

## Appendix A

# Federal Register Notice Soliciting Comments on Information Collection Requests

*Minutes:* The minutes of the meeting will be available for public review and copying within 90 days on the STEAB Web site, [www.steab.org](http://www.steab.org).

Issued at Washington, DC, on March 25, 2015.

**LaTanya Butler,**

*Deputy Committee Management Officer.*

[FR Doc. 2015-07379 Filed 3-30-15; 8:45 am]

BILLING CODE 6450-01-P

## DEPARTMENT OF ENERGY

### Federal Energy Regulatory Commission

#### Combined Notice of Filings #2

Take notice that the Commission received the following electric corporate filings:

*Docket Numbers:* EC15-103-000.

*Applicants:* Iberdrola, S.A., Iberdrola USA, Inc., Iberdrola USA Networks, Inc., Green Merger Sub, Inc., UIL Holdings Corporation.

*Description:* Joint Application of Iberdrola S.A, et al. for Authorization of Transaction under Section 203 of the Federal Power Act and Requests for Waivers of Filing Requirements, Shortened Comment Period and Expedited Consideration.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5217.

*Comments Due:* 5 p.m. ET 4/15/15.

Take notice that the Commission received the following electric rate filings:

*Docket Numbers:* ER12-348-004.

*Applicants:* Mercuria Energy America, Inc.

*Description:* Compliance filing per 35: MBR Tariff to be effective 3/26/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5245.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER13-1332-002.

*Applicants:* Canadian Hills Wind, LLC.

*Description:* Tariff Cancellation per 35.17(a): CH Withdrawal to be effective N/A.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5165.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-1372-000.

*Applicants:* Canadian Hills Wind, LLC.

*Description:* Section 205(d) rate filing per 35.13(a)(2)(iii): Filing of Amended Co-Tenancy and Shared Facilities Agreement to be effective 5/12/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5174.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-1373-000.

*Applicants:* Orange and Rockland Utilities, Inc.

*Description:* Section 205(d) rate filing per 35.13(a)(2)(i): Orange and Rockland Undergrounding Rate 3.24.15 to be effective 4/1/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5175.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-1374-000.

*Applicants:* PJM Interconnection, L.L.C., Potomac Electric Power Company.

*Description:* Section 205(d) rate filing per 35.13(a)(2)(iii): Potomac Electric Power Company submits revisions to OATT Att H-9A to be effective 4/1/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5196.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-1375-000.

*Applicants:* McCoy Solar, LLC.

*Description:* Baseline eTariff Filing per 35.1: McCoy Solar, LLC Application for Market-Based Rate Authority to be effective 5/24/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5230.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-1376-000.

*Applicants:* Mercuria Commodities Canada Corporation.

*Description:* Tariff Withdrawal per 35.15: Notice of Cancellation to be effective 3/26/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5246.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-1377-000.

*Applicants:* Midcontinent Independent System Operator, Inc.

*Description:* Section 205(d) rate filing per 35.13(a)(2)(iii): 2015-03-25 SA 2707 NSP-Odell Wind Farm 1st Rev GIA (G826) to be effective 3/26/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5247.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-1378-000.

*Applicants:* Mercuria Commodities Canada Corporation.

*Description:* Baseline eTariff Filing per 35.1: Refile MBR Tariff to be effective 3/26/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5248.

*Comments Due:* 5 p.m. ET 4/15/15.

*Docket Numbers:* ER15-755-001.

*Applicants:* Powerex Corp.

*Description:* Compliance filing per 35: FERC Rate Schedule No. 1 Compliance Filing to be effective 3/1/2015.

*Filed Date:* 3/25/15.

*Accession Number:* 20150325-5195.

*Comments Due:* 5 p.m. ET 4/15/15.

The filings are accessible in the Commission's eLibrary system by

clicking on the links or querying the docket number.

Any person desiring to intervene or protest in any of the above proceedings must file in accordance with Rules 211 and 214 of the Commission's Regulations (18 CFR 385.211 and 385.214) on or before 5:00 p.m. Eastern time on the specified comment date. Protests may be considered, but intervention is necessary to become a party to the proceeding.

eFiling is encouraged. More detailed information relating to filing requirements, interventions, protests, service, and qualifying facilities filings can be found at: <http://www.ferc.gov/docs-filing/efiling/filing-req.pdf>. For other information, call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Dated: March 25, 2015.

**Nathaniel J. Davis, Sr.,**

*Deputy Secretary.*

[FR Doc. 2015-07304 Filed 3-30-15; 8:45 am]

BILLING CODE 6717-01-P

## ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OW-2011-0439; EPA-HQ-OW-2011-0442; EPA-HQ-OW-2011-0443; FRL-9925-45-OW]

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

**AGENCY:** Environmental Protection Agency (EPA).

**ACTION:** Notice.

**SUMMARY:** The U.S. Environmental Protection Agency (EPA) will be submitting renewals of information collection requests (ICRs) to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act (PRA; 44 U.S.C. 3501 *et seq.*). The ICRs included in this renewal notice are the Microbial Rules Renewal Information Collection Request, EPA ICR No. 1895.08, OMB Control No. 2040-0205, which expires on August 31, 2015; the Public Water System Supervision Program Renewal Information Collection Request, EPA ICR No. 0270.46, OMB Control No. 2040-0090, which expires on October 31, 2015; and the Disinfectants/Disinfection Byproducts, Chemical and Radionuclides Rules Renewal

Information Collection Request (ICR), EPA ICR No. 1896.10, OMB Control No. 2040-0204, which expires on December 31, 2015. EPA is soliciting public comments on specific aspects of the proposed information collections as described in this renewal notice. The 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.

**DATES:** Comments must be submitted on or before June 1, 2015.

**ADDRESSES:** Submit your comments, referencing the Docket ID numbers provided for each ICR listed in the **SUPPLEMENTARY INFORMATION** section, online using [www.regulations.gov](http://www.regulations.gov) (our preferred method), by email to [OW-Docket@epa.gov](mailto:OW-Docket@epa.gov) or by mail to: EPA Docket Center, Environmental Protection Agency, Mail Code 28221T, 1200 Pennsylvania Ave., NW., Washington, DC 20460.

EPA's policy is that all comments received will be included in the public docket without modifications including any personal information provided, unless the comment includes profanity, threats, information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute.

**FOR FURTHER INFORMATION CONTACT:** Kevin Roland, Drinking Water Protection Division, Office of Ground Water and Drinking Water, (4606M), Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460; telephone number: 202-564-4588; fax number: 202-564-3755; email address: [roland.kevin@epa.gov](mailto:roland.kevin@epa.gov).

**SUPPLEMENTARY INFORMATION:** Supporting documents that explain in detail the information that the EPA will be collecting are available in the public dockets for these ICRs. The dockets can be viewed online at [www.regulations.gov](http://www.regulations.gov) or in person at the EPA Docket Center, WJC West, Room 3334, 1301 Constitution Ave., NW., Washington, DC. The telephone number for the Docket Center is 202-566-1744. For additional information about EPA's public docket, visit [www.epa.gov/dockets](http://www.epa.gov/dockets).

Pursuant to section 3506(c)(2)(A) of the PRA, the EPA is soliciting 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. EPA will consider the comments received and amend the ICRs as appropriate. The final ICR packages will then be submitted to OMB for review and approval. At that time, EPA will issue another **Federal Register** notice to announce the submission of the ICRs to OMB and the opportunity to submit additional comments to OMB.

**EPA ICR No. 1895.08, OW-2011-0442 Microbial Rules Renewal Information Collection Request**

*Abstract:* The Microbial Rules Renewal ICR examines public water system and primacy agency 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 per the *Code of Federal Regulations* (CFR) at 40 CFR parts 141 and 142. The following microbial regulations are included: the Surface Water Treatment Rule (SWTR), the Total Coliform Rule (TCR), the Revised Total Coliform Rule (RTCR), the Interim Enhanced Surface Water Treatment Rule (IESWTR), the Filter Backwash Recycling Rule (FBRR), the Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR), the Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR), the Ground Water Rule (GWR) and the Aircraft Drinking Water Rule (ADWR). Future microbial-related rulemakings will be added to this consolidated ICR after the regulations are promulgated and the initial, rule-specific, ICRs are due to expire.

*Form Numbers:* None.

*Respondents/affected entities:* Entities potentially affected by this action are new and existing public water systems and primacy agencies.

*Respondent's obligation to respond:* Mandatory for compliance with 40 CFR parts 141 and 142.

*Estimated number of respondents:* 153,083 (total).

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

*Total estimated burden:* 12,930,414 hours (per year). Burden is defined in 5 CFR 1320.03(b).

*Total estimated cost:* \$590,507,000 (per year), includes \$20,386,000 annualized capital and \$115,808,000 operation and maintenance costs.

*Changes in estimates:* 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.

**EPA ICR No. 0270.46, OW-2011-0443 Public Water System Supervision Program Renewal Information Collection Request**

*Abstract:* The Public Water System Supervision (PWSS) Program Renewal ICR examines public water system, primacy agency 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). The following activities have recordkeeping and reporting requirements that are mandatory for compliance with 40 CFR parts 141 and 142: The Consumer Confidence Report Rule (CCR), the Variance and Exemption Rule (V/E Rule), General State Primacy Activities, the Public Notification Rule (PN) and Proficiency Testing Studies for Drinking Water Laboratories. The information collection activities for both the Operator Certification 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.

*Form numbers:* None.

*Respondents/affected entities:* Entities potentially affected by this action are new and existing public water systems and primacy agencies.

*Respondent's obligation to respond:* Mandatory for compliance with 40 CFR parts 141 and 142.

*Estimated number of respondents:* 154,938 (total).

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

*Total estimated burden:* 4,113,408 hours (per year). Burden is defined in 5 CFR 1320.03(b).

*Total estimated cost:* \$227,666,000. This includes an estimated burden cost

of \$40,019,000 for maintenance and operational costs.

*Changes in estimates:* 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.

**EPA ICR No. 1896.10, OW-2011-0439 Disinfectants/Disinfection Byproducts, Chemical and Radionuclides Rules Information Collection Request**

*Abstract:* The Disinfectants/Disinfection Byproducts, Chemical and Radionuclides Rules ICR examines public water system and primacy agency 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: The Stage 1 Disinfectants and Disinfection Byproducts Rule (Stage 1 DBPR), the Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR), the Chemical Phase Rules (Phases II/III/V), the Radionuclides Rule, the Total Trihalomethanes (TTHM) Rule, Disinfectant Residual Monitoring and Associated Activities under the Surface Water Treatment Rule (SWTR), the Arsenic Rule, the Lead and Copper Rule (LCR) and the Lead and Copper Rule Short Term Revisions. Future chemical-related rulemakings will be added to this consolidated ICR after the regulations are promulgated and the initial, rule-specific, ICRs are due to expire.

*Form numbers:* None

*Respondents/affected entities:* Entities potentially affected by this action are new and existing public water systems and primacy agencies.

*Respondent's obligation to respond:* Mandatory for compliance with 40 CFR parts 141 and 142.

*Estimated number of respondents:* 153,036.

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

*Total estimated burden:* 5,734,335 hours (per year). Burden is defined in 5 CFR 1320.03(b).

*Total estimated cost:* \$435,706,000 (per year), includes \$4,984,000 annualized capital and \$225,068,000 operation and maintenance costs.

*Changes in Estimates:* 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.

Dated: March 20, 2015.

**Peter Grevatt,**

*Director, Office of Ground Water and Drinking Water.*

[FR Doc. 2015-07357 Filed 3-30-15; 8:45 am]

**BILLING CODE 6560-50-P**

**ENVIRONMENTAL PROTECTION AGENCY**

**[EPA-HQ-OW-2009-0090; FRL-9925-25-OW]**

**Proposed Information Collection Request; Comment Request; Information Collection Request Renewal for the Unregulated Contaminant Monitoring Rule (UCMR 3)**

**AGENCY:** Environmental Protection Agency (EPA).

**ACTION:** Notice.

**SUMMARY:** The U.S. Environmental Protection Agency (EPA) will be submitting the "Information Collection Request Renewal for the Unregulated Contaminant Monitoring Rule (UCMR 3)" (EPA ICR No. 2192.06, OMB Control No. 2040-0270) to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act (PRA; 44 U.S.C. 3501 *et seq.*). Before doing so, EPA solicits public comments on specific aspects of the proposed information collection as described in this renewal notice. This is a proposed extension of the information collection request (ICR), which is currently approved through August 31, 2015. 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.

**DATES:** Comments must be submitted on or before June 1, 2015.

**ADDRESSES:** Submit your comments, referencing Docket ID No. EPA-HQ-OW-2009-0090, online using [www.regulations.gov](http://www.regulations.gov) (our preferred method), by email to [OW-Docket@epa.gov](mailto:OW-Docket@epa.gov) or by mail to: EPA Docket Center, Environmental Protection Agency, Mail Code 28221T, 1200 Pennsylvania Ave. NW., Washington, DC 20460.

EPA's policy is that all comments received will be included in the public docket without change including any personal information provided, unless the comment includes profanity, threats, information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute.

**FOR FURTHER INFORMATION CONTACT:**

Brenda D. Parris, Technical Support Center, Office of Ground Water and Drinking Water, Environmental Protection Agency, 26 West Martin Luther King Drive (MS 140), Cincinnati, Ohio 45268; telephone (513) 569-7961 or email at [parris.brenda@epa.gov](mailto:parris.brenda@epa.gov).

**SUPPLEMENTARY INFORMATION:**

Supporting documents that explain in detail the information that EPA will be collecting are available in the public docket for this ICR. The docket can be viewed online at [www.regulations.gov](http://www.regulations.gov) or in person at the EPA Docket Center, WJC West, Room 3334, 1301 Constitution Ave. NW., Washington, DC. The telephone number for the Docket Center is 202-566-1744. For additional information about EPA's public docket, visit [www.epa.gov/dockets](http://www.epa.gov/dockets).

Pursuant to section 3506(c)(2)(A) of the PRA, EPA requests 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. EPA will consider the comments received and amend the ICR as appropriate. The final ICR package will then be submitted to OMB for review and approval. EPA will issue another **Federal Register** notice to announce the submission of the ICR to OMB and the opportunity to submit additional comments to OMB.

*Abstract:* The Safe Drinking Water Act (SDWA), as amended in 1996, requires EPA to establish criteria for a program for public water systems (PWSs) to monitor not more than 30 unregulated contaminants every five years. Information collected under the program supports Agency decision making regarding whether or not to regulate particular contaminants in drinking water. EPA published the first group of contaminants in UCMR 1, in the **Federal Register** on September 17, 1999 (64 FR 50556), and the second

## Appendix B

### Consumer Confidence Reports 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	27,677	4,658,106	168	3,659,418	132
501 to 3,300	13,514	19,403,711	1,436	7,391,424	547
3,301 to 9,999	4,925	28,607,912	5,809	10,265,070	2,084
10,000 to 50,000	3,348	73,046,244	21,818	24,712,484	7,381
50,001 to 99,999	538	37,100,853	68,961	11,905,650	22,129
100,000 & over	429	139,778,991	325,825	39,182,740	91,335
<b>Total</b>	<b>50,431</b>	<b>302,595,817</b>	<b>6,000</b>	<b>97,116,786</b>	<b>1,926</b>

Source: SDWIS/FED Data from October 2014

## Exhibit 2

### Summary of CWSs and Service Connections

<b>CWS Size Category (population served)</b>	<b>Number of CWSs</b>	<b>Number of Customers (service connections)</b>
500 & under	27,677	3,659,418
501 to 3,300	13,514	7,391,424
3,301 to 9,999	4,925	10,265,070
10,000 to 50,000	3,348	24,712,484
50,001 to 99,999	538	11,905,650
100,000 & over	429	39,182,740
<b>Totals</b>	<b>50,431</b>	<b>97,116,786</b>

Source: SDWIS/FED Data from October 2014.

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)

<b>CWS Size Category (population served)</b>	<b>Standard O&amp;M Cost Per Report [1]</b>	<b>Postage Per Report [2]</b>	<b>Total O&amp;M Cost Per Report</b>
500 & under	\$0.03	\$0.490	\$0.519
501 to 3,300	\$0.03	\$0.435	\$0.464
3,301 to 9,999	\$0.03	\$0.435	\$0.464
10,000 to 50,000	\$0.03	\$0.435	\$0.464
50,001 to 99,999	\$0.007	\$0.435	\$0.442
100,000 & over	\$0.007	\$0.435	\$0.442

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 (assumes 500 piece minimum). 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, \$0.49.

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 2013 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	\$286	N/A
3,301 to 9,999	\$858	N/A
10,000 to 50,000	\$2,858	N/A
50,001 to 99,999	\$2,858	N/A
100,000 & over	\$2,858	\$0

Notes:

[1] Systems serving 100,000 or more people that post their CCR online are assumed to have existing internet access and are assumed to have no additional internet access costs. Systems serving fewer than 100,000 people are not required to post CCRs online.

