

**Information Collection Request for Title IV of the  
Public Health Security and Bioterrorism Preparedness  
and Response Act of 2002: Drinking Water Security  
and Safety**

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*Prepared for:*

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**LIST OF ACRONYMS**

BLS	Bureau of Labor Statistics
CFR	Code of Federal Regulations
CWS	Community Water System
EPA	Environmental Protection Agency
ERP	Emergency Response Plan
FR	Federal Register
ICR	Information Collection Request
ICW	Information Correction Worksheet
NAICS	North American Industry Classification System
O&M	Operation and Maintenance
OGWDW	Office of Ground Water and Drinking Water (US EPA)
OMB	Office of Management and Budget
PRA	Paperwork Reduction Act
PWS	Public Water System
RFA	Regulatory Flexibility Act
SBA	Small Business Administration
SBREFA	Small Business Regulatory Enforcement Fairness Act
SDWA	Safe Drinking Water Act
SOC	Standard Occupational Classification
VA	Vulnerability Assessment

## 1 IDENTIFICATION OF THE INFORMATION COLLECTION

### 1(a) Title and Number of the Information Collection

Title IV of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002: Drinking Water Security and Safety

OMB Control Number: 2040-0253

EPA Tracking Number: 2103.05

### 1(b) Short Characterization

This Information Collection Request (ICR) details burden and cost estimates for reporting and recordkeeping activities required under the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002* (Pub. L. 107-188) (the Act). Specifically, this ICR addresses activities applicable to the U.S. Environmental Protection Agency (EPA or the Agency) and certain public water systems (PWSs) as required under Title IV of the Act, which addresses drinking water security and safety.

Title IV of the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002* (Pub. L. 107-188) amends the Safe Drinking Water Act (SDWA). The Act requires each community water system (CWS)<sup>1</sup> serving a population of more than 3,300 people to conduct a vulnerability assessment (VA) of its water system and to prepare or revise an emergency response plan (ERP) that incorporates the results of the vulnerability assessment.

To ensure proper compliance with the Act, EPA will collect and review the following items required to be submitted by CWSs on specified dates:

- Copy of the Vulnerability Assessment (VA)
- Certification that the CWS conducted a VA
- Certification that the CWS prepared or revised an Emergency Response Plan (ERP)

At this time, 100 percent submission has been achieved for Large Utilities (serving a population of 100,000 or more) and Medium Utilities (serving a population of 50,000 or more but less than 100,000).

As of September 16, 2014 the following documents remain to be collected from a total of 80 small CWSs (serving more than 3,300 people but fewer than 50,000). Some utilities have more than one document to be submitted. Below are the documents that remain to be submitted, totaling 117 responses:

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<sup>1</sup> A community water system is a PWS that serves at least 15 connections used by year-round residents or regularly serves at least 25 year-round residents.

- Copy of the Vulnerability Assessment (28)
- Certification that the CWS conducted a Vulnerability Assessment (22)
- Certification that the CWS prepared or revised an Emergency Response Plan (67)

EPA has been conducting quality assurance reviews of submitted vulnerability assessments to verify receipt of the required information and to ensure that the requirements of the Act have been met. To address the requirements under Title IV of the Act, EPA has provided baseline information to the CWSs that are required to conduct vulnerability assessments. EPA developed this information in consultation with other departments and agencies of the federal government and with state and local governments. Information has been provided on the kinds of terrorist attacks or other intentional acts that represent probable threats and that may substantially disrupt the ability of the system to provide a safe and reliable supply of drinking water.

The collection and storage of information is required to follow the “Protocol to Secure Vulnerability Assessments Submitted by Community Water Systems to EPA” (November 30, 2002). The protocol details the mandatory protective measures for shipping, storing, reviewing, discussing, transmitting, copying, and disposing of secure information related to the vulnerability assessments. In addition, the protocol provides procedures for identifying, investigating, training, and designating individuals who will have access to the vulnerability assessments.

Dependent upon further Congressional appropriations, EPA may provide CWSs with financial or technical assistance for complying with the requirements of this Act. This work, however, is not currently funded.

As explained in Section 2(a), this ICR estimates reporting and recordkeeping burden and costs to CWSs and EPA in response to Title IV of the Act. This ICR estimates burden and costs for calendar years 2014, 2015, and 2016.

Due to the dramatic reduction in number of expected respondents since the 2003 filing of the ICR for this task, estimated burden hours and costs to CWSs and EPA will be dramatically lower than in the original Information Collection Request submitted in August 2003, but remains the same as estimates in the 2007 and 2010 renewals.

For the 3-year (2014-2016) ICR period, the average annual respondent burden and cost to CWSs and EPA is estimated at 10,029 hours and \$888,180<sup>2</sup>. The annual burden and cost to CWSs is estimated at 8,994 hours and \$803,501. The estimated annual EPA burden for this ICR is 1,035 hours, at an estimated annual cost of \$84,679.

NOTE: EPA expects this task will be completed during calendar years 2014 and 2015, so in the third year of the ICR, there is no expected burden on CWS respondents or on EPA.

EPA estimates that \$337 of the annual CWS costs will be spent on operation and maintenance (O&M) activities. These costs represent postage for delivery of certifications

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<sup>2</sup> Note that due to limited data and the use of best professional judgment, these burden and cost estimates are not precise.

and copies of vulnerability assessments, as well as postage for delivery of certifications of emergency response plans. This \$337 represents the “cost burden” as reported in the official Office of Management and Budget (OMB) inventory. Note that these costs are for O&M only; there are no capital costs associated with the CWS activities covered by this ICR.

