

Appendix A

Federal Register Notice Soliciting Comments on Information Collection Requests

Abstract: Source Compliance and State Action Reporting is an activity whereby State, District, Local, and Commonwealth governments (hereafter referred to as either "states/locals" or "state and local agencies") make air compliance and enforcement information available to the U.S. Environmental Protection Agency (EPA or the Agency) on a cyclic basis via input to the Air Facility System (AFS). The information provided to EPA includes compliance activities and determinations, and enforcement activities. EPA uses this information to assess progress toward meeting emission requirements developed under the authority of the Clean Air Act (CAA or the Act) to protect and maintain the atmospheric environment and the public health. The EPA and many of the state and local agencies access the data in AFS to assist them in the management of their air pollution control programs. This renewal information collection request (ICR) affects oversight of approximately 39,005 stationary sources by 99 state and local agencies and the Federal EPA. On average, the burden imposed by this collection amounts to approximately one-tenth of a full-time equivalent employee for each small state and local agency, one-fourth of a full-time equivalent employee for each medium sized state and local agency and one and one-tenth of a full-time equivalent employee for each large sized state and local agency for national reporting of compliance and enforcement related data under all of the applicable Clean Air Act programs.

Burden Statement: The annual public reporting and recordkeeping burden for this collection of information is estimated to average 92 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.

Respondents/Affected Entities: State and Local Agencies.

Estimated Number of Respondents: 99.

Frequency of Response: Every 60 days.

Estimated Total Annual Hour Burden: 54,384.

Estimated Total Annual Cost: \$2,843,187 in labor costs. There are no capital or O&M costs.

Changes in the Estimates: There is a decrease of 18,689 hours in the total estimated burden currently identified in the OMB Inventory of Approved ICR Burdens. This decrease is due to a continuing decrease in the number of major sources in the reportable universe and a reported decrease of time and resources available for use in data management by small and medium sized agencies.

Dated: June 28, 2011.

Joseph A. Sierra,

Acting Director, Collection Strategies Division.

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ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OW-2011-0439; EPA-HQ-OW-2011-0442; EPA-HQ-OW-2011-0443; FRL-9429-6]

Agency Information Collection Activities; Proposed Collection; Comment Request; Disinfectants/Disinfection Byproducts, Chemical and Radionuclides; Microbial; and Public Water System Supervision Program

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: In compliance with the Paperwork Reduction Act (PRA) (44 U.S.C. 3501 *et seq.*), this document announces that EPA is planning to submit a request to renew existing approved Information Collection Requests (ICRs) to the Office of Management and Budget (OMB). The ICRs scheduled to expire are Disinfectants/Disinfection Byproducts, Chemical and Radionuclides Rules ICR expires on December 31, 2011; Microbial Rules ICR expires on April 30, 2012; and Public Water System Supervision ICR expires on March 31, 2012. Before submitting the ICR to OMB for review and approval, EPA is soliciting comments on specific aspects of the proposed information collection as described below.

DATES: Comments must be submitted on or before September 6, 2011.

ADDRESSES: Submit your comments, identified by the Docket ID EPA-HQ-

OW-2011-0439 (Disinfectants/Disinfection Byproducts, Chemical and Radionuclides Rules); EPA-HQ-OW-2011-0442 (Microbial Rules); and EPA-HQ-OW-2011-0443 (Public Water System Supervision), by one of the following methods:

- *http://www.regulations.gov:* Follow the on-line instructions for submitting comments.

- *E-mail:* OW-Docket@epa.gov

- *Mail:* Water Docket, US

Environmental Protection Agency, EPA Docket Center (EPA/DC), Water Docket, MC: 28221T, 1200 Pennsylvania Ave., NW., Washington, DC 20460.

- *Hand Delivery:* EPA Docket Center, Public Reading Room, EPA Headquarters West Building, Room 3334, 1301 Constitution Ave., NW., Washington, DC. Such deliveries are only accepted during the Docket's normal hours of operation, and special arrangements should be made for deliveries of boxed information.

Instructions: Direct your comments identified by the Docket ID numbers for each item in the text. EPA's policy is that all comments received will be included in the public docket without change and may be made available online at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through <http://www.regulations.gov> or e-mail. The <http://www.regulations.gov> Web site is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through www.regulations.gov your e-mail address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket visit the EPA

Docket Center homepage at <http://www.epa.gov/epahome/dockets.htm>.

FOR FURTHER INFORMATION CONTACT:

Matthew Reed, Drinking Water Protection Division, Office of Ground Water and Drinking Water, (4606M), Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460; telephone number: 202-564-4719; e-mail address: reed.matthew@epa.gov.

SUPPLEMENTARY INFORMATION:

How can I access the docket and/or submit comments?

EPA has established a public docket for each of the ICRs identified in the ADDRESSES section, which are available for online viewing at <http://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/DC 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.

Use <http://www.regulations.gov> to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document.

What information is EPA particularly interested in?

Pursuant to section 3506(c)(2)(A) of the PRA, EPA specifically solicits comments and information to enable it to:

- (i) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility;
- (ii) evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- (iii) enhance the quality, utility, and clarity of the information to be collected; and
- (iv) minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of

information technology, e.g., permitting electronic submission of responses. In particular, EPA is requesting comments from small public water systems (those that serve less than 10,000 customers) on examples of specific additional efforts that EPA could make to reduce the paperwork burden for small public water systems affected by this collection. The small public water systems include community water systems, and non-transient non-community water systems such as schools and hospitals, in addition to transient non-community water systems such as restaurants and campgrounds.

What should I consider when I prepare my comments for EPA?

You may find the following suggestions helpful for preparing your comments:

1. Explain your views as clearly as possible and provide specific examples.
2. Describe any assumptions that you used.
3. Provide copies of any technical information and/or data you used that support your views.
4. If you estimate potential burden or costs, explain how you arrived at the estimate that you provide.
5. Offer alternative ways to improve the collection activity.
6. Make sure to submit your comments by the deadline identified under DATES.
7. To ensure proper receipt by EPA, be sure to identify the docket ID number assigned to this action in the subject line on the first page of your response. You may also provide the name, date, and **Federal Register** citation.

What information collection activity or ICR does this apply to?

Docket ID No. EPA-HQ-OW-2011-0439.

Affected entities: Entities potentially affected by this action are new and existing public water systems (PWS), primacy agencies, and EPA.

Title: Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules (Renewal).

ICR numbers: EPA ICR No. 1896.09, OMB Control No. 2040-0204.

ICR status: This ICR is currently scheduled to expire on December 31, 2011. An Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in title 40 of the CFR, after appearing in the **Federal Register** when approved, are listed in 40 CFR part 9, are displayed either by publication in the **Federal**

Register or by other appropriate means, such as on the related collection instrument or form, if applicable. The display of OMB control numbers in certain EPA regulations is consolidated in 40 CFR part 9.

Abstract: The Disinfectants/Disinfection Byproducts, Chemical and Radionuclides Rules ICR examines PWS, primacy agency and EPA burden and costs for recordkeeping and reporting requirements in support of the chemical drinking water regulations. These recordkeeping and reporting requirements are mandatory for compliance with 40 CFR parts 141 and 142. The following chemical regulations are included: Stage 1 Disinfectants and Disinfection Byproducts Rule (Stage 1 DBPR), Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR), Chemical Phase Rules (Phases II/IIB/V), 1976 Radionuclides Rule and 2000 Radionuclides Rule, Total Trihalomethanes (TTHM) Rule, Disinfectant Residual Monitoring and Associated Activities under the Surface Water Treatment Rule, Arsenic Rule, Lead and Copper Rule (LCR) and revisions. Future chemical-related rulemakings will be added to this consolidated ICR after the regulations are finalized and the initial, rule-specific, ICRs are due to expire.

Burden Statement: The annual public reporting and recordkeeping burden for this collection of information is estimated to average 0.40 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.

The ICR provides a detailed explanation of the Agency's estimate, which is only briefly summarized here:

Estimated total number of potential respondents: 246,048.

Frequency of response: varies by requirement (i.e., on occasion, monthly, quarterly, semi-annually, annually, biennially, and every 3, 6, and 9 years).

Estimated total average number of responses for each respondent: varies by requirement.

Estimated total annual burden hours: 6,987,131 hours.

Estimated total annualized capital/startup costs: \$6,918,000.

Estimated total annual maintenance and operational costs: \$203,672,204.

Are there changes in the estimates from the last approval?

There is no estimated increase or decrease of hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB.

What information collection activity or ICR does this apply to?

Docket ID No. EPA-HQ-OW-2011-0442.

Affected entities: Entities potentially affected by this action are new and existing public water systems (PWS), primacy agencies, and EPA.

Title: Microbial Rules (Renewal).

ICR numbers: EPA ICR No. 1895.07, OMB Control No. 2040-0205

ICR status: This ICR is currently scheduled to expire on April 30, 2012. An Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in title 40 of the CFR, after appearing in the **Federal Register** when approved, are listed in 40 CFR part 9, are displayed either by publication in the **Federal Register** or by other appropriate means, such as on the related collection instrument or form, if applicable. The display of OMB control numbers in certain EPA regulations is consolidated in 40 CFR part 9.

Abstract: The Microbial Rules Renewal ICR examines PWS, primacy agency and EPA burden and costs for recordkeeping and reporting requirements in support of the microbial drinking water regulations. These recordkeeping and reporting requirements are mandatory for compliance with 40 CFR parts 141 and 142. The following microbial regulations are included: Surface Water Treatment Rule (SWTR), Total Coliform Rule (TCR), Interim Enhanced Surface Water Treatment Rule (IESWTR), Filter Backwash Recycling Rule (FBRR), Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR), Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR), Ground Water Rule, and the Aircraft Drinking Water Rule. Although the Aircraft Drinking Water Rule has a stand-alone

ICR at this time, it is being included into the Microbial ICR due to the nature of information collected. The information collected for the Aircraft Drinking Water Rule is directly correlated to information collected under the Total Coliform Rule, and therefore is appropriate to be included in the Microbial ICR. Future microbial-related rulemakings will be added to this consolidated ICR after the regulations are finalized and the initial, rule-specific, ICRs are due to expire.

Burden Statement: The annual public reporting and recordkeeping burden for this collection of information is estimated to average 0.79 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.

The ICR provides a detailed explanation of the Agency's estimate, which is only briefly summarized here:

Estimated total number of potential respondents: 161,337.

Frequency of response: Varies by requirement (*i.e.*, on occasion, monthly, quarterly, semi-annually, and annually).

Estimated total average number of responses for each respondent: 72.

Estimated total annual burden hours: 9,172,188 hours.

Estimated total annualized capital/startup costs: \$32,888,601.

Estimated total annual maintenance and operational costs: \$88,222,000.

Are there changes in the estimates from the last approval?

There is an increase of 17,583 hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB. This increase reflects EPA's inclusion of the information collection requirements of the Aircraft Drinking Water Rule, which was previously a stand-alone ICR.

What information collection activity or ICR does this apply to?

Docket ID No. EPA-HQ-OW-2011-0443.

Affected entities: Entities potentially affected by this action are new and existing public water systems (PWS), primacy agencies, and EPA.

Title: Public Water System Supervision Program (Renewal).

ICR numbers: EPA ICR No. 0270.45, OMB Control No. 2040-0090.

ICR status: This ICR is currently scheduled to expire on March 31, 2012. An Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in title 40 of the CFR, after appearing in the **Federal Register** when approved, are listed in 40 CFR part 9, are displayed either by publication in the **Federal Register** or by other appropriate means, such as on the related collection instrument or form, if applicable. The display of OMB control numbers in certain EPA regulations is consolidated in 40 CFR part 9.

Abstract: The Public Water System Supervision (PWSS) Program Renewal ICR examines PWS, primacy agency, EPA, and tribal operator certification provider burden and costs for "cross-cutting" recordkeeping and reporting requirements (*i.e.*, the burden and costs for complying with drinking water information requirements that are not associated with contaminant-specific rulemakings). These activities which have record keeping and reporting requirements that are mandatory for compliance with 40 CFR parts 141 and 142 include the following: Consumer Confidence Reports (CCRs), Primacy Regulation Activities, Variance and Exemption Rule (V/E Rule), General State Primacy Activities, Public Notification (PN) and Proficiency Testing Studies for Drinking Water Laboratories. The information collection activities for both the Operator Certification/Expense Reimbursement Program and the Capacity Development Program are driven by the grant withholding and reporting provisions under Sections 1419 and 1420, respectively, of the Safe Drinking Water Act. Although the Tribal Operator Certification Program is voluntary, the information collection is driven by grant eligibility requirements outlined in the Drinking Water Infrastructure Grant Tribal Set-Aside Program Final Guidelines and the Tribal Drinking Water Operator Certification Program Guidelines.

Appendix B

Consumer Confidence Rule Spreadsheets

Exhibit 1
Number of Community Water Systems, Population Served, and Service Connections

Size Category	Community Water Systems (CWSs)				
	Number of Systems	Popul	Average Popul/Sys	Service Connections	Average SCon/Sys
500 & under	28,524	4,795,887	168	2,066,814	72
501 to 3,300	13,857	19,862,981	1,433	7,425,250	536
3,301 to 10,000	4,882	28,454,618	5,828	10,211,575	2,092
10,001 to 50,000	3,240	70,839,298	21,864	23,742,055	7,328
50,001 to 99,999	541	36,992,251	68,378	11,843,581	21,892
100,000 & over	416	136,679,431	328,556	38,233,405	91,907
Total	51,460	297,624,466	5,784	93,522,680	1,817

Source: SDWIS/FED Data from October 2010

Exhibit 2

Summary of CWSs and Service Connections

CWS Size Category (population served)	Number of CWSs	Number of Customers (service connections)
500 & under	28,524	2,066,814
501 to 3,300	13,857	7,425,250
3,301 to 10,000	4,882	10,211,575
10,001 to 50,000	3,240	23,742,055
50,001 to 99,999	541	11,843,581
100,000 & over	416	38,233,405
Totals	51,460	93,522,680

Source: SDWIS/FED Data from October 2010.

Note: As a conservative estimate, the number of customers receiving CCRs is assumed to be equal to the number of service connections (i.e., residents in high-rise living facilities are not assumed to receive individual CCRs from their PWSs, as they are assumed to not pay a separate water bill).

Exhibit 3

Report Delivery Costs (O&M Costs)

CWS Size Category (population served)	Standard O&M Cost Per Report [1]	Postage Per Report [2]	Total O&M Cost Per Report
500 & under	\$0.03	\$0.414	\$0.441
501 to 3,300	\$0.03	\$0.414	\$0.441
3,301 to 10,000	\$0.03	\$0.414	\$0.441
10,001 to 50,000	\$0.03	\$0.414	\$0.441
50,001 to 99,999	\$0.007	\$0.414	\$0.421
100,000 & over	\$0.007	\$0.414	\$0.421

Notes:

[1] Standard O&M cost per report includes the cost of paper, photocopying or printing, folding, and affixing labels.

[2] Postage per report based on bulk rates for delivery to customers. All other postage rates (e.g., for delivery of reports and certifications from CWSs to their State/Primacy Agency) assume the full postage rate for a first class letter, \$0.44.

Sources:

Standard O&M costs: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR and updated for inflation using CPI-U 1998 Annual Avg. to 2010 Annual Avg.)

Exhibit 4

Publication and Internet Access Costs (O&M Costs)

CWS Size Category (population served)	Publishing Cost Per Report	Internet Access Cost Per System [1]
500 & under	N/A	N/A
501 to 3,300	\$268	N/A
3,301 to 10,000	\$803	N/A
10,001 to 50,000	\$2,676	N/A
50,001 to 99,999	\$2,676	N/A
100,000 & over	\$2,676	\$67

Notes:

[1] Internet costs apply only to those systems not able to receive free internet access.

Sources:

Publishing cost per report: Average cost to publish report in a newspaper typical for each size system, based on consultations during development of the CCR Rule (carried forward from 1998 ICR and updated for inflation using CPI-U 1998 Annual Avg. to 2010 Annual Avg.)

Internet access cost per system: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR and updated for inflation using CPI-U 1998 Annual Avg. to 2010 Annual Avg.)