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 2013 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
<b>Prepare report</b>									
500 & under	4	27,677	110,708	\$34.59	\$3,829,611	\$0.00	\$0	\$0	\$3,829,611
501 to 3,300	13	13,514	168,925	\$34.59	\$5,843,454	\$0.00	\$0	\$0	\$5,843,454
3,301 to 9,999	30	4,925	147,750	\$34.59	\$5,110,968	\$0.00	\$0	\$0	\$5,110,968
10,000 to 50,000	30	3,348	100,440	\$34.59	\$3,474,420	\$0.00	\$0	\$0	\$3,474,420
50,001 to 99,999	80	538	43,040	\$34.59	\$1,488,840	\$0.00	\$0	\$0	\$1,488,840
100,000 & over	160	429	68,640	\$34.59	\$2,374,395	\$0.00	\$0	\$0	\$2,374,395
<b>Submit report, certify that report was distributed to customers, and certify that information is correct to the State/Primacy Agency.</b>									
500 & under	0.5	27,677	13,839	\$34.59	\$478,701	\$0.52	\$14,353	\$0	\$493,054
501 to 3,300	0.5	13,514	6,757	\$34.59	\$233,738	\$0.52	\$7,008	\$0	\$240,746
3,301 to 9,999	0.5	4,925	2,463	\$34.59	\$85,183	\$0.52	\$2,554	\$0	\$87,737
10,000 to 50,000	0.5	3,348	1,674	\$34.59	\$57,907	\$0.52	\$1,736	\$0	\$59,643
50,001 to 99,999	0.5	538	269	\$34.59	\$9,305	\$0.50	\$267	\$0	\$9,573
100,000 & over [1]	0.5	429	215	\$34.59	\$7,420	\$0.50	\$149	\$0	\$7,569
<b>Storing and making available one copy of the report.</b>									
500 & under	0.25	27,677	6,919	\$34.59	\$239,351	\$0.00	\$0	\$0	\$239,351
501 to 3,300	0.25	13,514	3,379	\$34.59	\$116,869	\$0.00	\$0	\$0	\$116,869
3,301 to 9,999	0.25	4,925	1,231	\$34.59	\$42,591	\$0.00	\$0	\$0	\$42,591
10,000 to 50,000	0.25	3,348	837	\$34.59	\$28,954	\$0.00	\$0	\$0	\$28,954
50,001 to 99,999	0.25	538	135	\$34.59	\$4,653	\$0.00	\$0	\$0	\$4,653
100,000 & over	0.25	429	107	\$34.59	\$3,710	\$0.00	\$0	\$0	\$3,710
<b>Subtotals</b>	<b>N/A</b>	<b>151,293</b>	<b>677,326</b>	<b>N/A</b>	<b>\$23,430,070</b>	<b>N/A</b>	<b>\$26,068</b>	<b>\$0</b>	<b>\$23,456,138</b>

Note:

[1] Based on EPA best professional judgment, 30% of systems serving 100,000 or more people are assumed to exclusively deliver CCRs electronically (to both customers and the Primacy Agency), and therefore would not incur standard O&M costs for postage, paper, photocopying, etc.

Sources:

Hours per system: Based on consultations during development of the CCR Rule (carried forward from 1998 ICR). Includes burden estimates from the May 2015 consultation with water industry representatives.

Number of CWSs: Exhibit 2

Labor Rates: 2013\$ labor rate of \$21.62 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 \$34.59.

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
<b>Report Delivery - Systems Serving 500 or Fewer People</b>													
Deliver as bill stuffer	10	27,677	3,659,418	50%	13,839	138,385	\$34.59	\$4,787,014	1,829,709	\$0.03	\$52,300	\$0	\$4,839,314
Post report (e.g., bulletin board)	0.12	27,677	3,659,418	50%	13,839	1,661	\$34.59	\$57,444	13,839	\$0.03	\$396	\$0	\$57,840
<b>Report Delivery - Systems Serving 501 to 3,300 People</b>													
Deliver as bill stuffer	10	13,514	7,391,424	25%	3,379	33,785	\$34.59	\$1,168,691	1,847,856	\$0.03	\$52,819	\$0	\$1,221,509
Mail as separate item	10	13,514	7,391,424	25%	3,379	33,785	\$34.59	\$1,168,691	1,847,856	\$0.46	\$856,636	\$0	\$2,025,327
Publish notice of how to obtain CCR	0.25	13,514	7,391,424	50%	6,757	1,689	\$34.59	\$58,435	6,757	\$286	\$1,931,399	\$0	\$1,989,834
<b>Report Delivery - Systems Serving 3,301 to 9,999 People</b>													
Deliver as bill stuffer	10	4,925	10,265,070	25%	1,231	12,313	\$34.59	\$425,914	2,566,268	\$0.03	\$73,353	\$0	\$499,267
Mail as separate item	10	4,925	10,265,070	25%	1,231	12,313	\$34.59	\$425,914	2,566,268	\$0.46	\$1,189,680	\$0	\$1,615,594
Publish notice of how to obtain CCR	0.25	4,925	10,265,070	50%	2,463	616	\$34.59	\$21,296	2,463	\$858	\$2,111,619	\$0	\$2,132,915
<b>Report Delivery - Systems Serving 10,000 to 50,000 People</b>													
Deliver as bill stuffer	10	3,348	24,712,484	100%	3,348	33,480	\$34.59	\$1,158,140	24,712,484	\$0.03	\$706,374	\$0	\$1,864,514
Publish notice of how to obtain CCR [2]	0.25	3,348	24,712,484	100%	3,348	837	\$34.59	\$28,954	3,348	\$2,858	\$9,569,816	\$0	\$9,598,770
<b>Report Delivery - Systems Serving 50,001 to 99,999 People</b>													
Deliver as bill stuffer	10	538	11,905,650	100%	538	5,380	\$34.59	\$186,105	11,905,650	\$0.007	\$85,077	\$0	\$271,182
Publish notice of how to obtain CCR [2]	0.25	538	11,905,650	100%	538	135	\$34.59	\$4,653	538	\$2,858	\$1,537,802	\$0	\$1,542,455
<b>Report Delivery - Systems Serving 100,000 or More People</b>													
Deliver as bill stuffer [3]	10	429	39,182,740	70%	300	3,003	\$34.59	\$103,880	27,427,918	\$0.007	\$195,998	\$0	\$299,877
Publish notice of how to obtain CCR [2]	0.25	429	39,182,740	100%	429	107	\$34.59	\$3,710	429	\$2,858	\$1,226,240	\$0	\$1,229,950
Post on Public Internet Site [4]	2	429	39,182,740	100%	429	858	\$34.59	\$29,680	429	\$0	\$0	\$0	\$29,680
<b>Subtotals</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>55,046</b>	<b>278,345</b>	<b>N/A</b>	<b>\$9,628,519</b>	<b>74,731,810</b>	<b>N/A</b>	<b>\$19,589,508</b>	<b>\$0</b>	<b>\$29,218,027</b>

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.

[2] In addition to delivering CCRs as bill stuffers, systems serving 10,000 or more people are required to make good faith effort to reach those who do not receive water bills by publishing a notice to let customers know how to obtain the CCR.

[3] In response to the following memo (<http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf>), which allows electronic delivery of CCRs in some cases, EPA estimates 30% of systems serving 100,000 or more people will exclusively deliver CCRs electronically. Therefore only 70% of systems serving 100,000 or more people are assumed to incur O&M costs related to bill stuffer delivery.

[4] Based on EPA best professional judgment, all systems serving 100,000 or more people are assumed to have existing internet service. O&M costs related to internet access are therefore not attributable to rule compliance.

Sources:

[A] Based on consultations during development of the CCR Rule (carried forward from 1998 ICR). Includes burden estimates from the May 2015 consultation with water industry representatives.

[B], [C] Exhibit 2

[D] Based on assumptions developed in the 1998 standalone CCR Rule ICR.

[G] 2013\$ labor rate of \$21.62 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 \$34.59.

[J] Exhibits 3 and 4

[L] 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
<b>Assist in Preparation of Reports for Small CWSs</b>											
Systems serving 500 or fewer	2	57	27,677	50%	13,839	27,677	\$45.60	\$1,262,071	\$0	\$0	\$1,262,071
Systems serving 501 - 3,300	2	57	13,514	50%	6,757	13,514	\$45.60	\$616,238	\$0	\$0	\$616,238
Systems serving 3,301 - 9,999	2	57	4,925	25%	1,231	2,463	\$45.60	\$112,290	\$0	\$0	\$112,290
<b>State Recordkeeping</b>											
Receive and review CWS reports	0.50	57	50,431	100%	50,431	25,216	\$45.60	\$1,149,827	\$0	\$0	\$1,149,827
File reports	0.10	57	50,431	100%	50,431	5,043	\$45.60	\$229,965	\$0	\$0	\$229,965
<b>Totals</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>122,689</b>	<b>73,912</b>	<b>N/A</b>	<b>\$3,370,392</b>	<b>\$0</b>	<b>\$0</b>	<b>\$3,370,392</b>

Sources:

Hours per system: Based on burden estimates developed in the 1998 standalone CCR Rule ICR and reflects May 2015 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: 2013\$ labor rate of \$28.50 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 \$45.60.

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	50,431	955,671	19	\$33,058,588	\$19,615,576	\$0	\$52,674,165	\$1,044	206,339	\$255
States/Primacy Agencies	57	73,912	1,297	\$3,370,392	\$0	\$0	\$3,370,392	\$59,130	122,689	\$27

Sources: Derived from Exhibits 1-7.

**Exhibit 9**

**Consumer Confidence Reports - Summary of Original and Revised Burden Estimates**

**No changes in burden estimates based on May 2015 consultations.**

## 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	0	3	\$34.59	0	\$0.00
Notify persons served of variance application	0	2	\$34.59	0	\$0.00
Complete financial analysis without help	0	10	\$34.59	0	\$0.00
Complete variance application without help	0	24	\$34.59	0	\$0.00
Complete exemption application with help	0	3	\$34.59	0	\$0.00
Complete application to extend exemption with help	0	1.5	\$34.59	0	\$0.00
Notify persons served of exemption application	0	2	\$34.59	0	\$0.00
Complete financial analysis of exemption without help	0	10	\$34.59	0	\$0.00
Complete exemption application without help	0	24	\$34.59	0	\$0.00
Complete financial analysis to extend exemption without help	0	5	\$34.59	0	\$0.00
Complete application to extend exemption without help	0	12	\$34.59	0	\$0.00
Notify persons served of exemption application (for systems >3,300)	0	2	\$34.59	0	\$0.00
<b>Totals</b>	<b>0</b>			<b>0</b>	<b>\$0.00</b>

[A] The Variances inventory was historically based on the 1998 ICR for the V&E Rule. Data for exemptions were historically derived from EPA data on total number of actual exemptions applied for under the Arsenic Rule (286 systems). In May 2015, EPA sought consultation on zeroing out the inventory to reflect that no variances or exemptions are expected in this 3-year ICR period. Based on EPA BPJ and drinking water industry consultation results, inventory for the V&E Rule has been zeroed out for this 3-year ICR period.

[B] Burden for both variances and exemptions carried forward from 1998 ICR for the V&E Rule and reflects May 2015 consultations with drinking water industry representatives.

[C] From 2013 BLS SOC Code 51-8031, "Local Government - Water and Liquid Waste Treatment Plant and System Operators" (using 2013 dollars).



**Exhibit 2  
Variances and Exemptions Primacy Burden and 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
Evaluate variance application	0	40	\$45.60	0	\$0.00
Evaluate ensuing exemption applications	0	20	\$45.60	0	\$0.00
Complete financial analysis of variance for systems	0	10	\$45.60	0	\$0.00
Assist systems to complete variance application	0	18	\$45.60	0	\$0.00
Construct a compliance schedule for variance for which compliance alternative found	0	24	\$45.60	0	\$0.00
Write terms of small system variance to ensure enforceability	0	24	\$45.60	0	\$0.00
Notify administrator of proposed variances	0	1	\$45.60	0	\$0.00
Respond to administrator's objections	0	24	\$45.60	0	\$0.00
Provide public notice and public hearing	0	24	\$45.60	0	\$0.00
Enforce compliance schedule and report progress	0	6	\$45.60	0	\$0.00
File management for variances	0	0.5	\$45.60	0	\$0.00
Five year review	0	12	\$45.60	0	\$0.00
Complete financial analysis of exemption for system	0	10	\$45.60	0	\$0.00
Assist systems to complete exemption application	0	18	\$45.60	0	\$0.00
Create compliance schedule for exemption for which compliance alternative is found	0	24	\$45.60	0	\$0.00
Create compliance schedule for each exemption granted	0	24	\$45.60	0	\$0.00
Notify administrator of proposed exemptions	0	1	\$45.60	0	\$0.00
Respond to administrator's objections	0	24	\$45.60	0	\$0.00
Provide public notice and public hearing	0	24	\$45.60	0	\$0.00
Enforce compliance schedule and report progress	0	6	\$45.60	0	\$0.00
File management for exemptions	0	0.5	\$45.60	0	\$0.00
Quarterly variances and exemptions report (number of states)	0	208	\$45.60	0	\$0.00
Rule training (staff per year receiving training)	0	80	\$45.60	0	\$0.00
Management (number of states)	0	208	\$45.60	0	\$0.00
Supervision (number of states)	0	208	\$45.60	0	\$0.00
Clerical support (number of states)	0	208	\$45.60	0	\$0.00
<b>Total</b>				<b>0</b>	<b>0</b>

[A] The Variances inventory was historically based on the 1998 ICR for the V&E Rule. Data for exemptions were historically derived from EPA data on total number of actual exemptions applied for under the Arsenic Rule (286 systems). In May 2015, EPA sought consultation on zeroing out the inventory to reflect that no variances or exemptions are expected in this 3-year ICR period. Based on EPA BPJ and drinking water industry consultation results, PWS and primacy agency inventory for the V&E Rule has been zeroed out for this 3-year ICR period.

[B] Burden for both variances and exemptions carried forward from 1998 ICR for the V&E Rule and reflects May 2015 consultations with drinking water industry representatives.

[C] From 2013 BLS SOC Code 19-2041, "State Government - Environmental Scientists and Specialists, Including Health" (using 2013 dollars).

**Exhibit 3**  
**Variations and Exemptions - Three Year Total**

	Year 1	Year 2	Year 3	Totals	Average
<b>PWS</b>					
Burden (hrs)	0	0	0	0	0
Respondents	0	0	0	0	0
Responses	0	0	0	0	0
Costs (2013\$)	\$0	\$0	\$0	\$0	\$0
<b>Primacy Agency</b>					
Burden (hrs)	0	0	0	0	0
Respondents	0	0	0	0	0
Responses	0	0	0	0	0
Costs (2013\$)	\$0	\$0	\$0	\$0	\$0

Note: Based on EPA BPJ and drinking water industry consultation results, no systems are expected to apply for variations or exemptions. Therefore, reporting and recordkeeping burden and costs for PWSs and primacy agencies to comply with the V&E Rule are assumed to be negligible in this 3-year ICR period.

**Exhibit 4**  
**Variations and Exemptions - Summary of Original and Revised  
Burden Estimates**

The Variations and Exemptions inventory has historically included 286 systems. In May 2015, EPA sought consultation on zeroing out the inventory to reflect that no variations or exemptions are expected in this 3-year ICR period. Based on EPA BPJ and drinking water industry consultation results, reporting and recordkeeping burden for PWSs and primacy agencies to comply with the V&E Rule is assumed to be negligible.

