Inc. staff is expected to spend 5,952 hours pre-testing the survey questionnaire and sampling methodology, conducting the mail survey, conducting the non-response survey, and tabulating and analyzing the survey results. The cost of this contractor time is \$255,438. In addition to the effort expended by EPA's contractors, EPA staff is expected to spend 320 hours managing and reviewing this project and contributing to the analysis at a cost of \$31,000. Agency and contractor burden is 6,272 hours, with a total cost of \$286,438 excluding the costs of survey printing and mailing. Mailing and printing of the survey is expected to take 133 hours and cost \$100,531. Thus, the total Agency and contractor burden would be 6,404 hours and would cost \$386,969.