EPA is estimated to incur \$0 in annual O&M costs for reimbursing training providers and for establishing proper security procedures for handling and storing vulnerability assessments. EPA is also estimated to incur \$19,360 in annual capital costs to complete security enhancements necessary to store and handle vulnerability assessments.

The total estimated number of respondents for this ICR is 80; these respondents are all CWSs serving more than 3,300 but fewer than 50,000 people. The annual number of responses for these respondents is estimated to be 39, which averages to 0.49 responses per respondent annually.

## **2 NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need/Authority for the Collection**

EPA derives authority to collect this information from the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002* (Pub. L. 107-188). Through this Act, Congress conveyed the importance of protecting the nation's drinking water supply from intentional attack. The terrorist attacks of September 11, 2001, have resulted in a heightened awareness of the threat faced by the nation's citizens, its institutions, and its infrastructure. This includes the threat to the CWSs that supply the nation with safe drinking water. Congress mandated that CWSs assess their vulnerability to terrorist attacks and other intentional acts that would jeopardize a system's ability to ensure a safe and reliable supply of drinking water. To provide this security, systems must certify to the Agency that they have conducted these assessments and completed emergency response plans.

### **2(b) Practical Utility/Users of the Data**

EPA will use the information collected under this ICR to determine whether CWSs have completed vulnerability assessments and prepared emergency response plans in compliance with the requirements of the Act. EPA will also use information submitted with the grant applications to provide federal financial assistance to CWSs for completing vulnerability assessments and emergency response plans and for complying with the Act.

Primary users of the information collected under this ICR include the EPA Office of Ground Water and Drinking Water (OGWDW), EPA Regional Administrators, and CWSs. Only entities designated by the Administrator may have access to the vulnerability assessments or information contained in or derived from the assessments (except as noted in Section 1433(a)(6)(A), 1433(a)(6)(B), and 1433(a)(7) of the Act).



### **3 NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a) Non-duplication**

The information to be collected under this ICR is required by a new federal law. It does not duplicate any previous work. To the best of the Agency's knowledge, data requested to meet the requirements of the Act are not available from any other source.

The requested information will be prepared or compiled by CWSs. If CWSs have already developed emergency response plans, they are only required to revise them to include information from the vulnerability assessments that have not been developed or collected previously. Therefore, the information that EPA will collect is not unnecessarily duplicative of information otherwise available to the Agency.

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

To comply with the 1995 Amendments to the PRA, EPA solicited public comments on this ICR for a 60-day period before it was submitted to OMB. Comments were requested on July 16, 2014, via a *Federal Register* (FR) notice (79 FR 41547). EPA received no comments. An additional *Federal Register* notice will be published prior to submission of this ICR to OMB. The public comment period for this additional notice is 30 days.

#### **3(c) Consultations**

EPA worked closely with other federal agencies, state, and local governments, CWSs, and industry organizations to ensure that the program developed is both effective and efficient. The Agency will continue to work closely with affected entities throughout further development and implementation of these requirements.

#### **3(d) Effects of Less Frequent Collection**

Only one response is required for each of three information categories (i.e., the vulnerability assessment, certification of the vulnerability assessment, and certification of the emergency response plan). These three items are mandated by Congress; to collect less often would be a failure to implement the law.

#### **3(e) General Guidelines**

This collection does not violate any of the OMB guidelines for information collection activities. Specifically, the respondents are not required to:

- Report information to EPA more than quarterly.
- Prepare a written response to a collection of information in fewer than 30 days after receipt of a request.
- Submit more than an original and two copies of any document.
- Participate in a statistical survey that is not designed to produce data that can be generalized to the universe of the study.
- Use a statistical data classification that has not been reviewed and approved by OMB.

Though OMB guidelines state that respondents are not required to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years, this collection requires CWSs to retain copies of their emergency response plans for five years after providing certification to EPA. The authority to do so is stated directly in the Act: “each community water system shall maintain a copy of the emergency response plan completed pursuant to subsection (b) for 5 years after such plan has been certified to the Administrator under this section.” (Pub. L. 107-188, Sec. 1433(c)).

### **3(f) Confidentiality**

Because the Act requires collection of information that must remain confidential, CWSs will generally ship vulnerability assessments to EPA by courier service directly to a receiving location that secures the information, allowing access only by properly designated individuals. Each CWS is expected to retain a copy of its vulnerability assessment and emergency response plan in accordance with the recordkeeping requirements contained in the Act.

EPA has enacted protocols to secure the vulnerability assessments upon receipt. The collection and storage of information is required to follow the “Protocol to Secure Vulnerability Assessments Submitted by Community Water Systems to EPA” (November 30, 2002). The protocol details mandatory protective measures for shipping, storing, reviewing, discussing, transmitting, copying, and disposing of secure information related to the vulnerability assessments. In addition, the protocol provides procedures for identifying, investigating, training, and designating individuals who will have access to the vulnerability assessments. Only individuals granted access by the EPA Administrator will have authorization to view the vulnerability assessments and any information derived from them (except as noted in Section 1433(a)(6)(A), 1433(a)(6)(B), and 1433(a)(7) of the Act).

### **3(g) Sensitive Questions**

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



## 4 THE RESPONDENTS AND THE INFORMATION REQUESTED

### 4(a) Respondents and NAICS/SIC Codes

Data associated with this ICR are collected and maintained by EPA and by CWSs serving more than 3,300 persons. The 2007 North American Industry Classification System (NAICS) Code for water supply and irrigation systems is 221310.

### 4(b) Information Needed

This ICR covers activities outlined by Title IV of the *Public Health Security and Bioterrorism Preparedness and Response Act of 2002*. This ICR summarizes information collection activities, data items, and respondent activities associated with Title IV of the Act.