Exhibit 5

Annual Estimated Respondent Burden and Cost - Development of Consumer Confidence Report

Information Collection Activity	A	B	C=A*B	D	E=C*D	F	G=B*F	H	I=E+G+H
	Hours Per System	Number of CWSs (No. of Activities)	Annual Burden (hrs)	Labor Rate	Annual Labor Cost	O&M Cost Per Activity	Annual O&M Cost	Annual Capital Cost	Total Annual Cost
Prepare report									
500 & under	4	28,524	114,096	\$32.38	\$3,694,885	\$0.00	\$0	\$0	\$3,694,885
501 to 3,300	13	13,857	173,213	\$32.38	\$5,609,314	\$0.00	\$0	\$0	\$5,609,314
3,301 to 10,000	30	4,882	146,460	\$32.38	\$4,742,961	\$0.00	\$0	\$0	\$4,742,961
10,001 to 50,000	30	3,240	97,200	\$32.38	\$3,147,725	\$0.00	\$0	\$0	\$3,147,725
50,001 to 99,999	80	541	43,280	\$32.38	\$1,401,580	\$0.00	\$0	\$0	\$1,401,580
100,000 & over	160	416	66,560	\$32.38	\$2,155,479	\$0.00	\$0	\$0	\$2,155,479
Submit report, certify that report was distributed to customers, and certify that information is correct to the State/Primacy Agency.									
500 & under	0.5	28,524	14,262	\$32.38	\$461,861	\$0.47	\$13,314	\$0	\$475,174
501 to 3,300	0.5	13,857	6,929	\$32.38	\$224,373	\$0.47	\$6,468	\$0	\$230,840
3,301 to 10,000	0.5	4,882	2,441	\$32.38	\$79,049	\$0.47	\$2,279	\$0	\$81,328
10,001 to 50,000	0.5	3,240	1,620	\$32.38	\$52,462	\$0.47	\$1,512	\$0	\$53,974
50,001 to 99,999	0.5	541	271	\$32.38	\$8,760	\$0.45	\$242	\$0	\$9,002
100,000 & over	0.5	416	208	\$32.38	\$6,736	\$0.45	\$186	\$0	\$6,922
Storing and making available one copy of the report.									
500 & under	0.25	28,524	7,131	\$32.38	\$230,930	\$0.00	\$0	\$0	\$230,930
501 to 3,300	0.25	13,857	3,464	\$32.38	\$112,186	\$0.00	\$0	\$0	\$112,186
3,301 to 10,000	0.25	4,882	1,221	\$32.38	\$39,525	\$0.00	\$0	\$0	\$39,525
10,001 to 50,000	0.25	3,240	810	\$32.38	\$26,231	\$0.00	\$0	\$0	\$26,231
50,001 to 99,999	0.25	541	135	\$32.38	\$4,380	\$0.00	\$0	\$0	\$4,380
100,000 & over	0.25	416	104	\$32.38	\$3,368	\$0.00	\$0	\$0	\$3,368
Subtotals	N/A	154,380	679,404	N/A	\$22,001,803	N/A	\$24,000	\$0	\$22,025,803

Sources:

Hours per system: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR). Includes burden estimates from the August 2011 consultation with water industry representatives.

Number of CWSs: Exhibit 2

Labor Rates: \$2010 labor rate of \$20.24 was obtained from the National Occupational Employment and Wage Estimates, United States, BLS SOC Code 51-8031, "Local Government - Water and Liquid Waste Treatment Plant and System Operators". An overhead rate of 60 percent was applied, resulting in an hourly rate of \$32.38.

O&M Cost Per Activity: Exhibit 3

Capital Costs: All capital costs were incurred during the first 3-year ICR period.

Exhibit 6

Annual Estimated Respondent Burden and Cost - Delivery of Consumer Confidence Report

Information Collection Activity	A	B	C	D	E=B*D	F=A*E	G	H=F*G	I=C*D or B*D	J	K=I*J	L	M=H+K+L
	Hours Per System	Total Number of CWSs	Total Number of Service Connections	% CWSs Performing Activity	Number of CWS Activities	Annual Burden (hrs)	Labor Rate	Annual Labor Cost	Number of O&M Activities [1]	O&M Cost Per Activity	Annual O&M Cost	Annual Capital Cost	Total Annual Cost
Report Delivery - Systems Serving 500 or Fewer People													
Deliver as bill stuffer	10	28,524	2,066,814	50%	14,262	142,620	\$32.38	\$4,618,606	1,033,407	\$0.03	\$27,649	\$0	\$4,646,255
Post report	0.12	28,524	2,066,814	50%	14,262	1,711	\$32.38	\$55,423	14,262	\$0.03	\$382	\$0	\$55,805
Report Delivery - Systems Serving 501 to 3,300 People													
Deliver as bill stuffer	10	13,857	7,425,250	25%	3,464	34,643	\$32.38	\$1,121,863	1,856,313	\$0.03	\$49,666	\$0	\$1,171,529
Mail as separate item	10	13,857	7,425,250	25%	3,464	34,643	\$32.38	\$1,121,863	1,856,313	\$0.44	\$818,180	\$0	\$1,940,042
Publish notice of how to obtain CCR	0.25	13,857	7,425,250	50%	6,929	1,732	\$32.38	\$56,093	6,929	\$268	\$1,853,744	\$0	\$1,909,837
Report Delivery - Systems Serving 3,301 to 10,000 People													
Deliver as bill stuffer	10	4,882	10,211,575	25%	1,221	12,205	\$32.38	\$395,247	2,552,894	\$0.03	\$68,304	\$0	\$463,550
Mail as separate item	10	4,882	10,211,575	25%	1,221	12,205	\$32.38	\$395,247	2,552,894	\$0.44	\$1,125,202	\$0	\$1,520,448
Publish notice of how to obtain CCR	0.25	4,882	10,211,575	50%	2,441	610	\$32.38	\$19,762	2,441	\$803	\$1,959,293	\$0	\$1,979,056
Report Delivery - Systems Serving 10,001 to 50,000 People													
Deliver as bill stuffer	10	3,240	23,742,055	100%	3,240	32,400	\$32.38	\$1,049,242	23,742,055	\$0.03	\$635,227	\$0	\$1,684,468
Publish notice of how to obtain CCR	0.25	3,240	23,742,055	100%	3,240	810	\$32.38	\$26,231	3,240	\$2,676	\$8,668,729	\$0	\$8,694,960
Report Delivery - Systems Serving 50,001 to 99,999 People													
Deliver as bill stuffer	10	541	11,843,581	100%	541	5,410	\$32.38	\$175,197	11,843,581	\$0.007	\$79,220	\$0	\$254,417
Publish notice of how to obtain CCR	0.25	541	11,843,581	100%	541	135	\$32.38	\$4,380	541	\$2,676	\$1,447,464	\$0	\$1,451,844
Report Delivery - Systems Serving 100,000 or More People													
Deliver as bill stuffer	10	416	38,233,405	100%	416	4,160	\$32.38	\$134,717	38,233,405	\$0.007	\$255,737	\$0	\$390,454
Publish notice of how to obtain CCR	0.25	416	38,233,405	100%	416	104	\$32.38	\$3,368	416	\$2,676	\$1,113,022	\$0	\$1,116,390
Post on Public Internet Site-Systems with Free Internet Service	2	416	38,233,405	90%	374	749	\$32.38	\$24,249	374	\$0.00	\$0	\$0	\$24,249
Post on Public Internet Site-Systems Paying for Internet Service	0.50	416	38,233,405	10%	42	21	\$32.38	\$674	42	\$67	\$2,783	\$0	\$3,456
Subtotals	N/A	N/A	N/A	N/A	56,073	284,158	N/A	\$9,202,162	83,699,105	N/A	\$18,104,600	\$0	\$27,306,761

Notes:

[1] Number of O&M activities for delivery of report as bill stuffer or separate item based on the number of service connections, all other O&M activity numbers based on the number of CWSs.

Sources:

Hours per system: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR). Includes burden estimates from the August 2011 consultation with water industry representatives.

Number of CWSs and Service Connections: Exhibit 2

% CWSs Performing Activity: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR).

Labor Rates: \$2010 labor rate of \$20.24 was obtained from the National Occupational Employment and Wage Estimates, United States, BLS SOC Code 51-8031, "Local Government - Water and Liquid Waste Treatment Plant and System Operators". An overhead rate of 60 percent was applied, resulting in an hourly rate of \$32.38.

O&M Cost Per Activity: Exhibits 3 and 4

Capital Costs: All capital costs were incurred during the first 3-year ICR period.

Exhibit 7

Annual Estimated Respondent Burden and Cost - States/Primacy Agencies

Information Collection Activity	A	B	C	D	E=D*C	F=A*E	G	H=F*G	I	J	M=H+I+J
	Hours Per System	Number of Respondents	Total Number of CWSs	% CWSs Needing Assistance	Number of Activities	Annual Burden (hrs)	Labor Rate	Annual Labor Cost	Annual O&M Cost	Annual Capital Cost	Total Annual Cost
Assist in Preparation of Reports for Small CWSs											
Systems serving 500 or fewer	2	57	28,524	50%	14,262	28,524	\$43.79	\$1,249,123	\$0	\$0	\$1,249,123
Systems serving 501 - 3,300	2	57	13,857	50%	6,929	13,857	\$43.79	\$606,826	\$0	\$0	\$606,826
Systems serving 3,301 - 10,000	2	57	4,882	25%	1,221	2,441	\$43.79	\$106,896	\$0	\$0	\$106,896
State Recordkeeping											
Receive and review CWS reports	0.50	57	51,460	100%	51,460	25,730	\$43.79	\$1,126,768	\$0	\$0	\$1,126,768
File reports	0.10	57	51,460	100%	51,460	5,146	\$43.79	\$225,354	\$0	\$0	\$225,354
Totals	N/A	N/A	N/A	N/A	125,331	75,698	N/A	\$3,314,967	\$0	\$0	\$3,314,967

Sources:

Hours per system: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR). Includes burden estimates from the August 2011 consultation with water industry representatives.

Number of CWSs: Exhibit 2

% CWSs Needing Assistance: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR).

Labor Rates: \$2010 labor rate of \$27.37 was obtained from National Occupational Employment and Wage Estimates, United States, BLS SOC Code 19-2041, "State Government - Environmental Scientists and Specialists, Including Health." An overhead rate of 60 percent was applied, resulting in an hourly rate of \$43.79.

O&M Cost: States/Primacy Agencies are assumed to incur negligible O&M costs.

Capital Costs: All capital costs were incurred during the first 3-year ICR period.

Exhibit 8

Summary of CCR Burden and Costs

Respondent	A	B	C=B/A	D	E	F	G=D+E+F	H=G/A	I	J=G/I
	Annual Respondents	Annual Burden (hrs)	Average Burden (hrs/respondent)	Annual Labor Cost	Annual O&M Cost	Annual Capital/Startup Cost	Total Annual Cost	Average Annual Cost Per Respondent	Annual Responses	Average Annual Cost Per Response
CWSs	51,460	963,561	19	\$31,203,965	\$18,128,600	\$0	\$49,332,564	\$959	210,453	\$234
States/Primacy Agencies	57	75,698	1,328	\$3,314,967	\$0	\$0	\$3,314,967	\$58,157	125,331	\$26

Sources: Derived from Exhibits 1-7.

Exhibit 9

Consumer Confidence Reports - Summary of Original and Revised Burden Estimates

Burden for Development of Consumer Confidence Report		
2008 Burden (hours)	Task	Revised Burden
18.5	Prepare report (system size 3,301-9,999)	30 hours
23	Prepare report (system size ≥10,000)	30 hours (10,000-49,999) 80 hours (50,000-99,999) 160 hours (≥100K)
0.12	Submit report, certify that report was distributed to customers, and certify that information is correct to the State/Primacy Agency.	0.5 hours
Burden for Delivery of Consumer Confidence Report		
2008 Burden (hours)	Task	Revised Burden
1	Deliver as a bill stuffer	10 hours
1	Mail as separate item (system size 501-9,999)	10 hours
0.5	Post on Public Internet Site (system size ≥100,000)	2 hours
State Burden		
2008 Burden (hours)	Task	Revised Burden
4	Assist in preparation of reports for small CWSs (system size ≤9,999)	2 hours
0.2	State Recordkeeping - Receive and Review CWS reports	0.5 hours

Appendix C

Variations and Exemptions Spreadsheets

Exhibit 1
Variances and Exemptions PWS Burden & Costs

Task	Number of Systems Applying A	Burden per Application (hours) B	Labor Rate (\$/hr) C	Total Burden (hours) D=A*B	Total Costs (\$) E=C*D
Complete variance application with help	18	3	\$32.38	54	\$1,748.74
Notify persons served of variance application	45	2	\$32.38	90	\$2,914.56
Complete financial analysis without help	25	10	\$32.38	250	\$8,096.00
Complete variance application without help	25	24	\$32.38	600	\$19,430.40
Complete exemption application with help	134	3	\$32.38	402	\$13,018.37
Complete application to extend exemption with help	100	1.5	\$32.38	150	\$4,857.60
Notify persons served of exemption application	286	2	\$32.38	572	\$18,523.65
Complete financial analysis of exemption without help	152	10	\$32.38	1,520	\$49,223.68
Complete exemption application without help	152	24	\$32.38	3,648	\$118,136.83
Complete financial analysis to extend exemption without help	134	5	\$32.38	670	\$21,697.28
Complete application to extend exemption without help	88	12	\$32.38	1,056	\$34,197.50
Notify persons served of exemption application (for systems >3,300)	27	2	\$32.38	54	\$1,748.74
Totals	286			9,066	\$293,593.34

[A] Number of systems applying for variances carried forward from the 1998 ICR for the V&E rule. Data for exemptions derived from April 2008 EPA data on total number of actual exemptions applied for under the Arsenic Rule (286 systems). Number of systems completing each task above was based on percentages of 1998 inventory of systems (411 systems in total) completing each task in the 1998 ICR.

[B] Burden for both variances and exemptions carried forward from 1998 ICR for the V&E rule.

[C] From 2010 BLS SOC Code 51-8031, "Local Government - Water and Liquid Waste Treatment Plant and System Operators" (using 2010 dollars).

Exhibit 2
Variances and Exemptions Primacy Burden and Costs

Task	Number of Systems Applying	Burden per Application (hours)	Labor Rate (\$/hr)	Total Burden (hours)	Total Costs (\$)
	A	B	C	D = A*B	E = C*D
Evaluate variance application	45.45	40	\$43.79	1,818	\$79,613.86
Evaluate ensuing exemption applications	286	20	\$43.79	5,720	\$250,490.24
Complete financial analysis of variance for systems	21	10	\$43.79	210	\$9,196.32
Assist systems to complete variance application	21	18	\$43.79	378	\$16,553.38
Construct a compliance schedule for variance for which compliance alternative found	30	24	\$43.79	720	\$31,530.24
Write terms of small system variance to ensure enforceability	13	24	\$43.79	312	\$13,663.10
Notify administrator of proposed variances	18	1	\$43.79	18	\$788.26
Respond to administrator's objections	5.25	24	\$43.79	126	\$5,517.79
Provide public notice and public hearing	13.5	24	\$43.79	324	\$14,188.61
Enforce compliance schedule and report progress	108	6	\$43.79	648	\$28,377.22
File management for variances	108	0.5	\$43.79	54	\$2,364.77
Five year review	24	12	\$43.79	288	\$12,612.10
Complete financial analysis of exemption for system	134	10	\$43.79	1,340	\$58,681.28
Assist systems to complete exemption application	134	18	\$43.79	2,412	\$105,626.30
Create compliance schedule for exemption for which compliance alternative is found	132	24	\$43.79	3,168	\$138,733.06
Create compliance schedule for each exemption granted	154	24	\$43.79	3,696	\$161,855.23
Notify administrator of proposed exemptions	154	1	\$43.79	154	\$6,743.97
Respond to administrator's objections	19	24	\$43.79	456	\$19,969.15
Provide public notice and public hearing	154	24	\$43.79	3,696	\$161,855.23
Enforce compliance schedule and report progress	286	6	\$43.79	1,716	\$75,147.07
File management for exemptions	286	0.5	\$43.79	143	\$6,262.26
Quarterly variances and exemptions report (number of states)	57	208	\$43.79	11,856	\$519,197.95
Rule training (staff per year receiving training)	18.4	80	\$43.79	1,472	\$64,461.82
Management (number of states)	57	208	\$43.79	11,856	\$519,197.95
Supervision (number of states)	57	208	\$43.79	11,856	\$519,197.95
Clerical support (number of states)	57	208	\$43.79	11,856	\$519,197.95
Total				76,293	3,341,023

[A] Number of systems applying for variances carried forward from the 1998 ICR for the V&E rule. Data for exemptions derived from April 2008 EPA data on total number of actual exemptions applied for under the Arsenic Rule (286 systems). Number of systems completing each task above was based on percentages of 1998 inventory of systems (411 systems in total) completing each task in the 1998 ICR.

[B] Burden carried forward from 1998 ICR.

[C] From 2010 BLS SOC Code 19-2041, "State Government - Environmental Scientists and Specialists, Including Health" (using 2010 dollars).

Exhibit 3
Variances and Exemptions - Three Year Total

	Year 1	Year 2	Year 3	Totals	Average
PWS					
Burden (hrs)	9,066	9,066	9,066	27,198	9066
Respondents	519	519	519	1,557	519
Responses	286	286	286	858	286
Costs (2010\$)	\$293,593	\$293,593	\$293,593	\$880,780	\$293,593
Primacy Agency					
Burden (hrs)	76,293	76,293	76,293	228,879	76,293
Respondents	57	57	57	57	57
Responses	2,393	2,393	2,393	7,178	2,393
Costs (2010\$)	\$3,341,023	\$3,341,023	\$3,341,023	\$10,023,069	\$3,341,023

Exhibit 4
Variances and Exemptions - Summary of Original and Revised
Burden Estimates

No changes in burden estimates based on August 2011 consultations.