## 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
<b>Program for New Systems</b>				
Applying for approval	40	0.019	456	8.8
Improving capacity for approval	40	0.019	91	1.8
<b>Strategy for Existing Systems</b>				
Cooperation with state strategy	8	0.004	13,370	51.4
<b>Additional Program for New Systems Assumptions</b>				
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%
<b>Additional Strategy for Existing Systems Assumptions</b>				
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 November 1, 2015 to October 31, 2018:				40,111
<b>Other Assumptions</b>				
Cost of one system FTE:				\$71,951
Number of hours/year/FTE:				2,080

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

<b>Program for New Systems</b>												
	<b>Activity</b>	<b>Hours per System</b>	<b>FTEs per System</b>	<b>Number of Systems</b>	<b>Percent of States</b>	<b>Hours</b>	<b>in FTEs</b>	<b>Percent of States</b>	<b>Hours</b>	<b>in FTEs</b>	<b>Total FTEs</b>	<b>FTEs per State</b>
<b>Annual Burden</b>												
	Approval of systems	100	0.0481	456							21.9231	0.3846
	Improving capacity for approval	8	0.0038	91							0.3508	0.0062
	<b>Subtotal</b>										22.2738	0.3908
<b>Strategy for Existing Systems</b>												
<b>Annual Burden</b>												
	Implementing strategy	4	0.0019	13,370							25.7123	0.4511
	<b>Subtotal</b>										25.7123	0.4511
	Submittal of report to the Governor on the progress and success of strategy (every 3 years)				33%	40	0.0192				0.3653	0.0064
	<b>Subtotal</b>										0.3653	0.0064
<b>All Programs</b>												
	Documentation of program performance to EPA				100%	40	0.0192				1.0962	0.0192
	<b>Subtotal</b>										1.0962	0.0192
<b>Additional Program for New Systems Assumptions</b>												
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%	
<b>Additional Strategy for Existing Systems Assumptions</b>												
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%	
<b>Other Assumptions</b>												
Annual cost of state FTE:											\$94,848	
Number of hours/year/FTE:											2080	

**Exhibit 3  
Capacity Development Burden Estimate**

	<b>Annual FTEs</b>	<b>Annual Hours</b>	<b>Cost (Labor)</b>
<b>PWS</b>			
New Systems: Applying for Approval	8.8	18,240	\$630,958
New Systems: Improving Capacity for Approval	1.8	3,648	\$126,192
Existing Systems: Cooperation with State Strategy	51.4	106,963	\$3,700,075
<b>TOTAL</b>		<b>128,851</b>	<b>\$4,457,225</b>
<b>State</b>			
New System Capacity: Approval of Systems	21.9	45,600	\$2,079,360
New System Capacity: Improving Capacity for Approval	0.4	730	\$33,270
Existing Systems: Implementing Strategy	25.7	53,482	\$2,438,764
Existing Systems: Report to Governor	0.4	760	\$34,653
Other State Burden: Documentation of Program Performance to EPA	1.1	2,280	\$103,968
<b>TOTAL</b>		<b>102,851</b>	<b>\$4,690,014</b>

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

**No changes in burden estimates based on May 2015 consultations.**



## Appendix E

### General State Primacy Spreadsheets

**Exhibit 1  
Costs for General Primacy Activities [1]**

Line Item FTE Activities	State Workload Estimates				
	Nov. 2015 - Oct. 2016	Nov. 2016 - Oct. 2017	Nov. 2017 - Oct. 2018	Total	Average
<b>I. MANAGEMENT, ADMINSTRATIVE, &amp; STAFF</b>					
A. Grant Submittals	\$ 2,703,168.00	\$ 2,703,168.00	\$ 2,703,168.00	\$ 8,109,504.00	\$ 2,703,168.00
B. File Management	\$ 2,703,168.00	\$ 2,703,168.00	\$ 2,703,168.00	\$ 8,109,504.00	\$ 2,703,168.00
<b>II. DATA MANAGEMENT AND SUPPORT</b>					
A. Maintain Data System	\$ 2,703,168.00	\$ 2,703,168.00	\$ 2,703,168.00	\$ 8,109,504.00	\$ 2,703,168.00
B. Prepare and Submit Monthly Violation Reports	\$ 2,703,168.00	\$ 2,703,168.00	\$ 2,703,168.00	\$ 8,109,504.00	\$ 2,703,168.00
C. Laboratory Certification	\$ 1,892,217.60	\$ 1,892,217.60	\$ 1,892,217.60	\$ 5,676,652.80	\$ 1,892,217.60
<b>III. PROGRAM IMPLEMENTATION</b>					
A. Technical Activity					
1. Review Plans for Major Projects					
a. Systems >10,000	\$ 810,950.40	\$ 810,950.40	\$ 810,950.40	\$ 2,432,851.20	\$ 810,950.40
b. Systems 3,301 - 10,000	\$ 1,081,267.20	\$ 1,081,267.20	\$ 1,081,267.20	\$ 3,243,801.60	\$ 1,081,267.20
c. Systems ≤3,300	\$ 13,515,840.00	\$ 13,515,840.00	\$ 13,515,840.00	\$ 40,547,520.00	\$ 13,515,840.00
2. Review Plans for Minor Projects					
a. Systems >500	\$ 2,703,168.00	\$ 2,703,168.00	\$ 2,703,168.00	\$ 8,109,504.00	\$ 2,703,168.00
b. Systems ≤500	\$ 6,757,920.00	\$ 6,757,920.00	\$ 6,757,920.00	\$ 20,273,760.00	\$ 6,757,920.00
3. Routine Inspections	\$ 2,162,534.40	\$ 2,162,534.40	\$ 2,162,534.40	\$ 6,487,603.20	\$ 2,162,534.40
B. Compliance/Monitoring					
1. Violations Response					
a. Issuing Notices of Violation/Ensuring Public Notification	\$ 6,001,032.96	\$ 6,001,032.96	\$ 6,001,032.96	\$ 18,003,098.88	\$ 6,001,032.96
<b>Subtotal Cost For State Workload</b>	<b>\$ 45,737,602.56</b>	<b>\$ 45,737,602.56</b>	<b>\$ 45,737,602.56</b>	<b>\$ 137,212,807.68</b>	<b>\$ 45,737,602.56</b>
Supervision (10 staff: 1 supervisor)	\$ 4,573,760.26	\$ 4,573,760.26	\$ 4,573,760.26	\$ 13,721,280.77	\$ 4,573,760.26
Rule Training (5 days per FTE)	\$ 879,569.28	\$ 879,569.28	\$ 879,569.28	\$ 2,638,707.84	\$ 879,569.28
Clerical (10 staff: 1 clerical)	\$ 4,573,760.26	\$ 4,573,760.26	\$ 4,573,760.26	\$ 13,721,280.77	\$ 4,573,760.26
Ongoing Training (5 days per FTE) [2]	\$ 879,569.28	\$ 879,569.28	\$ 879,569.28	\$ 2,638,707.84	\$ 879,569.28
<b>Total Cost For State Workload</b>	<b>\$ 56,644,261.63</b>	<b>\$ 56,644,261.63</b>	<b>\$ 56,644,261.63</b>	<b>\$ 169,932,784.90</b>	<b>\$ 56,644,261.63</b>
<b>Total Cost For Purchases of Services</b>					
<b>Total Cost For State (including Purchases of Services)</b>	<b>\$ 56,644,261.63</b>	<b>\$ 56,644,261.63</b>	<b>\$ 56,644,261.63</b>	<b>\$ 169,932,784.90</b>	<b>\$ 56,644,261.63</b>

Notes:

[1] Revisions are currently being made to SDWIS. EPA expects primacy agencies to fully transition to the revised system (a centralized, cloud-based system called SDWIS Prime) in the subsequent ICR period. EPA expects the revisions to streamline the reporting and recordkeeping process thus decreasing Primacy Agency burden related to general primacy. Once primacy agencies fully transition to SDWIS Prime, EPA will incorporate any burden and costs savings into subsequent renewal ICRs.

[2] 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 2**  
**FTEs for General Primacy Activities [1]**

General Modeling Assumptions	Values
Total number of systems	149,765 systems
Number of systems ≤ 3,300	140,259 systems
Number of systems > 3,300	9,506 systems
Number of entities (includes States, territories, or Tribes)	57 entities
Avg Annual Salary (including benefits & overhead)	\$ 94,848 per year
Avg hours worked (1 FTE)	2,080 hours per year

Line Item FTE Activities	State Workload Estimates				
	Nov. 2015 - Oct. 2016	Nov. 2016 - Oct. 2017	Nov. 2017 - Oct. 2018	Total	Average
<b>I. MANAGEMENT, ADMINISTRATIVE, &amp; STAFF</b>					
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
<b>II. DATA MANAGEMENT AND SUPPORT</b>					
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
<b>III. PROGRAM IMPLEMENTATION</b>					
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
<b>FTE Subtotal</b>	<b>482.2</b>	<b>482.2</b>	<b>482.2</b>	<b>1,446.7</b>	<b>482.2</b>
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) [2]	9.3	9.3	9.3	27.8	9.3
<b>FTE Total</b>	<b>597.2</b>	<b>597.2</b>	<b>597.2</b>	<b>1,791.6</b>	<b>597.2</b>
<b>Total Cost For State Workload</b>	<b>\$ 56,644,262</b>	<b>\$ 56,644,262</b>	<b>\$ 56,644,262</b>	<b>\$ 169,932,785</b>	<b>\$ 56,644,262</b>
<b>Total Cost For Purchases of Services</b>				\$ -	\$ -
<b>Total Cost For State (including Purchases of Services)</b>	<b>\$ 56,644,262</b>	<b>\$ 56,644,262</b>	<b>\$ 56,644,262</b>	<b>\$ 169,932,785</b>	<b>\$ 56,644,262</b>
<b>Total Labor Hours for State Workload</b>	<b>1,242,199</b>	<b>1,242,199</b>	<b>1,242,199</b>	<b>3,726,596</b>	<b>1,242,199</b>

Notes:

[1] Revisions are currently being made to SDWIS. EPA expects primacy agencies to fully transition to the revised system (a centralized, cloud-based system called SDWIS Prime) in the subsequent ICR period. EPA expects the revisions to streamline the reporting and recordkeeping process thus decreasing Primacy Agency burden related to general primacy. Once primacy agencies fully transition to SDWIS Prime, EPA will incorporate any burden and costs savings into subsequent renewal ICRs.

[2] 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.

[3] Burden estimates/number of FTEs take into account the results of the May 2015 consultation with water industry representatives.

**Exhibit 3**  
**Hours for General Primacy Activities [1]**

General Modeling Assumptions	Values
Total number of systems	149,765 systems
Number of systems ≤ 3,300	140,259 systems
Number of systems > 3,300	9,506 systems
Number of entities (includes States, territories, or Tribes)	57 entities
Avg Annual Salary (including benefits & overhead)	\$ 94,848 per year
Avg hours worked (1 FTE)	2,080 hours per year

Line Item FTE Activities	State Workload Estimates				
	Nov. 2015 - Oct. 2016	Nov. 2016 - Oct. 2017	Nov. 2017 - Oct. 2018	Total	Average
<b>I. MANAGEMENT, ADMINSTRATIVE, &amp; STAFF</b>					
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
<b>II. DATA MANAGEMENT AND SUPPORT</b>					
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
<b>III. PROGRAM IMPLEMENTATION</b>					
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
<b>Hours Subtotal</b>	<b>1,003,018</b>	<b>1,003,018</b>	<b>1,003,018</b>	<b>3,009,053</b>	<b>1,003,018</b>
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) [2]	19,289	19,289	19,289	57,866	19,289
<b>Hours Total</b>	<b>1,242,199</b>	<b>1,242,199</b>	<b>1,242,199</b>	<b>3,726,596</b>	<b>1,242,199</b>

Notes:

[1] Revisions are currently being made to SDWIS. EPA expects primacy agencies to fully transition to the revised system (a centralized, cloud-based system called SDWIS Prime) in the subsequent ICR period. EPA expects the revisions to streamline the reporting and recordkeeping process thus decreasing Primacy Agency burden related to general primacy. Once primacy agencies fully transition to SDWIS Prime, EPA will incorporate any burden and costs savings into subsequent renewal ICRs.

[2] 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 May 2015 Consultations.**

## Appendix F

### Public Notification Rule Spreadsheets

**Exhibit 1**  
**Public Water System Inventory**

<b>System Category</b>	<b>Population Served</b>	<b>Number of Systems</b>	<b>Average Service Connections/System</b>
CWS	≤500	27,677	132
	501-3,300	13,514	547
	3,301-10,000	4,943	2,088
	10,001-100,000	3,869	9,457
	>100,000	428	91,482
<b>Total</b>		<b>50,431</b>	<b>1,926</b>
NTNCWS	≤500	15,130	6
	501-3,300	2,505	22
	3,301-10,000	145	100
	10,001-100,000	16	62
	>100,000	1	1,109
<b>Total</b>		<b>17,797</b>	<b>9</b>
TNCWS	≤500	78,707	8
	501-3,300	2,726	35
	3,301-10,000	89	35
	10,001-100,000	14	12
	>100,000	1	2
<b>Total</b>		<b>81,537</b>	<b>9</b>

Source: SDWIS/FED Data from October 2014.

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	SWTR TT Elevated from Tier 2 to Tier 1 F	IESWTR & LT1 Single Exceedances Elevated from Tier 2 to Tier 1 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	114	281	405	N/A	1	8	0.55	4.25	1	119	933
	501-3,300	46	77	87	N/A	1	1	1.20	0.50	-	58	272
	3,301-10,000	6	22	8	N/A	4	1	0.65	0.13	-	30	72
	10,001-100,000	12	22	2	N/A	-	0	0.50	0.25	-	47	84
	>100,000	3	2	1	N/A	-	0	0.15	0.13	-	6	13
<b>Subtotal</b>		<b>181</b>	<b>404</b>	<b>503</b>	<b>-</b>	<b>6</b>	<b>10</b>	<b>3.05</b>	<b>5.26</b>	<b>1</b>	<b>259</b>	<b>1,373</b>
NTNCWS	≤500	61	81	204	20	8	1	0.20	0.13	-	50	426
	501-3,300	12	14	15	2	-	0	0.25	0.13	-	10	53
	3,301-10,000	1	-	-	-	-	-	0.05	-	-	1	2
	10,001-100,000	-	-	-	-	-	-	-	-	-	0	0
	>100,000	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>		<b>74</b>	<b>95</b>	<b>219</b>	<b>22</b>	<b>8</b>	<b>1</b>	<b>0.50</b>	<b>0.26</b>	<b>-</b>	<b>60</b>	<b>480</b>
TNCWS	≤500	328	654	382	38	10	4	0.20	5.38	-	373	1,794
	501-3,300	11	14	12	1	-	0	0.25	-	-	13	52
	3,301-10,000	1	-	-	-	-	-	0.05	-	-	0	2
	10,001-100,000	-	-	-	-	-	-	-	-	-	0	0
	>100,000	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>		<b>340</b>	<b>668</b>	<b>394</b>	<b>39</b>	<b>10</b>	<b>4</b>	<b>0.50</b>	<b>5.38</b>	<b>-</b>	<b>387</b>	<b>1,848</b>
<b>Total for All Systems</b>		<b>595</b>	<b>1,167</b>	<b>1,116</b>	<b>61</b>	<b>24</b>	<b>15</b>	<b>4.05</b>	<b>10.90</b>	<b>1</b>	<b>706</b>	<b>3,701</b>

Sources: (A-C, E-G, I) SDWIS FY 2014 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 the 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) carried forward from a previous ICR.

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

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

(2) 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.

(3) Compliance data for the RTCR are not yet available in SDWIS and are therefore not included in this exhibit. RTCR violations estimated in the standalone RTCR ICR, which represent the net change violations (incremental over the 1989 TCR), are carried forward for this 3-year ICR period. PN unit burden and cost estimates for RTCR are presented in Exhibit 10 and are incorporated into the total PN burden and costs shown in Exhibits 12 and 13.



