



Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules

OMB Control No. 2040-0204

EPA ICR No. 1896.11

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APPENDIX

Appendix A. Federal Register Notices Soliciting Comment on Information Collection Requests

ACRONYMS

AMWA	Association of Metropolitan Water Agencies
ARCS	Aircraft Reporting and Compliance System
ASDWA	Association of State Drinking Water Administrators
AWWA	American Water Works Association
BATs	Best Available Technologies
BLS	Bureau of Labor Statistics
CCR	Consumer Confidence Report
CCT	Corrosion Control Treatment
CDC	Centers for Disease Control and Prevention
CFR	Code of Federal Regulations
CT	Contact Time
CWS	Community Water System
CWSS	Community Water System Survey
DBP	Disinfection Byproduct
DBPR	Disinfectants and Disinfection Byproducts Rule
DDBP/Chem/Rads	Disinfectants and Disinfection Byproducts, Chemical, and Radionuclides Rules
DWSRF	Drinking Water State Revolving Fund
EA	Economic Analysis
EPA	Environmental Protection Agency
ERP	Enforcement Response Policy
ETT	Enforcement Targeting Tool
FACA	Federal Advisory Committee Act
FR	Federal Register
GWR	Ground Water Rule
HAA5	Haloacetic Acids
ICR	Information Collection Request
IDSE	Initial Distribution System Evaluation
IESWTR	Interim Enhanced Surface Water Treatment Rule
IOCs	Inorganic Compounds
LCR	Lead and Copper Rule
LCRMR	Lead and Copper Rule Minor Revisions
LSL	Lead Service Line
LSLR	Lead Service Line Replacement
LT1ESWTR	Long Term 1 Enhanced Surface Water Treatment Rule
LT2ESWTR	Long Term 2 Enhanced Surface Water Treatment Rule
MCL	Maximum Contaminant Level
MCLG	Maximum Contaminant Level Goal
MDL	Method Detection Limit
MRDL	Maximum Residual Disinfectant Level
mrem	Millirem
NAICS	North American Industry Classification System
NAWC	National Association of Water Companies
NDWAC	National Drinking Water Advisory Council
NPDWRs	National Primary Drinking Water Regulations
NRWA	National Rural Water Association
NTNCWS	Nontransient Noncommunity Water System

OECA	Office of Enforcement and Compliance Assurance
OGWDW	Office of Ground Water and Drinking Water
O&M	Operation and Maintenance
OMB	Office of Management and Budget
pCi/L	PicoCuries per liter
PN	Public Notification
PRA	Paperwork Reduction Act
PWS	Public Water System
PWSS	Public Water System Supervision
RCAP	Rural Capacity Assistance Partnership
RegNeg	Regulatory Negotiation
RFA	Regulatory Flexibility Act
SBREFA	Small Business Regulatory Enforcement Fairness Act
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
SMF	Standardized Monitoring Framework
SOCs	Synthetic Organic Compounds
SWAP	Source Water Assessment Program
SWTR	Surface Water Treatment Rule
TCR	Total Coliform Rule
TNCWS	Transient Noncommunity Water System
TOC	Total Organic Carbon
TTHM	Total Trihalomethane
UCMR	Unregulated Contaminant Monitoring Rule
UIC	Underground Injection Program
VOCs	Volatile Organic Compounds
WQP	Water Quality Parameter

1 IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules

OMB Control Number: 2040-0204

EPA ICR Number: 1896.11

1(b) Short Characterization

The Office of Ground Water and Drinking Water (OGWDW) in the Office of Water at the Environmental Protection Agency (EPA) is responsible for managing the Public Water System Supervision (PWSS) Program, a national program mandated by the Safe Drinking Water Act (SDWA). Section 1412 of the SDWA requires the EPA to establish National Primary Drinking Water Regulations (NPDWRs) for contaminants that may adversely impact human health. The Act requires the EPA to monitor and enforce these regulations to ensure that the nation's drinking water dependably complies with the maximum contaminant levels (MCLs) or maximum residual disinfectant levels (MRDLs), as stipulated in the Code of Federal Regulations (CFR), 40 CFR Part 141, Subpart B.

Section 1445 of the SDWA states that public water systems shall conduct monitoring, maintain records, and provide such information as is needed for the EPA to implement its monitoring and enforcement responsibilities with respect to the Act. Primacy agencies, state governments that have assumed primary enforcement responsibility under SDWA section 1413, ensure that PWSs are complying with these requirements.

As part of the PWSS Program, the EPA uses the Safe Drinking Water Information System (SDWIS) to record drinking water compliance data collected to meet NPDWR requirements. These data assist the EPA in fulfilling its SDWA obligations. SDWIS is a database management system that assists the EPA in tracking and interpreting violations data and other program-related data. Revisions are currently being made to SDWIS. The EPA expects primacy agencies to transition to the revised system, a centralized, cloud-based system called SDWIS Prime, beginning in the current ICR period.

Many information collection requirements associated with the SDWA and its implementing regulations are associated with rulemakings that address specific contaminants or groups of contaminants. This ICR examines PWS, primacy agency, and the EPA burden and cost for radiological, chemical, and disinfection byproduct regulations only. Cross-cutting recordkeeping and reporting requirements are addressed in the PWSS Program ICR (OMB No. 2040-0090).

The specific regulations addressed in this ICR include the following:

- 1) Stage 1 Disinfectants and Disinfection Byproducts Rule (Stage 1 DBPR)
- 2) Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR)

- 3) Chemical Phase Rules (Phases II/IIB/V)
- 4) Radionuclides Rule
- 5) Disinfectant Residual Monitoring and Associated Activities under the Surface Water Treatment Rule (SWTR)¹
- 6) Arsenic Rule
- 7) Lead and Copper Rule (LCR)

This ICR estimates burden and costs for September 1, 2019 - August 31, 2022.

The total annual burden associated with this ICR is estimated to be 5.2 million hours. The total annual cost associated with this ICR is estimated to be approximately \$455.9 million. The distribution of annual burden between PWSs and primacy agencies is approximately 3.2 million hours and 2.0 million hours, respectively (numbers may not add due to rounding). The distribution of annual costs between PWSs and primacy agencies is approximately \$365 million and \$91 million, respectively. The approximate annual operation and maintenance (O&M) and capital costs are \$253 million, with \$248 million attributed for O&M and \$5.4 million for capital. There is no agency burden or cost. Section 6 provides details of all burden and cost estimates.

The total annual number of respondents for this ICR is 146,772. Fifty-seven of these respondents are primacy agencies and the remaining 146,715 respondents are existing PWSs. The total annual number of responses is 12.8 million: that is, 11.8 million for PWSs and 1.0 million for primacy agencies.

¹ Includes only the SWTR components relating to disinfectant residual monitoring and associated activities. All remaining SWTR requirements are included in the Microbial Rules ICR.

2 NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

This section identifies the regulatory or statutory authority for the information collection activities covered in this ICR and explains the EPA's need for the information. A summary of the major types of recordkeeping and reporting requirements for the contaminants covered by this ICR is provided in Section 4.

To allow the public to better understand the impact of the recordkeeping and reporting requirements stemming from the SDWA and 40 CFR Parts 141 and 142, the EPA has organized its ICRs so that related activities are addressed in the same ICR. Specifically, there are three primary ICRs — the Microbial Rules ICR, the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules (DDBP/Chem/Rads Rules) ICR, and the Public Water Systems Supervision Program (PWSS Program) ICR. The Microbial Rules ICR includes rules addressing microbial contaminants, such as the Total Coliform Rule (TCR), Surface Water Treatment Rule (SWTR), and Ground Water Rule (GWR). The PWSS Program ICR includes public notification and rules and programs addressing cross-cutting requirements that are not contaminant-specific. The DDBP/Chem/Rads Rules ICR includes rules addressing chemical contaminants. The specific regulations addressed in this ICR are:

- 1) Stage 1 Disinfectants and Disinfection Byproducts Rule (Stage 1 DBPR)
- 2) Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR)
- 3) Chemical Phase Rules (Phases II/IIB/V)
- 4) Radionuclides Rule
- 5) Disinfectant Residual Monitoring and Associated Activities under the Surface Water Treatment Rule (SWTR)²
- 6) Arsenic Rule
- 7) Lead and Copper Rule (LCR), including the Lead and Copper Rule Short Term Revisions

For a graphical depiction of the structure of the ICRs, see Figure 1. A complete itemization of the activities included in the three primary ICRs is included as Exhibit 1.