Appendix D

Capacity Development Spreadsheets

Exhibit 1
Assumptions for Capacity Development Burden Per System

	Hours per System	FTEs per System	Number of Systems per Year	Total FTEs per Year	
Program for New Systems					
1	Applying for approval	40	0.019	456	8.8
2	Improving capacity for approval	40	0.019	91	1.8
Strategy for Existing Systems					
3	Cooperation with state strategy	8	0.004	13,653	52.5
Additional Program for New Systems Assumptions					
Number of new systems per state per year:				8	
Percentage of new systems that are denied initial approval and therefore must submit supplemental materials:				20%	
Additional Strategy for Existing Systems Assumptions					
Percentage of all CWSs that will participate in state strategy each year:				20%	
Percentage of all TNCWSs that will participate in state strategy each year:				2.5%	
Percentage of all NTNCWSs that will participate in state strategy each year:				7%	
Total Number of Systems affected during April 1, 2012 to March 31, 2015:				40,960	
Other Assumptions					
Cost of one system FTE:				\$67,359	
Number of hours/year/FTE:				2,080	

**Exhibit 2
Assumptions for Capacity Development Burden Per State**

Program for New Systems												
	Activity	Hours per System	FTEs per System	Number of Systems	Percent of States	Hours	in FTEs	Percent of States	Hours	in FTEs	Total FTEs	FTEs per State
Annual Burden												
1	Approval of systems	100	0.0481	456							21.9231	0.3846
2	Improving capacity for approval	8	0.0038	91							0.3508	0.0062
	Subtotal										22.2738	0.3908
Strategy for Existing Systems												
Annual Burden												
3	Implementing strategy	4	0.0019	13,653							26.2563	0.4606
	Subtotal										26.2563	0.4606
4	SNC list with reasons (every 3 years)				0%	24	0.0115				0.0000	0.0000
5	Submittal of report to the Governor on the progress and success of strategy (every 3 years)				33%	40	0.0192				0.3653	0.0064
	Subtotal										0.3653	0.0064
All Programs												
6	Documentation of program performance to EPA				100%	40	0.0192				1.0962	0.0192
	Subtotal										1.0962	0.0192
Additional Program for New Systems Assumptions												
Number of new systems per state per year:											8	
Percentage of new systems that are denied initial approval and therefore must submit supplemental materials:											20%	
Additional Strategy for Existing Systems Assumptions												
Percentage of all CWSs that will participate in state strategy each year:											20%	
Percentage of all TNCWSs that will participate in state strategy each year:											2.5%	
Percentage of all NTNCWSs that will participate in state strategy each year:											7%	
Other Assumptions												
Annual cost of state FTE:											\$91,087	
Number of hours/year/FTE:											2080	

**Exhibit 3
Capacity Development Burden Estimate**

	Annual FTEs	Annual Hours	Cost (Labor)
PWS			
New Systems: Applying for Approval	8.8	18,240	\$590,684
New Systems: Improving Capacity for Approval	1.8	3,648	\$118,137
Existing Systems: Cooperation with State Strategy	52.5	109,226	\$3,537,175
TOTAL		131,114	\$4,245,996
State			
New System Capacity: Approval of Systems	21.9	45,600	\$1,996,915
New System Capacity: Improving Capacity for Approval	0.4	730	\$31,951
Existing Systems: Implementing Strategy	26.3	54,613	\$2,391,612
Existing Systems: SNC List with Reasons	0.0	0	\$0
Existing Systems: Report to Governor	0.4	760	\$33,279
Other State Burden: Documentation of Program Performance to EPA	1.1	2,280	\$99,846
TOTAL		103,983	\$4,553,603

Exhibit 4
**Capacity Development Program - Summary of Original
and Revised Burden Estimates**

Capacity Development Burden Per System		
2008 Burden (Hours)	Task	Revised Burden
20	Improving capacity for approval	40 hours

Appendix E

General Primacy Spreadsheets

**Exhibit 1
Costs for General Primacy Activities**

Line Item FTE Activities	State Workload Estimates				
	Apr. 2012 - Mar. 2013	Apr. 2013 - Mar. 2014	Apr. 2014 - Mar. 2015	Total	Average
I. MANAGEMENT, ADMINSTRATIVE, & STAFF					
A. Grant Submittals	\$ 2,595,989.76	\$ 2,595,989.76	\$ 2,595,989.76	\$ 7,787,969.28	\$ 2,595,989.76
B. File Management	\$ 2,595,989.76	\$ 2,595,989.76	\$ 2,595,989.76	\$ 7,787,969.28	\$ 2,595,989.76
II. DATA MANAGEMENT AND SUPPORT					
A. Maintain Data System	\$ 2,595,989.76	\$ 2,595,989.76	\$ 2,595,989.76	\$ 7,787,969.28	\$ 2,595,989.76
B. Prepare and Submit Monthly Violation Reports	\$ 2,595,989.76	\$ 2,595,989.76	\$ 2,595,989.76	\$ 7,787,969.28	\$ 2,595,989.76
C. Laboratory Certification	\$ 1,817,192.83	\$ 1,817,192.83	\$ 1,817,192.83	\$ 5,451,578.50	\$ 1,817,192.83
III. PROGRAM IMPLEMENTATION					
A. Technical Activity					
1. Review Plans for Major Projects					
a. Systems >10,000	\$ 778,796.93	\$ 778,796.93	\$ 778,796.93	\$ 2,336,390.78	\$ 778,796.93
b. Systems 3,301 - 10,000	\$ 1,038,395.90	\$ 1,038,395.90	\$ 1,038,395.90	\$ 3,115,187.71	\$ 1,038,395.90
c. Systems ≤3,300	\$ 12,979,948.80	\$ 12,979,948.80	\$ 12,979,948.80	\$ 38,939,846.40	\$ 12,979,948.80
2. Review Plans for Minor Projects					
a. Systems >500	\$ 2,595,989.76	\$ 2,595,989.76	\$ 2,595,989.76	\$ 7,787,969.28	\$ 2,595,989.76
b. Systems ≤500	\$ 6,489,974.40	\$ 6,489,974.40	\$ 6,489,974.40	\$ 19,469,923.20	\$ 6,489,974.40
3. Routine Inspections	\$ 2,076,791.81	\$ 2,076,791.81	\$ 2,076,791.81	\$ 6,230,375.42	\$ 2,076,791.81
B. Compliance/Monitoring					
1. Violations Response					
a. Issuing Notices of Violation/Ensuring Public Notification	\$ 5,763,097.27	\$ 5,763,097.27	\$ 5,763,097.27	\$ 17,289,291.80	\$ 5,763,097.27
Subtotal Cost For State Workload	\$ 43,924,146.74	\$ 43,924,146.74	\$ 43,924,146.74	\$131,772,440.22	\$ 43,924,146.74
Supervision (10 staff : 1 supervisor)	\$ 4,392,414.67	\$ 4,392,414.67	\$ 4,392,414.67	\$ 13,177,244.02	\$ 4,392,414.67
Rule Training (5 days per FTE)	\$ 844,695.13	\$ 844,695.13	\$ 844,695.13	\$ 2,534,085.39	\$ 844,695.13
Clerical (10 staff : 1 clerical)	\$ 4,392,414.67	\$ 4,392,414.67	\$ 4,392,414.67	\$ 13,177,244.02	\$ 4,392,414.67
Ongoing Training (5 days per FTE) ¹	\$ 844,695.13	\$ 844,695.13	\$ 844,695.13	\$ 2,534,085.39	\$ 844,695.13
Total Cost For State Workload	\$ 54,398,366.35	\$ 54,398,366.35	\$ 54,398,366.35	\$163,195,099.04	\$ 54,398,366.35
Total Cost For Purchases of Services					
Total Cost For State (including Purchases of Services)	\$ 54,398,366.35	\$ 54,398,366.35	\$ 54,398,366.35	\$163,195,099.04	\$ 54,398,366.35

¹ Ongoing Training includes attending professional conferences, attending classes for skills such as public speaking in seminars such as employee health and well being and stress management.and computers, and participating in seminars such as employee health and well being and stress management.

**Exhibit 2
FTEs for General Primacy Activities**

General Modeling Assumptions	Values
Total number of systems	152,979 systems
Number of systems ≤ 3,300	143,647 systems
Number of systems > 3,300	9,332 systems
Number of entities (includes States, territories, or Tribes)	57 entities
Avg Annual Salary (including benefits & overhead)	\$ 91,087 per year
Avg hours worked (1 FTE)	2,080 hours per year

Line Item FTE Activities	State Workload Estimates				
	Apr. 2012 - Mar. 2013	Apr. 2013 - Mar. 2014	Apr. 2014 - Mar. 2015	Total	Average
I. MANAGEMENT, ADMINSTRATIVE, & STAFF					
A. Grant Submittals	28.5	28.5	28.5	85.5	28.5
B. File Management	28.5	28.5	28.5	85.5	28.5
II. DATA MANAGEMENT AND SUPPORT					
A. Maintain Data System	28.5	28.5	28.5	85.5	28.5
B. Prepare and Submit Monthly Violation Reports	28.5	28.5	28.5	85.5	28.5
C. Laboratory Certification	20.0	20.0	20.0	59.9	20.0
III. PROGRAM IMPLEMENTATION					
A. Technical Activity					
1. Review Plans for Major Projects					
a. Systems >10,000	8.6	8.6	8.6	25.7	8.6
b. Systems 3,301 - 10,000	11.4	11.4	11.4	34.2	11.4
c. Systems ≤3,300	142.5	142.5	142.5	427.5	142.5
2. Review Plans for Minor Projects					
a. Systems >500	28.5	28.5	28.5	85.5	28.5
b. Systems ≤500	71.3	71.3	71.3	213.8	71.3
3. Routine Inspections	22.8	22.8	22.8	68.4	22.8
B. Compliance/Monitoring					
1. Violations Response					
a. Issuing Notices of Violation/Ensuring Public Notification	63.3	63.3	63.3	189.8	63.3
FTE Subtotal	482.2	482.2	482.2	1,446.7	482.2
Supervision (10 staff : 1 supervisor)	48.2	48.2	48.2	144.7	48.2
Rule Training (5 days per FTE)	9.3	9.3	9.3	27.8	9.3
Clerical (10 staff : 1 clerical)	48.2	48.2	48.2	144.7	48.2
Ongoing Training (5 days per FTE) ¹	9.3	9.3	9.3	27.8	9.3
FTE Total	597.2	597.2	597.2	1,791.6	597.2
Total Cost For State Workload	\$ 54,398,366	\$ 54,398,366	\$ 54,398,366	\$ 163,195,099	\$ 54,398,366
Total Cost For Purchases of Services				\$ -	\$ -
Total Cost For State (including Purchases of Services)	\$ 54,398,366	\$ 54,398,366	\$ 54,398,366	\$ 163,195,099	\$ 54,398,366
Total Labor Hours for State Workload	1,242,199	1,242,199	1,242,199	3,726,596	1,242,199

¹ Ongoing training includes attending professional conferences, attending classes for skills such as public speaking and computers, and participating in seminars such as employee health and well being and stress management.

**Exhibit 3
Hours for General Primacy Activities**

General Modeling Assumptions	Values
Total number of systems	152,979 systems
Number of systems ≤ 3,300	143,647 systems
Number of systems > 3,300	9,332 systems
Number of entities (includes States, territories, or Tribes)	57 entities
Avg Annual Salary (including benefits & overhead)	\$ 91,087 per year
Avg hours worked (1 FTE)	2,080 hours per year

Line Item FTE Activities	State Workload Estimates				
	Apr. 2012 - Mar. 2013	Apr. 2013 - Mar. 2014	Apr. 2014 - Mar. 2015	Total	Average
I. MANAGEMENT, ADMINSTRATIVE, & STAFF					
A. Grant Submittals	59,280	59,280	59,280	177,840	59,280
B. File Management	59,280	59,280	59,280	177,840	59,280
II. DATA MANAGEMENT AND SUPPORT					
A. Maintain Data System	59,280	59,280	59,280	177,840	59,280
B. Prepare and Submit Monthly Violation Reports	59,280	59,280	59,280	177,840	59,280
C. Laboratory Certification	41,496	41,496	41,496	124,488	41,496
III. PROGRAM IMPLEMENTATION					
A. Technical Activity					
1. Review Plans for Major Projects					
a. Systems >10,000	17,784	17,784	17,784	53,352	17,784
b. Systems 3,301 - 10,000	23,712	23,712	23,712	71,136	23,712
c. Systems ≤3,300	296,400	296,400	296,400	889,200	296,400
2. Review Plans for Minor Projects					
a. Systems >500	59,280	59,280	59,280	177,840	59,280
b. Systems ≤500	148,200	148,200	148,200	444,600	148,200
3. Routine Inspections	47,424	47,424	47,424	142,272	47,424
B. Compliance/Monitoring					
1. Violations Response					
a. Issuing Notices of Violation/Ensuring Public Notification	131,602	131,602	131,602	394,805	131,602
Hours Subtotal	1,003,018	1,003,018	1,003,018	3,009,053	1,003,018
Supervision (10 staff : 1 supervisor)	100,302	100,302	100,302	300,905	100,302
Rule Training (5 days per FTE)	19,289	19,289	19,289	57,866	19,289
Clerical (10 staff : 1 clerical)	100,302	100,302	100,302	300,905	100,302
Ongoing Training (5 days per FTE) ¹	19,289	19,289	19,289	57,866	19,289
Hours Total	1,242,199	1,242,199	1,242,199	3,726,596	1,242,199

¹ Ongoing Training includes attending professional conferences, attending classes for skills such as public speaking and computers, and participating in seminars such as employee health and well being and stress management

Exhibit 4

General Primacy Activities (States only) - Summary of Original and Revised Burden Estimates

No changes in burden estimates based on August 2011 Consultations.

Appendix F

Public Notification Rule Spreadsheets

Exhibit 1
Public Water System Inventory

System Category	Population Served	Number of Systems	Average Service Connections/System
CWS	≤500	28,524	72
	501-3,300	13,857	536
	3,301-10,000	4,882	2,092
	10,001-100,000	3,784	9,419
	>100,000	413	92,440
Total		51,460	1,817
NTNCWS	≤500	15,559	6
	501-3,300	2,584	20
	3,301-10,000	132	132
	10,001-100,000	19	43
	>100,000	1	2,181
Total		18,295	9
TNCWS	≤500	80,440	8
	501-3,300	2,683	36
	3,301-10,000	89	41
	10,001-100,000	11	8
	>100,000	1	2
Total		83,224	9

Source: SDWIS/FED Data from October 2010.

Exhibit 2

Derivation of Annual Tier 1 Violation Estimates for Existing Rules

System Category	Population Served	Acute TCR MCL A	TCR Confirmation Sample B	Nitrates, Nitrites, N+N MCL C	Nitrate Special Notices (NCWSs) D=(C)*10%	Nitrate/Nitrite Conf. Sample E	Tier 1 SWTR TT F	IESWTR & LT1 Elevated Single Exceedances G	Outbreaks/Emergencies H	Stage 1 Chlorine Dioxide MRDL I	GWR Triggered Monitoring Sample is Positive (Estimate) J	Total Tier 1 Violations K=Sum (A-J)
CWS	≤500	179	339	347	N/A	1	12	0.85	4.25	-	122	1,006
	501-3,300	62	54	134	N/A	1	2	2.00	0.50	1	59	316
	3,301-10k	14	26	10	N/A	-	1	0.40	0.13	-	30	81
	10,001-100k	17	13	10	N/A	-	0	0.90	0.25	-	46	88
	>100k	2	2	-	N/A	-	0	0.55	0.13	-	6	11
Subtotal		274	434	501	-	2	16	4.70	5.26	1	264	1,502
NTNCWS	≤500	74	110	171	17	7	1	0.30	0.13	-	52	432
	501-3,300	13	8	19	2	1	0	0.20	0.13	-	10	53
	3,301-10k	2	-	-	-	-	-	-	-	-	1	3
	10,001-100k	-	1	-	-	-	-	-	-	-	0	1
	>100k	-	-	-	-	-	-	-	-	-	-	-
Subtotal		89	119	190	19	8	1	0.50	0.26	-	62	489
TNCWS	≤500	363	765	526	53	28	3	0.30	5.38	-	383	2,126
	501-3,300	15	24	14	1	5	0	-	-	-	13	72
	3,301-10k	-	-	-	-	-	-	-	-	-	0	0
	10,001-100k	-	-	-	-	-	-	-	-	-	0	0
	>100k	-	-	-	-	-	-	-	-	-	-	-
Subtotal		378	789	540	54	33	3	0.30	5.38	-	396	2,199
Total for All Systems		741	1,342	1,231	73	43	20	5.50	10.90	1	723	4,190

Sources: (A-C, E-G, I) SDWIS FY 2010 October.

(D) Number of nitrate special notices for NCWSs (10% of nitrate MCL violations) based on EPA estimate (carried forward from previous ICR).

(F) Assumes 5 % of all SWTR TT single exceedance violations are elevated to Tier 1 based on EPA estimate (carried forward from previous ICR). Because data are not available for SWTR single exceedance, EPA assumes 5% of all SWTR TT violations (vcode 41) are elevated to Tier 1.

(G) IESWTR & LT1 elevated single exceedance is equal to 5% of violations for 'Treatment Technique Exceeds Turb 1 NTU.'

(H) Estimate of waterborne disease outbreaks/emergencies from biennial "Surveillance for Waterborne Disease Outbreaks – United States" reports prepared by the Center for Disease Control (CDC).

(J) From GWR model, the number of entry points estimated to test positive for fecal indicators.

Notes: Detail may not add to totals due to rounding.

Note that burden for public notification associated with the Aircraft Drinking Water Rule is not included here but is addressed in the model for that rule in the Microbial ICR.