#### 4(b)(i) Data Items

Each CWS serving more than 3,300 people must conduct a vulnerability assessment of the water system, must certify to EPA that it has conducted this assessment, must revise an existing or prepare a new emergency response plan using the information obtained from the vulnerability assessment, and must certify the completion of this plan to EPA. CWSs may apply for financial assistance to complete the vulnerability assessment but must submit a grant application to do so.<sup>3</sup>

Title IV of the Act requires each CWS to submit the following to EPA:

- Copy of vulnerability assessment.
- Certification of vulnerability assessment conduct.
- Certification of completed emergency response plan.

Additionally, the Act requires each CWS to retain a copy of its emergency response plan for a minimum of five years. CWSs may also maintain records of other documents (e.g., copies of grant applications, vulnerability assessments, and certifications) as necessary.

#### 4(b)(ii) Respondent Activities

Respondents for this information collection include community water systems serving more than 3,300 people. Because the Bioterrorism Act does not specify reporting or recordkeeping requirements for states, this ICR assumes no state activities associated with the

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<sup>3</sup> Currently, this ICR includes only descriptions of grant activities and unit burden and costs. If Congress appropriates funds for the grants, average annual burden and costs for grant applications and review will be added to the ICR through an Information Correction Worksheet (ICW). The appropriation will determine availability and funding levels for new grants.

Act. Each CWS is expected to complete the following activities to comply with Title IV of the Act:

- Read and understand the requirements.
- Complete vulnerability assessment training.
- Conduct an assessment of the vulnerability of the system to a terrorist attack or other intentional act intended to disrupt substantially the ability of the system to provide a safe and reliable supply of drinking water.
- Certify to EPA that the system has conducted a vulnerability assessment.
- Send the vulnerability assessment to EPA.
- Prepare or revise an emergency response plan that incorporates the results of the vulnerability assessment and includes (but is not limited to) plans, procedures, and identification of equipment that can be implemented or utilized in the event of a terrorist or other intentional attack on the public water system.
- Certify to EPA that the system has prepared or revised an emergency response plan.
- Maintain appropriate records as specified by the Act.

NOTE: The assessment shall include (but is not limited to) a review of the following applicable system parts: pipes and constructed conveyances; physical barriers; water collection, pretreatment, treatment, storage and distribution facilities; electronic, computer, or other automated systems which are utilized by the system; the use, storage, or handling of various chemicals; and the operation and maintenance of the system.

In addition, some CWSs may submit a grant application if funds become available.

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

### **5(a) Agency Activities**

EPA will conduct activities associated with this information collection to meet requirements of Title IV of the Act. These activities are listed below.

- Read and understand the Act.
- Review grant requests, if funding is appropriated.
- Conduct quality assurance reviews of submitted vulnerability assessments to ensure that requirements of the Act have been met.
- Conduct quality assurance reviews of vulnerability assessment certifications to ensure that requirements of the Act have been met.
- Conduct quality assurance reviews of emergency response plan certifications to ensure that requirements of the Act have been met.
- Maintain records as specified by the Act.

### **5(b) Collection Methodology and Management**

In collecting the information associated with this ICR, EPA will use the U.S. Postal Service or overnight delivery services. CWSs should submit their vulnerability assessments, vulnerability assessment certifications, and emergency response plan certifications to EPA by courier service directly to a receiving location that secures the information. EPA must maintain information related to the vulnerability assessments in such a way as to monitor and limit access to authorized individuals. Access to the information must be limited to properly designated individuals as required by the Agency's Information Protection Protocol (November 30, 2002). EPA will ensure that requirements of the Act have been met by tracking the submission of vulnerability assessments, vulnerability assessment certifications, and emergency response plan certifications. EPA will review a statistically representative sample of the submitted vulnerability assessments to ensure that all applicable requirements of the Act are being met. In addition, EPA will review grant applications, as necessary.

### **5(c) Small Entity Flexibility**

In developing this ICR for the requirements of the Act, EPA considered the requirement of the Small Business Regulatory Enforcement Fairness Act (SBREFA) to minimize the burden of information collections on small entities. Small entities include "small businesses," "small organizations," and "small government jurisdictions." These terms are defined below.<sup>4</sup>

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<sup>4</sup> These definitions are taken from section 601 of the Regulatory Flexibility Act.

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

The major requirement under SBREFA is a regulatory flexibility analysis of all rules that have a “significant economic impact on a substantial number of small entities.” Since EPA is not promulgating a rule, this ICR is not subject to SBREFA.

EPA will also provide financial assistance to CWSs, as funding is appropriated by Congress. However, EPA believes that the burden on small systems will be minimal. In addition, the Act is applicable only to CWSs serving more than 3,300 people. The smallest systems, consequently, are not affected by information collection activities covered in this ICR.

#### **5(d) Collection Schedule**

The original schedule for this information collection, as submitted to OMB in August 2003, is detailed below. All large systems (serving a population of 100,000 or more) and medium-sized systems (serving a population of 50,000 to 99,999) have responded. A total of 80 small systems (from an overall total of 7,613 small systems serving populations greater than 3,300 but smaller than 50,000) have not responded.

#### **Vulnerability Assessments and Certifications**

Community water systems must certify and submit to EPA copies of their vulnerability assessments prior to the following dates:

- March 31, 2003, for systems serving a population of 100,000 or more. (All have been submitted.)
- December 31, 2003, for systems serving a population of 50,000 to 99,999 people. (All have been submitted.)
- June 30, 2004, for systems serving a population greater than 3,300 but less than 50,000 people. (A total of 28 vulnerability assessments and 22 vulnerability assessment certifications remain to be submitted.)

#### **Emergency Response Plan Certifications**

A community water system must certify to EPA that it has prepared or revised an emergency response plan not later than 6 months after certifying to EPA that the system has

conducted a vulnerability assessment (see section 1433(b) of the Act). (A total of 67 ERP certifications remain to be submitted.)