**Exhibit 3**  
**Derivation of Annual Tier 2 Violation Estimates for Existing Rules**

System Category	Population Served	MCL Violations						TT Violations							M/R Violations Total Tier 2 N=(Tier 3 M/R)*5%	Other		Total Tier 2 (All Types) Q=Sum(A-P)
		Rads A	Monthly TCR B	Stage 1 C	Stage 2 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 J	Stage 1 K	LCR L	GWR M		Stage 1 MRDL O	V&E P	
CWS	≤500	668	1,503	372	82	771	200	361	144	42	16.0	200	299	578	2,336	2	3	7,578
	501-3,300	195	507	579	143	269	49	84	22	65	20.0	159	90	133	601	-	1	2,917
	3,301-10,000	84	237	236	20	91	34	12	15	41	9.0	32	23	26	213	2	-	1,076
	10,001-100,000	67	204	41	151	36	19	5	5	25	16.0	43	21	18	231	-	-	881
	>100,000	-	8	-	49	3	5	-	3	5	-	19	-	-	18	-	2	112
	<b>Subtotal</b>	<b>1,014</b>	<b>2,459</b>	<b>1,228</b>	<b>445</b>	<b>1,170</b>	<b>307</b>	<b>462</b>	<b>189</b>	<b>178</b>	<b>61.0</b>	<b>453</b>	<b>433</b>	<b>795</b>	<b>3,398</b>	<b>4</b>	<b>6</b>	<b>12,562</b>
NTNCWS	≤500	17	753	56	23	270	79	4	20	20	-	24	231	72	1,054	2	2	2,627
	501-3,300	-	104	18	7	43	7	-	6	6	2.0	10	30	19	145	-	-	396
	3,301-10,000	-	4	3	2	-	-	-	-	1	0.0	1	-	-	4	-	-	15
	10,001-100,000	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	1
	>100,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	<b>Subtotal</b>	<b>17</b>	<b>861</b>	<b>77</b>	<b>32</b>	<b>313</b>	<b>86</b>	<b>4</b>	<b>26</b>	<b>27</b>	<b>2.0</b>	<b>35</b>	<b>261</b>	<b>91</b>	<b>1,203</b>	<b>2</b>	<b>2</b>	<b>3,039</b>
TNCWS	≤500	N/A	3,841	-	-	6	-	65	70	16	5.0	9	4	375	873	N/A	-	5,264
	501-3,300	N/A	157	-	-	N/A	N/A	1	2	(0)	2.0	N/A	N/A	10	28	N/A	-	199
	3,301-10,000	N/A	5	-	-	N/A	N/A	-	-	(0)	-	N/A	N/A	-	1	N/A	-	6
	10,001-100,000	N/A	-	-	-	N/A	N/A	-	-	-	-	N/A	N/A	-	0	N/A	-	0
	>100,000	N/A	-	-	-	N/A	N/A	-	-	-	-	N/A	N/A	-	-	N/A	-	-
	<b>Subtotal</b>	<b>-</b>	<b>4,003</b>	<b>-</b>	<b>-</b>	<b>6</b>	<b>-</b>	<b>66</b>	<b>72</b>	<b>16</b>	<b>7</b>	<b>9</b>	<b>4</b>	<b>385</b>	<b>902</b>	<b>-</b>	<b>-</b>	<b>5,470</b>
<b>Total for All Systems</b>	<b>1,031</b>	<b>7,323</b>	<b>1,305</b>	<b>477</b>	<b>1,489</b>	<b>393</b>	<b>532</b>	<b>287</b>	<b>220</b>	<b>70</b>	<b>497</b>	<b>698</b>	<b>1,231</b>	<b>5,504</b>	<b>6</b>	<b>8</b>	<b>21,071</b>	

Sources: (A-M, O-P) SDWIS FY 2014 October.

(H) Assumes 5% of SWTR TT violations (code 41) are elevated to Tier 1 and 95% remain in Tier 2, based on EPA estimate (carried forward from previous ICR).

(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 (carried forward from previous ICR).

(M) Includes failure to take corrective action and failure to maintain 4-log inactivation when required to do so. 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).

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

(2) 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.

(3) Compliance data for the RTCR are not yet available in SDWIS and are therefore not included in this exhibit. RTCR violations estimated in the standalone RTCR ICR, which represent the net change violations (incremental over the 1989 TCR), are carried forward for this 3-year ICR period. PN unit burden and cost estimates for RTCR are presented in Exhibit 10 and are incorporated into the total PN burden and costs shown in Exhibits 12 and 13.

Exhibit 4

Derivation of Annual Tier 3 Violation Estimates for Existing Rules

System Category	Violations Data														Total Number of Systems w/Tier 3 M/R O	
	Population Served	TCR M/R A	SWTR M/R B	IESWTR & LT1 M/R C	LT2 M/R D	Stage 1 M/R E	Stage 2 M/R 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
CWS	≤500	6,042	557	236	8	2,913	270	873	496	1,471	6,070	27,502	278	46,716	44,380	7,777
	501-3,300	1,274	210	132	1	1,877	344	253	146	352	1,886	5,499	44	12,018	11,417	3,254
	3,301-10,000	224	84	36	1	658	78	68	56	118	738	2,198	4	4,263	4,050	1,144
	10,001-100,000	125	68	31	3	230	386	90	72	157	541	2,891	16	4,610	4,380	831
	>100,000	3	3	4	1	8	31	1	9			50	248	2	360	342
<b>Subtotal</b>	<b>7,668</b>	<b>922</b>	<b>439</b>	<b>14</b>	<b>5,686</b>	<b>1,109</b>	<b>1,285</b>	<b>779</b>	<b>2,098</b>	<b>9,285</b>	<b>38,338</b>	<b>344</b>	<b>67,967</b>	<b>64,569</b>	<b>13,065</b>	
NTNCWS	≤500	1,531	53	8	2	735	53	351	293	1	2,939	14,978	136	21,080	20,026	3,702
	501-3,300	237	5	2	-	233	25	53	42	-	414	1,876	8	2,895	2,750	617
	3,301-10,000	13	-	1	-	26	2	1	-	-	29	2	-	74	70	35
	10,001-100,000	6	-	-	-	6	4	2	-	-	2	-	-	20	19	7
	>100,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>1,787</b>	<b>58</b>	<b>11</b>	<b>2</b>	<b>1,000</b>	<b>84</b>	<b>407</b>	<b>335</b>	<b>1</b>	<b>3,384</b>	<b>16,856</b>	<b>144</b>	<b>24,069</b>	<b>22,866</b>	<b>4,361</b>	
TNCWS	≤500	12,145	363	97	4	58	-	3,404	14	2	193	569	610	17,459	16,586	10,949
	501-3,300	380	8	7	-	2	-	79	1	-	6	41	30	554	526	362
	3,301-10,000	16	6	3	-	-	-	1	-	-	-	-	-	26	25	14
	10,001-100,000	1	-	-	-	-	-	1	-	-	-	-	-	2	2	2
	>100,000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>12,542</b>	<b>377</b>	<b>107</b>	<b>4</b>	<b>60</b>	<b>-</b>	<b>3,485</b>	<b>15</b>	<b>2</b>	<b>199</b>	<b>610</b>	<b>640</b>	<b>18,041</b>	<b>17,139</b>	<b>11,327</b>	
<b>Total for All Systems</b>	<b>21,997</b>	<b>1,357</b>	<b>557</b>	<b>20</b>	<b>6,746</b>	<b>1,193</b>	<b>5,177</b>	<b>1,129</b>	<b>2,101</b>	<b>12,868</b>	<b>55,804</b>	<b>1,128</b>	<b>110,077</b>	<b>104,573</b>	<b>28,753</b>	

Sources: (A-K, O) SDWIS FY 2014 October.

(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: [1] Detail may not add to totals due to rounding.

[2] Systems exceeding the fluoride secondary MCL and systems performing monitoring of unregulated contaminants are required to notify customers (via CCRs or bill stuffers) of the fluoride concentrations and the availability of unregulated contaminant monitoring results, respectively. Note that these systems are not accounted for separately as they are assumed to be included in the inventory of systems with Tier 3 violations (see Column O).

[3] Compliance data for the RTCR are not yet available in SDWIS and are therefore not included in this exhibit. RTCR violations developed in the standalone RTCR ICR, which represent the net change violations (incremental over the 1989 TCR), are carried forward for this 3-year ICR period. Under the 1989 TCR and RTCR, Tier 3 PN for monitoring and reporting violations are assumed to be reported once per year as part of the consumer confidence report (CCR). Because of the use of the CCR to communicate Tier 3 PN on a yearly basis, no cost differential between the 1989 TCR and the RTCR was estimated in standalone RTCR ICR. Although net change burden and costs related to RTCR Tier 3 PN were not quantitatively evaluated as part of the standalone RTCR ICR, the TCRDSAC concluded that significant reductions in monitoring and reporting violations may be realized through the revised regulatory framework of the RTCR. PN unit burden and cost estimates for RTCR are presented in Exhibit 10 and are incorporated into the total PN burden and costs shown in Exhibits 12 and 13.

**Exhibit 5**

**Summary of Annual Violation Estimates for Existing Rules**

System Category	Population Served	Total Violations - Year 1 (November 1, 2015 - October 31, 2016)			Total Violations - Year 2 (November 1, 2016 - October 31, 2017)			Total Violations - Year 3 (November 1, 2017 - October 31, 2018)			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	933	7,578	44,380	933	7,578	44,380	933	7,578	44,380	933	7,578	44,380
	501-3,300	272	2,917	11,417	272	2,917	11,417	272	2,917	11,417	272	2,917	11,417
	3,301-10,000	72	1,076	4,050	72	1,076	4,050	72	1,076	4,050	72	1,076	4,050
	10,001-100,000	84	881	4,380	84	881	4,380	84	881	4,380	84	881	4,380
	>100,000	13	112	342	13	112	342	13	112	342	13	112	342
	<b>Subtotal</b>	<b>1,373</b>	<b>12,562</b>	<b>64,569</b>	<b>1,373</b>	<b>12,562</b>	<b>64,569</b>	<b>1,373</b>	<b>12,562</b>	<b>64,569</b>	<b>1,373</b>	<b>12,562</b>	<b>64,569</b>
NTNCWS	≤500	426	2,627	20,026	426	2,627	20,026	426	2,627	20,026	426	2,627	20,026
	501-3,300	53	396	2,750	53	396	2,750	53	396	2,750	53	396	2,750
	3,301-10,000	2	15	70	2	15	70	2	15	70	2	15	70
	10,001-100,000	0	1	19	0	1	19	0	1	19	0	1	19
	>100,000	-	-	-	-	-	-	-	-	-	-	-	-
	<b>Subtotal</b>	<b>480</b>	<b>3,039</b>	<b>22,866</b>	<b>480</b>	<b>3,039</b>	<b>22,866</b>	<b>480</b>	<b>3,039</b>	<b>22,866</b>	<b>480</b>	<b>3,039</b>	<b>22,866</b>
TNCWS	≤500	1,794	5,264	16,586	1,794	5,264	16,586	1,794	5,264	16,586	1,794	5,264	16,586
	501-3,300	52	199	526	52	199	526	52	199	526	52	199	526
	3,301-10,000	2	6	25	2	6	25	2	6	25	2	6	25
	10,001-100,000	0	0	2	0	0	2	0	0	2	0	0	2
	>100,000	-	-	-	-	-	-	-	-	-	-	-	-
	<b>Subtotal</b>	<b>1,848</b>	<b>5,470</b>	<b>17,139</b>	<b>1,848</b>	<b>5,470</b>	<b>17,139</b>	<b>1,848</b>	<b>5,470</b>	<b>17,139</b>	<b>1,848</b>	<b>5,470</b>	<b>17,139</b>
	<b>Total for All Systems</b>	<b>3,701</b>	<b>21,071</b>	<b>104,573</b>	<b>3,701</b>	<b>21,071</b>	<b>104,573</b>	<b>3,701</b>	<b>21,071</b>	<b>104,573</b>	<b>3,701</b>	<b>21,071</b>	<b>104,573</b>

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

Notes: [1] Detail may not add to totals due to rounding.

[2] Compliance data for the RTCR are not yet available in SDWIS and are therefore not included in this exhibit. RTCR violations estimated in the standalone RTCR ICR, which represent the net change violations (incremental over the 1989 TCR), are carried forward for this 3-year ICR period. PN unit burden and cost estimates for RTCR are presented in Exhibit 10 and are incorporated into the total PN burden and costs shown in Exhibits 12 and 13.

**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	Failure to Filter / Failure to Provide Treatment E	Failure to Address Contamination F	Triggered Source Water Monitoring G	Monitoring to Demonstrate Compliance with 4-Log Treatment Requirement H	Failure to Conduct Assessment Monitoring I
CWS	≤500	24,647	119	441	135	1	1	139	0	139
	501-3,300	10,153	58	118	14	0	1	22	0	22
	3,301-10,000	3,107	30	20	6	0	0	2	0	2
	10,001-100,000	1,887	47	8	10	0	0	8	0	8
	>100,000	106	6	0	0	0	0	1	0	1
<b>Subtotal</b>	<b>39,900</b>	<b>259</b>	<b>587</b>	<b>165</b>	<b>1</b>	<b>2</b>	<b>172</b>	<b>-</b>	<b>172</b>	
NTNCWS	≤500	14,532	50	62	5	1	4	68	0	68
	501-3,300	2,325	10	17	2	0	0	4	0	4
	3,301-10,000	92	1	0	0	0	0	0	0	0
	10,001-100,000	9	0	0	0	0	0	0	0	0
	>100,000	-	-	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>16,958</b>	<b>60</b>	<b>79</b>	<b>7</b>	<b>1</b>	<b>4</b>	<b>72</b>	<b>-</b>	<b>72</b>	
TNCWS	≤500	76,570	373	302	62	0	11	305	0	305
	501-3,300	2,579	13	10	0	0	0	15	0	15
	3,301-10,000	69	0	0	0	0	0	0	0	0
	10,001-100,000	12	0	0	0	0	0	0	0	0
	>100,000	-	-	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>79,230</b>	<b>387</b>	<b>312</b>	<b>62</b>	<b>-</b>	<b>11</b>	<b>320</b>	<b>-</b>	<b>320</b>	
<b>Total for All Systems</b>	<b>136,089</b>	<b>706</b>	<b>978</b>	<b>234</b>	<b>2</b>	<b>17</b>	<b>564</b>	<b>-</b>	<b>564</b>	

Sources: (A) Ground water system inventories for CWSs, NTNCWSs, and TNCWSs: SDWIS FY 2014 October.  
 (B) Microbial Rules ICR, Exhibit G.3 (Ground Water Rule ICR model) (entry points).  
 (C)-(I) SDWIS FY 2014 October.

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

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$34.59 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
<b>Preparation of Notice</b>							
<b>TIER 1 - Preparation</b>							
	A	B	C	D	E=A*D	F=\$34.59*E	G
<b>CWS</b>							
Systems serving ≤500	15.0	\$ -	\$ -	933	13,996	\$ 484,163	\$ -
Systems serving 501 - 3,300	15.0	\$ -	\$ -	272	4,073	\$ 140,878	\$ -
Systems serving 3,301 - 10,000	15.0	\$ -	\$ -	72	1,077	\$ 37,256	\$ -
Systems serving 10,001 - 100,000	30.0	\$ -	\$ -	84	2,510	\$ 86,833	\$ -
Systems serving over 100,000	30.0	\$ -	\$ -	13	377	\$ 13,036	\$ -
<b>NTNCWS</b>							
Systems serving ≤500	15.0	\$ -	\$ -	426	6,383	\$ 220,810	\$ -
Systems serving 501 - 3,300	15.0	\$ -	\$ -	53	795	\$ 27,491	\$ -
Systems serving 3,301 - 10,000	15.0	\$ -	\$ -	2	24	\$ 842	\$ -
Systems serving 10,001 - 100,000	30.0	\$ -	\$ -	0	2	\$ 68	\$ -
Systems serving over 100,000	30.0	\$ -	\$ -	-	-	\$ -	\$ -
<b>TNCWS</b>							
Systems serving ≤500	15.0	\$ -	\$ -	1,794	26,916	\$ 931,078	\$ -
Systems serving 501 - 3,300	15.0	\$ -	\$ -	52	775	\$ 26,805	\$ -
Systems serving 3,301 - 10,000	15.0	\$ -	\$ -	2	23	\$ 800	\$ -
Systems serving 10,001 - 100,000	30.0	\$ -	\$ -	0	3	\$ 101	\$ -
Systems serving over 100,000	30.0	\$ -	\$ -	-	-	\$ -	\$ -
<b>TIER 2 - Preparation</b>							
<b>CWS</b>							
Systems serving ≤500	3.5	\$ -	\$ -	7,578	26,522	\$ 917,441	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	2,917	10,208	\$ 353,113	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	1,076	3,765	\$ 130,237	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	881	3,083	\$ 106,634	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	112	391	\$ 13,524	\$ -
<b>NTNCWS</b>							
Systems serving ≤500	3.5	\$ -	\$ -	2,627	9,194	\$ 318,026	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	396	1,387	\$ 47,969	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	15	51	\$ 1,774	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	1	4	\$ 121	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
<b>TNCWS</b>							
Systems serving ≤500	3.5	\$ -	\$ -	5,264	18,424	\$ 637,329	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	199	698	\$ 24,136	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	6	22	\$ 757	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	0	0	\$ 12	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
<b>TIER 3 - Preparation</b>							
<b>CWS</b>							
Systems serving ≤500	2.0	\$ -	\$ -	7,777	15,554	\$ 538,044	\$ -
Systems serving 501 - 3,300	2.0	\$ -	\$ -	3,254	6,508	\$ 225,125	\$ -
Systems serving 3,301 - 10,000	2.0	\$ -	\$ -	1,144	2,288	\$ 79,146	\$ -
Systems serving 10,001 - 100,000	2.0	\$ -	\$ -	831	1,662	\$ 57,492	\$ -
Systems serving over 100,000	2.0	\$ -	\$ -	59	118	\$ 4,082	\$ -
<b>NTNCWS</b>							
Systems serving ≤500	3.5	\$ -	\$ -	3,702	12,957	\$ 448,209	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	617	2,160	\$ 74,701	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	35	123	\$ 4,238	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	7	25	\$ 848	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
<b>TNCWS</b>							
Systems serving ≤500	3.5	\$ -	\$ -	10,949	38,322	\$ 1,325,617	\$ -
Systems serving 501 - 3,300	3.5	\$ -	\$ -	362	1,267	\$ 43,828	\$ -
Systems serving 3,301 - 10,000	3.5	\$ -	\$ -	14	49	\$ 1,695	\$ -
Systems serving 10,001 - 100,000	3.5	\$ -	\$ -	2	7	\$ 242	\$ -
Systems serving over 100,000	3.5	\$ -	\$ -	-	-	\$ -	\$ -
<b>TOTAL - Preparation</b>							
<b>Total CWS</b>							
Systems serving ≤500				16,288	56,072	\$ 1,939,649	\$ -
Systems serving 501 - 3,300				6,442	20,788	\$ 719,116	\$ -
Systems serving 3,301 - 10,000				2,292	7,130	\$ 246,640	\$ -
Systems serving 10,001 - 100,000				1,795	7,255	\$ 250,959	\$ -
Systems serving over 100,000				183	886	\$ 30,641	\$ -
<b>TOTAL</b>				<b>27,000</b>	<b>92,131</b>	<b>\$ 3,187,005</b>	<b>\$ -</b>
<b>Total NTNCWS</b>							
Systems serving ≤500				6,754	28,534	\$ 987,044	\$ -
Systems serving 501 - 3,300				1,066	4,341	\$ 150,161	\$ -
Systems serving 3,301 - 10,000				51	198	\$ 6,854	\$ -
Systems serving 10,001 - 100,000				8	30	\$ 1,036	\$ -
Systems serving over 100,000				-	-	\$ -	\$ -
<b>TOTAL</b>				<b>7,880</b>	<b>33,103</b>	<b>\$ 1,145,095</b>	<b>\$ -</b>
<b>Total TNCWS</b>							
Systems serving ≤500				18,007	83,662	\$ 2,894,025	\$ -
Systems serving 501 - 3,300				613	2,740	\$ 94,768	\$ -
Systems serving 3,301 - 10,000				22	94	\$ 3,251	\$ -
Systems serving 10,001 - 100,000				2	10	\$ 355	\$ -
Systems serving over 100,000				-	-	\$ -	\$ -
<b>TOTAL</b>				<b>18,644</b>	<b>86,506</b>	<b>\$ 2,992,400</b>	<b>\$ -</b>
<b>TOTAL</b>				<b>53,524</b>	<b>211,740</b>	<b>\$ 7,324,500</b>	<b>\$ -</b>

Notes:

[1] Detail may not add to totals due to rounding.