Exhibit 3

Derivation of Annual Tier 2 Violation Estimates for Existing Rules

System Category	Population Served	MCL Violations						TT Violations						M/R Violations	Other	Total Tier 2 (All Types)	
		Rads A	Monthly TCR B	Stage 1 C	Stage 2 Estimate D	Arsenic E	All Others (SOCs, VOCs, and other IOCs) F	SWTR Failure to Filter G	SWTR Other TT Tier 2 H	IESWTR & LT1 I	LT2 Estimate J	Stage 1 K	LCR L	GWR M	Total Tier 2 N=(Tier 3 M/R)*5%	Stage 1 MRDL O	P=Sum(A-O)
CWS	≤500	621	1,641	709	12	1,139	255	327	229	68	1.7	195	536	16	1,363	2	7,115
	501-3,300	298	512	1,039	28	473	84	121	47	120	1.8	110	152	6	393	1	3,385
	3,301-10k	59	252	368	57	219	13	11	12	33	0.9	64	36	4	137	-	1,266
	10,001-100k	77	234	107	282	70	7	5	6	74	1.3	25	16	-	131	-	1,035
	>100k	4	4	1	73	-	5	-	1	25	0.4	1	1	-	22	-	137
Subtotal		1,059	2,643	2,224	452	1,901	364	464	295	320	6.2	395	741	26	2,046	3	12,939
NTNCWS	≤500	9	866	180	-	458	53	6	23	16	1.1	40	455	16	870	-	2,992
	501-3,300	-	126	32	-	66	7	4	2	4	0.2	8	59	2	110	-	420
	3,301-10k	-	9	4	-	4	-	-	-	-	-	-	3	-	10	-	30
	10,001-100k	-	1	-	-	-	-	-	-	-	-	-	-	-	5	-	6
	>100k	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal		9	1,002	216	-	528	60	10	25	20	1.2	48	517	18	995	-	3,449
TNCWS	≤500	N/A	4,006	7	-	11	8	84	53	43	1.5	14	26	59	1,049	N/A	5,362
	501-3,300	N/A	118	N/A	-	N/A	N/A	2	1	2	0.1	N/A	3	1	31	N/A	158
	3,301-10k	N/A	2	N/A	-	N/A	N/A	1	-	-	0.005	N/A	N/A	-	2	N/A	5
	10,001-100k	N/A	-	N/A	-	N/A	N/A	-	-	-	-	N/A	N/A	-	-	N/A	-
	>100k	N/A	-	N/A	-	N/A	N/A	-	-	-	-	N/A	N/A	-	-	N/A	-
Subtotal		-	4,126	7	-	11	8	87	54	45	2	14	29	60	1,082	-	5,524
Total for All Systems		1,068	7,771	2,447	452	2,440	432	561	373	385	9	457	1,287	104	4,123	3	21,912

Sources: (A-C, E-G, I, K-L, O) SDWIS FY 2010 October.

(D) Compliance data for the Stage 2 DBPR are not yet available. EPA therefore made a conservative assumption that the number of Stage 2 violations was equal to the predicted number of operational evaluations from Exhibit 14 of the Stage 2 DBPR ICR model (only CWSs are assumed to undergo these evaluations).

(H) Assumes 5% of SWTR TT violations (vcode 41) are elevated to Tier 1 and 95% remain in Tier 2, based on EPA estimate.

(I) Assumes 5% of IESWTR and LT1 violations for 'Treatment Technique Exceeds Turb 1 NTU' are elevated to Tier 1 and 95% remain in Tier 2, based on EPA estimate.

(J) Compliance data for the LT2ESWTR are not yet available. EPA therefore estimated the number of LT2 violations based on the number of plants installing treatment in the LT2ESWTR ICR and 2010 violation rates for the SWTR, IESWTR, and LT1ESTWTR.

(N) Includes failure to take corrective action and failure to maintain 4-log inactivation when required to do so. From Exhibit 6.

(O) Tier 3 violations elevated to Tier 2 (5% of all M/R violations) based on EPA estimate (carried forward from previous ICR).

Notes: Detail may not add to totals due to rounding.

Exhibit 4

Derivation of Annual Tier 3 Violation Estimates for Existing Rules

System Category	Violation Data														System Data		
	Population Served	TCR M/R A	SWTR M/R B	IESWTR & LT1 M/R C	LT2 M/R Estimate D	Stage 1 M/R E	Stage 2 M/R Estimate F	Nitrates M/R G	Arsenic M/R H	Rads I	LCR M/R J	SOCs, VOCs, and other IOCs K	GWR L	Total M/R Violations M=SUM(A-L)	Total Tier 3 N=M*95	SDWIS Total Number of Systems w/Tier 3 M/R O	M/R Total P
CWS	≤500	4,889	515	190	4	1,886	125	1,047	375	828	5,023	12,168	215	27,265	25,902	9,320	9,320
	501-3,300	1,268	237	148	5	996	216	323	149	223	1,378	2,880	29	7,852	7,459	3,370	3,370
	3,301-10k	266	73	51	3	302	28	93	54	76	364	1,426	11	2,747	2,609	1,013	1,013
	10,001-100k	105	17	19	2	230	14	82	25	44	255	1,819	14	2,626	2,495	646	646
	>100k	9	6	5	2	14	2	9	11	2	19	352	1	432	410	65	65
Subtotal	6,537	848	413	15	3,428	385	1,554	614	1,173	7,039	18,645	270	40,921	38,875	14,414	14,414	
NTNCWS	≤500	1,729	24	12	1	397	-	499	176	10	2,613	11,842	91	17,394	16,525	4,422	4,422
	501-3,300	216	15	6	1	141	-	100	29	6	440	1,238	18	2,210	2,099	748	748
	3,301-10k	32	1	-	0	20	-	13	4	-	15	111	-	196	186	59	59
	10,001-100k	-	-	-	-	5	-	2	3	-	2	93	-	105	100	9	9
	>100k	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	1,977	40	18	2	563	-	614	212	16	3,070	13,284	109	19,905	18,910	5,238	5,238	
TNCWS	≤500	14,083	295	82	6	35	4	4,762	43	12	250	831	582	20,985	19,936	14,314	14,314
	501-3,300	373	12	5	1	1	-	144	1	N/A	10	64	10	621	590	418	418
	3,301-10k	13	6	10	0	N/A	-	2	N/A	N/A	N/A	N/A	-	31	30	15	15
	10,001-100k	-	-	-	-	N/A	-	-	N/A	N/A	N/A	N/A	-	-	-	-	-
	>100k	-	-	-	-	N/A	-	-	N/A	N/A	N/A	N/A	-	-	-	-	-
Subtotal	14,469	313	97	7	36	4	4,908	44	12	260	895	592	21,637	20,555	14,747	14,747	
Total for All Systems	22,983	1,201	528	24	4,027	389	7,076	870	1,201	10,369	32,824	971	82,463	78,340	34,399	34,399	

Sources: (A-C, E, G-K, O) SDWIS FY 2010 October.

(D) Compliance data for the LT2ESWTR are not yet available. EPA therefore estimated the number of LT2 violations based on the number of plants installing treatment in the LT2ESWTR ICR and 2010 violation rates for the SWTR, IESWTR, and LT1ESTWTR.

(F) Compliance monitoring violation data for Stage 2 DBPR are not yet available. EPA therefore assumes that the number of monitoring violations will be equal to the number of monitoring violations associated with the initial distribution system evaluation for FY 2010 according to SDWIS (note that the initial distribution system evaluation is now complete).

(L) From Exhibit 6.

(N) Tier 3 violations elevated to Tier 2 (5% of all M/R violations) based on EPA estimate (carried forward from previous ICR).

(O) Burden for distributing notice of Tier 3 violations is calculated on a per-system basis since multiple violations at one system are likely to be reported in a single report. Note that this number may be an overestimate, as SDWIS does not adjust its count for systems that have violations of more than one rule.

Notes: Detail may not add to totals due to rounding.

No data were available on systems with fluoride SMCL exceedances or systems required to report availability of unregulated contaminant monitoring results. These systems are assumed to be included in systems with Tier 3 violations.

Exhibit 5

Summary of Annual Violation Estimates for Existing Rules

System Category	Population Served	Total Violations - Year 1 (April 1, 2012 - March 31, 2013)			Total Violations - Year 2 (April 1, 2013 - March 31, 2014)			Total Violations - Year 3 (April 1, 2014 - March 31, 2015)			Annual Average Violations		
		Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3
CWS	≤500	1,006	7,115	25,902	1,006	7,115	25,902	1,006	7,115	25,902	1,006	7,115	25,902
	501-3,300	316	3,385	7,459	316	3,385	7,459	316	3,385	7,459	316	3,385	7,459
	3,301-10k	81	1,266	2,609	81	1,266	2,609	81	1,266	2,609	81	1,266	2,609
	10,001-100k	88	1,035	2,495	88	1,035	2,495	88	1,035	2,495	88	1,035	2,495
	>100k	11	137	410	11	137	410	11	137	410	11	137	410
Subtotal		1,502	12,939	38,875	1,502	12,939	38,875	1,502	12,939	38,875	1,502	12,939	38,875
NTNCWS	≤500	432	2,992	16,525	432	2,992	16,525	432	2,992	16,525	432	2,992	16,525
	501-3,300	53	420	2,099	53	420	2,099	53	420	2,099	53	420	2,099
	3,301-10k	3	30	186	3	30	186	3	30	186	3	30	186
	10,001-100k	1	6	100	1	6	100	1	6	100	1	6	100
	>100k	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal		489	3,449	18,910	489	3,449	18,910	489	3,449	18,910	489	3,449	18,910
TNCWS	≤500	2,126	5,362	19,936	2,126	5,362	19,936	2,126	5,362	19,936	2,126	5,362	19,936
	501-3,300	72	158	590	72	158	590	72	158	590	72	158	590
	3,301-10k	0	5	30	0	5	30	0	5	30	0	5	30
	10,001-100k	0	-	-	0	-	-	0	-	-	0	-	-
	>100k	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal		2,199	5,524	20,555	2,199	5,524	20,555	2,199	5,524	20,555	2,199	5,524	20,555
Total for All Systems		4,190	21,912	78,340	4,190	21,912	78,340	4,190	21,912	78,340	4,190	21,912	78,340

Sources: Existing Violations Tables (Exhibits E.2, E.3, and E.4).

Notes: Detail may not add to totals due to rounding.

Annual average violations represent total from all years divided by the period covered by this ICR (i.e., sum of violations for years 1 to 3/3 years).

**Exhibit 6
Derivation of GWR Violation Estimates**

System Category	Population Served	Total Systems A	Tier 1	Tier 2		Tier 3	
			Triggered Source Water Monitoring Sample is Positive B	Failure to Take Corrective Action C	Failure to Maintain 4-Log Treatment of Viruses D	Triggered Source Water Monitoring E	Monitoring to Demonstrate Compliance with 4-Log Treatment Requirement F
CWS	≤500	25,420	122	5	11	123	92
	501-3,300	10,427	59	0	6	19	10
	3,301-10k	3,108	30	1	3	7	4
	10,001-100k	1,853	46	0	0	14	0
	>100k	109	6	0	0	1	0
Subtotal		40,918	264	6	20	164	106
NTNCWS	≤500	15,038	52	0	16	42	49
	501-3,300	2,423	10	0	2	6	12
	3,301-10k	103	1	0	0	0	0
	10,001-100k	12	0	0	0	0	0
	>100k	-	-	0	0	0	0
Subtotal		17,576	62	-	18	48	61
TNCWS	≤500	78,596	383	2	57	343	239
	501-3,300	2,533	13	0	1	8	2
	3,301-10k	66	0	0	0	0	0
	10,001-100k	9	0	0	0	0	0
	>100k	-	-	0	0	0	0
Subtotal		81,204	396	2	58	351	241
Total for All Systems		139,698	723	8	96	563	408

Sources: (A) Ground water system inventories for CWSs, NTNCWSs, and TNCWSs: SDWIS FY 2010 October.
 (B) Microbial Rules ICR, Exhibit G.3 (Ground Water Rule ICR model) (entry points).
 (C)-(G) SDWIS FY 2010 October.

Exhibit 7
PN RULE ANNUAL ESTIMATED RESPONDENT BURDEN & COST (PWS BURDEN) - PREPARATION OF NOTICES

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$32.38 per hour	Capital/Startup Costs per Activity	O&M Costs per Activity	Number of Responses or Activities	Total Hours per Year	Labor Costs per Year	Capital/SU/O&M Costs per Year
Preparation of Notice							
TIER 1 - Preparation							
	A	B	C	D	E=A*D	F=\$32.38*E	G
CWS							
Systems serving ≤500	15.0	\$ -	\$ -	1,006	15,083	\$ 488,433	\$ -
Systems serving 501 - 3,300	15.0	\$ -	\$ -	316	4,743	\$ 153,584	\$ -
Systems serving 3,301 - 10,000	15.0	\$ -	\$ -	81	1,221	\$ 39,549	\$ -
Systems serving 10,001 - 100,000	30.0	\$ -	\$ -	88	2,626	\$ 85,036	\$ -
Systems serving over 100,000	30.0	\$ -	\$ -	11	329	\$ 10,666	\$ -
NTNCWS							
Systems serving ≤500	15.0	\$ -	\$ -	432	6,483	\$ 209,960	\$ -
Systems serving 501 - 3,300	15.0	\$ -	\$ -	53	802	\$ 25,959	\$ -
Systems serving 3,301 - 10,000	15.0	\$ -	\$ -	3	40	\$ 1,283	\$ -
Systems serving 10,001 - 100,000	30.0	\$ -	\$ -	1	33	\$ 1,056	\$ -
Systems serving over 100,000	30.0	\$ -	\$ -	-	-	\$ -	\$ -
TNCWS							
Systems serving ≤500	15.0	\$ -	\$ -	2,126	31,888	\$ 1,032,666	\$ -
Systems serving 501 - 3,300	15.0	\$ -	\$ -	72	1,085	\$ 35,152	\$ -
Systems serving 3,301 - 10,000	15.0	\$ -	\$ -	0	7	\$ 228	\$ -
Systems serving 10,001 - 100,000	30.0	\$ -	\$ -	0	2	\$ 71	\$ -
Systems serving over 100,000	30.0	\$ -	\$ -	-	-	\$ -	\$ -
TIER 2 - Preparation							
CWS							
Systems serving ≤500	3.5	\$ -	\$ -	7,115	24,903	\$ 806,451	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	3,385	11,847	\$ 383,663	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	1,266	4,432	\$ 143,517	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	1,035	3,624	\$ 117,357	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	137	481	\$ 15,579	\$ -
NTNCWS							
Systems serving ≤500	3.5	\$ -	\$ -	2,992	10,473	\$ 339,160	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	420	1,471	\$ 47,644	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	30	104	\$ 3,378	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	6	22	\$ 708	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
TNCWS							
Systems serving ≤500	3.5	\$ -	\$ -	5,362	18,766	\$ 607,716	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	158	553	\$ 17,914	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	5	16	\$ 517	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
TIER 3 - Preparation							
CWS							
Systems serving ≤500	2.0	\$ -	\$ -	9,320	18,640	\$ 603,638	\$ -
Systems serving 501 - 3,300	2.0	\$ -	\$ -	3,370	6,740	\$ 218,268	\$ -
Systems serving 3,301 - 10,000	2.0	\$ -	\$ -	1,013	2,026	\$ 65,610	\$ -
Systems serving 10,001 - 100,000	2.0	\$ -	\$ -	646	1,292	\$ 41,840	\$ -
Systems serving over 100,000	2.0	\$ -	\$ -	65	130	\$ 4,210	\$ -
NTNCWS							
Systems serving ≤500	3.5	\$ -	\$ -	4,422	15,477	\$ 501,207	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	748	2,618	\$ 84,781	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	59	207	\$ 6,687	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	9	32	\$ 1,020	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
TNCWS							
Systems serving ≤500	3.5	\$ -	\$ -	14,314	50,099	\$ 1,622,406	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	418	1,463	\$ 47,378	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	15	53	\$ 1,700	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
TOTAL - Preparation							
Total CWS							
Systems serving ≤500				17,441	58,625	\$ 1,898,522	\$ -
Systems serving 501 - 3,300				7,071	23,330	\$ 755,515	\$ -
Systems serving 3,301 - 10,000				2,361	7,679	\$ 248,676	\$ -
Systems serving 10,001 - 100,000				1,769	7,542	\$ 244,233	\$ -

PN RULE ANNUAL ESTIMATED RESPONDENT BURDEN & COST (PWS BURDEN) - PREPARATION OF NOTICES

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$32.38 per hour	Capital/ Startup Costs per Activity	O&M Costs per Activity	Number of Responses or Activities	Total Hours per Year	Labor Costs per Year	Capital/SU/ O&M Costs per Year
Systems serving over 100,000				213	940	\$ 30,454	\$ -
TOTAL				28,855	98,116	\$ 3,177,400	\$ -
Total NTNCWS							
Systems serving ≤500				7,847	32,434	\$ 1,050,328	\$ -
Systems serving 501 - 3,300				1,222	4,891	\$ 158,385	\$ -
Systems serving 3,301 - 10,000				91	350	\$ 11,349	\$ -
Systems serving 10,001 - 100,000				16	86	\$ 2,784	\$ -
Systems serving over 100,000				-	-	\$ -	\$ -
TOTAL				9,176	37,761	\$ 1,222,845	\$ -
Total TNCWS							
Systems serving ≤500				21,802	100,753	\$ 3,262,788	\$ -
Systems serving 501 - 3,300				648	3,102	\$ 100,443	\$ -
Systems serving 3,301 - 10,000				20	76	\$ 2,446	\$ -
Systems serving 10,001 - 100,000				0	2	\$ 71	\$ -
Systems serving over 100,000				-	-	\$ -	\$ -
TOTAL				22,470	103,932	\$ 3,365,747	\$ -
TOTAL				60,501	239,810	\$ 7,765,993	\$ -

Note: Detail may not add to totals due to rounding.