**Grant Applications**

At its discretion and depending on available funding, EPA may develop additional grant programs to provide CWSs with financial assistance for conducting vulnerability assessments, preparing emergency response plans, and completing other activities to comply with the Act. Grant availability and funding levels have not yet been determined. If such programs are announced, CWSs may submit grant applications in accordance with guidelines established by EPA.



## 6 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section describes the annual burden and costs for the information collection activities necessary to meet the requirements of Title IV of the Act. The burden and cost estimates for CWSs are discussed in detail in Section 6(a) and (b). The Agency's burden and cost estimates are outlined in Section 6(c). Because the Bioterrorism Act does not specify reporting or recordkeeping requirements for States, the States assume no burden or costs for activities associated with this ICR.

To the extent possible, estimates were based on consultations with individuals who have already prepared vulnerability assessments and emergency response plans. EPA emphasizes that the per-respondent estimates represent the *average* burden and cost over the three-year period covered by this ICR (2014 through 2016). Some respondents will incur higher costs and some will fall below the average. Also, due to limited data and the use of best professional judgment, these burden and cost estimates are not precise. Detailed burden and cost estimates for CWSs and EPA are provided in Exhibits 6-2, 6-3, 6-4, 6-5, and in Appendix A.

### 6(a) Estimating Respondent Burden

The average annual respondent burden for CWSs is summarized in Exhibit 6-2; Exhibit 6-4 shows burden and cost estimates by year. Appendix A provides detail of the annual estimated respondent burden for CWSs to complete the activities described in section 4(b)(ii). EPA estimates a total average annual respondent burden of 8,994 hours for complying with the requirements of Title IV of the Act. This estimate includes burden hours associated with reading and understanding Title IV of the Act, preparing grant applications (if authorized), completing training, conducting vulnerability assessments, certifying the conduct of vulnerability assessments, preparing or revising emergency response plans, certifying the conduct of emergency response plans, and recordkeeping. The derivation of estimates is described below.

Conducting Vulnerability Assessments: The burden associated with conducting vulnerability assessments is estimated based on system size, with burdens averaging 680 hours for the smallest systems—serving populations of 3,301-49,999 persons—which is the only class of utilities containing any CWSs that have not submitted vulnerability assessments, as required to fulfill the Act's provisions. EPA based its estimates for vulnerability assessment burden on preliminary consultations with CWSs and EPA Regional personnel and on information from previous grant applications.

Certifying Conduct of Vulnerability Assessments: EPA estimated that CWSs will require 2 hours to prepare a vulnerability assessment certification, based on the Agency's experience with similar certification requirements.

Preparing or Revising Emergency Response Plans<sup>5</sup>: The estimate for the CWS burden to prepare an emergency response plan is 128 hours for systems serving 3,301 to 49,999 people, and 255 hours for systems serving populations of 50,000 or greater. To revise an emergency response plan, the Agency estimated the burden at 28 hours for systems serving 3,301 to 9,999 people, 100 hours for systems serving 10,000 to 49,999 people, and 120 hours for systems serving populations of 50,000 or greater. The Agency used a three-step process to arrive at these estimates. First, based on its consultations with CWSs and EPA Regional personnel, EPA estimated the burden required both to prepare and to revise an emergency response plan. It then estimated the percentage of these plans related specifically to the security of the system preparing the plan. Finally, multiplying the estimated unit burden for preparing or revising an emergency response plan by the percentage of the plan related to security yielded the estimated unit burden for emergency response plans under the Act.

**Exhibit 6-1. Estimated CWS Burden for Emergency Response Plan.**

<i>System Size</i>	<i>ERP Unit Burden Hours Estimate</i>	<i>Security-Related Portion</i>	<i>ERP Unit Burden Hours Estimate (Security Only)</i>
<b><i>Develop ERP</i></b>			
3,301 - 9,999	60	70%	42
10,000 - 49,999	425	50%	212
50,000 - 99,999	850	30%	255
≥100,000	850	30%	255
<b><i>Revise ERP</i></b>			
3,301 - 9,999	40	70%	28
10,000 - 49,999	200	50%	100
50,000 - 99,999	400	30%	120
≥100,000	400	30%	120

Certifying the Completion of Emergency Response Plans: EPA estimates that CWSs will require 2 hours to prepare an emergency response plan certification, based on the Agency's experience with similar certification requirements.

Recordkeeping: EPA estimates the CWS burden for recordkeeping to be 0.25 hours per record kept, based on the Agency's experience with maintaining records. (In Exhibit 6-2, which shows burden calculations based on responses, the recordkeeping burden is included with each of the three response activities – develop/submit vulnerability assessment, submit certification of vulnerability assessment, and prepare/revise emergency response plan and submit certification.)

## **6(b) Estimating Respondent Costs**

<sup>5</sup> Note that these burden estimates are only for the security portions of the ERPs.

Exhibit 6-2 shows the annual average costs for CWSs over the 3-year ICR period, and Exhibit 6-4 shows burden and cost estimates by year.

### 6(b)(i) Respondent Labor

CWS labor costs are estimated by applying an hourly labor rate to the burden hour estimates (as explained in 6(a) above). For purposes of calculating CWS labor costs, EPA assumed a single average hourly wage rate of \$89.30. The rate is derived from the rate quoted by the Bureau of Labor Statistics (BLS) for Standard Occupational Classification (SOC) code 11-1021 (General and Operations Managers)<sup>6</sup>. EPA estimates that CWSs will incur an average annual labor cost of \$803,164 for these requirements. Appendix A provides detailed cost calculations for the information collection activities covered by this ICR.