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

[3] 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).

[4] Burden estimates take into account the results of the May 2015 consultation with water industry representatives.

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

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$34.59 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
<b>Distribution of Notice</b>								
<b>TIER 1 - Distribution</b>								
	A	B	C	D	E	F=A*E	G=\$34.59*F	H=C*D*E
<b>CWS</b>								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	132	933	11,197	\$ 387,331	\$ 7,511
Systems serving 501 - 3,300 (Mass Media)	12	\$ -	\$ -	547	272	3,258	\$ 112,703	\$ -
Systems serving 3,301 - 10,000 (Mass Media)	12	\$ -	\$ -	2,088	72	862	\$ 29,806	\$ -
Systems serving 10,001 - 100,000 (Mass Media)	12	\$ -	\$ -	9,457	84	1,004	\$ 34,733	\$ -
Systems serving over 100,000 (Mass Media)	12	\$ -	\$ -	91,482	13	151	\$ 5,214	\$ -
<b>NTNCWS</b>								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	6	426	5,107	\$ 176,648	\$ 154
Systems serving 501 - 3,300 (Posting and mass media)	12	\$ -	\$ -	22	53	636	\$ 21,993	\$ -
Systems serving 3,301 - 10,000 (Posting and mass media)	12	\$ -	\$ -	100	2	19	\$ 674	\$ -
Systems serving 10,001 - 100,000 (Posting and mass media)	12	\$ -	\$ -	62	0	1	\$ 27	\$ -
Systems serving over 100,000 (Posting and mass media)	12	\$ -	\$ -	1,109	0	0	\$ -	\$ -
<b>TNCWS</b>								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	8	1,794	21,533	\$ 744,863	\$ 921
Systems serving 501 - 3,300 (Posting and mass media)	12	\$ -	\$ -	35	52	620	\$ 21,444	\$ -
Systems serving 3,301 - 10,000 (Posting and mass media)	12	\$ -	\$ -	35	2	18	\$ 640	\$ -
Systems serving 10,001 - 100,000 (Posting and mass media)	12	\$ -	\$ -	12	0	1	\$ 40	\$ -
Systems serving over 100,000 (Posting and mass media)	12	\$ -	\$ -	2	0	0	\$ -	\$ -
<b>TIER 2 - Distribution</b>								
<b>CWS</b>								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	132	7,578	68,199	\$ 2,359,139	\$ 60,993
Systems serving 501 - 3,300 (Mail or Bill Stuffer)	30	\$ -	\$ 0.31	547	2,917	87,497	\$ 3,026,675	\$ 487,934
Systems serving 3,301 - 10,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.31	2,088	1,076	32,271	\$ 1,116,318	\$ 687,171
Systems serving 10,001 - 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.27	9,457	881	26,423	\$ 914,007	\$ 2,265,982
Systems serving over 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.27	91,482	112	3,351	\$ 115,918	\$ 2,780,020
<b>NTNCWS</b>								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	6	2,627	23,641	\$ 817,781	\$ 953
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	22	396	3,566	\$ 123,348	\$ 523
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	100	15	132	\$ 4,563	\$ 89
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	62	1	9	\$ 311	\$ 2
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	1,109	0	0	\$ -	\$ -
<b>TNCWS</b>								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	8	5,264	47,376	\$ 1,638,846	\$ 2,702
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	35	199	1,794	\$ 62,063	\$ 419
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	35	6	56	\$ 1,946	\$ 13
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	12	0	1	\$ 31	\$ 0
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	2	0	0	\$ -	\$ -
<b>TIER 3 - Distribution</b>								
<b>CWS</b>								
Systems serving ≤500 (Posting and Hand delivery)	9	\$ -	\$ 0.06	132	7,777	69,993	\$ 2,421,198	\$ 62,598
Systems serving 501 - 3,300 (CCR and mail)	5	\$ -	\$ 0.15	547	3,254	16,270	\$ 562,812	\$ 272,194
Systems serving 3,301 - 10,000 (CCR and mail)	5	\$ -	\$ 0.15	2,088	1,144	5,720	\$ 197,866	\$ 365,401
Systems serving 10,001 - 100,000 (CCR)	4	\$ -	\$ -	9,457	831	3,324	\$ 114,984	\$ -
Systems serving over 100,000 (CCR)	4	\$ -	\$ -	91,482	59	236	\$ 8,164	\$ -
<b>NTNCWS</b>								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	6	3,702	33,318	\$ 1,152,536	\$ 1,343
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	22	617	5,553	\$ 192,089	\$ 814
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	100	35	315	\$ 10,896	\$ 213
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	62	7	63	\$ 2,179	\$ 12
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	1,109	0	0	\$ -	\$ -
<b>TNCWS</b>								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	8	10,949	98,541	\$ 3,408,730	\$ 5,620
Systems serving 501 - 3,300 (Posting and hand delivery)	9	\$ -	\$ 0.06	35	362	3,258	\$ 112,701	\$ 761
Systems serving 3,301 - 10,000 (Posting and hand delivery)	9	\$ -	\$ 0.06	35	14	126	\$ 4,359	\$ 29
Systems serving 10,001 - 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	12	2	18	\$ 623	\$ 1
Systems serving over 100,000 (Posting and hand delivery)	9	\$ -	\$ 0.03	2	0	0	\$ -	\$ -
<b>TOTAL - Distribution</b>								
<b>CWS</b>								
Systems serving ≤500					16,288	149,389	\$ 5,167,663	\$ 131,102
Systems serving 501 - 3,300					6,442	107,025	\$ 3,702,193	\$ 760,128
Systems serving 3,301 - 10,000					2,292	38,853	\$ 1,343,990	\$ 1,052,572
Systems serving 10,001 - 100,000					1,795	30,751	\$ 1,063,724	\$ 2,265,982
Systems serving over 100,000					183	3,738	\$ 129,296	\$ 2,780,020
<b>TOTAL</b>					<b>27,000</b>	<b>329,754</b>	<b>\$ 11,406,866</b>	<b>\$ 6,989,804</b>
<b>Total NTNCWS</b>								
Systems serving ≤500					6,754	62,065	\$ 2,146,965	\$ 2,450
Systems serving 501 - 3,300					1,066	9,755	\$ 337,430	\$ 1,336
Systems serving 3,301 - 10,000					51	466	\$ 16,133	\$ 302
Systems serving 10,001 - 100,000					8	73	\$ 2,518	\$ 13
Systems serving over 100,000					0	0	\$ -	\$ -
<b>TOTAL</b>					<b>7,880</b>	<b>72,359</b>	<b>\$ 2,503,046</b>	<b>\$ 4,102</b>
<b>Total TNCWS</b>								
Systems serving ≤500					18,007	167,450	\$ 5,792,439	\$ 9,243
Systems serving 501 - 3,300					613	5,672	\$ 196,208	\$ 1,180
Systems serving 3,301 - 10,000					22	201	\$ 6,944	\$ 43
Systems serving 10,001 - 100,000					2	20	\$ 694	\$ 1
Systems serving over 100,000					0	0	\$ -	\$ -
<b>TOTAL</b>					<b>18,644</b>	<b>173,343</b>	<b>\$ 5,996,285</b>	<b>\$ 10,466</b>
<b>TOTAL</b>					<b>53,524</b>	<b>575,457</b>	<b>\$ 19,906,197</b>	<b>\$ 7,004,372</b>

Notes:

[1] Detail may not add to totals due to rounding.

[2] Tier 3 response rate uses number of systems in violation.

[3] 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).

[4] Burden estimates presented in Column A take into account the results of the May 2015 consultation with water industry representatives.

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

INFORMATION COLLECTION ACTIVITY	Labor Hours @ \$34.59 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
<b>DEVELOPMENT AND DISTRIBUTION OF REPEAT PUBLIC NOTIFICATION</b>								
<b>Preparation of Repeat Notice</b>								
<b>TIER 1 - Preparation</b>								
	A	B	C	D	E	F=A*E	G=\$34.59*F	H
<b>PWS - Nitrates</b>								
Systems serving ≤500	3.00	\$ -	\$ -	N/A	991	2,973	\$ 102,842	\$ -
Systems serving 501 - 3,300	3.00	\$ -	\$ -	N/A	114	342	\$ 11,830	\$ -
Systems serving 3,301 - 10,000	3.00	\$ -	\$ -	N/A	8	24	\$ 830	\$ -
Systems serving 10,001 - 100,000	3.00	\$ -	\$ -	N/A	2	6	\$ 208	\$ -
Systems serving over 100,000	3.00	\$ -	\$ -	N/A	1	3	\$ 104	\$ -
<b>TIER 2 - Preparation</b>								
<b>PWS - Coliform</b>								
Systems serving ≤500	3.00	\$ -	\$ -	N/A	610	1,829	\$ 63,272	\$ -
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	-	-	\$ -	\$ -
<b>PWS - MCLs and TTs, not NO<sub>3</sub> or Coliform</b>								
Systems serving ≤500	3.00	\$ -	\$ -	N/A	1,906	5,719	\$ 197,839	\$ -
Systems serving 501 - 3,300	3.00	\$ -	\$ -	N/A	738	2,215	\$ 76,628	\$ -
Systems serving 3,301 - 10,000	3.00	\$ -	\$ -	N/A	226	677	\$ 23,412	\$ -
Systems serving 10,001 - 100,000	3.00	\$ -	\$ -	N/A	160	481	\$ 16,646	\$ -
Systems serving over 100,000	3.00	\$ -	\$ -	N/A	30	91	\$ 3,155	\$ -
<b>TOTAL - Preparation of Repeat Notice</b>								
<b>Total PWS</b>								
Systems serving ≤500					3,507	10,521	\$ 363,953	\$ -
Systems serving 501 - 3,300					852	2,557	\$ 88,459	\$ -
Systems serving 3,301 - 10,000					234	701	\$ 24,242	\$ -
Systems serving 10,001 - 100,000					162	487	\$ 16,853	\$ -
Systems serving over 100,000					31	94	\$ 3,259	\$ -
<b>TOTAL</b>					<b>4,787</b>	<b>14,361</b>	<b>\$ 496,765</b>	<b>\$ -</b>
<b>Distribution of Repeat Notice</b>								
<b>TIER 1 - Distribution</b>								
<b>PWS - Nitrate</b>								
Systems serving ≤500 (Posting and hand delivery)	12	\$ -	\$ 0.06	132	991	11,892	\$ 411,368	\$ 7,977
Systems serving 501 - 3,300 (Mass Media)	12	\$ -	\$ -	547	114	1,368	\$ 47,322	\$ -
Systems serving 3,301 - 10,000 (Mass Media)	12	\$ -	\$ -	2,088	8	96	\$ 3,321	\$ -
Systems serving 10,001 - 100,000 (Mass Media)	12	\$ -	\$ -	9,457	2	24	\$ 830	\$ -
Systems serving over 100,000 (Mass Media)	12	\$ -	\$ -	91,482	1	12	\$ 415	\$ -
<b>TIER 2 - Distribution</b>								
<b>PWS - Coliform</b>								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	132	610	5,487	\$ 189,817	\$ 4,908
Systems serving 501 - 3,300 (Mail or Bill Stuffer)	30	\$ -	\$ 0.31	547	-	-	\$ -	\$ -
Systems serving 3,301 - 10,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.31	2,088	-	-	\$ -	\$ -
Systems serving 10,001 - 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.27	9,457	-	-	\$ -	\$ -
Systems serving over 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.27	91,482	-	-	\$ -	\$ -
<b>PWS - MCLs and TTs, not NO<sub>3</sub> or Coliform</b>								
Systems serving ≤500 (Posting and hand delivery)	9	\$ -	\$ 0.06	132	1,906	17,158	\$ 593,516	\$ 15,345
Systems serving 501 - 3,300 (Mail or Bill Stuffer)	30	\$ -	\$ 0.31	547	738	22,152	\$ 766,282	\$ 123,533
Systems serving 3,301 - 10,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.31	2,088	226	6,768	\$ 234,119	\$ 144,116
Systems serving 10,001 - 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.27	9,457	160	4,812	\$ 166,457	\$ 412,675
Systems serving over 100,000 (Mail or Bill Stuffer)	30	\$ -	\$ 0.27	91,482	30	912	\$ 31,548	\$ 756,604
<b>TOTAL - Distribution of Repeat Notice</b>								
<b>Total PWS</b>								
Systems serving ≤500					3,507	34,537	\$ 1,194,700	\$ 28,229
Systems serving 501 - 3,300					852	23,520	\$ 813,604	\$ 123,533
Systems serving 3,301 - 10,000					234	6,864	\$ 237,439	\$ 144,116
Systems serving 10,001 - 100,000					162	4,836	\$ 167,287	\$ 412,675
Systems serving over 100,000					31	924	\$ 31,963	\$ 756,604
<b>TOTAL</b>					<b>4,787</b>	<b>70,681</b>	<b>\$ 2,444,994</b>	<b>\$ 1,465,157</b>
<b>Preparation and Distribution of Repeat Notice</b>								
<b>Total PWS</b>								
Systems serving ≤500					7,014	45,058	\$ 1,558,653	\$ 28,229
Systems serving 501 - 3,300					1,705	26,077	\$ 902,063	\$ 123,533
Systems serving 3,301 - 10,000					467	7,565	\$ 261,682	\$ 144,116
Systems serving 10,001 - 100,000					325	5,323	\$ 184,140	\$ 412,675
Systems serving over 100,000					63	1,018	\$ 35,222	\$ 756,604
<b>TOTAL</b>					<b>9,574</b>	<b>85,042</b>	<b>\$ 2,941,759</b>	<b>\$ 1,465,157</b>

Notes:

- [1] Detail may not add to totals due to rounding.
- [2] EPA assumes that coliform violations in systems serving more than 500 people will be resolved prior to the deadline for repeat notice.
- [3] 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.
- [4] Burden estimates presented in Column A take into account the results of the May 2015 consultation with water industry representatives.