The information collected under this ICR is required by the EPA to carry out its monitoring and enforcement responsibilities as specified under the SDWA. Without comprehensive, up-to-date information on these contaminants, the EPA would not be able to meet these statutory requirements.

² Includes only SWTR components relating to disinfectant residual monitoring and associated activities. All remaining SWTR requirements are included in the Microbial Rules ICR.

Figure 1. Structure of OGWDW ICRs

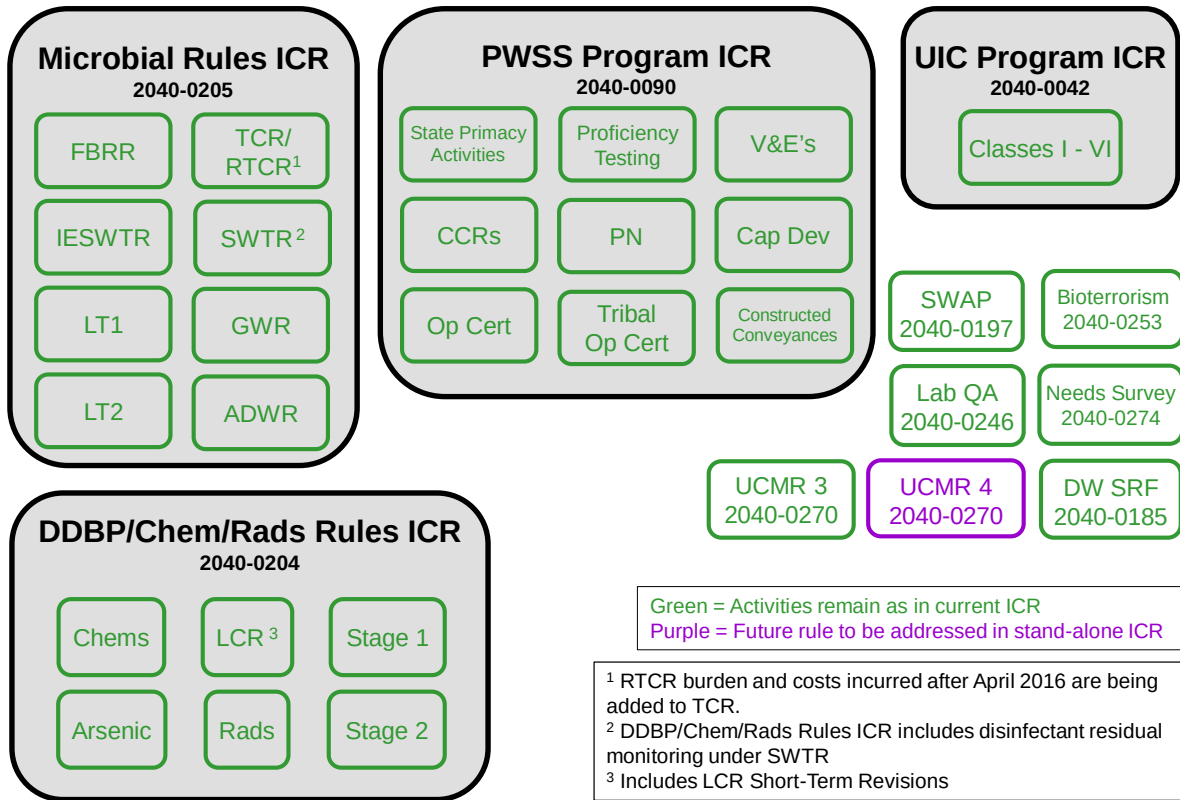


Exhibit 1: Structure of OGWDW ICRs

Currently covered	To be covered in the future
PWSS Program ICR (2040-0090)	
Consumer Confidence Reports (CCRs)	
Variances & Exemptions	
Capacity Development Program	
General State Primacy Activities	
Public Notification (PN)	
Operator Certification Program	
Tribal Operator Certification	
Constructed Conveyances	
Proficiency Testing	
Microbial Rules ICR (2040-0205)	
Surface Water Treatment Rule, except disinfectant residual monitoring and associated activities ³	
Total Coliform Rule/ Revised Total Coliform Rule	
Interim Enhanced Surface Water Treatment Rule (IESWTR)	
Filter Backwash Recycling Rule	
Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR)	
Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR)	
Ground Water Rule	
Aircraft Drinking Water Rule	
Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules ICR (2040-0204)	
Stage 1 Disinfectants and Disinfection Byproducts Rule	Lead and Copper Rule Long Term Revisions
Disinfectant Residual Monitoring and associated activities under the SWTR	
Stage 2 Disinfectants and Disinfection Byproducts Rule	
Chemical Phase Rules	
Radionuclides Rule	
Arsenic Rule	
Lead and Copper Rule	
Source Water Assessment Program (SWAP) ICR (2040-0197)	
SWAP	
Underground Injection Control (UIC) Program ICR (2040-0042)	
UIC Base Program Activities	
Classes I-VI Rules	
Florida Class I Rule	
Drinking Water State Revolving Fund (DWSRF) Program ICR (2040-0185)	

³ Disinfectant residual monitoring and associated activities are included in the DDBP/Chem/Rads Rules ICR.

Currently covered	To be covered in the future
Drinking Water State Revolving Fund Program	
Drinking Water Infrastructure Needs Survey ICR (2040-0274)	
Drinking Water Infrastructure Needs Survey	
Title VI of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002: Drinking Water Security and Safety ICR (2040-0253)	
Vulnerability Assessments and Emergency Response Plans for community water systems (CWSs).	
Unregulated Contaminant Monitoring Rule ICR (2040-0270)	
Monitoring of Unregulated Contaminants (UCMR 3)	UCMR 4
Laboratory Quality Assurance Evaluation Program for Analysis of Cryptosporidium ICR (2040-0246)	
Proficiency Testing Program for Laboratories Analyzing Cryptosporidium Samples	

To implement its compliance oversight and enforcement responsibilities under the SDWA, the EPA requires PWSs to monitor for various drinking water contaminants. The results of this monitoring must be reported to primacy agencies, which in turn report a specified subset of this information in SDWIS. Additionally, both PWSs and primacy agencies must maintain records of analytic results and other related activities (e.g., sanitary survey results). If these monitoring requirements were voluntary, the EPA would not receive timely, comprehensive data on contaminant levels and associated acute and long-term public health risks. Specifically, voluntary monitoring would not:

- Reliably occur with sufficient frequency.
- Follow uniform national standards on quality of sampling, collection, and analysis.
- Ensure that monitoring addresses all contaminants listed in the regulations.

The EPA uses SDWIS data to estimate the costs of new regulations and to conduct economic and policy analyses that promote cost-effective regulatory approaches. These uses are discussed in more detail in section 2(b) below.

Section 4 of the ICR contains a summary of the major types of chemical contaminant recordkeeping and reporting requirements, as mandated by 40 CFR parts 141 and 142. Specifically, most reporting required by PWSs can be found in 40 CFR 141.31, 141.34, and 141.35.

Most recordkeeping requirements for PWSs are codified in 40 CFR 141.33, which requires that the results of chemical analyses be kept for a period of at least 10 years. Reporting and recordkeeping required by states can be found in 40 CFR 142.15 and 142.14, respectively.

2(b) Uses/Users of the Data

Primary users of the data collected under this ICR are the EPA, PWS managers, and primacy agencies, which include state regulators and Indian tribes. This section contains more information about how chemical-related data are used specifically for analytical monitoring, regulatory enforcement, oversight of state programs, implementation assistance, economic and policy analyses, and other EPA and public data evaluations. These functions are discussed in greater detail below.

