

Appendix C
Prime Burden Reduction

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In 2016 EPA estimated burden reduction associated with transition to a new cloud-based reporting system. This estimate was 783,000 hours of burden reduction annually for states, and 82,000 hours annually for PWS and laboratories. The state reduction is assumed to impact state general primacy burden associated with monthly operating reports and compliance determinations. PWS and lab burden reduction does not impact the estimates in the PWSS ICR.

State burden associated with general state primacy with no cloud-based burden reduction is estimated at 1,773,621 hours. EPA currently expects states to start using the new cloud-based reporting system in this ICR period. A cumulative 15 percent of states are expected to adopt the system each year of the ICR period. This will result in burden reductions 117,450 hours in the 1st year, and 234,900 hours in the 2nd year, and 352,350 in the 3rd year. These 3 yearly burden reduction estimates are subtracted from the calculated yearly burden and averaged to produce the yearly annual burden of 1,382,121 hours. This calculation is broken out in Exhibit 1 below.

Exhibit 1
General State Primacy Burden Reduction Calculation
April 1, 2019 - March 31, 2022

	Annual Burden Estimate	Subtract Expected Burden Reduction	Revised Annual Burden	Annual Average Burden
1st year	1,773,621	117,450	1,656,171	1,538,721
2nd year	1,773,621	234,900	1,538,721	1,538,721
3rd year	1,773,621	352,350	1,421,271	1,538,721