**Exhibit 10  
PWS Unit Burden and Cost Estimates for RTCR Public Notification**

PWS Size (Population Served)	Labor Cost (per hour)	Average Number of Service Connections per System	Preparation (labor) (hours/ violation)	Distribution (labor) (hours/ violation)	Tier 1 (acute)				Tier 2 (non-acute)						
					Unit Burden	Distribution (O&M Cost/ notice) (\$/service connection)	Unit Cost (Labor)	Unit Cost (O&M)	Preparation (labor) (hours/ violation)	Distribution (labor) (hours/ violation)	Unit Burden	Distribution (O&M Cost/notice) (\$/service connection)	Unit Cost (Labor)	Unit Cost (O&M)	
															A
<b>Community Water Systems (CWSs) - SW</b>															
≤100	\$ 34.59	989	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 60.23	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 59.36	
101-500	\$ 34.59	408	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 24.83	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 24.47	
501-1,000	\$ 34.59	312	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	30.0	33.5	\$ 0.31	\$ 1,158.83	\$ 96.65	
1,001-4,100	\$ 34.59	872	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	30.0	33.5	\$ 0.31	\$ 1,158.83	\$ 270.45	
4,101-33,000	\$ 34.59	4,324	25.9	12.0	37.9	\$ -	\$ 1,311.67	\$ -	3.5	30.0	33.5	\$ 0.28	\$ 1,158.83	\$ 1,214.60	
33,001-96,000	\$ 34.59	17,581	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 4,746.81	
96,001-500,000	\$ 34.59	56,590	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 15,279.39	
500,001-1 Million	\$ 34.59	206,222	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 55,680.02	
> 1 Million	\$ 34.59	456,048	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 123,132.97	
<b>Community Water Systems (CWSs) - GW</b>															
≤100	\$ 34.59	45	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 2.73	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 2.69	
101-500	\$ 34.59	100	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 6.10	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 6.01	
501-1,000	\$ 34.59	286	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	30.0	33.5	\$ 0.31	\$ 1,158.83	\$ 88.59	
1,001-4,100	\$ 34.59	765	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	30.0	33.5	\$ 0.31	\$ 1,158.83	\$ 237.23	
4,101-33,000	\$ 34.59	3,551	25.8	12.0	37.8	\$ -	\$ 1,308.86	\$ -	3.5	30.0	33.5	\$ 0.28	\$ 1,158.83	\$ 998.20	
33,001-96,000	\$ 34.59	16,636	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 4,491.79	
96,001-500,000	\$ 34.59	51,179	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 13,818.20	
500,001-1 Million	\$ 34.59	199,707	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 53,921.00	
> 1 Million	\$ 34.59	448,209	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	30.0	33.5	\$ 0.27	\$ 1,158.83	\$ 121,016.43	
<b>Nontransient Noncommunity Water Systems (NTNCWSs) - SW</b>															
≤100	\$ 34.59	7	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 0.41	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 0.40	
101-500	\$ 34.59	18	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 1.07	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 1.06	
501-1,000	\$ 34.59	61	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 3.66	
1,001-4,100	\$ 34.59	45	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 2.69	
4,101-33,000	\$ 34.59	105	21.1	12.0	33.1	\$ -	\$ 1,145.48	\$ -	3.5	9.0	12.5	\$ 0.05	\$ 432.40	\$ 5.03	
33,001-96,000	\$ 34.59	165	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ 4.94	
96,001-500,000	\$ 34.59	1,109	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ 33.27	
500,001-1 Million	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
> 1 Million	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
<b>Nontransient Noncommunity Water Systems (NTNCWSs) - GW</b>															
≤100	\$ 34.59	4	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 0.27	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 0.27	
101-500	\$ 34.59	7	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 0.45	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 0.44	
501-1,000	\$ 34.59	10	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 0.60	
1,001-4,100	\$ 34.59	42	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 2.55	
4,101-33,000	\$ 34.59	62	18.7	12.0	30.7	\$ -	\$ 1,060.69	\$ -	3.5	9.0	12.5	\$ 0.05	\$ 432.40	\$ 3.24	
33,001-96,000	\$ 34.59	57	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ 1.71	
96,001-500,000	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
500,001-1 Million	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
> 1 Million	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
<b>Transient Noncommunity Water Systems (TNCWSs) - SW</b>															
≤100	\$ 34.59	9	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 0.55	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 0.54	
101-500	\$ 34.59	31	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 1.86	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 1.83	
501-1,000	\$ 34.59	64	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 3.83	
1,001-4,100	\$ 34.59	42	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 2.53	
4,101-33,000	\$ 34.59	44	17.3	12.0	29.3	\$ -	\$ 1,014.50	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 2.43	
33,001-96,000	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
96,001-500,000	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
500,001-1 Million	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
> 1 Million	\$ 34.59	2	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ 0.06	
<b>Transient Noncommunity Water Systems (TNCWSs) - GW</b>															
≤100	\$ 34.59	6	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 0.36	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 0.35	
101-500	\$ 34.59	15	15.0	12.0	27.0	\$ 0.06	\$ 933.98	\$ 0.94	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 0.92	
501-1,000	\$ 34.59	31	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 1.86	
1,001-4,100	\$ 34.59	40	15.0	12.0	27.0	\$ -	\$ 933.98	\$ -	3.5	9.0	12.5	\$ 0.06	\$ 432.40	\$ 2.42	
4,101-33,000	\$ 34.59	37	17.6	12.0	29.6	\$ -	\$ 1,023.79	\$ -	3.5	9.0	12.5	\$ 0.05	\$ 432.40	\$ 2.01	
33,001-96,000	\$ 34.59	31	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ 0.92	
96,001-500,000	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
500,001-1 Million	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	
> 1 Million	\$ 34.59	-	30.0	12.0	42.0	\$ -	\$ 1,452.86	\$ -	3.5	9.0	12.5	\$ 0.03	\$ 432.40	\$ -	

Notes:

(B) Service connections per system is consistent with SDWIS/FED Data from October 2014. Data for certain size categories (e.g., <500, 501-1,000) may seem counterintuitive. EPA is investigating the SDWIS database for any data discrepancies.

To calculate the net change RTCR PN costs, columns (F) and (L) are used to derive 1989 TCR PN costs, and column (F) is used to derive RTCR PN costs.

Sources:

(A) National Occupational Employment and Wage Estimates, United States, BLS SOC Code 51-9031, "Local Government - Water and Liquid Waste Treatment Plant and System Operators." May 2013 data (published in April 2014).

<http://www.bls.gov/oes/2013/may/oes519031.htm>. Multiplied by a loading rate of 1.6 to account for benefits.

(B) SDWIS/FED Data from October 2014.

(C), (I) Labor hour assumptions based on Exhibit 7, column A.

(D), (J) Labor hour assumptions based on Exhibit 8, column A.

(F), (L) Distribution cost assumptions based on Exhibit 8, column C.



**Exhibit 11**  
**Primacy Agency Unit Burden and Cost Estimates for RTCR Public Notification**

Labor Cost (per hour)	Tier 1 Consultation (labor) (hours/violation)	Tier 2 Consultation (labor) (hours/violation)	Receive/Review PN Certification (labor) (hours/violation)	File Reports (labor) (hours/violation)	Tier 1 Unit Burden	Tier 2 Unit Burden	Tier 1 Unit Cost	Tier 2 Unit Cost
A	B	C	D	E	F=B+D+E	G=C+D+E	H=A*F	I=A*G
\$ 45.60	3.00	1.10	0.20	0.10	3.30	1.40	\$ 150.48	\$ 63.84

Sources:

(A) National Occupational Employment and Wage Estimates, United States, BLS SOC Code 19-2041, "State Government - Environmental Scientists and Specialists, Including Health." May 2013 data (published in April 2014).

(B), (C), (D), (E) Labor hour assumptions based on best professional judgment as carried forward from the 2011 *Information Collection Request for the Public Water System Supervision Program* and take into account the results of May 2015 consultations with water industry representatives.

**Exhibit 12**

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

<b>INFORMATION COLLECTION ACTIVITY</b>	<b>Number of Responses or Activities</b>	<b>Total Hours per Year</b>	<b>Labor Costs per Year</b>	<b>Capital/SU/ O&amp;M Costs per Year</b>
<b>TOTAL BURDEN SUMMARY</b>				
<b>Total CWS</b>				
Systems serving ≤500	39,590	250,519	\$ 8,665,965	\$ 159,331
Systems serving 501 - 3,300	14,589	153,890	\$ 5,323,372	\$ 883,661
Systems serving 3,301 - 10,000	5,050	53,547	\$ 1,852,311	\$ 1,196,688
Systems serving 10,001 - 100,000	3,916	43,329	\$ 1,498,824	\$ 2,678,657
Systems serving over 100,000	429	5,642	\$ 195,159	\$ 3,536,624
<b>CWS SUBTOTAL</b>	<b>63,574</b>	<b>506,927</b>	<b>\$ 17,535,630</b>	<b>\$ 8,454,961</b>
<b>Total NTCWS</b>				
Systems serving ≤500	13,509	90,599	\$ 3,134,009	\$ 2,450
Systems serving 501 - 3,300	2,132	14,095	\$ 487,591	\$ 1,336
Systems serving 3,301 - 10,000	103	665	\$ 22,987	\$ 302
Systems serving 10,001 - 100,000	16	103	\$ 3,554	\$ 13
Systems serving over 100,000	0	0	\$ -	\$ -
<b>NTNCWS SUBTOTAL</b>	<b>15,760</b>	<b>105,462</b>	<b>\$ 3,648,141</b>	<b>\$ 4,102</b>
<b>Total TNCWS</b>				
Systems serving ≤500	36,015	251,112	\$ 8,686,464	\$ 9,243
Systems serving 501 - 3,300	1,226	8,412	\$ 290,976	\$ 1,180
Systems serving 3,301 - 10,000	44	295	\$ 10,196	\$ 43
Systems serving 10,001 - 100,000	4	30	\$ 1,050	\$ 1
Systems serving over 100,000	0	0	\$ -	\$ -
<b>TNCWS SUBTOTAL</b>	<b>37,289</b>	<b>259,849</b>	<b>\$ 8,988,685</b>	<b>\$ 10,466</b>
<b>TOTAL</b>	<b>116,622</b>	<b>872,238</b>	<b>\$ 30,172,456</b>	<b>\$ 8,469,529</b>
<b>RTCR Net Change PWS Burden and Costs for PN</b>	<b>(6,102)</b>	<b>(92,845)</b>	<b>\$ (3,211,693)</b>	<b>\$ (815,979)</b>
<b>GRAND TOTAL</b>	<b>110,520</b>	<b>779,393</b>	<b>\$ 26,960,763</b>	<b>\$ 7,653,550</b>

Notes:

[1] Net change burden and costs related to RTCR PN have been removed from the RTCR standalone ICR and are now accounted for in the 2015 PWSS Programmatic ICR. A significant reduction in costs is estimated due to the elimination of Tier 2 PN for TC occurrence (non-acute violations under the 1989 TCR) under the RTCR. PWS unit burden and cost estimates for RTCR PN are presented in Exhibit 10.

[2] Detail may not add to totals due to rounding.

**Exhibit 13**

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

<b>INFORMATION COLLECTION ACTIVITY</b>	<b>Labor Hours @ \$45.60 per hour</b>	<b>Capital/ Startup Costs per Activity</b>	<b>Avg. O&amp;M Costs per Activity</b>	<b>Number of Responses or Activities</b>	<b>Total Hours per Year</b>	<b>Labor Costs per Year</b>	<b>Capital/SU/ O&amp;M Costs per Year</b>
<b>TOTAL BURDEN SUMMARY</b>							
<b>Total Primacy Agencies</b>							
Consultation: Tier 1	3.0	\$ -	\$ -	3,701	11,102	\$ 506,235	\$ -
Consultation: Tier 2	1.1	\$ -	\$ -	21,071	23,178	\$ 1,056,907	\$ -
Consultation: Tier 3	0.5	\$ -	\$ -	104,573	52,287	\$ 2,384,268	\$ -
Receive/Review PN Certification	0.2	\$ -	\$ -	129,344	25,869	\$ 1,179,621	\$ -
File Reports	0.1	\$ -	\$ -	129,344	12,934	\$ 589,810	\$ -
<b>TOTAL</b>				<b>388,033</b>	<b>125,369</b>	<b>\$ 5,716,841</b>	<b>\$ -</b>
<b>RTCR Net Change Primacy Agency Burden and Costs for PN [1]</b>				<b>(6,102)</b>	<b>(8,704)</b>	<b>\$ (396,900)</b>	<b>\$ -</b>
<b>GRAND TOTAL</b>				<b>381,931</b>	<b>116,665</b>	<b>\$ 5,319,941</b>	<b>\$ -</b>

Source: Burden estimates take into account the results of the May 2015 consultation with water industry representatives.

Notes:

[1] Net change burden and costs related to RTCR PN have been removed from the RTCR standalone ICR and are now accounted for in the 2015 PWSS Programmatic ICR. A significant reduction in costs is estimated due to the elimination of Tier 2 PN for TC occurrence (non-acute violations under the 1989 TCR) under the RTCR. Because state costs are calculated on a per-violation basis, state costs decline. State unit burden and cost estimates for RTCR PN are presented in Exhibit 11.

[2] Detail may not add to totals due to rounding.

**Exhibit 14**  
**Public Notification Rule - Summary of Original and Revised Burden**  
**Estimates**

**No changes in burden estimates based on May 2015 consultations.**

## Appendix G

# Operator Certification Program Spreadsheets

**Exhibit 1**  
**Number of Public Water Systems Required to Have a Certified Operator by System Type and Size Category**  
 [Source: SDWIS/FED Data from October 2014]

	Community Water Systems (CWSs)						Nontransient Noncommunity Water Systems (NTNCWSs)					Transient Noncommunity Water Systems (TNCWSs)						
	500 & Under	501-3,300	3,301-10,000	10,001-50,000	Over 50,000	CWS Total	500 & Under	501-3,300	3,301-10,000	10,001-50,000	Over 50,000	NTNCWS Total	500 & Under	501-3,300	3,301-10,000	10,001-50,000	Over 50,000	TNCWS Total
National Total	27,250	13,278	4,892	3,314	967	<b>49,701</b>	15,044	2,445	128	12	2	<b>17,631</b>	2,125	147	20	2	1	<b>2,295</b>

Note: Inventory includes the number of PWSs required to have a certified operator, from SDWIS FED 2014, excluding Tribal systems and GW TNCWSs.

**Exhibit 2**

**STATE WORKLOAD ASSUMPTIONS FOR OPERATOR CERTIFICATION**

<b>Operator Certification Program</b>					
	<b>Percent of States</b>	<b>Time per State</b>		<b>Total FTEs</b>	<b>FTEs per State</b>
		<b>in hours [1]</b>	<b>in FTEs*</b>		
<b>Annual Burden</b>					
<b>Submittal to EPA</b>	<b>100%</b>	<b>16</b>	<b>0.008</b>	<b>0.40</b>	<b>0.008</b>
Report on status of implementation	100%	16	0.008	0.40	0.008
Document any changes to the program [2]	0%	0	0.000	0.00	0.000
AG certification [2]	0%	0	0.000	0.00	0.000
<b>Expense Reimbursement Grants Program</b>					
	<b>Percent of States</b>	<b>Time per State</b>		<b>Total FTEs</b>	<b>FTEs per State</b>
		<b>in hours</b>	<b>in FTEs*</b>		
<b>Annual Burden</b>					
<b>Submittal to EPA (i.e., progress report)</b>	<b>0%</b>	<b>560</b>	<b>0.269</b>	<b>0.00</b>	<b>0.00</b>
Amend workplan/describe proposed uses of next allotment [3]	0%	32	0.015	0.00	0.00
Document actual uses of previous FY's allotment [4]	0%	8	0.004	0.00	0.00
Administer grant [4]	0%	520	0.250	0.00	0.00

\*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 ended in December 2012.

[1] Burden estimates take into account the results of the May 2015 consultation with water industry representatives.

[2] States are assumed to not make any changes to their operator certification program in this 3-year ICR period; therefore, no burden is associated with these activities.

[3] Assumes 0% of states will seek changes or extensions to their existing grants as the grants program ended in the previous ICR period.

[4] EPA assumes no burden associated with the expense reimbursement grants will be incurred as the grants program ended in the previous ICR period.