Tier 3 response rate uses number of systems in violation rather than number of violations.

To account for cases where systems will not be able to use the CCR template and additional burden will be incurred by systems, assume 50% of systems use CCR (1 hrs burden) and 50% of systems are not able to use the template (3 hrs burden).

Exhibit 8
PN RULE ANNUAL ESTIMATED RESPONDENT BURDEN & COST (PWS BURDEN) - DISTRIBUTION OF NOTICES

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$32.38 per hour	Capital/Startup Costs per Activity	Avg. O&M Costs per Activity	Service Connections per System	Number of Responses or Activities	Total Hours per Year	Labor Costs per Year	Capital/SU/O&M Costs per Year
Distribution of Notice								
TIER 1 - Distribution								
	A	B	C	D	E	F=A*E	G=\$32.38*F	H=C*D*E
CWS								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	72	1,006	12,066	\$ 390,746	\$ 4,152
Systems serving 501 - 3,300 (Mass Media)	12	\$ -	\$ -	536	316	3,794	\$ 122,867	\$ -
Systems serving 3,301 - 10,000 (Mass Media)	12	\$ -	\$ -	2,092	81	977	\$ 31,639	\$ -
Systems serving 10,001 - 100,000 (Mass Media)	12	\$ -	\$ -	9,419	88	1,050	\$ 34,015	\$ -
Systems serving over 100,000 (Mass Media)	12	\$ -	\$ -	92,440	11	132	\$ 4,266	\$ -
NTNCWS								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	6	432	5,187	\$ 167,968	\$ 140
Systems serving 501 - 3,300 (Posting and mass media)	12	\$ -	\$ -	20	53	641	\$ 20,767	\$ -
Systems serving 3,301 - 10,000 (Posting and mass media)	12	\$ -	\$ -	132	3	32	\$ 1,027	\$ -
Systems serving 10,001 - 100,000 (Posting and mass media)	12	\$ -	\$ -	43	1	13	\$ 422	\$ -
Systems serving over 100,000 (Posting and mass media)	12	\$ -	\$ -	2,181	0	0	\$ -	\$ -
TNCWS								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	8	2,126	25,511	\$ 826,133	\$ 982
Systems serving 501 - 3,300 (Posting and mass media)	12	\$ -	\$ -	36	72	868	\$ 28,121	\$ -
Systems serving 3,301 - 10,000 (Posting and mass media)	12	\$ -	\$ -	41	0	6	\$ 183	\$ -
Systems serving 10,001 - 100,000 (Posting and mass media)	12	\$ -	\$ -	8	0	1	\$ 28	\$ -
Systems serving over 100,000 (Posting and mass media)	12	\$ -	\$ -	2	0	0	\$ -	\$ -
TIER 2 - Distribution								
CWS								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	72	7,115	64,036	\$ 2,073,732	\$ 29,378
Systems serving 501 - 3,300 (Mail or Bill Stuffer)	30	\$ -	\$ 0.28	536	3,385	101,548	\$ 3,288,542	\$ 502,397
Systems serving 3,301 - 10,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.28	2,092	1,266	37,986	\$ 1,230,145	\$ 733,589
Systems serving 10,001 - 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.25	9,419	1,035	31,062	\$ 1,005,917	\$ 2,392,533
Systems serving over 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.25	92,440	137	4,123	\$ 133,531	\$ 3,116,961
NTNCWS								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	6	2,992	26,931	\$ 872,126	\$ 971
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	20	420	3,783	\$ 122,614	\$ 489
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	132	30	268	\$ 8,686	\$ 224
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	43	6	56	\$ 1,822	\$ 7
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	2,181	0	0	\$ -	\$ -
TNCWS								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	8	5,362	48,255	\$ 1,562,697	\$ 2,476
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	36	158	1,422	\$ 46,064	\$ 325
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	41	5	41	\$ 1,330	\$ 11
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	8	0	0	\$ -	\$ -
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	2	0	0	\$ -	\$ -
TIER 3 - Distribution								
CWS								
Systems serving ≤500 (Posting and Hand delivery)	9	\$ -	\$ 0.06	72	9,320	83,880	\$ 2,716,370	\$ 38,482
Systems serving 501 - 3,300 (CCR and mail)	5	\$ -	\$ 0.14	536	3,370	16,850	\$ 545,670	\$ 250,089
Systems serving 3,301 - 10,000 (CCR and mail)	5	\$ -	\$ 0.14	2,092	1,013	5,065	\$ 164,025	\$ 293,446
Systems serving 10,001 - 100,000 (CCR)	4	\$ -	\$ -	9,419	646	2,584	\$ 83,680	\$ -
Systems serving over 100,000 (CCR)	4	\$ -	\$ -	92,440	65	260	\$ 8,420	\$ -
NTNCWS								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	6	4,422	39,798	\$ 1,288,818	\$ 1,434
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	20	748	6,732	\$ 218,009	\$ 870
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	132	59	531	\$ 17,196	\$ 444
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	43	9	81	\$ 2,623	\$ 10
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	2,181	0	0	\$ -	\$ -
TNCWS								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	8	14,314	128,826	\$ 4,171,901	\$ 6,610
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	36	418	3,762	\$ 121,829	\$ 860
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	41	15	135	\$ 4,372	\$ 35
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	8	0	0	\$ -	\$ -
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	2	0	0	\$ -	\$ -
TOTAL - Distribution								
CWS								
Systems serving ≤500					17,441	159,982	\$ 5,180,848	\$ 72,011
Systems serving 501 - 3,300					7,071	122,192	\$ 3,957,080	\$ 752,487
Systems serving 3,301 - 10,000					2,361	44,028	\$ 1,425,809	\$ 1,027,035
Systems serving 10,001 - 100,000					1,769	34,697	\$ 1,123,611	\$ 2,392,533
Systems serving over 100,000					213	4,515	\$ 146,217	\$ 3,116,961
TOTAL					28,855	365,414	\$ 11,833,565	\$ 7,361,027
NTNCWS								
Systems serving ≤500					7,847	71,916	\$ 2,328,912	\$ 2,545
Systems serving 501 - 3,300					1,222	11,156	\$ 361,290	\$ 1,359
Systems serving 3,301 - 10,000					91	831	\$ 26,909	\$ 668
Systems serving 10,001 - 100,000					16	150	\$ 4,867	\$ 17
Systems serving over 100,000					0	0	\$ -	\$ -
TOTAL					9,176	84,053	\$ 2,721,979	\$ 4,589
TNCWS								
Systems serving ≤500					21,802	202,592	\$ 6,560,731	\$ 10,067
Systems serving 501 - 3,300					648	6,053	\$ 196,013	\$ 1,186
Systems serving 3,301 - 10,000					20	182	\$ 5,884	\$ 45
Systems serving 10,001 - 100,000					0	1	\$ 28	\$ -
Systems serving over 100,000					0	0	\$ -	\$ -
TOTAL					22,470	208,827	\$ 6,762,658	\$ 11,298
TOTAL					60,501	658,294	\$ 21,318,202	\$ 7,376,914

Note: Detail may not add to totals due to rounding.

Tier 3 response rate uses number of systems in violation.

The number of service connections per system is used to approximate the number of billing customers; this number may be an underestimate as it does not account for billing customers who do not have service connections (e.g., customers in apartment buildings).

Exhibit 9
PN RULE ANNUAL ESTIMATED RESPONDENT BURDEN & COST (PWS BURDEN) - PREPARATION AND DISTRIBUTION OF REPEAT NOTICES

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$32.38 per hour	Capital/Startup Costs per Activity	Avg. O&M Costs per Activity	Service Connections per System	Number of Responses or Activities	Total Hours per Year	Labor Costs per Year	Capital/SU/O&M Costs per Year
DEVELOPMENT AND DISTRIBUTION OF REPEAT PUBLIC NOTIFICATION								
Preparation of Repeat Notice								
TIER 1 - Preparation								
	A	B	C	D	E	F=A*E	G=\$32.38*F	H
CWS - Nitrates								
Systems serving ≤500	3.00	\$ -	\$ -	N/A	1,044	3,132	\$ 101,427	\$ -
Systems serving 501 - 3,300	3.00	\$ -	\$ -	N/A	167	501	\$ 16,224	\$ -
Systems serving 3,301 - 10,000	3.00	\$ -	\$ -	N/A	10	30	\$ 972	\$ -
Systems serving 10,001 - 100,000	3.00	\$ -	\$ -	N/A	10	30	\$ 972	\$ -
Systems serving over 100,000	3.00	\$ -	\$ -	N/A	0	0	\$ -	\$ -
TIER 2 - Preparation								
CWS - Coliform								
Systems serving ≤500	3.00	\$ -	\$ -	N/A	651	1,954	\$ 63,275	\$ -
Systems serving 501 - 3,300	3.00	\$ -	\$ -	N/A	-	-	\$ -	\$ -
Systems serving 3,301 - 10,000	3.00	\$ -	\$ -	N/A	-	-	\$ -	\$ -
Systems serving 10,001 - 100,000	3.00	\$ -	\$ -	N/A	-	-	\$ -	\$ -
Systems serving over 100,000	3.00	\$ -	\$ -	N/A	-	-	\$ -	\$ -
CWS - MCLs and TTs, not NO₃ or Coliform								
Systems serving ≤500	3.00	\$ -	\$ -	N/A	4,016	12,047	\$ 390,120	\$ -
Systems serving 501 - 3,300	3.00	\$ -	\$ -	N/A	1,175	3,525	\$ 114,167	\$ -
Systems serving 3,301 - 10,000	3.00	\$ -	\$ -	N/A	429	1,286	\$ 41,640	\$ -
Systems serving 10,001 - 100,000	3.00	\$ -	\$ -	N/A	349	1,046	\$ 33,863	\$ -
Systems serving over 100,000	3.00	\$ -	\$ -	N/A	44	131	\$ 4,232	\$ -
TOTAL - Preparation of Repeat Notice								
Total CWS								
Systems serving ≤500					5,711	17,133	\$ 554,822	\$ -
Systems serving 501 - 3,300					1,342	4,026	\$ 130,392	\$ -
Systems serving 3,301 - 10,000					439	1,316	\$ 42,612	\$ -
Systems serving 10,001 - 100,000					359	1,076	\$ 34,834	\$ -
Systems serving over 100,000					44	131	\$ 4,232	\$ -
TOTAL					7,894	23,681	\$ 766,891	\$ -
Distribution of Repeat Notice								
TIER 1 - Distribution								
CWS - Nitrate								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	72	1,044	12,528	\$ 405,707	\$ 4,311
Systems serving 501 - 3,300 (Mass Media)	12	\$ -	\$ -	536	167	2,004	\$ 64,898	\$ -
Systems serving 3,301 - 10,000 (Mass Media)	12	\$ -	\$ -	2,092	10	120	\$ 3,886	\$ -
Systems serving 10,001 - 100,000 (Mass Media)	12	\$ -	\$ -	9,419	10	120	\$ 3,886	\$ -
Systems serving over 100,000 (Mass Media)	12	\$ -	\$ -	92,440	0	0	\$ -	\$ -
TIER 2 - Distribution								
CWS - Coliform								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	72	651	5,862	\$ 189,825	\$ 2,689
Systems serving 501 - 3,300 (Mail or Bill Stuffer)	30	\$ -	\$ 0.28	536	-	-	\$ -	\$ -
Systems serving 3,301 - 10,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.28	2,092	-	-	\$ -	\$ -
Systems serving 10,001 - 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.25	9,419	-	-	\$ -	\$ -
Systems serving over 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.25	92,440	-	-	\$ -	\$ -
CWS - MCLs and TTs, not NO₃ or Coliform								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	72	4,016	36,140	\$ 1,170,359	\$ 16,580
Systems serving 501 - 3,300 (Mail or Bill Stuffer)	30	\$ -	\$ 0.28	536	1,175	35,254	\$ 1,141,672	\$ 174,415
Systems serving 3,301 - 10,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.28	2,092	429	12,858	\$ 416,405	\$ 248,321
Systems serving 10,001 - 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.25	9,419	349	10,457	\$ 338,628	\$ 805,412
Systems serving over 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.25	92,440	44	1,307	\$ 42,321	\$ 987,881
TOTAL - Distribution of Repeat Notice								
Total CWS								
Systems serving ≤500					5,711	54,530	\$ 1,765,891	\$ 23,580
Systems serving 501 - 3,300					1,342	37,258	\$ 1,206,569	\$ 174,415
Systems serving 3,301 - 10,000					439	12,978	\$ 420,291	\$ 248,321
Systems serving 10,001 - 100,000					359	10,577	\$ 342,514	\$ 805,412
Systems serving over 100,000					44	1,307	\$ 42,321	\$ 987,881
TOTAL					7,894	116,650	\$ 3,777,586	\$ 2,239,610
Preparation and Distribution of Repeat Notice								
Total CWS								
Systems serving ≤500					11,422	71,662	\$ 2,320,713	\$ 23,580
Systems serving 501 - 3,300					2,684	41,285	\$ 1,336,961	\$ 174,415
Systems serving 3,301 - 10,000					877	14,294	\$ 462,903	\$ 248,321
Systems serving 10,001 - 100,000					717	11,652	\$ 377,348	\$ 805,412
Systems serving over 100,000					87	1,438	\$ 46,553	\$ 987,881
TOTAL					15,787	140,331	\$ 4,544,478	\$ 2,239,610

Note: Detail may not add to totals due to rounding.
 EPA assumes that coliform violations in systems serving more than 500 people will be resolved prior to the deadline for repeat notice.
 EPA assumes repeat notices will be required for 40% of MCL violations for radionuclides, Stage 1, Stage 2, arsenic, IOCs, SOCs, and VOCs, as well as for 40% of TT violations for SWTR failure to filter, Stage 1, lead and copper, and the ground water rule.

Exhibit 10

PN RULE ANNUAL ESTIMATED RESPONDENT BURDEN & COST (PWS BURDEN) - TOTAL BURDEN SUMMARY

INFORMATION COLLECTION ACTIVITY	Number of Responses or Activities	Total Hours per Year	Labor Costs per Year	Capital/SU/ O&M Costs per Year
TOTAL BURDEN SUMMARY				
Total CWS				
Systems serving ≤500	46,303	290,269	\$ 9,400,083	\$ 95,591
Systems serving 501 - 3,300	16,827	186,807	\$ 6,049,556	\$ 926,902
Systems serving 3,301 - 10,000	5,598	66,001	\$ 2,137,388	\$ 1,275,356
Systems serving 10,001 - 100,000	4,255	53,891	\$ 1,745,193	\$ 3,197,945
Systems serving over 100,000	514	6,893	\$ 223,224	\$ 4,104,842
TOTAL	73,497	603,861	\$ 19,555,444	\$ 9,600,637
Total NTNCWS				
Systems serving ≤500	15,693	104,349	\$ 3,379,240	\$ 2,545
Systems serving 501 - 3,300	2,444	16,047	\$ 519,675	\$ 1,359
Systems serving 3,301 - 10,000	183	1,181	\$ 38,258	\$ 668
Systems serving 10,001 - 100,000	33	236	\$ 7,652	\$ 17
Systems serving over 100,000	0	0	\$ -	\$ -
TOTAL	18,352	121,814	\$ 3,944,824	\$ 4,589
Total TNCWS				
Systems serving ≤500	43,603	303,345	\$ 9,823,519	\$ 10,067
Systems serving 501 - 3,300	1,297	9,154	\$ 296,456	\$ 1,186
Systems serving 3,301 - 10,000	40	257	\$ 8,330	\$ 45
Systems serving 10,001 - 100,000	0	3	\$ 99	\$ -
Systems serving over 100,000	0	0	\$ -	\$ -
TOTAL	44,940	312,760	\$ 10,128,405	\$ 11,298
TOTAL	136,789	1,038,435	\$ 33,628,673	\$ 9,616,523

Note: Detail may not add to totals due to rounding.

Exhibit 11

PN RULE ANNUAL ESTIMATED PRIMACY AGENCY BURDEN & COST - TOTAL BURDEN SUMMARY

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$43.79 per hour	Capital/ Startup Costs per Activity	Avg. O&M Costs per Activity	Number of Responses or Activities	Total Hours per Year	Labor Costs per Year	Capital/SU/ O&M Costs per Year
TOTAL BURDEN SUMMARY							
Total Primacy Agencies							
Consultation: Tier 1	3.0	\$ -	\$ -	4,190	12,569	\$ 550,437	\$ -
Consultation: Tier 2	1.1	\$ -	\$ -	21,912	24,103	\$ 1,055,532	\$ -
Consultation: Tier 3	0.5	\$ -	\$ -	78,340	39,170	\$ 1,715,339	\$ -
Receive/Review PN Certification	0.2	\$ -	\$ -	104,442	20,888	\$ 914,746	\$ -
File Reports	0.1	\$ -	\$ -	104,442	10,444	\$ 457,373	\$ -
TOTAL				313,326	107,175	\$ 4,693,427	\$ -

Source: Burden estimate carried forward from previous ICR.