Primacy agencies maintain records on the analytical results of monitoring and use these data to:

- Determine compliance with national standards.
- Modify monitoring frequencies, schedules, and variances to address potential health risks.
- Evaluate the quality of water delivered to customers.
- Alert the public, when the system is not in compliance with federal and state regulations so that they may take actions to minimize exposure to potentially harmful drinking water contaminants.⁴

Quarterly and annual reports that primacy agencies must submit to the EPA include PWS inventory, enforcement actions, and analytical results. This reporting is required to establish primacy and maintain eligibility for grants. All of this information is stored in SDWIS, which supports overall maintenance and retrieval of information.

The EPA and primacy agencies use the data collected to assist small systems in implementing SDWA requirements, including developing and evaluating PWS capacity. Capacity development is a state program designed to help all drinking water systems, particularly small systems, enhance their technical, managerial, and/or financial capacity to achieve or maintain their compliance with drinking water regulations.

SDWIS data are used in the development of economic analyses for proposed regulations or revisions of existing regulations. The data help to determine a system's susceptibility and vulnerability to contaminants. Data are also used by the EPA to conduct analyses used in developing new policies, regulations, and guidance documents. When analyzing economic or financial impacts on the public water systems or consumers, the EPA uses compliance data from SDWIS, and other national survey data, to estimate the number of systems that would have to install treatment technologies or apply contamination reduction measures to reduce public health risks. Without such data, the EPA would be unable to predict costs and benefits that systems would incur under new or revised regulations.

The information collected by the EPA is made available to the public via the EPA's public website <https://ofmpub.epa.gov/apex/sfdw/f?p=108:1:0::NO:1::>) or by requesting the data via the Freedom of Information Act (40 CFR, Chapter 1, Part 2). Other organizations that utilize the data include:

⁴ The burden associated with implementing the public notification requirements is currently addressed in the PWSS Program ICR (OMB No. 2040-0090).

- Staff from other EPA programs (such as Superfund, the Resource Conservation and Recovery Act, and the Office of Enforcement and Compliance Assistance (OECA))
- Federal Emergency Management Administration
- Centers for Disease Control and Prevention (CDC)
- Military bases
- Farmers Home Administration
- Department of Interior
- Department of Housing and Urban Development
- U.S. Army Corps of Engineers
- White House Task Forces
- American Water Works Association (AWWA)
- Association of Metropolitan Water Agencies (AMWA)
- National Rural Water Association (NRWA)
- National Association of Water Companies (NAWC)
- Association of State Drinking Water Administrators (ASDWA)
- Natural Resources Defense Council (NRDC)

3 NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

The EPA has consulted state environmental programs, other federal agencies, and regulated entities, such as PWSs and their representative trade associations, to ensure the data collection efforts associated with this ICR are not duplicative. To the best of the EPA's knowledge, data currently required by the SDWA and its drinking water regulations, codified at 40 CFR Parts 141 and 142, are not available from any other source.

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

The EPA solicited public comment on this ICR for a 60-day period before it was submitted to OMB (83 FR 45929, September 11, 2018). The EPA published a notice in the *Federal Register* (FR) requesting comment on the estimated respondent burden and other aspects of this ICR. The EPA did not receive any comments during the 60-day comment period.

An additional FR notice will be published prior to submission of this ICR to OMB. The public comment period for this additional notice is 30 days.

3(c) Consultations

In November 2018, the EPA consulted with representatives of PWSs and states regarding the accuracy of the EPA's burden estimates. The groups consulted were NAWC, NRWA, AWWA, AMWA, ASDWA, and RCAP. The EPA received comments from ASDWA. ASDWA's comments were general in nature and did not change the burden estimates in this ICR.

3(d) Effects of Less Frequent Collection

The EPA has chosen to require the least frequent collection that remains consistent with the overall goal of protecting public health. If data are collected less frequently, primacy agencies may not identify in a timely fashion significant contaminant concentrations that might threaten the health and safety of drinking water consumers.

For some rules, the primacy agency has discretion in adjusting monitoring schedules, where possible, by granting waivers or reducing the monitoring frequency and/or sites. Monitoring frequencies vary based on the type of contaminant, system characteristics, and compliance history.

3(e) General Guidelines

The only exceptions from the Paperwork Reduction Act and 5 CFR 1320.5(d)(2) occur based on recordkeeping requirements specified by regulation.

3(f) Confidentiality

No confidential information will be collected as a result of this ICR.

3(g) Sensitive Questions

No information of a sensitive nature concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private will be collected as a result of this ICR.

4 RESPONDENTS AND INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

Data associated with this ICR are collected and maintained at the PWS, state, and federal levels. Respondents include:

- Owners/operators of PWSs, who must report to their primacy agency.
- Primacy agencies and EPA Regions that act as primacy agencies in Indian lands and in states that do not have primacy.

The North American Industry Classification System (NAICS) code for PWSs is 22131. The NAICS codes for state agencies that include drinking water programs are 92411 (Administration of Air and Water Resources and Solid Waste Management Programs) or 92312 (Administration of Public Health Programs). Ancillary systems (i.e., those that supplement the function of other establishments like factories, power plants, mobile home parks, etc.) cannot be categorized in a single NAICS code. For ancillary systems, the NAICS code is that of the primary establishment or industry.

4(b) Information Requested

4(b)(i) Data Items

Each PWS is required to report to its primacy agency monitoring results received from laboratories. As required by 40 CFR 141.33, PWSs must either maintain analytical reports or transfer the following information regarding sample results:

- Date, place, and time of sampling.
- Name of the person who collected the sample.
- Identification of the sample as a routine distribution system sample, check sample, raw or process water sample, or other special purpose sample.
- Date of analysis.
- Laboratory and person responsible for performing analysis.
- Contaminants for which the analysis was performed.
- Analytical technique/method used.
- Results of the analysis.

PWSs are required to submit and keep records on additional information such as public education on lead, monitoring plans, waiver applications, and disinfection calculations. Exhibit 2 further describes the respondent information collection requirements covered by the DDBP/Chem/Rads Rules ICR.

Exhibit 2 PWS Recordkeeping and Reporting Requirements

Requirement	Regulatory Citation	Frequency/ Retention Period
General Requirements (apply to all regulations)		
Reporting		
Except where a different period is specified in an individual drinking water regulation, PWSs are required to submit the following to the state:		
Results of any test measurement or analysis required in 40 CFR Part 141.	40 CFR 141.31(a)	At the end of the required monitoring period
Failure to comply with any NPDWR, including failure to monitor.	40 CFR 141.31(b) and (c)	As necessary, unless state lab performs analysis and reports results to state
Copies of records required to be maintained under 40 CFR 141.33 and/or copies of documents that the state is entitled to under section 1445 of SDWA or state law.	40 CFR 141.31(e)	As requested
Recordkeeping		
Except where a different period is specified in an individual drinking water regulation, PWSs are required to retain the following information:		
Records of bacteriological, or chemical analyses and related information.	40 CFR 141.33(a)	5 years for bacteriological data; 10 years for chemical data
Records of actions taken by the PWS to correct violations of NPDWRs.	40 CFR 141.33(b)	3 years after last action taken related to the violation
Copies of any written reports, summaries, or communications relating to sanitary surveys.	40 CFR 141.33(c)	10 years
Records concerning a variance or exemption granted.	40 CFR 141.33(d)	5 years following the expiration of the variance or exemption
Stage 1 DBPR		
Reporting		
Report to the state specified sampling information (including MCL or MRDL exceedances) about disinfectants, disinfection byproducts (DBPs), and DBP precursors.	40 CFR 141.134(a) through (d)	Quarterly or as necessary for systems sampling less frequently than quarterly
Develop and submit application to state for approval of alternative minimum total organic carbon (TOC) removal levels.	40 CFR 141.135(b)(3)and (4)	As necessary
Develop and submit application to state for approval of waiver of enhanced coagulation requirements.	40 CFR 141.135(b)(4)(v)	One time