**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) [1]	Number of Operators	Total FTEs	Other Costs (per operator)	Total Cost	Time per Operator (hours) [1]	Number of Operators	Total FTEs	Other Costs (per operator)	Total Cost	Total FTEs	Total Cost	FTEs	Cost
<b>Annual burden</b>														
Maintain/renew certification														
Paid	16.00	7,729	59.45	\$700	\$4,277,742.80	16.00	6,225	47.89	\$700	\$3,445,548	107.34	\$7,723,290	0.00	\$111
Unpaid	16.00	5,791	44.54	n/a	\$0.00						44.54	\$0	0.00	\$0
<b>Subtotal</b>	<b>n/a</b>	<b>13,520</b>	<b>104.00</b>	<b>\$700</b>	<b>\$4,277,743</b>	<b>16.00</b>	<b>6,225</b>	<b>47.89</b>	<b>\$700</b>	<b>\$3,445,548</b>	<b>151.88</b>	<b>\$7,723,290</b>	<b>0.00</b>	<b>\$111</b>
Roundtrip Travel (@ \$0.575/mile)*	n/a	0	n/a	\$230	\$0	n/a	0	n/a	\$288	\$0		\$0	n/a	\$0
Lodging & Meals*	n/a	0	n/a	\$500	\$0	n/a	0	n/a	\$500	\$0		\$0	n/a	\$0
Fees (renewal)	n/a	13,520	n/a	\$100	\$1,351,958	n/a	6,225	n/a	\$100	\$622,533		\$1,974,491	n/a	\$28
Cost of Course	n/a	13,520	n/a	\$600	\$8,111,747	n/a	6,225	n/a	\$600	\$3,735,200		\$11,846,947	n/a	\$170
<b>Subtotal for all 2 activities</b>			<b>104.00</b>		<b>\$13,741,448</b>			<b>47.89</b>		<b>\$7,803,281</b>		<b>\$21,544,729</b>	<b>0.00</b>	<b>\$309</b>
Circuit Rider	0.00	548	0.00	n/a	\$0						0.00	\$0	0.00	\$0
<b>Annual Burden Subtotal</b>			<b>104.00</b>		<b>\$13,741,448</b>			<b>47.89</b>		<b>\$7,803,281</b>	<b>151.88</b>	<b>\$21,544,729</b>		

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

[1] Burden estimates take into account the results of the May 2015 consultation with water industry representatives.



**Exhibit 4  
Inputs for Operator Certification and Expense Reimbursement Grants Program**

<b>General Modeling Assumptions</b>	<b>Values</b>
Total number of PWSs required to have a certified operator	69,627 systems
Number of PWSs with requirement ≤ 3,300	60,289 systems
Number of PWSs with requirement > 3,300	9,338 systems
Avg hourly rate ≤ 3,300 (including benefits & overhead)	\$34.59 per hour
Avg hourly rate > 3,300 (including benefits & overhead)	\$34.59 per hour
Avg annual salary ≤ 3,300 (including benefits & overhead)	\$71,951 per year
Avg annual salary > 3,300 (including benefits & overhead)	\$71,951 per year
Avg hourly rate State employee (including benefits & overhead)	\$45.60 per hour
Avg annual salary State employee (including benefits & overhead)	\$94,848 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
Note: The number of PWSs required to have a certified operator is from SDWIS FED 2014 inventory, and excludes Tribal systems and GW TNCWSs.	

**Exhibit 5**

<b>Average Annual Burden and Cost to States for the Operator Certification and Expense Reimbursement Grants Program</b>									
Line Item FTE Activities	Annual FTE Estimates			Total Estimated Burden			Average Annual Estimate		
	November 2015 - October 2016	November 2016 - October 2017	November 2017 - October 2018	FTEs	Hours	Dollars	FTEs	Hours	Dollars
<b>Operator Certification</b>									
<b>Annual Burden</b>									
11 Submittal to EPA	0.40	0.40	0.40	1.20	2,496	\$113,818	0.40	832	\$37,939
<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>\$113,818</i>	<i>0.40</i>	<i>832</i>	<i>\$37,939</i>
<b>Operator Certification Subtotal</b>	<b>0.40</b>	<b>0.40</b>	<b>0.40</b>	<b>1.20</b>	<b>2,496</b>	<b>\$113,818</b>	<b>0.40</b>	<b>832</b>	<b>\$37,939</b>
<b>Expense Reimbursement Grants Program</b>									
<b>Annual Burden</b>									
17 Submittal to EPA (i.e., work plan)	0.00	0.00	0.00	0.00	0	\$0	0.00	0	\$0
<i>Annual Burden Subtotal</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0</i>	<i>\$0</i>	<i>0.00</i>	<i>0</i>	<i>\$0</i>
<b>Expense Reimbursement Grants Program Subtotal</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0</b>	<b>\$0</b>	<b>0.00</b>	<b>0</b>	<b>\$0</b>
<b>Total Estimated Burden</b>	<b>0.40</b>	<b>0.40</b>	<b>0.40</b>	<b>1.20</b>	<b>2,496</b>	<b>\$113,818</b>	<b>0.40</b>	<b>832</b>	<b>\$37,939</b>

Note: The expense reimbursement grant program ended in December 2012. EPA assumes no burden associated with these grants will be incurred in this ICR period.

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

System Activities	November 2015 - October 2016			November 2016 - October 2017			November 2017 - October 2018			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
<b>Annual burden</b>																	
<b>2 Maintain/renew certification</b>	151.88	\$13,821,438	\$7,723,290	151.88	\$13,821,438	\$7,723,290	151.88	\$13,821,438	\$7,723,290	947,756	455.65	\$41,464,315	\$23,169,871	315,919	151.88	\$13,821,438	\$7,723,290
<b>Annual Burden Subtotal</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>	<b>947,756</b>	<b>455.65</b>	<b>\$41,464,315</b>	<b>\$23,169,871</b>	<b>315,919</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>
<b>Total Burden</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>	<b>947,756</b>	<b>455.65</b>	<b>\$41,464,315</b>	<b>\$23,169,871</b>	<b>315,919</b>	<b>151.88</b>	<b>\$13,821,438</b>	<b>\$7,723,290</b>

Note: The expense reimbursement grant program ended in December 2012. EPA assumes no burden associated with these grants will be incurred in this ICR period.

## **Exhibit 7**

### **Operator Certification Program - Summary of Original and Revised Burden Estimates**

**No changes in burden estimates based on May 2015 consultations. The expense reimbursement grants program ended in December 2012. EPA assumes no burden associated with these grants will be incurred going forward. Other components of the Operator Certification program continue in this 3-year ICR period.**

## Appendix H

### Tribal Drinking Water Operator Certification Program Spreadsheets

**Exhibit 1**  
**ASSUMPTIONS FOR TRIBAL RESPONDENTS**

<b>Tribal System Assumption</b>	<b>No. of Systems</b>
Total number of systems (1)	908
Systems that currently have a certified operator (2)	596
- Systems that will renew operator certifications (3)	596
Systems without certified operator	312
- Systems that will seek grandparent status or new certification (4)	156
- Systems that will seek grandparent status (4)	101
- Systems that will seek new certification (4)	55

(1) Total number of tribal systems required to have a certified operator based October 2014 SDWIS data, and includes all Tribal systems except TNCWSs served by ground water.

(2) Ratio of tribal systems with certified operators carried forward from November 2001 GPRA goal status estimates and applied to current Tribal system inventory.

(3) All systems with certified operators are assumed to renew operator certifications (either through state or other providers, or through EPA-approved tribal providers).

(4) Based on EPA best professional judgment, 50 percent of systems without a certified operator will either seek grandparent status or seek new certifications. 65 percent of these systems will seek grandparent status, and 35 percent of these systems will seek new certifications.

**Exhibit 2**  
**ASSUMPTIONS FOR TRIBAL SYSTEM UNIT BURDEN AND COSTS (2013\$)**

Activities	Tribal Systems			
	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost [1]
<b>Start-up/One-time Activities</b>				
Grandparent Status Applications	2	\$ 34.59	\$ 69.18	\$ 0.49
<b>Ongoing Activities</b>				
Training - New Certifications				
- Level 1 (85%)	40	\$ 34.59	\$ 1,383.68	\$ 1,430
- Level 2 (10%)	26	\$ 34.59	\$ 899.39	\$ 1,230
- Level 3 (5%)	26	\$ 34.59	\$ 899.39	\$ 1,230
Training - Certification Renewals [1]	40	\$ 34.59	\$ 1,383.68	\$ 700
Process Reimbursements - New Certifications [2]	0.5	\$ 34.59	\$ 17.30	\$ 0.49
Process Reimbursements - Certification Renewals [2]	0.5	\$ 34.59	\$ 17.30	\$ 0.49

(1) O&M costs incurred by systems for operator certification have historically been reimbursed through the grants applicability program. Note that the grants applicability program ended in December 2012; therefore Tribal systems and operators are no longer reimbursed for costs related to certification or re-certification. O&M costs for new certifications assume 400 mile round-trip journey by car at \$0.575 per mile, \$125 per night for four nights of lodging/meals, course fees, and testing and registration fees. O&M costs for renewal certifications assume web-based training; therefore, no travel, lodging/meal expenses are incurred by operators for certification renewals.

(2) The expense reimbursement grants program ended in December 2012. EPA assumes no burden associated with these grants will be incurred going forward.

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	2016	2017	2018
<b>Start-up/One-time Activities</b>																
Grandparent Status Applications	51	50	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>51</b>	<b>50</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Ongoing Activities</b>																
Training - New Certifications																
- Level 1 (85%)	23	23	-	43	43	20	28	28	20	28	28	20	28	28	20	28
- Level 2 (10%)	3	3	-	5	5	-	-	-	-	-	-	-	-	-	-	-
- Level 3 (5%)	1	1	-	3	3	-	-	-	-	-	-	-	-	-	-	-
Training - Certification Renewals	199	199	198	226	226	178	249	249	178	249	249	178	249	249	178	249
Process Reimbursements - New Certifications [1]	27	27	-	51	51	20	28	28	20	28	28	-	-	-	-	-
Process Reimbursements - Certification Renewals [1]	199	199	198	226	226	178	249	249	178	249	-	-	-	-	-	-
<b>Subtotal</b>	<b>452</b>	<b>452</b>	<b>396</b>	<b>554</b>	<b>554</b>	<b>396</b>	<b>554</b>	<b>554</b>	<b>396</b>	<b>554</b>	<b>277</b>	<b>198</b>	<b>277</b>	<b>277</b>	<b>198</b>	<b>277</b>
<b>Total - All Activities</b>	<b>503</b>	<b>502</b>	<b>396</b>	<b>554</b>	<b>554</b>	<b>396</b>	<b>554</b>	<b>554</b>	<b>396</b>	<b>554</b>	<b>277</b>	<b>198</b>	<b>277</b>	<b>277</b>	<b>198</b>	<b>277</b>
	<b>Tribal Systems Burden by Year</b>															
Activities	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>Start-up/One-time Activities</b>																
Grandparent Status Applications	102	100	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>102</b>	<b>100</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Ongoing Activities</b>																
Training - New Certifications																
- Level 1 (85%)	920	920	-	1,720	1,720	792	1,108	1,108	792	1,108	1,108	792	1,108	1,108	792	1,108
- Level 2 (10%)	78	78	-	130	130	-	-	-	-	-	-	-	-	-	-	-
- Level 3 (5%)	26	26	-	78	78	-	-	-	-	-	-	-	-	-	-	-
Training - Certification Renewals	7,960	7,960	7,920	9,040	9,040	7,128	9,972	9,972	7,128	9,972	9,972	7,128	9,972	9,972	7,128	9,972
Process Reimbursements - New Certifications [1]	14	14	-	26	26	10	14	14	10	14	-	-	-	-	-	-
Process Reimbursements - Certification Renewals [1]	100	100	99	113	113	89	125	125	89	125	-	-	-	-	-	-
<b>Subtotal</b>	<b>9,097</b>	<b>9,097</b>	<b>8,019</b>	<b>11,107</b>	<b>11,107</b>	<b>8,019</b>	<b>11,219</b>	<b>11,219</b>	<b>8,019</b>	<b>11,219</b>	<b>11,080</b>	<b>7,920</b>	<b>11,080</b>	<b>11,080</b>	<b>7,920</b>	<b>11,080</b>
<b>Total - All Activities</b>	<b>9,199</b>	<b>9,197</b>	<b>8,019</b>	<b>11,107</b>	<b>11,107</b>	<b>8,019</b>	<b>11,219</b>	<b>11,219</b>	<b>8,019</b>	<b>11,219</b>	<b>11,080</b>	<b>7,920</b>	<b>11,080</b>	<b>11,080</b>	<b>7,920</b>	<b>11,080</b>
	<b>Tribal Systems Labor Cost by Year</b>															
Activities	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>Start-up/One-time Activities</b>																
Grandparent Status Applications	\$ 3,528	\$ 3,459	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Subtotal</b>	<b>\$ 3,528</b>	<b>\$ 3,459</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Ongoing Activities</b>																
Training - New Certifications																
- Level 1 (85%)	\$ 31,825	\$ 31,825	\$ -	\$ 59,498	\$ 59,498	\$ 27,397	\$ 38,328	\$ 38,328	\$ 27,397	\$ 38,328	\$ 38,328	\$ 27,397	\$ 38,328	\$ 38,328	\$ 27,397	\$ 38,328
- Level 2 (10%)	\$ 2,698	\$ 2,698	\$ -	\$ 4,497	\$ 4,497	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3 (5%)	\$ 899	\$ 899	\$ -	\$ 2,698	\$ 2,698	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Training - Certification Renewals	\$ 275,352	\$ 275,352	\$ 273,969	\$ 312,712	\$ 312,712	\$ 246,572	\$ 344,951	\$ 344,951	\$ 246,572	\$ 344,951	\$ 344,951	\$ 246,572	\$ 344,951	\$ 344,951	\$ 246,572	\$ 344,951
Process Reimbursements - New Certifications [1]	\$ 467	\$ 467	\$ -	\$ 882	\$ 882	\$ 342	\$ 479	\$ 479	\$ 342	\$ 479	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Process Reimbursements - Certification Renewals [1]	\$ 3,442	\$ 3,442	\$ 3,425	\$ 3,909	\$ 3,909	\$ 3,082	\$ 4,312	\$ 4,312	\$ 3,082	\$ 4,312	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Subtotal</b>	<b>\$ 314,683</b>	<b>\$ 314,683</b>	<b>\$ 277,393</b>	<b>\$ 384,196</b>	<b>\$ 384,196</b>	<b>\$ 277,393</b>	<b>\$ 388,070</b>	<b>\$ 388,070</b>	<b>\$ 277,393</b>	<b>\$ 388,070</b>	<b>\$ 383,279</b>	<b>\$ 273,969</b>	<b>\$ 383,279</b>	<b>\$ 383,279</b>	<b>\$ 273,969</b>	<b>\$ 383,279</b>
<b>Total - All Activities</b>	<b>\$ 318,212</b>	<b>\$ 318,143</b>	<b>\$ 277,393</b>	<b>\$ 384,196</b>	<b>\$ 384,196</b>	<b>\$ 277,393</b>	<b>\$ 388,070</b>	<b>\$ 388,070</b>	<b>\$ 277,393</b>	<b>\$ 388,070</b>	<b>\$ 383,279</b>	<b>\$ 273,969</b>	<b>\$ 383,279</b>	<b>\$ 383,279</b>	<b>\$ 273,969</b>	<b>\$ 383,279</b>
	<b>Tribal Systems O&amp;M Cost by Year</b>															
Activities	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>Start-up/One-time Activities</b>																
Grandparent Status Applications	\$ 25	\$ 25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Subtotal</b>	<b>\$ 25</b>	<b>\$ 25</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Ongoing Activities</b>																
Training - New Certifications																
- Level 1 (85%)	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	\$ 39,611	\$ 28,314	\$ 39,611	\$ 39,611	\$ 28,314	\$ 39,611
- Level 2 (10%)	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3 (5%)	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Training - Certification Renewals	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	\$ 174,510	\$ 124,740	\$ 174,510	\$ 174,510	\$ 124,740	\$ 174,510
Process Reimbursements - New Certifications [1]	\$ 13	\$ 13	\$ -	\$ 25	\$ 25	\$ 10	\$ 14	\$ 14	\$ 10	\$ 14	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Process Reimbursements - Certification Renewals [1]	\$ 98	\$ 98	\$ 97	\$ 111	\$ 111	\$ 87	\$ 122	\$ 122	\$ 87	\$ 122	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Subtotal</b>	<b>\$ 111</b>	<b>\$ 111</b>	<b>\$ 97</b>	<b>\$ 136</b>	<b>\$ 136</b>	<b>\$ 97</b>	<b>\$ 136</b>	<b>\$ 136</b>	<b>\$ 97</b>	<b>\$ 136</b>	<b>\$ 214,121</b>	<b>\$ 153,054</b>	<b>\$ 214,121</b>	<b>\$ 214,121</b>	<b>\$ 153,054</b>	<b>\$ 214,121</b>
<b>Total - All Activities</b>	<b>\$ 136</b>	<b>\$ 135</b>	<b>\$ 97</b>	<b>\$ 136</b>	<b>\$ 136</b>	<b>\$ 97</b>	<b>\$ 136</b>	<b>\$ 136</b>	<b>\$ 97</b>	<b>\$ 136</b>	<b>\$ 214,121</b>	<b>\$ 153,054</b>	<b>\$ 214,121</b>	<b>\$ 214,121</b>	<b>\$ 153,054</b>	<b>\$ 214,121</b>

(1) The expense reimbursement grants program ended in December 2012. EPA assumes no burden associated with these grants will be incurred going forward.  
(2) All course fees and travel and lodging costs were reimbursed by EPA through reimbursement grants program, which ended in December 2012. Tribal system O&M costs incurred for operator certification activities after December 2012 are shown above.