Note: Detail may not add to totals due to rounding.

Exhibit 12
Public Notification Rule - Summary of Original and Revised Burden
Estimates

PN Rule Burden - PWS (Preparation of Notice)		
2008 Burden (hours)	Task	Revised Burden
8.5	TIER 1 - Preparation (system size ≤10,000)	15 hours
10	TIER 1 - Preparation (system size >10,000)	30 hours
1	TIER 3 - Preparation (CWSs)	3 hours
PN Rule Burden - PWS (Distribution of Notices)		
2008 Burden (hours)	Task	Revised Burden
0	TIER 3 - Distribution	4 hours
PN Rule Burden - PWS (Preparation and Distribution of Repeat Notices)		
Preparation of Repeat Notice		
2008 Burden (hours)	Task	Revised Burden
0.33	TIER 1 - Preparation	3 hours
0.33	TIER 2 - Preparation	3 hours
Primacy Agency Burden		
2008 Burden (hours)	Task	Revised Burden
0.1	Consultation: Tier 3	0.5 hours

Appendix G

Operator Certification Spreadsheets

Exhibit 1
Number of Public Water Systems by System Type and Size Category
[Source: SDWIS/FED Data from October 2010]

	Community Water Systems (CWSs)						Nontransient Noncommunity Water Systems (NTNCWSs)						Transient Noncommunity Water Systems (TNCWSs)						
	500 &	501-	3,301-	10,001-	Over		500 &	501-	3,301-	10,001-	Over		500 &	501-	3,301-	10,001-	Over		
	Under	3,300	10,000	50,000	50,000	Total	Under	3,300	10,000	50,000	50,000	Total	Under	3,300	10,000	50,000	50,000	Total	
National																			
Total	28,524	13,857	4,882	3,240	957	51,460	15,559	2,584	132	18	2	18,295	80,440	2,683	89	8	4	83,224	

Exhibit 2

STATE WORKLOAD ASSUMPTIONS FOR OPERATOR CERTIFICATION

Operator Certification Program					
	Percent of States	Time per State		Total FTEs	FTEs per State
		in hours	in FTEs*		
Annual Burden					
Submittal to EPA	100%	16	0.008	0.40	0.008
Report on status of implementation	100%	16	0.008		
Document any changes to the program	0%	0	0.000		
AGs certification	0%	0	0.000		
Expense Reimbursement Grants Program					
	Percent of States	Time per State		Total FTEs	FTEs per State
		in hours	in FTEs*		
Annual Burden					
Submittal to EPA (i.e., progress report)		560	0.269	7.88	0.15
Amend workplan/describe proposed uses of next allotment (A)	0%	32	0.015	0.00	
Document actual uses of previous FY's allotment (B)	67%	8	0.004	0.13	
Administer grant (C)	60%	520	0.250	7.75	

*Number of hours in 1 FTE

2,080 hours per year

Percentages of states completing tasks based on discussion with expense reimbursement grant personnel at EPA. Note that the expense reimbursement grant program will end in December 2012.

(A) Assumes 0% of states will seek changes or extensions to their existing grants as the grants program ends during year 1 of this ICR analysis period.

(B) 21 states are assumed to have completed administering grants as of August 2011, and the remaining 31 states have grants in place. Thus 31 states are assumed to document use of their grant allotment during the first year of this ICR period. Additionally, 4 states are assumed to have exhausted their grants since the 2008 OMB Approved ICR, resulting in a total of 35 of 52 states that are assumed to document use of their grant allotment during the first year of this ICR period.

(C) 21 of 52 states have completed administering grants as of August 2011. Therefore, 31 of 52 states are expected to administer grants during this ICR period. Note, 52 states is based on the 50 states plus Puerto Rico and the U.S. Virgin Islands.

Exhibit 3

ASSUMPTIONS FOR OPERATOR CERTIFICATION BURDEN PER SYSTEM

System Activities	Systems Serving ≤3,300					Systems Serving >3,301					Total Burden		Avg Burden/System	
	Time per Operator (hours)	Number of Operators	Total FTEs	Other Costs (per operator)	Total Cost	Time per Operator (hours)	Number of Operators	Total FTEs	Other Costs (per operator)	Total Cost	Total FTEs	Total Cost	FTEs	Cost
Annual burden														
Maintain/renew certification														
Paid	16.00	7,917	60.90	\$700	\$4,102,282.41	16.00	6,154	47.34	\$700	\$3,188,658	108.24	\$7,290,941	0.00	\$105
Unpaid	16.00	5,655	43.50	n/a	\$0.00						43.50	\$0	0.00	\$0
Subtotal	n/a	13,572	104.40	\$700	\$4,102,282	16.00	6,154	47.34	\$700	\$3,188,658	151.74	\$7,290,941	0.00	\$105
Roundtrip Travel (@ \$0.51/mile)*	n/a	0	n/a	\$204	\$0	n/a	0	n/a	\$255	\$0		\$0	n/a	\$0
Lodging & Meals (paid only)*	n/a	0	n/a	\$500	\$0	n/a	0	n/a	\$500	\$0		\$0	n/a	\$0
Fees (renewal)	n/a	13,572	n/a	\$100	\$1,357,231	n/a	6,154	n/a	\$100	\$615,400		\$1,972,631	n/a	\$28
Cost of Course	n/a	13,572	n/a	\$600	\$8,143,388	n/a	6,154	n/a	\$600	\$3,692,400		\$11,835,788	n/a	\$170
					\$9,500,619					\$4,307,800		\$13,808,419	n/a	\$198
Subtotal for all 2 activities			104.40		\$13,602,902			47.34		\$7,496,458	151.74	\$21,099,360	0.00	\$302
Circuit Rider	0.00	550	0.00	n/a	\$0						0.00	\$0	0.00	\$0
Annual Burden Subtotal			104.40		\$13,602,902			47.34		\$7,496,458	151.74	\$21,099,360		

*EPA assumed that renewal certifications will be pursued via web-based training. Therefore, no travel, lodging/meal expenses are incurred by operators.

Exhibit 4
Inputs for Operator Certification and Expense Reimbursement Grants Program

General Modeling Assumptions	Values
Total number of PWS	152,979 systems
Number of PWS \leq 3,300	143,647 systems
Number of PWS $>$ 3,300	9,332 systems
Total number of CWS/NTNCWS	69,755 systems
Number of CWS/NTNCWS \leq 3,300	60,524 systems
Number of CWS/NTNCWS $>$ 3,300	9,231 systems
Avg hourly rate \leq 3,300 (including benefits & overhead)	\$32.38 per hour
Avg hourly rate $>$ 3,300 (including benefits & overhead)	\$32.38 per hour
Avg annual salary \leq 3,300 (including benefits & overhead)	\$67,359 per year
Avg annual salary $>$ 3,300 (including benefits & overhead)	\$67,359 per year
Avg hourly rate State employee (including benefits & overhead)	\$43.79 per hour
Avg annual salary State employee (including benefits & overhead)	\$91,087 per year
Number of hours in 1 FTE	2,080 hours per year
Number of FTE hours/day	8 hours per day
Number of systems per circuit rider	9 systems
Number of hours per system per year (circuit riders)	225 hours

Exhibit 5

Average Annual Burden and Cost to States for the Operator Certification and Expense Reimbursement Grants Program									
Line Item FTE Activities	Annual FTE Estimates			Total Estimated Burden			Average Annual Estimate		
	April 2012 - March 2013	April 2013 - March 2014	April 2014 - March 2015	FTEs	Hours	Dollars	FTEs	Hours	Dollars
Operator Certification									
Annual Burden									
11 Submittal to EPA	0.40	0.40	0.40	1.20	2,496	\$109,305	0.40	832	\$36,435
<i>Annual Burden Subtotal</i>	<i>0.40</i>	<i>0.40</i>	<i>0.40</i>	<i>1.20</i>	<i>2,496</i>	<i>\$109,305</i>	<i>0.40</i>	<i>832</i>	<i>\$36,435</i>
Operator Certification Subtotal	0.40	0.40	0.40	1.20	2,496	\$109,305	0.40	832	\$36,435
Expense Reimbursement Grants Program									
Annual Burden									
17 Submittal to EPA (i.e., work plan)	3.94	0.00	0.00	3.94	8,200	\$359,094	1.31	2,733	\$119,698
<i>Annual Burden Subtotal</i>	<i>3.94</i>	<i>0.00</i>	<i>0.00</i>	<i>3.94</i>	<i>8,200</i>	<i>\$359,094</i>	<i>1.31</i>	<i>2,733</i>	<i>\$119,698</i>
Expense Reimbursement Grants Program Subtotal	3.94	0.00	0.00	3.94	8,200	\$359,094	1.31	2,733	\$119,698
Total Estimated Burden	4.34	0.40	0.40	5.14	10,696	\$468,399	1.71	3,565	\$156,133

Note: The expense reimbursement grant program is scheduled to end in December 2012. EPA assumes no burden associated with these grants will be incurred after December 2012.

**Exhibit 6
Average Annual Burden and Cost to Systems for the Operator Certification Program**

System Activities	April 2012 - March 2013			April 2013 - March 2014			April 2014 - March 2015			Total Estimated Burden				Average Annual Estimate			
	Annual Burden (FTEs)	Annual O&M Costs	Annual Labor Costs	Annual Burden (FTEs)	Annual O&M Costs	Annual Labor Costs	Annual Burden (FTEs)	Annual O&M Costs	Annual Labor Costs	Total Burden (Hours)	Total Burden (FTEs)	Total O&M Costs	Total Labor Costs	Avg Annual Burden (Hours)	Avg Annual Burden (FTEs)	Avg Annual O&M Costs	Avg Annual Labor Cost
Annual burden																	
2 Maintain/renew certification*	75.87	\$6,904,210	\$3,645,470	151.74	\$13,808,419	\$7,290,941	151.74	\$13,808,419	\$7,290,941	789,053	379.35	\$34,521,048	\$18,227,351	263,018	126.45	\$11,507,016	\$6,075,784
Annual Burden Subtotal	75.87	\$6,904,210	\$3,645,470	151.74	\$13,808,419	\$7,290,941	151.74	\$13,808,419	\$7,290,941	789,053	379.35	\$34,521,048	\$18,227,351	263,018	126.45	\$11,507,016	\$6,075,784
Total Burden	75.87	\$6,904,210	\$3,645,470	151.74	\$13,808,419	\$7,290,941	151.74	\$13,808,419	\$7,290,941	789,053	379.35	\$34,521,048	\$18,227,351	263,018	126.45	\$11,507,016	\$6,075,784

Note: The expense reimbursement grant program is scheduled to end in December 2012. EPA assumes systems will incur burden for travel and course fees after December 2012.

Exhibit 7

Operator Certification Program - Summary of Original and Revised Burden Estimates

Assumptions for Operator Certification Burden Per System		
2008 Burden (hours)	Task	Revised Burden
4	Maintain/renew certifications	16 hours

Appendix H

Tribal Operator Certification Spreadsheets

Exhibit 1
ASSUMPTIONS FOR TRIBAL RESPONDENTS

Tribal System Assumption	No. of Systems
Total number of systems (1)	989
Systems that currently have a certified operator (2)	569
- Systems that will renew with the state or other provider (3)	426
- Systems that will renew with an EPA-approved tribal provider (3)	142
Systems without certified operator (2)	420
- Systems that will seek grandparent status or new certification (3)	210
- Systems that will seek grandparent status (3)	137
- Systems that will seek new certification (3)	74

(1) Total tribal systems based October 2010 SDWIS data.

(2) Based on November 2001 GPRA goal status estimates.

(3) EPA estimate.

Exhibit 2
ASSUMPTIONS FOR TRIBAL SYSTEM BURDEN AND COSTS

Activities	Tribal Systems			
	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost
Start-up/One-time Activities				
Grandparent Status Applications	2	\$ 32.38	\$ 64.77	\$ 0.44
Ongoing Activities				
Training - New Certifications				
- Level 1 (85%)	40	\$ 32.38	\$ 1,295.36	(1)
- Level 2 (10%)	26	\$ 32.38	\$ 841.98	(1)
- Level 3 (5%)	26	\$ 32.38	\$ 841.98	(1)
Training - Certification Renewals	40	\$ 32.38	\$ 1,295.36	(1)
Process Reimbursements - New Certifications	0.5	\$ 32.38	\$ 16.19	\$ 0.44
Process Reimbursements - Certification Renewals	0.5	\$ 32.38	\$ 16.19	\$ 0.44

(1) All travel and lodging costs to be reimbursed by EPA.

Exhibit 3
TRIBAL SYSTEMS YEARLY RESPONSES, BURDEN, AND COSTS

Activities	Tribal Systems Responses by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grandparent Status Applications													
Subtotal	69	68	-	-	-	-	-	-	-	-	-	-	-
Ongoing Activities													
Training - New Certifications													
- Level 1 (85%)	31	31	-	59	58	5	15	15	5	15	15	5	15
- Level 2 (10%)	4	4	-	7	7	-	-	-	-	-	-	-	-
- Level 3 (5%)	2	2	-	3	3	-	-	-	-	-	-	-	-
Training - Certification Renewals	47	47	46	84	84	41	138	137	41	138	137	41	138
Process Reimbursements - New Certifications	37	37	-	69	68	5	15	15	5	15	15	5	15
Process Reimbursements - Certification Renewals	47	47	46	84	84	41	138	137	41	138	137	41	138
Subtotal	168	168	92	306	304	92	306	304	92	306	304	92	306
Total - All Activities	237	236	92	306	304	92	306	304	92	306	304	92	306
	Tribal Systems Burden by Year												
Activities	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grandparent Status Applications													
Subtotal	138	136	-	-	-	-	-	-	-	-	-	-	-
Ongoing Activities													
Training - New Certifications													
- Level 1 (85%)	1,240	1,240	-	2,360	2,320	184	612	608	184	612	608	184	612
- Level 2 (10%)	104	104	-	182	182	-	-	-	-	-	-	-	-
- Level 3 (5%)	52	52	-	78	78	-	-	-	-	-	-	-	-
Training - Certification Renewals	1,880	1,880	1,840	3,360	3,360	1,656	5,508	5,472	1,656	5,508	5,472	1,656	5,508
Process Reimbursements - New Certifications	19	19	-	35	34	2	8	8	2	8	8	2	8
Process Reimbursements - Certification Renewals	24	24	23	42	42	21	69	68	21	69	68	21	69
Subtotal	3,318	3,318	1,863	6,057	6,016	1,863	6,197	6,156	1,863	6,197	6,156	1,863	6,197
Total - All Activities	3,456	3,454	1,863	6,057	6,016	1,863	6,197	6,156	1,863	6,197	6,156	1,863	6,197
	Tribal Systems Labor Cost by Year												
Activities	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grandparent Status Applications													
Subtotal	\$ 4,469	\$ 4,404	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ongoing Activities													
Training - New Certifications													
- Level 1 (85%)	\$ 40,156	\$ 40,156	\$ -	\$ 76,426	\$ 75,131	\$ 5,959	\$ 19,819	\$ 19,689	\$ 5,959	\$ 19,819	\$ 19,689	\$ 5,959	\$ 19,819
- Level 2 (10%)	\$ 3,368	\$ 3,368	\$ -	\$ 5,894	\$ 5,894	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3 (5%)	\$ 1,684	\$ 1,684	\$ -	\$ 2,526	\$ 2,526	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Training - Certification Renewals	\$ 60,882	\$ 60,882	\$ 59,587	\$ 108,810	\$ 108,810	\$ 53,628	\$ 178,371	\$ 177,205	\$ 53,628	\$ 178,371	\$ 177,205	\$ 53,628	\$ 178,371
Process Reimbursements - New Certifications	\$ 599	\$ 599	\$ -	\$ 1,117	\$ 1,101	\$ 74	\$ 249	\$ 246	\$ 74	\$ 248	\$ 246	\$ 74	\$ 248
Process Reimbursements - Certification Renewals	\$ 781	\$ 781	\$ 745	\$ 1,360	\$ 1,360	\$ 670	\$ 2,230	\$ 2,215	\$ 670	\$ 2,230	\$ 2,215	\$ 670	\$ 2,230
Subtotal	\$ 107,450	\$ 107,450	\$ 60,331	\$ 196,134	\$ 194,822	\$ 60,331	\$ 200,667	\$ 199,356	\$ 60,331	\$ 200,667	\$ 199,356	\$ 60,331	\$ 200,667
Total - All Activities	\$ 111,919	\$ 111,854	\$ 60,331	\$ 196,134	\$ 194,822	\$ 60,331	\$ 200,667	\$ 199,356	\$ 60,331	\$ 200,667	\$ 199,356	\$ 60,331	\$ 200,667
	Tribal Systems O&M Cost by Year												
Activities	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grandparent Status Applications													
Subtotal	\$ 30	\$ 30	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ongoing Activities													
Training - New Certifications													
- Level 1 (85%)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
- Level 2 (10%)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
- Level 3 (5%)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
Training - Certification Renewals	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
Process Reimbursements - New Certifications	\$ 16	\$ 16	\$ -	\$ 30	\$ 30	\$ 2	\$ 7	\$ 7	\$ 2	\$ 7	\$ 7	\$ 2	\$ 7
Process Reimbursements - Certification Renewals	\$ 21	\$ 21	\$ 20	\$ 37	\$ 37	\$ 18	\$ 61	\$ 60	\$ 18	\$ 61	\$ 60	\$ 18	\$ 61
Subtotal	\$ 37	\$ 37	\$ 20	\$ 67	\$ 67	\$ 20	\$ 67	\$ 67	\$ 20	\$ 67	\$ 67	\$ 20	\$ 67
Total - All Activities	\$ 67	\$ 67	\$ 20	\$ 67	\$ 67	\$ 20	\$ 67	\$ 67	\$ 20	\$ 67	\$ 67	\$ 20	\$ 67

(1) All Course fees and travel and lodging costs to be reimbursed by EPA.