Requirement	Regulatory Citation	Frequency/ Retention Period
Stage 2 DBPR		
Reporting		
Develop and submit an Initial Distribution System Evaluation (IDSE) Plan and Report or 40/30 certification or very small system waiver.	40 CFR 141.600	One time
Recordkeeping		
Records of IDSE Reports	40 CFR 141.601(c)(4)	Ten years
Results of operational evaluations to be discussed with states	40 CFR 141.626	Ten years
Chemical Phase Rules (Phases II, IIB, and V)		
Reporting		
Apply to state for asbestos monitoring waiver.	40 CFR 141.23(b)(2) and (4)	Every 3 years, if applicable
Apply to state for inorganic compound (IOC) monitoring waiver.	40 CFR 141.23(c)(2) and (3)	Every 9 years, if applicable
Apply to the state to conduct more frequent IOC monitoring.	40 CFR 141.23(h)	One time, if applicable
Apply to state for volatile organic compounds (VOC) monitoring waiver.	40 CFR 141.24(f)(7) and (10)	Every 6 years or frequency specified by state, if applicable
Apply to state for synthetic organic compound (SOC) monitoring waiver.	40 CFR 141.24(h)(5) and 141.24(h)(7)(iv)	Every 3 years, if applicable
Notify state of MCL exceedances.	40 CFR 141.23(m) through (o)	As necessary
Submit written treatment technique certification to state regarding acrylamide and epichlorohydrin levels.	40 CFR 141.111	Annually, if applicable
Radionuclides		
Reporting		
Notify state of MCL exceedances for contaminants specified in 40 CFR 141.66(b)-(e).	40 CFR 141.26(c)(5)	As necessary
SWTR (only disinfection residual monitoring and associated activities)		
Unfiltered Systems – Reporting		
Disinfection information specified in 40 CFR 141.74(b)	40 CFR 141.75(a)(2)	Within 10 days after the end of each month the system serves water to the public
Filtered Systems - Reporting		
Disinfection information specified in 40 CFR 141.74(c)	40 CFR 141.75(b)(2)	Within 10 days after the end of each month the system serves water to the public
Arsenic Rule		
Subject to general requirements as listed above.		

Requirement	Regulatory Citation	Frequency/ Retention Period
Lead and Copper Rule, Including October 2008 Short Term Revisions		
Reporting		
Report to the state any information required by the treatment provisions in Subpart I (especially 40 CFR 141.90).	40 CFR 141.80(i)	As required
<u>Tap water and water quality parameters (WQP) monitoring requirements</u>		
Water systems that exceed the lead action level must reevaluate lead service lines (LSLs) classified as “replaced” through testing if they resume lead service line replacement (LSLR) programs.	40 CFR 141.84(b) & (c)	As necessary
Systems with less than 5 taps can take one sample per tap if approved by state.	40 CFR 141.86 (c) 141.80(c)(3)(v)	One time
Report the specified information for all tap water samples and all WQP samples.	40 CFR 141.90(a)(1)	End of the applicable monitoring period
Provide written documentation to the state identifying standing times and locations for enough non-first-draw samples to make up its sampling pool under 40 CFR 141.86(b)(5).	40 CFR 141.90(a)(2)(i)	As necessary
If the state has waived prior approval of non-first-draw sample sites selected by the system, identify, in writing, each site that did not meet the six-hour minimum standing time and the length of standing time for that particular substitute sample.	40 CFR 141.90(a)(2)(ii)	As necessary
For a water system deemed to have optimized corrosion control, a water system subject to reduced monitoring, or a water system subject to a monitoring waiver, send written documentation to the state describing any addition of a new source or any change in water treatment.	40 CFR 141.81(b)(3)(iii);	As necessary
For a water system, prohibit systems that exceed the lead action level from initiating or remaining on reduced monitoring based solely on results of WQP monitoring	40 CFR 141.86(d)(4)(vi)(B)	As necessary

Requirement	Regulatory Citation	Frequency/ Retention Period
For any small water system applying for a monitoring waiver, provide documentation to the state demonstrating that it meets the waiver criteria.	40 CFR 141.90(a)(4)(i)	As necessary
For each small system desiring to maintain its monitoring waiver, provide written information to the state.	40 CFR 141.90(a)(4)(ii)	Every 9 years
For each small system with a monitoring waiver, provide written notification to the state if the system is no longer free of lead-containing or copper-containing materials.	40 CFR 141.90(a)(4)(iii)	As necessary, within 60 days after becoming aware of change
For each ground water system that limits WQP monitoring to a subset of entry points, provide written correspondence to the state that identifies selected entry points and includes information sufficient to demonstrate that the sites are representative of water quality and treatment conditions throughout the system.	40 CFR 141.90(a)(5)	One time, as necessary
Provide the specified information to the state if the state calculates the 90th percentile concentrations.	40 CFR 141.90(h)(2)	End of monitoring period
<u>Source water monitoring reporting requirements</u>		
Report the sampling results for all source water samples collected in accordance with 40 CFR 141.88.	40 CFR 141.90(b)(1)	End of monitoring period
Specify any site which was not sampled during the previous monitoring period and explain why the sampling point has changed.	40 CFR 141.90(b)(2)	As necessary, end of monitoring period
<u>Corrosion control treatment reporting requirements</u>		
For systems demonstrating optimized corrosion control, provide the state information demonstrating that the PWS has conducted activities equivalent to the applicable corrosion control steps.	40 CFR 141.81(b)(2), 141.90(c)(1)	One time, as necessary

Requirement	Regulatory Citation	Frequency/ Retention Period
For systems demonstrating optimized corrosion control, submit results of tap water monitoring and source water monitoring.	40 CFR 141.81(b)(3)	As necessary
For systems deemed to have optimized corrosion control, notify the state in writing <i>prior</i> to any change in treatment or of the addition of a new source.	40 CFR 141.81(b)(3)(iii) 141.86(d)(4)(vii); 141.86(g)(4)(iii); 141.90(a)(3)	As necessary
Submit monitoring results that show two consecutive monitoring periods that meet both lead and copper action levels.	40 CFR 141.81(c)	As necessary
Request in writing a modification of optimal CCT.	40 CFR 141.82(h)	As necessary
For systems required to evaluate the effectiveness of CCTs, report the information required by 40 CFR 141.82(c).	40 CFR 141.90(c)(3)	As necessary
For systems required to install optimal corrosion control, submit a letter certifying that the system has completed installation.	40 CFR 141.90(c)(4)	As necessary
<u>Source water treatment reporting requirements</u>		
Provide to the state a recommendation regarding source water treatment.	40 CFR 141.83(a)(1), 40 CFR 141.83(b)(1), 40 CFR 141.90(d)(1)	As necessary, within 6 months of exceeding action level
Request in writing a modification of source water treatment or maximum permissible lead and copper concentrations.	40 CFR 141.83(b)(6)	As necessary
For systems required to install source water treatment, submit a letter certifying that the system has completed installation of the designated treatment.	40 CFR 141.90(d)(2)	As necessary, within 24 months after state designates treatment
<u>Public education program reporting requirements</u>		
Deliver written public education materials if a water system exceeds the lead action level based on tap water samples.	40 CFR 141.85(a) & (c)	As necessary, timing varies by type of system
Broadcast public service announcements if a CWS exceeds the lead action level based on tap water samples.	40 CFR 141.85(b) & (c)	As necessary

Requirement	Regulatory Citation	Frequency/ Retention Period
Water systems that exceed the lead action level must provide information to additional at-risk populations and must conduct specified public education activities. Water systems must include a statement on lead in their CCR. Water systems certify to state that activities have been conducted.	40 CFR 141.85(a) & (b);141.154	As necessary
Apply to the state in writing to alter specified public education language (CWSs only).	40 CFR 141.85(c)(7)	As necessary
Water systems must provide consumers who occupy homes or buildings that are part of the utility's monitoring program, with testing results when their drinking water is tested for lead and copper. Water systems certify to state that results have been distributed.	40 CFR 141.80(g); 141.85(d); 141.90(f)(3)	As necessary
For any water system that is subject to public education requirements, send written documentation to the state that contains specified information.	40 CFR 141.90(f)(1)	As necessary; end of each public education period

Primacy agencies review and maintain records on monitoring results, approve monitoring plans, waivers, treatment changes, public education, and other documents submitted by PWSs. Primacy agencies report compliance and enforcement data to the EPA and apply to the EPA for primacy to implement new drinking water regulations. Reporting and recordkeeping requirements for states are described in more detail in Exhibit 3.