### 6(b)(ii) Respondent Operation and Maintenance Costs

CWSs incur no capital costs associated with this ICR. CWSs are estimated to incur O&M costs (\$337 annually) to cover postage for submitting grant applications (when authorized), vulnerability assessments, vulnerability assessment certifications, and emergency response plan certifications. Given the sensitive nature of these materials, EPA assumed that each CWS will submit the required information by certified, return-receipt mail or courier service at a cost of \$32.10 to ship the vulnerability assessment and associated certification and \$4.91 to ship the certification of emergency response plan completion.

**Exhibit 6-2. Estimated Average Annual CWS Burden and Costs.**

Activity	Responses	Burden Hours	Labor Costs	O&M Costs	Total Annual Costs
Develop/Submit Vulnerability Assessment	9	6,120	\$546,516	\$0	\$546,516
Submit Certification of Assessment	7	14	\$1,250	\$235	\$1,485
Prepare/Revise Emergency Response Plan and Submit Certification	22	2,860	\$255,398	\$102	\$255,500
<b>Total</b>	<b>38</b>	<b>8,994</b>	<b>\$803,164</b>	<b>\$337</b>	<b>\$803,501</b>

Notes:

Detail may not add exactly to total due to independent rounding.

Hours reflect an annual average for all system sizes over the 3-year ICR period.

A record-keeping burden of 0.25 hours/record is included in the burden hours for the three activities above.

<sup>6</sup> The quoted rate was \$55.81 in year 2013 dollars (see <http://stats.bls.gov>). In addition, 60 percent overhead was assumed, bringing the loaded rate to \$89.30.

**6(c) Estimating Agency Burden and Costs**

To implement Title IV of the Act, EPA will incur burden and costs. Cost and burden estimates for EPA's activities associated with the Act are detailed in Exhibit 6-3 and Appendix A.

For the three-year ICR period, EPA estimated that the average annual burden to the Agency will be 1,035 hours. This estimate includes burden incurred by EPA staff for the activities outlined in Section 5(a) above. The derivation of these burden hours follows.

**6(c)(i) Reading and Understanding Requirements**

Given previous experience with regulations similar complexity, EPA estimated that its staff will require 40 hours to read and understand the requirements of Title IV of the Act. This estimate assumed that several key staff members will read the requirements.

**6(c)(ii) Reviewing Vulnerability Assessments and Certifications**

As stated in Section 5(a), EPA will ensure that requirements of the Act are met by tracking submissions of vulnerability assessments and certifications of vulnerability assessment conduct. EPA will conduct a quality assurance review of a statistically representative sample of the submitted vulnerability assessments to ensure that all applicable requirements of the Act are being met. See paragraph 4(b)(ii) of this document for additional discussion of the conduct of a vulnerability assessment.

Based on EPA's recent experience with vulnerability assessments, the Agency has estimated an average review time for each CWS size category as follows:

- 0.6 hours for systems serving 3,301 to 49,999 people.
- 1.1 hours for systems serving 50,000 to 99,999 people.
- 1.3 hours for systems serving 100,000 or more people.

These estimates are weighted averages based on the anticipated review time and the number of reviews that EPA will conduct. EPA developed the weighted averages by estimating the time required to verify receipt of the vulnerability assessments (and the percentage of systems for which EPA will complete this task) and the time necessary for a detailed quality assurance review of some vulnerability assessments (and the percentage of systems for which EPA will complete this task). The estimated time to verify receipt of the vulnerability assessment is 0.5 hours per system. For the detailed quality assurance reviews, the estimated burden is 3 hours per vulnerability assessment.

**6(c)(iii) Reviewing Emergency Response Plan Certifications**

EPA estimated that it will incur 0.25 hours of burden to review each certification of emergency response plan completion. EPA based this estimate on its experience reviewing certifications for other EPA-administered programs.

**6(c)(iv) Recordkeeping**

To both file and secure the records required by Title IV of the Act, EPA estimated that it will incur a 0.25-hour burden for each record and an additional 1,000 hours annually for security. The Agency estimated this burden based on its experience with maintaining similar records. The annual security burden is for one staff member devoted full-time to security of those records. For the 3,105 burden hours, EPA will incur annual labor costs of \$195,957 to implement the Act's requirements. The following assumptions were used to develop a cost estimate for EPA activities associated with Title IV of the Act:

The average salary and benefits for EPA staff is at the GS 13, Step 5 level of \$131,268<sup>7</sup>.

- There are 2,080 hours per person-year.
- The average hourly rate is \$63.11.

In addition to the labor costs incurred for these activities, EPA cost estimates include the cost of security enhancements designed to protect contents of the vulnerability assessments. These are considered capital costs, which are estimated at \$19,360 annually.

**Exhibit 6-3. Estimated Average Annual Agency Burden and Costs.**

<b>Activity</b>	<b>Burden Hours</b>	<b>Labor Costs</b>	<b>O&amp;M Costs</b>	<b>Capital Costs</b>	<b>Total Annual Costs</b>
Read/Understand Requirements	13	\$820	\$0	\$0	\$820
Review Vulnerability Assessments and Certifications	6	\$379	\$0	\$0	\$379
Review Emergency Response Plan Certifications	6	\$379	\$0	\$0	\$379
Recordkeeping/Security	1,010	\$63,741	\$0	\$19,360	\$83,101
<b>Total</b>	<b>1,035</b>	<b>\$65,319</b>	<b>0</b>	<b>\$19,360</b>	<b>\$84,679</b>

Note: Detail may not add exactly to total due to independent rounding.  
Hours reflect an annual average for all system sizes over the three-year ICR period.