Exhibit 4

ASSUMPTIONS FOR CERTIFICATION PROVIDER BURDEN AND COSTS

Activities	Certification Training Providers				
	Number of Providers	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost (2)
Start-up/One-time Activities					
Grant Submission	10	56	\$ 47.14	\$ 2,640	\$ 10
Program Establishment/Approval - New Providers	10	(1)	(1)	(1)	(1)
Program Establishment/Approval - Existing Providers	5	44	\$ 47.14	\$ 2,074	\$ 10

(1) Burden and costs for new programs covered by EPA grants.

(2) Unit O&M costs are based on one-time postage costs to send application packages.

Note: Providers do not incur burden for annual activities such as running training courses because they are reimbursed for these activities by EPA grants.

Exhibit 5
PROVIDER YEARLY RESPONSES, BURDEN, AND COSTS

Activities	Provider Responses by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grant Submission	10	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers	(1)	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	5	-	-	-	-	-	-	-	-	-	-	-	-
Total - All Activities	15	-	-	-	-	-	-	-	-	-	-	-	-
Activities	Provider Burden by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grant Submission	560	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers	(1)	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	220	-	-	-	-	-	-	-	-	-	-	-	-
Total - All Activities	780	-	-	-	-	-	-	-	-	-	-	-	-
Activities	Provider Labor Cost by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grant Submission	\$ 26,396	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers	(1)	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	\$ 10,370	-	-	-	-	-	-	-	-	-	-	-	-
Total - All Activities	\$ 36,766	-	-	-	-	-	-	-	-	-	-	-	-
Activities	Provider O&M Cost by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Grant Submission	\$ 100	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers	(1)	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	\$ 50	-	-	-	-	-	-	-	-	-	-	-	-
Total - All Activities	\$ 150	-	-	-	-	-	-	-	-	-	-	-	-

(1) Costs for new programs covered by EPA grants.
 Note: Providers do not incur burden for annual activities such as running training courses because they are reimbursed for these activities by EPA grants.

Exhibit 6

ASSUMPTIONS FOR AGENCY BURDEN AND COSTS

Activities	EPA Regions (1)				EPA Headquarters			
	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost
Start-up/One-time Activities								
Initial Assessments	80	\$ 43.84	\$ 3,507	\$ -	80	\$ 62.48	\$ 4,999	\$ -
Grant Funding/Approval	-	\$ 43.84	\$ -	\$ -	40	\$ 62.48	\$ 2,499	\$ 50,000
Program Review/Certification	40	\$ 43.84	\$ 1,754	\$ -	40	\$ 62.48	\$ 2,499	\$ -
Develop Tracking System	-	\$ 43.84	\$ -	\$ -	80	\$ 62.48	\$ 4,999	\$ -
Conduct Peer Review	20	\$ 43.84	\$ 877	\$ -	40	\$ 62.48	\$ 2,499	\$ -
Review Grandparent Status Applications	8	\$ 43.84	\$ 351	\$ 0.44	8	\$ 62.48	\$ 500	\$ 0.44
Ongoing Activities								
Compliance Tracking	-	\$ 43.84	\$ -	\$ -	0.25	\$ 62.48	\$ 16	\$ -
System Reimbursements - New Certifications								
- Level 1	0.5	\$ 43.84	\$ 22	\$ 704	0.5	\$ 62.48	\$ 31	\$ 704
- Level 2	0.5	\$ 43.84	\$ 22	\$ 704	0.5	\$ 62.48	\$ 31	\$ 704
- Level 3	0.5	\$ 43.84	\$ 22	\$ 704	0.5	\$ 62.48	\$ 31	\$ 704
System Reimbursements - Certification Renewals	0.5	\$ 43.84	\$ 22	\$ 704	0.5	\$ 62.48	\$ 31	\$ 704
Provider Reimbursements - New Certifications								
- Level 1	0.5	\$ 43.84	\$ 22	\$ 700	0.5	\$ 62.48	\$ 31	\$ 700
- Level 2	0.5	\$ 43.84	\$ 22	\$ 500	0.5	\$ 62.48	\$ 31	\$ 500
- Level 3	0.5	\$ 43.84	\$ 22	\$ 500	0.5	\$ 62.48	\$ 31	\$ 500
Provider Reimbursements - Certification Renewals	0.5	\$ 43.84	\$ 22	\$ 500	0.5	\$ 62.48	\$ 31	\$ 500
Enforcement	8	\$ 43.84	\$ 351	\$ -	8	\$ 62.48	\$ 500	\$ -

Note: To avoid double counting, EPA burden and labor costs for Regions and Headquarters associated with Tribal operator certification are not included in the totals presented in Exhibit 9 (only the O&M costs are included in Exhibit 9). Total Agency burden and labor costs for the PWSS ICR are calculated separately and reported in the summary tables of the PWSS Program ICR.
 (1) Burden and costs assumed for the 9 EPA Regions with recognized tribal entities.

Exhibit 7
AGENCY REGIONAL YEARLY RESPONSES, BURDEN, AND COSTS

Activities	EPA Regional Responses by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	14	-	-	-	-	-	-	-	-	-	-	-	-
Grant Funding/Approval	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Review/Certification	14	-	-	-	-	-	-	-	-	-	-	-	-
Develop Tracking System	9	-	-	-	-	-	-	-	-	-	-	-	-
Conduct Peer Review	64	64	-	-	-	-	-	-	-	-	-	-	-
Review Grandparent Status Applications	64	64	-	-	-	-	-	-	-	-	-	-	-
Subtotal	101	64											
Ongoing Activities													
Compliance Tracking	-	-	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - New Certifications													
- Level 1	29	29	-	55	54	4	14	14	4	14	14	4	14
- Level 2	4	4	-	7	7	-	-	-	-	-	-	-	-
- Level 3	2	2	-	3	3	-	-	-	-	-	-	-	-
System Reimbursements - Certification Renewals	44	44	43	78	78	39	129	128	39	129	128	39	129
Provider Reimbursements - New Certifications													
- Level 1	29	29	-	55	54	4	14	14	4	14	14	4	14
- Level 2	4	4	-	7	7	-	-	-	-	-	-	-	-
- Level 3	2	2	-	3	3	-	-	-	-	-	-	-	-
Provider Reimbursements - Certification Renewals	44	44	43	78	78	39	129	128	39	129	128	39	129
Enforcement	3	3	2	6	6	2	6	6	2	6	6	2	6
Subtotal	161	161	88	292	290	88	292	290	88	292	290	88	292
Total - All Activities	262	225	88	292	290	88	292	290	88	292	290	88	292
	EPA Regional Burden by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	1,120	-	-	-	-	-	-	-	-	-	-	-	-
Grant Funding/Approval	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Review/Certification	560	-	-	-	-	-	-	-	-	-	-	-	-
Develop Tracking System	-	-	-	-	-	-	-	-	-	-	-	-	-
Conduct Peer Review	180	-	-	-	-	-	-	-	-	-	-	-	-
Review Grandparent Status Applications	512	512	-	-	-	-	-	-	-	-	-	-	-
Subtotal	2,372	512											
Ongoing Activities													
Compliance Tracking	-	-	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - New Certifications													
- Level 1	15	15	-	28	27	2	7	7	2	7	7	2	7
- Level 2	2	2	-	4	4	-	-	-	-	-	-	-	-
- Level 3	1	1	-	2	2	-	-	-	-	-	-	-	-
System Reimbursements - Certification Renewals	22	22	22	39	39	20	65	64	20	65	64	20	65
Provider Reimbursements - New Certifications													
- Level 1	15	15	-	28	27	2	7	7	2	7	7	2	7
- Level 2	2	2	-	4	4	-	-	-	-	-	-	-	-
- Level 3	1	1	-	2	2	-	-	-	-	-	-	-	-
Provider Reimbursements - Certification Renewals	22	22	22	39	39	20	65	64	20	65	64	20	65
Enforcement	103	103	59	191	190	59	191	190	59	191	190	59	191
Subtotal	103	103	59	191	190	59	191	190	59	191	190	59	191
Total - All Activities	2,475	615	59	191	190	59	191	190	59	191	190	59	191

AGENCY REGIONAL YEARLY RESPONSES, BURDEN, AND COSTS (Continued)

Activities	EPA Regional Labor Cost by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	\$ 49,100	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grant Funding/Approval	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Program Review/Certification	\$ 24,550	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Develop Tracking System	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Conduct Peer Review	\$ 7,891	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Review Grandparent Status Applications	\$ 22,446	\$ 22,446	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ 103,987	\$ 22,446	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ongoing Activities													
Compliance Tracking	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - New Certifications													
- Level 1	\$ 636	\$ 636	\$ -	\$ 1,206	\$ 1,184	\$ 88	\$ 307	\$ 307	\$ 88	\$ 307	\$ 307	\$ 88	\$ 307
- Level 2	\$ 88	\$ 88	\$ -	\$ 153	\$ 153	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ 44	\$ 44	\$ -	\$ 66	\$ 66	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - Certification Renewals	\$ 964	\$ 964	\$ 943	\$ 1,710	\$ 1,710	\$ 855	\$ 2,828	\$ 2,806	\$ 855	\$ 2,828	\$ 2,806	\$ 855	\$ 2,828
Provider Reimbursements - New Certifications													
- Level 1	\$ 636	\$ 636	\$ -	\$ 1,206	\$ 1,184	\$ 88	\$ 307	\$ 307	\$ 88	\$ 307	\$ 307	\$ 88	\$ 307
- Level 2	\$ 88	\$ 88	\$ -	\$ 153	\$ 153	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ 44	\$ 44	\$ -	\$ 66	\$ 66	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Provider Reimbursements - Certification Renewals	\$ 964	\$ 964	\$ 943	\$ 1,710	\$ 1,710	\$ 855	\$ 2,828	\$ 2,806	\$ 855	\$ 2,828	\$ 2,806	\$ 855	\$ 2,828
Enforcement	\$ 1,052	\$ 1,052	\$ 701	\$ 2,104	\$ 2,104	\$ 701	\$ 2,104	\$ 2,104	\$ 701	\$ 2,104	\$ 2,104	\$ 701	\$ 2,104
Subtotal	\$ 4,515	\$ 4,515	\$ 2,587	\$ 8,373	\$ 8,329	\$ 2,587	\$ 8,373	\$ 8,329	\$ 2,587	\$ 8,373	\$ 8,329	\$ 2,587	\$ 8,373
Total - All Activities	\$ 108,502	\$ 26,961	\$ 2,587	\$ 8,373	\$ 8,329	\$ 2,587	\$ 8,373	\$ 8,329	\$ 2,587	\$ 8,373	\$ 8,329	\$ 2,587	\$ 8,373
	EPA Regional O&M Cost by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grant Funding/Approval	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Program Review/Certification	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Develop Tracking System	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Conduct Peer Review	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Review Grandparent Status Applications	\$ 28	\$ 28	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ 28	\$ 28	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ongoing Activities													
Compliance Tracking	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - New Certifications													
- Level 1	\$ 20,429	\$ 20,429	\$ -	\$ 38,744	\$ 38,040	\$ 2,818	\$ 9,862	\$ 9,862	\$ 2,818	\$ 9,862	\$ 9,862	\$ 2,818	\$ 9,862
- Level 2	\$ 2,818	\$ 2,818	\$ -	\$ 4,931	\$ 4,931	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ 1,409	\$ 1,409	\$ -	\$ 2,113	\$ 2,113	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - Certification Renewals	\$ 30,995	\$ 30,995	\$ 30,291	\$ 54,946	\$ 54,946	\$ 27,473	\$ 90,873	\$ 90,168	\$ 27,473	\$ 90,873	\$ 90,168	\$ 27,473	\$ 90,873
Provider Reimbursements - New Certifications													
- Level 1	\$ 20,313	\$ 20,313	\$ -	\$ 38,524	\$ 37,824	\$ 2,802	\$ 9,806	\$ 9,806	\$ 2,802	\$ 9,806	\$ 9,806	\$ 2,802	\$ 9,806
- Level 2	\$ 2,002	\$ 2,002	\$ -	\$ 3,503	\$ 3,503	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ 1,001	\$ 1,001	\$ -	\$ 1,501	\$ 1,501	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Provider Reimbursements - Certification Renewals	\$ 22,019	\$ 22,019	\$ 21,519	\$ 39,034	\$ 39,034	\$ 19,517	\$ 64,557	\$ 64,056	\$ 19,517	\$ 64,557	\$ 64,056	\$ 19,517	\$ 64,557
Enforcement	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ 100,986	\$ 100,986	\$ 51,810	\$ 183,298	\$ 181,893	\$ 52,610	\$ 175,098	\$ 173,893	\$ 52,610	\$ 175,098	\$ 173,893	\$ 52,610	\$ 175,098
Total - All Activities	\$ 101,014	\$ 101,014	\$ 51,810	\$ 183,298	\$ 181,893	\$ 52,610	\$ 175,098	\$ 173,893	\$ 52,610	\$ 175,098	\$ 173,893	\$ 52,610	\$ 175,098

Note: To avoid double counting, EPA burden and labor costs for Regions and Headquarters associated with Tribal approval certification are not included in the totals presented in Exhibit 9 (only the O&M costs are included in Exhibit 9). Total Agency burden and labor costs for the PWSS ICR are calculated separately and reported in the summary tables of the PWSS Program ICR.

Exhibit 8

AGENCY HEADQUARTERS YEARLY RESPONSES, BURDEN, AND COSTS

Activities	EPA Headquarters Responses by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	1	-	-	-	-	-	-	-	-	-	-	-	-
Grant Funding/Approval	10	-	-	-	-	-	-	-	-	-	-	-	-
Program Review/Certification	1	-	-	-	-	-	-	-	-	-	-	-	-
Develop Tracking System	1	-	-	-	-	-	-	-	-	-	-	-	-
Conduct Peer Review	1	-	-	-	-	-	-	-	-	-	-	-	-
Review Grandparent Status Applications	5	5	-	-	-	-	-	-	-	-	-	-	-
Subtotal	19	5											
Ongoing Activities													
Compliance Tracking	989	989	989	989	989	989	989	989	989	989	989	989	989
System Reimbursements - New Certifications													
- Level 1	2	2	-	4	4	-	1	1	-	1	1	-	1
- Level 2	-	-	-	-	-	-	-	-	-	-	-	-	-
- Level 3	-	-	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - Certification Renewals	3	3	3	6	6	3	9	9	3	9	9	3	9
Provider Reimbursements - New Certifications													
- Level 1	2	2	-	4	4	-	1	1	-	1	1	-	1
- Level 2	-	-	-	-	-	-	-	-	-	-	-	-	-
- Level 3	-	-	-	-	-	-	-	-	-	-	-	-	-
Provider Reimbursements - Certification Renewals	3	3	3	6	6	3	9	9	3	9	9	3	9
Enforcement	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	999	999	995	1,009	1,009	995	1,009	1,009	995	1,009	1,009	995	1,009
Total - All Activities	1,018	1,004	995	1,009	1,009	995	1,009	1,009	995	1,009	1,009	995	1,009
	EPA Headquarters Burden by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	80	-	-	-	-	-	-	-	-	-	-	-	-
Grant Funding/Approval	400	-	-	-	-	-	-	-	-	-	-	-	-
Program Review/Certification	40	-	-	-	-	-	-	-	-	-	-	-	-
Develop Tracking System	80	-	-	-	-	-	-	-	-	-	-	-	-
Conduct Peer Review	40	-	-	-	-	-	-	-	-	-	-	-	-
Review Grandparent Status Applications	40	40	-	-	-	-	-	-	-	-	-	-	-
Subtotal	680	40											
Ongoing Activities													
Compliance Tracking	247	247	247	247	247	247	247	247	247	247	247	247	247
System Reimbursements - New Certifications													
- Level 1	1	1	-	2	2	-	1	1	-	1	1	-	1
- Level 2	-	-	-	-	-	-	-	-	-	-	-	-	-
- Level 3	-	-	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - Certification Renewals	2	2	2	3	3	2	5	5	2	5	5	2	5
Provider Reimbursements - New Certifications													
- Level 1	1	1	-	2	2	-	1	1	-	1	1	-	1
- Level 2	-	-	-	-	-	-	-	-	-	-	-	-	-
- Level 3	-	-	-	-	-	-	-	-	-	-	-	-	-
Provider Reimbursements - Certification Renewals	2	2	2	3	3	2	5	5	2	5	5	2	5
Enforcement	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	252	252	250	257	257	250	257	257	250	257	257	250	257
Total - All Activities	932	292	250	257	257	250	257	257	250	257	257	250	257

AGENCY HEADQUARTERS YEARLY RESPONSES, BURDEN, AND COSTS (Continued)