Exhibit 3 Primacy Agency Recordkeeping and Reporting Requirements

Requirement	Regulatory Citation	Frequency/Retention Period
General Requirements (apply to all regulations)		
Reporting		
Submit reports to the Administrator containing new violations by PWS and new enforcement actions by states that occurred during the previous quarter.	40 CFR 142.15(a)(1) and (2)	Quarterly

Requirement	Regulatory Citation	Frequency/Retention Period
Recordkeeping		
Maintain records of tests, measurements, analyses, decisions, and determinations performed on each PWS to determine compliance with applicable provisions of state primary drinking water regulations.	40 CFR 142.14(a)	Varies
Retain files, which shall include for each PWS in the state, records of any state approvals and records of any enforcement actions.	40 CFR 142.14(d)(2) and (3)	12 years
Stage 1 DBPR		
Reporting		
Review and make determination regarding approval of application for use of alternative minimum TOC removal levels.	40 CFR 141.135(b)(1)	As necessary
Review and make determination regarding application for approval of waiver of enhanced coagulation requirements.	40 CFR 141.135(b)(4)(v)	One time, as necessary
Recordkeeping		
Records of the currently applicable or most recent state determinations, including all supporting information and an explanation of the technical basis for each decision, made under the following provisions of 40 CFR Part 141, Subpart L for the control of disinfectants and DBPs.	40 CFR 142.14(d)(12)	12 years
Records of systems that are installing granular activated carbon or membrane technology.	40 CFR 142.14(d)(12)(i)	12 years
Records of systems that are required, by the state, to meet alternative minimum TOC removal requirements or for whom the state has determined that the source water is not amenable to enhanced coagulation.	40 CFR 142.14(d)(12)(ii)	12 years
Records of Subpart H systems using conventional treatment meeting any of the alternative compliance criteria.	40 CFR 142.14(d)(12)(iii)	12 years
A register of qualified operators that have met the state requirements.	40 CFR 142.14(d)(12)(iv)	12 years

Requirement	Regulatory Citation	Frequency/Retention Period
Records of systems with multiple wells considered to be one treatment plant.	40 CFR 142.14(d)(13)	12 years
Monitoring plans for Subpart H systems serving more than 3,300 persons.	40 CFR 142.14(d)(14)	12 years
List of laboratories approved for analyses.	40 CFR 142.14(d)(15)	12 years
List of systems required to monitor for disinfectants and DBPs in accordance with Part 141, Subpart L.	40 CFR 142.14(d)(16)	12 years
Stage 2 DBPR		
Recordkeeping		
1A record of all current monitoring requirements and the most recent monitoring frequency decision pertaining to the contaminant.	40 CFR 142.14(a)(8)	In perpetuity, until replaced or revised
1Records of IDSE monitoring plans submitted by PWSs plus any modifications, until replaced by approved IDSE reports.	40 CFR 142.14(a)(8)(i)	In perpetuity, until replaced or revised
1Records of IDSE reports and 40/30 certifications and any modifications required by the state, until replaced or revised.	40 CFR 142.14(a)(8)(ii)	In perpetuity, until replaced or revised
1Operational evaluations submitted by a system.	40 CFR 142.14(a)(8)(iii)	Ten years
Special Primacy Requirements		
An application for approval of a state program revision that adopts 40 CFR Part 141, Subpart L, must contain a description of how the state will accomplish the program requirements.	40 CFR 142.16(h)	One time
Chemical Phase Rules (Phases II, IIB, and V)		
Reporting		
Make determination regarding asbestos waiver requests.	40 CFR 141.23(b)(3) and (4)	3 years, as necessary
Make determination regarding IOC waiver requests.	40 CFR 141.23(c)(2) through (4)	9 years, as necessary
Make determination regarding VOC waiver.	40 CFR 141.24(f)(7), (8), and (10)	6 years or frequency specified by state, as necessary
Make determination regarding SOC waiver requests.	40 CFR 141.24(h)(5) and (6)	3 years, as necessary

Requirement	Regulatory Citation	Frequency/Retention Period
<i>Recordkeeping</i>		
Records for most recent vulnerability determination, including monitoring results and other data supporting the determination, the state's findings, and any additional bases for such determination.	40 CFR 142.14(d)(4)	In perpetuity or until more current vulnerability determination has been issued
Records of all current monitoring requirements and most recent monitoring frequency decision pertaining to each contaminant, including the monitoring results and other data supporting the decision, the state's findings, and any additional bases for such decision.	40 CFR 142.14(d)(5)	In perpetuity or until a more recent monitoring frequency decision has been issued
Records of most recent asbestos repeat monitoring determination, including monitoring results and other data supporting the determination, the state's findings, and any additional bases for the determination and the repeat monitoring frequency.	40 CFR 142.14(d)(6)	In perpetuity or until more current repeat monitoring determination has been issued
Records of annual certifications received from systems pursuant to Part 141, Subpart K demonstrating the system's compliance with the treatment techniques for acrylamide and/or epichlorohydrin.	40 CFR 142.14(d)(7)	12 years
<i>Radionuclides</i>		
<i>Reporting</i>		
Evaluate and draft written response for a system request to use historical monitoring data.	40 CFR 141.26(a)(2)(ii)(C)	As necessary
Determine whether to designate a system as vulnerable and notify system of the determination.	40 CFR 141.26(b)(1)	As necessary
Designate system using waters contaminated by nuclear facility effluent and notify system of determination.	40 CFR 141.26(b)(2)	As necessary
<i>Recordkeeping</i>		
Subject to general requirements as listed above.		
<i>SWTR (only disinfectant residual monitoring and associated activities)</i>		
<i>Reporting</i>		
Subject to general requirements as listed above		

Requirement	Regulatory Citation	Frequency/Retention Period
Recordkeeping		
Records of disinfectant residual measurements and other parameters necessary to document disinfection effectiveness.	40 CFR 142.14(a)(4)(i)	1 year
Records of decisions to allow an unfiltered or filtered PWS to sample residual disinfectant concentration at alternate locations if it also has ground water source(s).	40 CFR 142.14(a)(4)(ii)(A)(4) and (6)	40 years, or 1 year after decision is reversed or revised
Records of any decision that a violation of monthly contact time (CT) compliance requirements was caused by circumstances that were unusual and unpredictable.	40 CFR 142.14(a)(4)(ii)(B)(1)	1 year
Records of any decision that a violation of the disinfection effectiveness criteria was not caused by a deficiency in treatment of the source water.	40 CFR 142.14(a)(4)(ii)(B)(2)	1 year
Records of any decision that failure to meet the disinfectant residual concentration requirements of 40 CFR 141.72(a)(3)(i) was caused by circumstances that were unusual and unpredictable. A copy of the decision must be provided to the system.	40 CFR 142.14(a)(4)(ii)(C)(2)	40 years, unless filtration is installed
Records of decisions that an unfiltered or filtered system has no means for having a sample transported and analyzed for heterotrophic plate count by a certified laboratory under the requisite time and temperature conditions and that the system is providing adequate disinfection in the distribution system, so that the disinfection requirements do not apply, and the basis for the decision. A copy of the decision must be provided to the system.	40 CFR 142.14(a)(4)(ii)(C)(9) and (10), respectively	Until the decision is reversed or revised