<sup>7</sup> According to the Office of Personnel Management January 2013 GS Pay Schedule, the GS-13 Step 5 salary is \$82,043. By using the standard government benefits factor of 1.6, the average salary plus benefits is \$131,268.

**Exhibit 6-4. Estimated Burden and Costs by Year.**

Respondent	2014 (Year 1)		2015 (Year 2)		2016 (Year 3)		Total	
	Burden (hours)	Cost	Burden (hours)	Cost	Burden (hours)	Cost	Burden (hours)	Cost
CWS	13,491	\$1,204,746	13,491	\$1,204,746	0	\$0	26,982	\$2,409,493
EPA	1,552	\$97,947	1,553	\$98,010	0	\$0	3,105	\$195,957

Note: Detail may not add exactly to total due to independent rounding.

EPA estimates that one-half of the responses will be received and processed in 2014 and the remaining one-half will be received and processed in 2015 and all activity associated with this Information Collection Request will be completed by the end of calendar year 2015.

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

The only respondents for this ICR are CWSs serving populations of more than 3,300 people. This ICR estimates the number of such CWSs at 8,487. (At this time, 8,407 of these systems have already responded, based on the Information Collection Request submitted for this task in 2003.) The total costs and burden for these respondents are summarized in Exhibit 6-2. Agency costs and burden are detailed in Section 6(c) and in Exhibit 6-3. Exhibit 6-4 shows burden and cost by year for both CWSs and EPA.

**6(e) Bottom Line Burden Hours and Cost Tables**

The bottom line burden hours and costs appear in Exhibit 6-5<sup>8</sup>. The total annual average respondent burden associated with this ICR is estimated to be 8,994 burden hours. The corresponding total annual average respondent costs are estimated to be \$803,501. The total average EPA burden is estimated to be 1,035 hours and \$84,679 annually. The burden and costs by year, and in total, are summarized in Exhibit 6-4.

<sup>8</sup> See Appendix A for detailed derivations of these burden and cost estimates.

**Exhibit 6-5. Estimated Bottom Line Average Annual Burden and Costs.**

<b>Number of Respondents</b>	80	Community water systems
<b>Total Annual Responses</b>	38	Community water system responses
<b>Number of Responses per Respondent</b>	$0.48 = 38 / 80$	Total annual responses from above Total respondents from above
<b>Total Annual Respondent Burden Hours</b>	8,994	Community water system hours
<b>Hours per Response</b>	$237 = 8,994 / 38$	Total annual hours from above Total responses from above
<b>Annual O&amp;M Costs</b>	\$337	Community water system O&M costs
<b>Total Annual Respondent Cost</b>	\$803,501	Community water system costs
<b>Total Annual Hours (respondent plus Agency)</b>	$10,029 = 8,994 + 1035$	Total respondent hours Total EPA hours
<b>Total Annual Cost (respondent plus Agency)</b>	$\$888,180 = \$803,501 + \$84,679$	Total respondent cost Total EPA cost

Note: Detail may not add exactly to total due to independent rounding.

Note: Annual O&M costs represent the “cost burden” as reported in the OMB inventory; there are no CWS capital costs associated with this ICR.

## 6(f) BURDEN STATEMENT

**Burden Statement:** The public reporting burden for collections included in this ICR is detailed in Exhibit 6-5 above. The annual respondent burden is estimated to average 237 hours per respondent per year, which is attributed to CWSs. This estimate includes time for reading and understanding the requirements, completing training, conducting a vulnerability assessment, certifying that the vulnerability assessment was conducted, preparing or revising an emergency response plan, certifying the completion of an emergency response plan, and maintaining the required records.

Burden means the total time, effort, or financial resources expended by people to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology, and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a request for information collection unless it displays a currently valid OMB control number. The OMB control numbers for EPA’s regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2003-0013, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the room is (202) 566-1744, and the telephone number for the Water Docket is (202) 566-2426. An electronic version of the public docket is available through <http://www.regulations.gov>. Use [regulations.gov](http://www.regulations.gov) to submit or view public comments, to access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also submit comments to OMB via email to [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov). Address comments to OMB Desk Officer for EPA. Please include the EPA Docket ID No. EPA-HQ-OW-2003-0013 in any correspondence.

#### **6(f)(i) Reasons For Change In Burden**

At this time, 8,407 of the 8,487 CWSs have already responded to this one-time collection. This has resulted in total average annual burden hours for respondents dropping from 2,913,929 in the original to 8,994 hours in the current request. There has been no change in the hour burden from the 2011 ICR. The cost increase is an adjustment to the estimates to account for inflation.



**- APPENDICES -**

**APPENDIX A: Analytical Burden Assumptions**

**Exhibit A-1. CWS Inventory.**

System Size Category (Population Served)	Ground Water CWSs		Surface Water CWSs		Wholesale CWSs	All CWSs
	Article I. A	Article II. B	Article III. C	A+B+C		
3,301-9,999	2,567	1,971	38	4,576		
10,000-49,999	1,256	1,729	52	3,037		
50,000-99,999	140	322	13	475		
>100,000	62	300	37	399		
<b>Totals</b>	<b>4,025</b>	<b>4,322</b>	<b>140</b>	<b>8,487</b>		

Source: SDWIS FY 2002 Quarter 3 frozen database. Active CWSs in the current inventory only.