Activities	EPA Headquarters Labor Cost by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	\$ 4,999	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grant Funding/Approval	\$ 24,994	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Program Review/Certification	\$ 2,499	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Develop Tracking System	\$ 4,999	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Conduct Peer Review	\$ 2,499	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Review Grandparent Status Applications	\$ 2,499	\$ 2,499	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ 42,490	\$ 2,499	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ongoing Activities													
Compliance Tracking	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449	\$ 15,449
System Reimbursements - New Certifications													
- Level 1	\$ 62	\$ 62	\$ -	\$ 125	\$ 125	\$ -	\$ 31	\$ 31	\$ -	\$ 31	\$ 31	\$ -	\$ 31
- Level 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - Certification Renewals	\$ 94	\$ 94	\$ 94	\$ 187	\$ 187	\$ 94	\$ 281	\$ 281	\$ 94	\$ 281	\$ 281	\$ 94	\$ 281
Provider Reimbursements - New Certifications													
- Level 1	\$ 62	\$ 62	\$ -	\$ 125	\$ 125	\$ -	\$ 31	\$ 31	\$ -	\$ 31	\$ 31	\$ -	\$ 31
- Level 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Provider Reimbursements - Certification Renewals	\$ 94	\$ 94	\$ 94	\$ 187	\$ 187	\$ 94	\$ 281	\$ 281	\$ 94	\$ 281	\$ 281	\$ 94	\$ 281
Enforcement	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ 15,762	\$ 15,762	\$ 15,637	\$ 16,074	\$ 16,074	\$ 15,637	\$ 16,074	\$ 16,074	\$ 15,637	\$ 16,074	\$ 16,074	\$ 15,637	\$ 16,074
Total - All Activities	\$ 58,251	\$ 18,261	\$ 15,637	\$ 16,074	\$ 16,074	\$ 15,637	\$ 16,074	\$ 16,074	\$ 15,637	\$ 16,074	\$ 16,074	\$ 15,637	\$ 16,074
	EPA Headquarters O&M Cost by Year												
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Start-up/One-time Activities													
Initial Assessments	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grant Funding/Approval	\$ 500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Program Review/Certification	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Develop Tracking System	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Conduct Peer Review	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Review Grandparent Status Applications	\$ 2	\$ 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ 500,002	\$ 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ongoing Activities													
Compliance Tracking	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - New Certifications													
- Level 1	\$ 1,409	\$ 1,409	\$ -	\$ 2,818	\$ 2,818	\$ -	\$ 704	\$ 704	\$ -	\$ 704	\$ 704	\$ -	\$ 704
- Level 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - Certification Renewals	\$ 2,113	\$ 2,113	\$ 2,113	\$ 4,227	\$ 4,227	\$ 2,113	\$ 6,340	\$ 6,340	\$ 2,113	\$ 6,340	\$ 6,340	\$ 2,113	\$ 6,340
Provider Reimbursements - New Certifications													
- Level 1	\$ 1,401	\$ 1,401	\$ -	\$ 2,802	\$ 2,802	\$ -	\$ 700	\$ 700	\$ -	\$ 700	\$ 700	\$ -	\$ 700
- Level 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Provider Reimbursements - Certification Renewals	\$ 1,501	\$ 1,501	\$ 1,501	\$ 3,003	\$ 3,003	\$ 1,501	\$ 4,504	\$ 4,504	\$ 1,501	\$ 4,504	\$ 4,504	\$ 1,501	\$ 4,504
Enforcement	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ 6,424	\$ 6,424	\$ 3,615	\$ 12,849	\$ 12,849	\$ 3,615	\$ 12,249	\$ 12,249	\$ 3,615	\$ 12,249	\$ 12,249	\$ 3,615	\$ 12,249
Total - All Activities	\$ 506,427	\$ 6,427	\$ 3,615	\$ 12,849	\$ 12,849	\$ 3,615	\$ 12,249	\$ 12,249	\$ 3,615	\$ 12,249	\$ 12,249	\$ 3,615	\$ 12,249

Note: To avoid double counting, EPA burden and labor costs for Regions and Headquarters associated with Tribal operator certification are not included in the totals presented in Exhibit 9 (only the O&M costs are included in Exhibit 9). Total Agency burden and labor costs for the PWSS ICR are calculated separately and reported in the summary tables of the PWSS Program ICR.

Exhibit 9
BURDEN AND COST SUMMARY

Respondent	Respondents	Annual Response Estimates			Average Annual Responses	Annual Burden Estimates			Average Annual Burden	Annual O&M (Cost Burden) Estimates			Average Annual O&M (Cost Burden)
		April 1, 2012 - March 31, 2013	April 1, 2013 - March 31, 2014	April 1, 2014 - March 31, 2015		April 1, 2012 - March 31, 2013	April 1, 2013 - March 31, 2014	April 1, 2014 - March 31, 2015		April 1, 2012 - March 31, 2013	April 1, 2013 - March 31, 2014	April 1, 2014 - March 31, 2015	
		EPA Headquarters	1	1,009		1,002	1,002	1,004.3		257	254	254	
EPA Regions	9	291	189	190	223.3	191	125	125	146.7	\$ 174,495	\$ 113,251	\$ 113,854	\$ 133,867
EPA Total	10	1,300	1,191	1,192	1,227.7	448	378	379	401.6	\$ 186,744	\$ 121,183	\$ 121,786	\$ 143,238
Tribal Systems	352	305	198	199	234.0	6,176	4,010	4,030	4,738.5	\$ 67	\$ 44	\$ 44	\$ 51
Certification Providers	15	-	-	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -

Other Measures

Respondent	Respondents	Annual Responses per Respondent			Average Annual Responses/ Respondent	Annual Labor Cost			Average Annual Labor Cost
		April 1, 2012 - March 31, 2013	April 1, 2013 - March 31, 2014	April 1, 2014 - March 31, 2015		April 1, 2012 - March 31, 2013	April 1, 2013 - March 31, 2014	April 1, 2014 - March 31, 2015	
		EPA Headquarters	1	1,009		1,002	1,002	1,004.3	
EPA Regions	9	32	21	21	24.8	\$ 8,351	\$ 5,458	\$ 5,480	\$ 6,430
EPA Total	10	130	119	119	122.8	\$ 24,426	\$ 21,313	\$ 21,335	\$ 22,358
Tribal Systems	352	0.9	0.6	0.6	0.7	\$ 200,012	\$ 129,844	\$ 130,499	\$ 153,452
Certification Providers	15	-	-	-	-	\$ -	\$ -	\$ -	\$ -

Note: To avoid double counting, EPA burden and labor costs for Regions and Headquarters associated with Tribal operator certification are not included in the totals presented in Exhibit 9 (only the O&M costs are included in Exhibit 9). Total Agency burden and labor costs for the PWSS ICR are calculated separately and reported in the summary tables of the PWSS Program ICR.

Exhibit 10
Tribal Certification - Summary of Original and Revised Burden Estimates

No changes in burden estimates based on August 2011 consultations.

Appendix I

Constructed Conveyances Spreadsheets

**Exhibit 1 - Identification of PWSs Under the Revised PWS Definition - Use of Constructed Conveyances
(Annual PWS Burden Assumptions)**

Activity	Number of PWSs per Year	Annual Burden per PWS (hrs)	Total Annual Burden (hrs)	Hourly Labor Cost	Total Annual Labor Cost	O&M Cost Per PWS	Total Annual O&M Cost	Capital Cost Per PWS	Total Annual Capital Cost
Surveys and Data Collection	114	20	2,280	\$ 32.38	\$ 73,836	\$ -	\$ -	\$ -	\$ -
Application for Other Residential Uses Exclusion	28.5	10	285	\$ 32.38	\$ 9,229	\$ -	\$ -	\$ -	\$ -
Application for Alternative Water Exclusion	28.5	10	285	\$ 32.38	\$ 9,229	\$ -	\$ -	\$ -	\$ -
Application for Treatment Exclusion	28.5	10	285	\$ 32.38	\$ 9,229	\$ -	\$ -	\$ -	\$ -
Application for Certain Piped Irrigation Districts Exclusion	28.5	10	285	\$ 32.38	\$ 9,229	\$ -	\$ -	\$ -	\$ -
Communication with Primacy Agency	370.5	10	3,705	\$ 32.38	\$ 119,983	\$ -	\$ -	\$ -	\$ -
Recordkeeping	370.5	1	371	\$ 32.38	\$ 11,998	\$ -	\$ -	\$ -	\$ -

Source: Estimates based on discussions with EPA Regional personnel.

**Exhibit 2 - Identification of PWSs Under the Revised PWS Definition - Use of Constructed Conveyances
(Annual Primacy Agency Burden Assumptions)**

Activity	Number of PWSs per Year per Primacy Agency	Annual Burden per PWS (hrs)	No. of Primacy Agencies	Total Annual Burden (hrs)	Hourly Labor Cost	Total Annual Labor Cost	O&M Cost Per PWS	Total Annual O&M Cost	Capital Cost Per PWS	Total Annual Capital Cost
Review Surveys and Data Collection/Make Determinations	2	150	57	17,100	\$ 43.79	\$ 748,843	\$ -	\$ -	\$ -	\$ -
Review Applications for Other Residential Uses Exclusion/Make Determinations	0.5	10	57	285	\$ 43.79	\$ 12,481	\$ -	\$ -	\$ -	\$ -
Review Applications for Alternative Water Exclusion/Make Determinations	0.5	10	57	285	\$ 43.79	\$ 12,481	\$ -	\$ -	\$ -	\$ -
Review Applications for Treatment Exclusion/Make Determinations	0.5	10	57	285	\$ 43.79	\$ 12,481	\$ -	\$ -	\$ -	\$ -
Review Applications for Certain Piped Irrigation Districts Exclusion/Make Determinations	0.5	10	57	285	\$ 43.79	\$ 12,481	\$ -	\$ -	\$ -	\$ -
Communication with PWSs	6.5	10	57	3,705	\$ 43.79	\$ 162,249	\$ -	\$ -	\$ -	\$ -
Recordkeeping	6.5	60	57	22,230	\$ 43.79	\$ 973,496	\$ -	\$ -	\$ -	\$ -

Source: Estimates based on discussions with EPA Regional personnel.

**Exhibit 3a - Identification of PWSs Under the Revised PWS Definition - Use of Constructed Conveyances
(PWS Burden and Cost Summary)**

Requirement	Annual Respondents	Avg. Annual Responses	Annual Burden	Annual Burden (Labor) Cost	Annual O&M Cost	Annual Capital Cost
Surveys and Data Collection	114	114	2,280	\$ 73,836	\$ -	\$ -
Application for Other Residential Uses Exclusion	28.5	28.5	285	\$ 9,229	\$ -	\$ -
Application for Alternative Water Exclusion	28.5	28.5	285	\$ 9,229	\$ -	\$ -
Application for Treatment Exclusion	28.5	28.5	285	\$ 9,229	\$ -	\$ -
Application for Certain Piped Irrigation Districts Exclusion	28.5	28.5	285	\$ 9,229	\$ -	\$ -
Communication with Primacy Agency	370.5	370.5	3,705	\$ 119,983	\$ -	\$ -
Recordkeeping	370.5	370.5	371	\$ 11,998	\$ -	\$ -
Total	371	969	7,496	\$ 242,734	\$ -	\$ -

**Exhibit 3b - Identification of PWSs Under the Revised PWS Definition - Use of Constructed Conveyances
(State Burden and Cost Summary)**

Requirement	Annual Respondents	Avg. Annual Responses	Annual Burden	Annual Burden (Labor) Cost	Annual O&M Cost	Annual Capital Cost
Review Surveys and Data Collection/Make Determinations	57	114	17,100	\$ 748,843	\$ -	\$ -
Review Applications for Other Residential Uses Exclusion/Make Determinations	57	28.5	285	\$ 12,481	\$ -	\$ -
Review Applications for Alternative Water Exclusion/Make Determinations	57	28.5	285	\$ 12,481	\$ -	\$ -
Review Applications for Treatment Exclusion/Make Determinations	57	28.5	285	\$ 12,481	\$ -	\$ -
Review Applications for Certain Piped Irrigation Districts Exclusion/Make Determinations	57	28.5	285	\$ 12,481	\$ -	\$ -
Communication with PWSs	57	370.5	3,705	\$ 162,249	\$ -	\$ -
Recordkeeping	57	370.5	22,230	\$ 973,496	\$ -	\$ -
Total	57	969	44,175	\$ 1,934,512	\$ -	\$ -

Exhibit 4
Constructed Conveyance - Summary of Original and Revised Burden Estimates

No changes in burden estimates based on August 2011 consultations.

Appendix J

Proficiency Testing Spreadsheets

Exhibit 1. Estimated Laboratory Burden for Proficiency Testing

Collection Activities	Manager hours/year	Chemist hours/year	Records Clerk hours/year	Total Hours per Lab	# of Labs ¹	Total Average Annual Burden Hours (all respondents)
	(A)	(B)	(C)	(D) = (A) + (B) + (C)	(E)	(F) = (D)*(E)
Read Instructions	2	2	0	4.0	1,902	7,608
Plan Activities	1.5	0	0	1.5	1,902	2,853
Analyze Inorganics	0	16.0	0	16.0	871	13,935
Analyze DBPs	0	8.0	0	8.0	701	5,609
Analyze Organics	0	16.0	0	16.0	330	5,280
Report Results	1	0	1	2.0	1,902	3,804
Maintain Records	1	0	1	2.0	1,902	3,804
Annual Average Burden						42,892
Annual Average per Respondent Burden						22.55

¹ Data from State Laboratory Certification Program Assessment, 2011, collected to inform the 2011 State Workload Resources Model. Burden estimates take into account the results of the August 2011 consultation with water industry representatives.

Exhibit 2. Estimated Laboratory Cost for Proficiency Testing

Collection Activities	Labor Costs						O&M Costs	Total Average Annual Costs
	Manager at \$99.47/hr (A)	Chemist at \$56.34/hr (B)	Records Clerk at \$28.80/hr (C)	Labor Costs per Activity	# of Labs	Labor Costs/Year	Standards at \$15.73/analyte (G) = (E) * \$15.73 * # of analytes	(all respondents) (H) = (F) + (G)
	hourly rates * labor hours from Exhibit 6-1, columns (a)-(c)			(D) = (A) + (B) + (C)	(E)	(F) = (D) * (E)		
Read Instructions	\$ 199	\$ 113	\$ -	\$ 312	1,902	\$ 592,694	\$ -	\$ 592,694
Plan Activities	\$ 149	\$ -	\$ -	\$ 149	1,902	\$ 283,794	\$ -	\$ 283,794
Analyze Inorganics	\$ -	\$ 901	\$ -	\$ 901	871	\$ 785,019	\$ 397,321	\$ 1,182,340
Analyze Disinfection Byproducts	\$ -	\$ 451	\$ -	\$ 451	701	\$ 315,966	\$ 99,261	\$ 415,227
Analyze Organic Chemicals	\$ -	\$ 901	\$ -	\$ 901	330	\$ 297,466	\$ 269,962	\$ 567,428
Report Results	\$ 99	\$ -	\$ 29	\$ 128	1,902	\$ 243,973	\$ -	\$ 243,973
Maintain Records	\$ 99	\$ -	\$ 29	\$ 128	1,902	\$ 243,973	\$ -	\$ 243,973
Average Annual Costs for All Laboratory Respondents						\$ 2,762,885	\$ 766,544	\$ 3,529,428
Average Annual Costs per Laboratory Respondent						\$ 1,453	\$ 403	\$ 1,856

Salaries from U.S. Department of Labor Statistics, May 2010 National Industry Specific Occupational Employment and Wage Estimates. Loaded by factor of 1.6 to account for benefits.

(A) U.S. Department of Labor Statistics, Natural Science Manager 11-9121.

(B) U.S. Department of Labor Statistics, Chemist 19-2031.

(C) U.S. Department of Labor Statistics, Information and Record Clerk 43-4199.

Exhibit 3. Bottom Line Burden and Costs (for ICR period of April 1, 2012 - March 31, 2015)

Cost/Burden	Total Across 3 ICR Years (April 1, 2012 - March 31, 2015)	Average Per Year over ICR Years (April 1, 2012 - March 31, 2015)
Number of Respondents (Laboratories)	1,902	1,902
Total Responses	5,706	1,902
Number of Responses per Lab	3	1
Burden Hours per Lab	67.65	22.55
Total Burden Hours (all labs)	128,677	42,892
Hours per Response (Total hours from above/Total responses from above)	67.65	22.55
Per Laboratory Labor Costs	\$4,358	\$1,453
Total Labor Costs (all labs)	\$8,288,654	\$2,762,885
Per Laboratory O&M Costs	\$1,209	\$403
Total O&M Costs (all labs)	\$2,299,631	\$766,544
Total Lab Costs (Labor plus O&M costs for all labs)	\$10,588,285	\$3,529,428

Exhibit 4. Proficiency Testing - Summary of Original and Revised Burden Estimates						
2008 Burden			Activity	Revised Burden		
Manager	Chemist	Records Clerk		Manager	Chemist	Records Clerk
0.5	0.5	-	Read Instructions	2 hrs	2 hrs	-
0.2	-	-	Plan Activities	1.5 hrs		-
-	3.3	-	Analyze Inorganics	-	16 hrs	-
-	2	-	Analyze DBPs	-	8 hrs	-
-	16	-	Analyze Organics	-	16 hrs	-
0.5	-	0.5	Report Results	1 hr	-	1 hr
-	-	0.1	Maintain Records	1 hr	-	1 hr