Requirement	Regulatory Citation	Frequency/Retention Period
Records of decisions that a system using a disinfectant other than chlorine may use CT 99.9 values other than those in tables 2.1 or 3.1 and /or other operational parameters to determine if the minimum total inactivation rates are being met. A copy of the decision must be provided to the system.	40 CFR 142.14(a)(4)(ii)(C)(13)	Until the decision is reversed or revised
Arsenic Rule		
Reporting		
Subject to general requirements as listed above		
Recordkeeping		
Subject to general requirements as listed above		
Lead and Copper Rule		
Reporting		
Notify the system after an approval decision has been made in regards to the system's request to add a new source of water or change a treatment process prior to implementation.	40 CFR 141.81(b)(3)(iii); 141.86(d)(4)(vii); 141.86(g)(4)(iii); 141.90(a)(3)	As necessary
Provide written notice to PWSs explaining the basis for determining if the PWS has optimized corrosion control and specifying the water quality control parameters that represent optimal corrosion control.	40 CFR 141.81(b)(2)	As necessary
Notify a system in writing of any determination requiring a system to repeat treatment steps previously completed.	40 CFR 141.81(c)	As necessary
Specify corrosion control studies or optimal CCT (after a small or medium system exceeds the lead or copper action level).	40 CFR 141.81(e)(2)	Within 18 months (medium systems) or 24 months (small systems) of exceedance
Designate optimal CCT (if a small or medium system has performed corrosion control studies).	40 CFR 141.81(e)(4)	As necessary, within 6 months of system completing studies
For small and medium systems, designate optimal WQPs.	40 CFR 141.81(e)(7)	As necessary, within 6 months of system completing follow-up sampling
Notify PWSs in writing of decisions on optimal CCT.	40 CFR 141.82(d)(2)	As necessary
Modify determinations of optimal CCT in writing.	40 CFR 141.82(h)	As necessary or as requested

Requirement	Regulatory Citation	Frequency/Retention Period
Notify the system in writing of determinations regarding necessary source water treatment.	40 CFR 141.83(a)(2),141.83(b)(2)	As necessary, within 6 months of submission of monitoring results
Notify the system in writing of designations for maximum permissible source water levels.	40 CFR 141.83(a)(5), 141.83(b)(4)	As necessary within 6 months of completing tap and source water monitoring.
Provide in writing revised source water treatment or maximum permissible lead and copper concentrations along with a basis for the decision and an implementation schedule.	40 CFR 141.83(b)(6)	As necessary or as requested
Review public education materials content and consult on activities. Review and track system certification.	40 CFR 141.85(a)	As necessary
Notify a system in writing if a shorter LSLR schedule is required.	40 CFR 141.84(e)	As necessary, within 6 months after system triggered into LSLR
Review and track system certification regarding distribution of tap samples to individual monitoring locations.	40 CFR 141.80(g); 141.85(d); 141.90(f)(3)	As necessary
Notify the system of approval of non-first-draw sample sites.	40 CFR 141.86(b)(5)	As necessary
If applicable, review system request and approve in writing or by site verification the number of taps for sampling.	40 CFR 141.80(c)(3)(v); 141.86(c)	One time
Specify sampling locations when a system is conducting reduced monitoring.	40 CFR 141.86(c)	As necessary
Notify the system in writing when the state determines that a system is eligible to commence reduced monitoring.	40 CFR 141.86(d)(4)(ii) & (iii)	As necessary
Notify system of alternate period for collecting reduced lead and copper tap samples.	40 CFR 141.86(d)(4)(iv)(B)	As necessary
Document in writing the decision and rationale for invalidating a sample.	40 CFR 141.86(f)(3)	As necessary
Notify the system in writing of its waiver determination and the conditions of the waiver.	40 CFR 141.86(g)(3)	As necessary
Notify a system if its waiver has been revoked.	40 CFR 141.86(g)(5)(iii)	As necessary
Review additional monitoring data and reports from systems that have exceeded the lead action level.	40 CFR 141.86(d)(4)(vi)(B)	As necessary

Requirement	Regulatory Citation	Frequency/Retention Period
Report to the EPA the following information related to each system's compliance with lead and copper requirements:		
For each large and medium PWS, all 90th percentile lead levels calculated during each monitoring period, and the first and last day of the monitoring period for which the 90th percentile lead level was calculated.	40 CFR 142.15(c)(4)(iii)(A)	Quarterly
For each small PWS, the 90th percentile lead level calculated during each monitoring period in which the systems exceeds the lead action level, and the first and last day of each monitoring period in which an exceedance occurred.	40 CFR 142.15(c)(4)(iii)(B)	Quarterly
For each PWS, the 90th percentile copper level calculated during each monitoring period in which the system exceeds the copper action level, and the first and last day of each monitoring period in which an exceedance occurred.	40 CFR 142.15(c)(4)(iii)(C)	Quarterly
For each PWS for which the state has designated optimal WQPs or which the state has deemed to have optimized corrosion control, the date of the determination and the paragraph(s) under which the state made its determination.	40 CFR 142.15(c)(4)(iii)(D)	Quarterly
For each PWS required to begin replacing LSLs, the date each system must begin replacement.	40 CFR 142.15(c)(4)(iii)(E)	Quarterly
For each PWS that has implemented optimal corrosion control, completed applicable source water treatment requirements or completed LSLR requirements and the date of the state's determination that these requirements have been met.	40 CFR 142.15(c)(4)(iii)(F)	Quarterly

Requirement	Regulatory Citation	Frequency/Retention Period
Recordkeeping		
Maintain records of currently applicable or most recent state determinations, including all supporting information and explanation of technical basis for each decision.	40 CFR 142.14(d)(8)	12 years
For any system deemed to be optimized, maintain records of any conditions imposed by the state to ensure the continued operation and maintenance of CCT in place.	40 CFR 142.14(d)(8)(i)	12 years
Maintain records of decisions to require a system to conduct CCT studies.	40 CFR 142.14(d)(8)(ii)	12 years
Maintain records of designations of optimal CCT.	40 CFR 142.14(d)(8)(iii)	12 years
Maintain records of designations of optimal WQPs.	40 CFR 142.14(d)(8)(iv)	12 years
Maintain records of decisions to modify a PWS's optimal CCT or WQPs.	40 CFR 142.14(d)(8)(v)	12 years
Maintain records of determinations of source water treatment.	40 CFR 142.14(d)(8)(vi)	12 years
Maintain records of designations of maximum permissible concentrations of lead and copper in source water.	40 CFR 142.14(d)(8)(vii)	12 years
Maintain records of determinations establishing shorter LSLR schedules.	40 CFR 142.14(d)(8)(viii)	12 years
Maintain records of determinations of additional monitoring requirements and/or other actions required to maintain optimal corrosion control by systems monitoring for lead and copper at the tap less frequently than once every six months that change treatment or add a new source of water.	40 CFR 142.14(d)(8)(ix)	12 years
Maintain records of system-specific decisions regarding the content of written public education materials and/or the distribution of these materials.	40 CFR 142.14(d)(8)(x)	12 years

Requirement	Regulatory Citation	Frequency/Retention Period
Maintain records of system-specific determinations regarding use of non-first-draw samples at NTNCWSs and CWSs that operate 24 hours a day.	40 CFR 142.14(d)(8)(xi)	12 years
Maintain records of system-specific designations of sampling locations for systems subject to reduced monitoring.	40 CFR 142.14(d)(8)(xii)	12 years
Maintain records of system-specific determinations pertaining to alternative sample collection periods for systems subject to reduced monitoring.	40 CFR 142.14(d)(8)(xiii)	12 years
Maintain records of determinations of small system monitoring waivers, waiver recertifications, and waiver revocations.	40 CFR 142.14(d)(8)(xiv)	12 years
Maintain records of determinations regarding representative entry point locations at ground water systems.	40 CFR 142.14(d)(8)(xv)	12 years
Maintain records of reports and any other information submitted by PWSs.	40 CFR 142.14(d)(9)	12 years
Maintain records of state activities to verify compliance with state determinations.	40 CFR 142.14(d)(10)(i)	12 years
Maintain records of state activities to verify compliance with the requirements related to partial LSLR and compliance with LSLR schedules.	40 CFR 142.14(d)(10)(ii)	12 years
Maintain records of state activities to invalidate tap water lead and copper samples.	40 CFR 142.14(d)(10)(iii)	12 years
Maintain records of each system's currently applicable or most recently designated monitoring requirements.	40 CFR 142.14(d)(11)	12 years or until a new decision, determination, or designation has been issued

4(b)(ii) Respondent Activities

PWSs and primacy agencies must complete the activities described in the sections below.