## Exhibit A-2. CWS Unit Cost Assumptions

Activities	Assumptions				
	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost	Unit Capital Cost
	A	B	C=A*B	D	E
<b>Read and Understand Requirements</b>					
- Systems Serving 3,301-9,999	8	\$ 78.96	\$ 631.68	\$ -	\$ -
- Systems Serving 10,000-49,999	8	\$ 78.96	\$ 631.68	\$ -	\$ -
- Systems Serving 50,000-99,999	8	\$ 78.96	\$ 631.68	\$ -	\$ -
- Systems Serving >100,000	8	\$ 78.96	\$ 631.68	\$ -	\$ -
<b>Grant Requests (Note 1)</b>					
- Systems Serving 3,301-9,999	40	\$ 78.96	\$ 3,158.40	\$ 4.27	\$ -
- Systems Serving 10,000-49,999	40	\$ 78.96	\$ 3,158.40	\$ 4.27	\$ -
- Systems Serving 50,000-99,999	40	\$ 78.96	\$ 3,158.40	\$ 4.27	\$ -
- Systems Serving >100,000	40	\$ 78.96	\$ 3,158.40	\$ 4.27	\$ -
<b>Training</b>					
- Systems Serving 3,301-9,999	8	\$ 78.96	\$ 631.68	\$ -	\$ -
- Systems Serving 10,000-49,999	8	\$ 78.96	\$ 631.68	\$ -	\$ -
- Systems Serving 50,000-99,999	48	\$ 78.96	\$ 3,790.08	\$ -	\$ -
- Systems Serving >100,000	48	\$ 78.96	\$ 3,790.08	\$ -	\$ -
<b>Develop Vulnerability Assessments</b>					
- Systems Serving 3,301-9,999	84.9	\$ 78.96	\$ 6,703.70	\$ -	\$ -
- Systems Serving 10,000-49,999	1,273.9	\$ 78.96	\$ 100,587.14	\$ -	\$ -
- Systems Serving 50,000-99,999	1,698.5	\$ 78.96	\$ 134,113.56	\$ -	\$ -
- Systems Serving >100,000	6,794.0	\$ 78.96	\$ 536,454.24	\$ -	\$ -
<b>Certify Vulnerability Assessments Developed and Submit Copy to EPA</b>					
- Systems Serving 3,301-9,999	2	\$ 78.96	\$ 157.92	\$ 27.94	\$ -
- Systems Serving 10,000-49,999	2	\$ 78.96	\$ 157.92	\$ 27.94	\$ -
- Systems Serving 50,000-99,999	2	\$ 78.96	\$ 157.92	\$ 27.94	\$ -
- Systems Serving >100,000	2	\$ 78.96	\$ 157.92	\$ 27.94	\$ -
<b>Prepare Emergency Response Plans</b>					
- Systems Serving 3,301-9,999	42	\$ 78.96	\$ 3,316.32	\$ -	\$ -
- Systems Serving 10,000-49,999	213	\$ 78.96	\$ 16,818.48	\$ -	\$ -
- Systems Serving 50,000-99,999	255	\$ 78.96	\$ 20,134.80	\$ -	\$ -
- Systems Serving >100,000	255	\$ 78.96	\$ 20,134.80	\$ -	\$ -
<b>Revise Emergency Response Plans</b>					
- Systems Serving 3,301-9,999	28	\$ 78.96	\$ 2,210.88	\$ -	\$ -
- Systems Serving 10,000-49,999	100	\$ 78.96	\$ 7,896.00	\$ -	\$ -
- Systems Serving 50,000-99,999	120	\$ 78.96	\$ 9,475.20	\$ -	\$ -
- Systems Serving >100,000	120	\$ 78.96	\$ 9,475.20	\$ -	\$ -
<b>Certify Emergency Response Plans Prepared or Revised</b>					
- Systems Serving 3,301-9,999	2	\$78.96	\$ 157.92	\$ 4.27	\$ -
- Systems Serving 10,000-49,999	2	\$78.96	\$ 157.92	\$ 4.27	\$ -
- Systems Serving 50,000-99,999	2	\$78.96	\$ 157.92	\$ 4.27	\$ -
- Systems Serving >100,000	2	\$78.96	\$ 157.92	\$ 4.27	\$ -
<b>Recordkeeping</b>					
- Systems Serving 3,301-9,999	0.25	\$78.96	\$ 19.74	\$ -	\$ -
- Systems Serving 10,000-49,999	0.25	\$78.96	\$ 19.74	\$ -	\$ -
- Systems Serving 50,000-99,999	0.25	\$78.96	\$ 19.74	\$ -	\$ -
- Systems Serving >100,000	0.25	\$78.96	\$ 19.74	\$ -	\$ -

Note 1: Availability and funding levels for new grants have not yet been determined.

**Exhibit A-3. EPA Unit Cost Assumptions.**

Activities	Assumptions				
	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost	Unit Capital Cost
	A	B	C=A*B	D	E
<b>Read and Understand Requirements</b>	40	\$ 58.37	\$ 2,334.80	\$ -	\$ -
<b>Review Grant Requests</b>					
- Systems Serving 3,301-9,999	20	\$ 58.37	\$ 1,167.40	\$ -	\$ -
- Systems Serving 10,000-49,999	20	\$ 58.37	\$ 1,167.40	\$ -	\$ -
- Systems Serving 50,000-99,999	40	\$ 58.37	\$ 2,334.80	\$ -	\$ -
- Systems Serving >100,000	40	\$ 58.37	\$ 2,334.80	\$ -	\$ -
<b>Review Vulnerability Assessments and Certifications</b>					
- Systems Serving 3,301-9,999		\$ 58.37	\$ 35.02	\$ -	\$ -
- Systems Serving 10,000-49,999	0.6	\$ 58.37	\$ 35.02	\$ -	\$ -
- Systems Serving 50,000-99,999	0.6	\$ 58.37	\$ 64.21	\$ -	\$ -
- Systems Serving >100,000	1.1	\$ 58.37	\$ 75.88	\$ -	\$ -
	1.3	\$ 58.37	\$ 75.88	\$ -	\$ -
<b>Review Emergency Response Plan Certifications</b>					
- Systems Serving 3,301-9,999		\$ 58.37	\$ 14.59	\$ -	\$ -
- Systems Serving 10,000-49,999	0.25	\$ 58.37	\$ 14.59	\$ -	\$ -
- Systems Serving 50,000-99,999	0.25	\$ 58.37	\$ 14.59	\$ -	\$ -
- Systems Serving >100,000	0.25	\$ 58.37	\$ 14.59	\$ -	\$ -
	0.25	\$ 58.37	\$ 14.59	\$ -	\$ -
<b>Recordkeeping</b>					
- Filing		\$ 58.37	\$ 14.59	\$ -	\$ -
- Security	0.25	\$ 58.37	\$ 14.59	\$ -	\$ -
	2,080	\$ 58.37	\$ 121,409.60	\$ -	\$50,547