**Exhibit 4**

**ASSUMPTIONS FOR CERTIFICATION PROVIDER BURDEN AND COSTS**

**(Activity Completed in a Previous ICR Period)**

Activities	Certification Training Providers				
	Number of Providers	Hrs per Response	Labor Cost (per Hour)	Labor Cost (per Response)	Unit O&M Cost (2)
<b>Start-up/One-time Activities</b>					
Grant Submission	10	56	\$ 48.51	\$ 2,717	\$ 10
Program Establishment/Approval - New Providers	10	(1)	(1)	(1)	(1)
Program Establishment/Approval - Existing Providers	5	44	\$ 48.51	\$ 2,135	\$ 10
Note: Providers do not incur burden and costs for annual activities such as running training courses because, prior to the end of the grants reimbursement program in December 2012, they were reimbursed for these activities by EPA grants, and from 2013 onwards, they are paid for their services by systems.					

(1) Burden and costs for new programs were covered by the expense reimbursement grants program, which ended in December 2012.

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

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	2016	2017	2018
<b>Start-up/One-time Activities (1)</b>																
Grant Submission	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers (2)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total - All Activities</b>	<b>15</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Activities	Provider Burden by Year															
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>Start-up/One-time Activities (1)</b>																
Grant Submission	560	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers (2)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	220	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total - All Activities</b>	<b>780</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Activities	Provider Labor Cost by Year															
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>Start-up/One-time Activities</b>																
Grant Submission	\$ 27,167	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers (2)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	\$ 10,673	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total - All Activities</b>	<b>\$ 37,839</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Activities	Provider O&M Cost by Year															
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>Start-up/One-time Activities</b>																
Grant Submission	\$ 100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - New Providers (2)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Establishment/Approval - Existing Providers	\$ 50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total - All Activities</b>	<b>\$ 150</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

Note: Providers do not incur burden and costs for annual activities such as running training courses because, prior to the end of the grants reimbursement program in December 2012, they were reimbursed for these activities by EPA grants, and from 2013 onwards, they are paid for

(1) Start-up/one-time activities were completed in a previous ICR period.

(2) Burden and costs for new programs were covered by the expense reimbursement grants program, which ended in December 2012.

**Exhibit 6**  
**ASSUMPTIONS FOR AGENCY UNIT BURDEN AND COSTS (2013\$)**

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
<b>Start-up/One-time Activities [2]</b>								
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	\$ 0.49	8	\$ 62.48	\$ 500	\$ 0.49
<b>Ongoing Activities</b>								
Compliance Tracking	-	\$ 43.84	\$ -	\$ -	0.25	\$ 62.48	\$ 16	\$ -
System Reimbursements - New Certifications [3]								
- Level 1	0.5	\$ 43.84	\$ 22	\$ 730	0.5	\$ 62.48	\$ 31	\$ 730
- Level 2	0.5	\$ 43.84	\$ 22	\$ 730	0.5	\$ 62.48	\$ 31	\$ 730
- Level 3	0.5	\$ 43.84	\$ 22	\$ 730	0.5	\$ 62.48	\$ 31	\$ 730
System Reimbursements - Certification Renewals [3]	0.5	\$ 43.84	\$ 22	\$ 730	0.5	\$ 62.48	\$ 31	\$ 730
Provider Reimbursements - New Certifications [3]								
- Level 1	0.5	\$ 43.84	\$ 22	\$ 700	0.5	\$ 62.48	\$ 31	\$ 700
- Level 2	0.5	\$ 43.84	\$ 22	\$ 700	0.5	\$ 62.48	\$ 31	\$ 500
- Level 3	0.5	\$ 43.84	\$ 22	\$ 700	0.5	\$ 62.48	\$ 31	\$ 500
Provider Reimbursements - Certification Renewals [3]	0.5	\$ 43.84	\$ 22	\$ 700	0.5	\$ 62.48	\$ 31	\$ 500
Enforcement	8	\$ 43.84	\$ 351	\$ 700	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.

(2) Start-up/one-time activities were completed in a previous ICR period.

(3) The expense reimbursement grants program ended in December 2012. EPA assumes no burden associated with these grants will be incurred going forward.

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	2016	2017	2018
<b>Start-up/One-time Activities (1)</b>																
Initial Assessments	14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Grant Funding/Approval	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Review/Certification	14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Develop Tracking System	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Conduct Peer Review	48	48	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Review Grandparent Status Applications	85	48	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>185</b>	<b>104</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Ongoing Activities</b>																
Compliance Tracking	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - New Certifications (2)																
- Level 1	21	21	-	40	40	18	26	26	18	26	-	-	-	-	-	-
- Level 2	3	3	-	5	5	-	-	-	-	-	-	-	-	-	-	-
- Level 3	1	1	-	3	3	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - Certification Renewals (2)	186	186	185	211	211	166	233	233	166	233	-	-	-	-	-	-
Provider Reimbursements - New Certifications (2)																
- Level 1	21	21	-	40	40	18	26	26	18	26	-	-	-	-	-	-
- Level 2	3	3	-	5	5	-	-	-	-	-	-	-	-	-	-	-
- Level 3	1	1	-	3	3	-	-	-	-	-	-	-	-	-	-	-
Provider Reimbursements - Certification Renewals (2)	186	186	185	211	211	166	233	233	166	233	-	-	-	-	-	-
Enforcement	8	8	7	10	10	7	10	10	7	10	-	-	-	-	-	-
<b>Subtotal</b>	<b>430</b>	<b>430</b>	<b>377</b>	<b>528</b>	<b>528</b>	<b>375</b>	<b>528</b>	<b>528</b>	<b>375</b>	<b>528</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total - All Activities</b>	<b>515</b>	<b>478</b>	<b>377</b>	<b>528</b>	<b>528</b>	<b>375</b>	<b>528</b>	<b>528</b>	<b>375</b>	<b>528</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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	2016	2017	2018
<b>Start-up/One-time Activities (1)</b>																
Initial Assessments	1,120	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Grant Funding/Approval	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Program Review/Certification	560	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Develop Tracking System	180	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Conduct Peer Review	384	384	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Review Grandparent Status Applications	2,244	384	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>4,988</b>	<b>768</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Ongoing Activities</b>																
Compliance Tracking	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - New Certifications (2)																
- Level 1	11	11	-	20	20	9	13	13	9	13	-	-	-	-	-	-
- Level 2	2	2	-	3	3	-	-	-	-	-	-	-	-	-	-	-
- Level 3	1	1	-	2	2	-	-	-	-	-	-	-	-	-	-	-
System Reimbursements - Certification Renewals (2)	93	93	93	106	106	83	117	117	83	117	-	-	-	-	-	-
Provider Reimbursements - New Certifications (2)																
- Level 1	11	11	-	20	20	9	13	13	9	13	-	-	-	-	-	-
- Level 2	2	2	-	3	3	-	-	-	-	-	-	-	-	-	-	-
- Level 3	1	1	-	2	2	-	-	-	-	-	-	-	-	-	-	-
Provider Reimbursements - Certification Renewals (2)	93	93	93	106	106	83	117	117	83	117	-	-	-	-	-	-
Enforcement	64	64	56	80	80	56	80	80	56	80	-	-	-	-	-	-
<b>Subtotal</b>	<b>275</b>	<b>275</b>	<b>241</b>	<b>339</b>	<b>339</b>	<b>240</b>	<b>339</b>	<b>339</b>	<b>240</b>	<b>339</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total - All Activities</b>	<b>2,519</b>	<b>659</b>	<b>241</b>	<b>339</b>	<b>339</b>	<b>240</b>	<b>339</b>	<b>339</b>	<b>240</b>	<b>339</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Activities	EPA Regional O&M Cost by Year															
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
<b>Start-up/One-time Activities (1)</b>																
Initial Assessments	\$ 48,100	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grant Funding/Approval	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Program Review/Certification	\$ 24,550	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Develop Tracking System	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Conduct Peer Review	\$ 7,891	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Review Grandparent Status Applications	\$ 16,834	\$ 16,834	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Subtotal</b>	<b>\$ 98,375</b>	<b>\$ 16,834</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Ongoing Activities</b>																
Compliance Tracking	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - New Certifications (2)																
- Level 1	\$ 460	\$ 460	\$ -	\$ 877	\$ 877	\$ 395	\$ 570	\$ 570	\$ 395	\$ 570	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 2	\$ 66	\$ 66	\$ -	\$ 110	\$ 110	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ 22	\$ 22	\$ -	\$ 66	\$ 66	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
System Reimbursements - Certification Renewals (2)	\$ 4,077	\$ 4,077	\$ 4,055	\$ 4,625	\$ 4,625	\$ 3,639	\$ 5,107	\$ 5,107	\$ 3,639	\$ 5,107	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Provider Reimbursements - New Certifications (2)																
- Level 1	\$ 460	\$ 460	\$ -	\$ 877	\$ 877	\$ 395	\$ 570	\$ 570	\$ 395	\$ 570	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 2	\$ 66	\$ 66	\$ -	\$ 110	\$ 110	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
- Level 3	\$ 22	\$ 22	\$ -	\$ 66	\$ 66	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Provider Reimbursements - Certification Renewals (2)	\$ 4,077	\$ 4,077	\$ 4,055	\$ 4,625	\$ 4,625	\$ 3,639	\$ 5,107	\$ 5,107	\$ 3,639	\$ 5,107	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Enforcement	\$ 2,806	\$ 2,806	\$ 2,455	\$ 3,507	\$ 3,507	\$ 2,455	\$ 3,507	\$ 3,507	\$ 2,455	\$ 3,507	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Subtotal</b>	<b>\$ 12,056</b>	<b>\$ 12,056</b>	<b>\$ 10,565</b>	<b>\$ 14,861</b>	<b>\$ 14,861</b>	<b>\$ 10,521</b>	<b>\$ 14,861</b>	<b>\$ 14,861</b>	<b>\$ 10,521</b>	<b>\$ 14,861</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Total - All Activities</b>	<b>\$ 110,431</b>	<b>\$ 28,890</b>	<b>\$ 10,565</b>	<b>\$ 14,861</b>	<b>\$ 14,861</b>	<b>\$ 10,521</b>	<b>\$ 14,861</b>	<b>\$ 14,861</b>	<b>\$ 10,521</b>	<b>\$ 14,861</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

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) Start-up/one-time activities were completed in a previous ICR period.

(2) The expense reimbursement grants program ended in December 2012. EPA assumes no burden associated with these grants will be incurred going forward.



**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)
		November 1, 2015 - October 31, 2016	November 1, 2016 - October 31, 2017	November 1, 2017 - October 31, 2018		November 1, 2015 - October 31, 2016	November 1, 2016 - October 31, 2017	November 1, 2017 - October 31, 2018		November 1, 2015 - October 31, 2016	November 1, 2016 - October 31, 2017	November 1, 2017 - October 31, 2018	
EPA Headquarters	1	908	908	908	908.0	227	227	227	227.0	\$ -	\$ -	\$ -	\$ -
EPA Regions	9	-	-	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -
EPA Total	10	908	908	908	908.0	227	227	227	227.0	\$ -	\$ -	\$ -	\$ -
Tribal Systems	752	277	211	264	250.7	11,080	8,447	10,553	10,026.7	\$ 214,121	\$ 163,232	\$ 203,943	\$ 193,765
Certification Providers	-	-	-	-	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -

**Other Measures**

Respondent	Respondents	Annual Responses per Respondent			Average Annual Responses/ Respondent	Annual Labor Cost			Average Annual Labor Cost
		November 1, 2015 - October 31, 2016	November 1, 2016 - October 31, 2017	November 1, 2017 - October 31, 2018		November 1, 2015 - October 31, 2016	November 1, 2016 - October 31, 2017	November 1, 2017 - October 31, 2018	
EPA Headquarters	1	908	908	908	908.0	\$ 14,184	\$ 14,184	\$ 14,184	\$ 14,184
EPA Regions	9	-	-	-	-	\$ -	\$ -	\$ -	\$ -
EPA Total	10	91	91	91	90.8	\$ 14,184	\$ 14,184	\$ 14,184	\$ 14,184
Tribal Systems	752	0.4	0.3	0.4	0.3	\$ 383,279	\$ 292,187	\$ 365,061	\$ 346,842
Certification Providers	-	-	-	-	-	\$ -	\$ -	\$ -	\$ -

Note: To avoid double counting, EPA burden and labor costs developed in this exhibit for Regions and Headquarters associated with Tribal operator certification are not included in the totals presented in the summary tables in Section 6 of the PWSS Program ICR. 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 May 2015 consultations. The expense reimbursement grants program ended in December 2012. EPA assumes no burden associated with these grants will be incurred going forward. Other components of the Tribal Operator Certification program continue in this 3-year ICR period.

# Appendix I

## 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 <sup>1</sup>	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
<b>Annual Average Burden</b>						<b>42,892</b>
<b>Annual Average Burden per Respondent</b>						<b>22.55</b>

<sup>1</sup> Data from State Laboratory Certification Program Assessment, 2011, collected to inform the 2011 State Workload Resources Model. This lab inventory is carried forward in the 2015 PWSS ICR.

(A), (B), (C) Burden estimates take into account the results of the May 2015 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 \$102.19/hr (A)	Chemist at \$59.79/hr (B)	Records Clerk at \$28.88/hr (C)	Labor Costs per Activity (D) = (A) + (B) + (C)	# of Labs (E)	Labor Costs/Year (F) = (D) * (E)	Standards at \$16.81/analyte (G) = (E) * \$16.81 * # of analytes	(all respondents) (H) = (F) + (G)
	hourly rates * labor hours from Exhibit 1, columns (a)-(c)							
Read Instructions	\$ 204	\$ 120	\$ -	\$ 324	1,902	\$ 616,187	\$ -	\$ 616,187
Plan Activities	\$ 153	\$ -	\$ -	\$ 153	1,902	\$ 291,554	\$ -	\$ 291,554
Analyze Inorganics	\$ -	\$ 957	\$ -	\$ 957	871	\$ 833,177	\$ 424,472	\$ 1,257,649
Analyze Disinfection Byproducts	\$ -	\$ 478	\$ -	\$ 478	701	\$ 335,350	\$ 106,044	\$ 441,393
Analyze Organic Chemicals	\$ -	\$ 957	\$ -	\$ 957	330	\$ 315,714	\$ 288,410	\$ 604,124
Report Results	\$ 102.19	\$ -	\$ 29	\$ 131	1,902	\$ 249,299	\$ -	\$ 249,299
Maintain Records	\$ 102.19	\$ -	\$ 29	\$ 131	1,902	\$ 249,299	\$ -	\$ 249,299
<b>Average Annual Costs for All Laboratory Respondents</b>						<b>\$ 2,890,579</b>	<b>\$ 818,926</b>	<b>\$ 3,709,505</b>
<b>Average Annual Costs per Laboratory Respondent</b>						<b>\$ 1,520</b>	<b>\$ 431</b>	<b>\$ 1,950</b>

Salaries from U.S. Department of Labor, Bureau of Statistics, May 2013 National Industry Specific Occupational Employment and Wage Estimates. Loaded by factor of 1.6 to account for benefits.

(A) Bureau of Labor Statistics, Natural Science Manager 11-9121.

(B) Bureau of Labor Statistics, Chemist 19-2031.

(C) Bureau of Labor Statistics, Information and Record Clerk 43-4199.

**Exhibit 3. Bottom Line Burden and Costs (for ICR period of November 1, 2015 - October 31, 2018)**

<b>Cost/Burden</b>	<b>Total Across 3 ICR Years (November 1, 2015 - October 31, 2018)</b>	<b>Average Per Year over ICR Years (November 1, 2015 - October 31, 2018)</b>
<b>Number of Respondents (Laboratories)</b>	1,902	1,902
<b>Total Responses</b>	5,706	1,902
<b>Number of Responses per Lab</b>	3	1
<b>Burden Hours per Lab</b>	67.65	22.55
<b>Total Burden Hours (all labs)</b>	128,677	42,892
<b>Hours per Response</b> (Total hours from above/Total responses from above)	67.65	22.55
<b>Per Laboratory Labor Costs</b>	\$4,559	\$1,520
<b>Total Labor Costs (all labs)</b>	\$8,671,738	\$2,890,579
<b>Per Laboratory O&amp;M Costs</b>	\$1,292	\$431
<b>Total O&amp;M Costs (all labs)</b>	\$2,456,778	\$818,926
<b>Total Lab Costs</b> (Labor plus O&M costs for all labs)	\$11,128,516	\$3,709,505

**Exhibit 4. Proficiency Testing - Summary of Original and Revised Burden Estimates**

**No changes in burden estimates based on May 2015 consultations.**