Public Water Systems

PWSs are required to monitor for compliance with the MCLs or MRDLs as established in 40 CFR part 141, subpart B. Public water system owners and operators are required to report laboratory results to the state at frequencies specified in the EPA regulations. In addition, they are required to record, maintain, and report the analytical results of these monitoring efforts in accordance with 40 CFR part 141, subparts C and D. General activities carried out by PWSs implementing the regulations addressed in this ICR are described in Exhibit 2.

Primacy Agencies

States are currently required to maintain records of state verification activities and each determination made and to report to the EPA through SDWIS in accordance with state reporting requirements (40 CFR 142.14). Primacy agencies ensure the implementation of the rules covered by this ICR. To meet their responsibilities, the primacy agencies conduct the following activities:⁵

- Make compliance determinations.
- Provide training and technical assistance to PWSs.
- Maintain data management systems.
- Establish the monitoring schedules.
- Review plans and specifications.
- Enter monitoring and enforcement data.
- Keep records and supporting information, including state determinations and explanations for technical decisions regarding rule implementation.

A detailed description of monitoring and other data collection and reporting requirements for each of the drinking water rules included in this ICR is found in Exhibit 3.

⁵ Some of the general activities conducted by states are included in the PWSS Program ICR (OMB 2040-0090).

5 INFORMATION COLLECTED — AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The EPA maintains SDWIS and evaluates SDWIS data to determine system compliance. The EPA personnel also reformat, distribute, and store these data for a number of uses, including responding to Congressional and public inquiries. The EPA also oversees the EPA regional and state programs, provides technical assistance, and develops policies designed to ensure consistent program implementation.

The EPA's requirements are outlined in Exhibit 4 below. Most of the burden and costs for these activities are addressed in the PWS Program ICR (OMB No. 2040-0090). The EPA will also conduct primacy activities in states, tribes, and territories that do not have primacy. Specifically, the EPA will be involved in the following activities:

- Planning and implementation.
- Training PWS and providing technical assistance.
- Analyzing and reviewing PWS data.
- Making compliance determinations concerning PWSs.
- Recordkeeping.

Burden and costs for these activities are accounted for under the primacy agency burden (see section 6).

Exhibit 4 The EPA Requirements

Requirement	Regulatory Citation	Frequency
General Requirements (apply to all regulations)		
For states and other entities for which the EPA maintains primacy, the Agency must maintain the records and perform the reporting activities required of states.	40 CFR 142.14 and 142.15	As necessary
Review state request for approval of a program revision and notify state of determination regarding request.	40 CFR 142.12(d)(3)	One time, as necessary
Stage 1 DBPR		
Subject to general requirements as listed above.		
Stage 2 DBPR		
Subject to general requirements as listed above.		
Chemical Phase Rules (Phases II, IIB, and V)		
Subject to general requirements as listed above.		
Radionuclides		
Subject to general requirements as listed above.		
SWTR (only disinfectant residual monitoring and associated activities)		
Subject to general requirements as listed above.		
Arsenic Rule		
Subject to general requirements as listed above.		
Lead and Copper Rule		
Subject to general requirements as listed above.		

5(b) Collection Methodology and Management

1 Primacy agencies must report data to the EPA on a quarterly basis. These data include any new data and revisions or corrections to existing data. This data is reported to EPA electronically. This information is maintained in SDWIS⁶, which contains the following:

- Inventory data for each PWS.
- Violations, enforcement actions, and some follow-up activity.
- Variances and exemptions (where applicable).

SDWIS data support a number of rule implementation and program management activities, which promote consistent national program implementation. SDWIS data are used to identify compliance trends with specific regulations, prioritize public water systems that might require training and technical assistance to return to compliance, and provide insights into how the primacy agency makes compliance determinations.

⁶ The public can access the violation data in SDWIS online at <https://ofmpub.epa.gov/apex/sfdw/f?p=108:1:::NO:1::>.

All costs for rule-related data management activities are addressed in the PWSS Program ICR (OMB No. 2040-0090). Section 5(b) of the PWSS Program ICR contains additional detail regarding the activities supported by the previously described collection of SDWIS data.

5(c) Small Entity Flexibility

In developing rules contained in this ICR, the EPA considered the requirement of the Small Business Regulatory Enforcement Fairness Act (SBREFA) to minimize the burden of information collections on small entities. Small entities include “small businesses,” “small organizations,” and “small government jurisdictions.” These terms are defined below.⁷

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

The major requirement under the SBREFA is a regulatory flexibility analysis of all rules that have a “significant economic impact on a substantial number of small entities.” This ICR is not associated with new rules. Therefore, this ICR is not subject to the SBREFA.

5(d) Collection Schedule

Exhibit 5 contains a summary of the collection schedules for each rule. Given the wide range of phase-in schedules for the respective rules, additional information may be obtained by consulting the individual rules for specific collection schedules.

⁷ These definitions were taken from section 601 of the Regulatory Flexibility Act (RFA).

Exhibit 5
Collection Schedule⁸

Rule	Collection Commencement
Disinfectant residual monitoring and associated activities for the SWTR	1991/1993 (depending on filtration status)
Phase II	1993
Phase IIB	1993
Phase V	1996
Stage 1 DBPR	2002/2004 (depending on system size and source)
Stage 2 DBPR	2006
Radionuclides Rule	2003
Arsenic Rule	2006/2007 (depending on source water)
Lead and Copper Rule	1994

⁸ Collection schedule is based on the commencement of monitoring requirements. Startup activities are typically completed prior to these dates.

6 ESTIMATING BURDEN AND COST OF COLLECTION

This section discusses the assumptions used to estimate burden and costs and describes the change in annual burden, as compared with the 2016 DDBP/Chem/Rads Rules ICR. This ICR updates the annual burden and costs associated with these rulemakings for September 1, 2019 - August 31, 2022.

The EPA is committed to accurately characterizing the burden and costs of rules it promulgates. Consequently, the EPA has refined some of the assumptions for calculating the burden and costs associated with implementing the drinking water regulations contained in this ICR. For this update, assumptions were revised based on program changes and well-documented changes. To provide a comparable basis on which to calculate the requirements addressed by the DDBP/Chem/Rads Rules ICR and to address inconsistencies, the EPA applied uniform assumptions to all rules. The categories of assumptions are listed below.

- Labor rates: For PWSs, a 2018 labor rate of \$21.87 was obtained from the Bureau of Labor Statistics (BLS). An overhead rate of 60 percent was applied, resulting in an hourly rate of \$34.99. For states, a 2018 labor rate of \$29.97 was obtained from the BLS. An overhead rate of 60 percent was applied, resulting in an hourly rate of \$47.95.
- PWS inventory figures from the most recent frozen SDWIS database pull (October 2018).
- Number of entry points per system, as reported in the 2006 Community Water System Survey (CWSS).
- Number of plants per system, as reported in the 2006 CWSS.

6(a) Respondent Burden

6(a)(i) Burden to Public Water Systems

The annual PWS burden for September 1, 2019, through August 31, 2022, is estimated to be approximately 3.2 million hours. Exhibit 6 tabulates the annual burden hours on a rule-specific basis. Activity-level burden assumptions were carried forward from previous ICRs. If updated data, such as system inventories and results of consultations on burden, were available, those data were used in burden calculations. The following further describes the basis for the burden estimates for each rule.