**Exhibit A-4. CWS Yearly Responses, Burden, and Costs.**

Activities	CWS Responses by Year			CWS Burden by Year			CWS Labor Cost by Year			CWS O&M Cost by Year			CWS Capital Cost by Year		
	2007	2008	2009	2007	2008	2009	2007	2008	2009	2007	2008	2009	2007	2008	2009
<b>Develop/Submit Vulnerability Assessments</b> - Systems Serving 3,301-49,999	14	14	-	9,520	9,520	-	\$ 751,699	\$ 751,699	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Certify Vulnerability Assessments Developed and Submit Copy to EPA</b> - Systems Serving 3,301-49,999	11	11	-	21	21	-	\$ 1,658	\$ 1,658	\$ -	\$ 308	\$ 308	\$ -	\$ -	\$ -	\$ -
<b>Prepare or Revise Emergency Response Plans and Submit Certification</b> - Systems Serving 3,301-49,999	33	33	-	4,026	4,026	-	\$ 317,893	\$ 317,893	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total - All Activities</b>	<b>58</b>	<b>58</b>	<b>-</b>	<b>13,567</b>	<b>13,567</b>	<b>-</b>	<b>\$1,071,250</b>	<b>\$1,071,250</b>	<b>\$ -</b>	<b>\$ 442</b>	<b>\$ 442</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

Note: Detail may not add up exactly due to independent rounding.

**Exhibit A.5. EPA Yearly Responses, Burden, and Costs.**

Activities	EPA Responses by Year			EPA Burden by Year			EPA Labor Cost by Year			EPA O&M Cost by Year			EPA Capital Cost by Year		
	2007	2008	2009	2007	2008	2009	2007	2008	2009	2007	2008	2009	2007	2008	2009
<b>Read and Understand Requirements</b>	1	1	-	20	20	-	\$ 1,139	\$ 1,139	\$ -	\$ -	\$ -	\$ -			\$ -
<b>Review Vulnerability Assessments and Certifications</b> - Systems Serving 3,301-49,999	9	9	-	9	9	-	\$ 525	\$ 525	\$ -	\$ -	\$ -	\$ -			\$ -
<b>Review Emergency Response Plan Certifications-</b> Systems Serving 3,301-49,999	9	9	-	9	9	-	\$ 525	\$ 525	\$ -	\$ -	\$ -	\$ -			\$ -
<b>Recordkeeping</b> - Filing	18	18	-	1,515	1,515	-	\$ 88,415	\$ 88,415	\$ -	\$ -	\$ -	\$ -			\$ -
- Security	1	1	-	-	-	-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 25,274	\$ 25,274	\$ -
<b>Total – All Activities</b>	<b>38</b>	<b>38</b>	<b>-</b>	<b>1,553</b>	<b>1,553</b>	<b>-</b>	<b>\$ 90,604</b>	<b>\$ 90,604</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 25,274</b>	<b>\$ 25,274</b>	<b>\$ -</b>

Exhibit A-6. Respondent, Responses, Burden, and Cost Summaries.

Respondent	Respondent (count)	Annual Response Estimates			Average Annual Responses	Annual Burden Estimates			Average Annual Burden
		2007	2008	2009		2007	2008	2009	
CWSs - Systems Serving 3,301-49,999	80	57	57	-	38	13,491	13,491	-	8,994
CWS Total	80	57	57	-	38	13,491	13,491	-	8,994
EPA	1	29	29	-	19	1,553	1,553	-	1,035

Respondent	Respondent (count)	Annual Labor Cost			Average Annual Labor Cost	Annual O&M Cost (Burden) Estimates			Average Annual O&M (Cost Burden)
		2007	2008	2009		2007	2008	2009	
CWSs - Systems Serving 3,301- 49,999	80	\$1,065,249	\$1,065,249	-	\$710,166	\$ 441	\$ 441	-	\$ 294
CWS Total	80	\$1,065,249	\$1,065,249	-	\$710,166	\$ 441	\$ 441	-	\$ 294
EPA	1	\$ 88,416	\$ 88,416	-	\$ 58,944	-	-	-	-

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Respondent	Respondent (count)	Annual Capital Cost			Average Annual Capital Cost
		2007	2008	2009	
CWSs - Systems Serving 3,301-49,999	80	\$ -	\$ -	\$ -	\$ -
CWS Total	80	\$ -	\$ -	\$ -	\$ -
EPA	1	\$ 25,274	\$ 25,274	-	\$ 16,849

Respondent	Respondent (count)	Annual Responses Per Respondent			Annual O&M Cost Per Respondent		
		2007	2008	2009	2007	2008	2009
CWSs - Systems Serving 3,301-49,999	80	0.48	0.48	-	\$ 5.51	\$ 5.51	-
CWS Total	80	0.48	0.48	-	\$ 5.51	\$ 5.51	-
EPA	1	2	2	-	-	-	-



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