1) Stage 1 Disinfectants and Disinfection Byproducts Rule

Activities associated with the Stage 1 DBPR account for 0.51 million annual burden hours. The assumptions used to calculate the Stage 1 DBPR burden are based largely on assumptions from the September 1998 Information Collection Request for the National Primary Drinking Water Regulations: Stage 1 Disinfectants and Disinfection Byproducts Rule (Stage 1 DBPR ICR). The burden for systems includes only monitoring. The specific burden for monitoring includes the following:

- Paired TTHM/HAA5
- Alkalinity and paired TOC
- Bromate
- Chloride dioxide
- Chlorite (both daily and monthly monitoring)
- Chlorine or chloramines (in the distribution system)⁹

At this point, reduced monitoring burden has not been estimated for the above contaminants, with the exception of alkalinity and paired TOC monitoring, for which this ICR carried forward reduced monitoring rate estimates from the September 1998 Stage 1 DBPR ICR. The Stage 2 DBPR burden estimates account for any additional monitoring that may be required in addition to monitoring already required under Stage 1 DBPR.

Section 6(f) describes the reasons for changes between the burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

2) Stage 2 Disinfectants and Disinfection Byproducts Rule

Over the 3 years covered by this ICR, the total national respondent burden to PWSs is estimated at an annual average of 0.047 million hours (see Exhibit 7). Initial Distribution System Evaluation (IDSE) activities were completed during a previous ICR period, as were Stage 2 compliance monitoring plans. The next two sections describe the burden estimates for the current ICR period in greater detail.

Additional Routine Compliance Monitoring

Systems began conducting additional routine compliance monitoring during the previous ICR period. This monitoring is in addition to monitoring required under the Stage 1 DBPR. This requirement is not applicable to the majority of the public water systems. The burden for monitoring takes into account any changes in TTHM and HAA5 monitoring requirements resulting from the IDSE conducted during a previous ICR period. All small PWSs, regardless of whether or not they conducted *Cryptosporidium* monitoring under the LT2ESWTR, began to comply with the Stage 2 MCLs previous to this ICR period.

Operational Evaluations

An operational evaluation must include an examination of distribution system operational practices and how these practices may be modified to reduce TTHM and HAA5 levels. Systems must discuss their evaluations with the primacy agency. Systems with operational evaluations incur costs in the year that the operational level is exceeded. This began in previous ICR periods once systems had one year's worth of compliance monitoring data and continues forward in this ICR period.

3) Chemical Phase Rules

⁹ Includes burden for ground water systems only. Disinfectant residual monitoring and associated activities for surface water systems are addressed by the SWTR.

PWS activities associated with the Chemical Phase Rules account for a burden of 0.35 million hours per year. The burden estimate includes routine and reduced sampling for IOCs, VOCs, and SOCs under the schedules dictated by the SMF. The assumptions used to calculate the Chemical Phase Rule burden are based on assumptions from the 1993 PWSS Program ICR, which maintained most assumptions and burden estimates from the individual ICRs for the Phase II, IIB, and V rules, with an adjustment to the waiver rate assumptions (in the 2004 DDBP/Chem/Rads Rules ICR) to more accurately reflect actual waiver issuance rates. Section 6(f) describes the reasons for changes between the burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

4) Radionuclides Rule

Annual PWS burden for the Radionuclides Rule is estimated to be 0.02 million hours. This is based on burden assumptions carried forward from the 2000 Radionuclides Rule ICR.

Monitoring burden is for the following contaminants:

- Gross alpha
- Beta and photon emitters
- Combined radium-226/-228
- Uranium

Section 6(f) describes the reasons for changes between the radionuclides burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

5) Disinfectant Residual Monitoring and Associated Activities under the SWTR

As stated previously, this ICR includes burden estimates only for the disinfectant residual monitoring and associated activities required under the SWTR. The Microbial Rules ICR addresses the burden and costs for all other SWTR requirements. Implementation of the SWTR disinfectant residual monitoring and associated activities is estimated to result in an annual PWS burden of 1.1 million hours. Included in the estimate is burden for:

- Distribution system residual monitoring.
- Calculation of inactivation ratio using CT values for unfiltered systems.
- Measurement of pH and temperature, as necessary to calculate CT.
- Entry point residual monitoring for filtered systems.
- Entry point residual monitoring for unfiltered systems.

Section 6(f) describes the reasons for changes between the burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

6) Arsenic Rule

This ICR addresses the burden and cost for arsenic monitoring, reporting, and recordkeeping for 2019 through 2022. PWSs monitor arsenic in accordance with the standard monitoring framework schedule. In this 3-year ICR period, systems with existing waivers are expected to incur burden for reapplying. Implementation of the Arsenic Rule is estimated to result in an annual PWS burden of 0.18 million hours.

7) Lead and Copper Rule

The average annual respondent burden is 1.0 million hours for reporting, recordkeeping, and public education activities of the LCR. Only CWSs and NTNCWSs incur a burden associated with LCR requirements. The burden accounts for the provisions of the short-term revisions, which require that systems:

- Take additional tap samples for lead if they are on reduced monitoring and the lead action level of 0.015 mg/L is exceeded.
- Provide revised public education materials according to revised delivery requirements if the lead action level is exceeded, including a statement on lead in the CCR.
- Notify the state before making long term treatment changes.
- Notify customers of results of samples taken at customers' homes.
- Retest LSLs previously exempted from replacement if the lead action level is exceeded.

Section 6(f) describes the reasons for changes between the burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this DDBP/Chem/Rads Rules ICR.

6(a)(ii) Burden to Primacy Agencies

The annual burden for primacy agencies is estimated to be approximately 2.0 million hours. Exhibit 7 shows the annual burden hours on a rule-specific basis. Many other state activities, such as compliance assurance and data management, cannot be divided among specific rules and are included in the PWSS Program ICR as general primacy activities. The following briefly describes the basis for the burden estimates:

1) Stage 1 Disinfectants and Disinfection Byproducts Rule

The annual state burden for the Stage 1 DBPR is expected to be 0.15 million hours. This reflects data entry and recordkeeping burden. Section 6(f) describes the reasons for changes between the Stage 1 DBPR burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

2) Stage 2 Disinfectants and Disinfection Byproducts Rule

The annual state burden for the Stage 2 DBPR is expected to be 0.051 million hours. This reflects reporting and recordkeeping burden for maintaining records and tracking compliance by systems. This ICR also includes burden for reviewing operational evaluations. States are assumed to have already completed their IDSE oversight activities and review of compliance monitoring plans.

3) Chemical Phase Rules

For states, the annual burden associated with the Chemical Phase Rules is estimated to be approximately 1.4 million hours. This reflects reporting and recordkeeping burden for routine and reduced sampling for IOCs, VOCs, and SOCs under the schedules dictated by the SMF. Estimates for primacy agency burden for the Chemical Phase Rules are based on State Workload Model¹⁰ assumptions carried forward from the 1993 PWSS Program ICR. Note that the burden associated with oversight of arsenic monitoring is discussed separately below. Section 6(f) describes the reasons for changes between the Chemical Phase Rules burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

4) Radionuclides Rule

For the Radionuclides Rule, annual state burden is estimated to be 2,228 hours. The annual state burden is based on burden assumptions carried forward from the 2016 DDBP/Chem/Rads Rules ICR. Burden is calculated for primacy agency staff for recordkeeping, reporting, and compliance tracking and analysis requirements, based on the number of analyses conducted by PWSs. Section 6(f) describes the reasons for changes between the radionuclides burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

5) Disinfectant Residual Monitoring and Associated Activities under SWTR

As stated previously, this ICR includes burden estimates for only disinfectant residual monitoring and associated activity components of the SWTR. The Microbial Rules ICR addresses the burden and costs for the other SWTR requirements. Implementation of the SWTR disinfectant residual monitoring is expected to result in an annual state burden of 0.16 million hours. Included in this estimate is burden associated with reviewing data for—

- Distribution system residual monitoring.
- Calculation of inactivation ratio using CT values.
- Measurement of pH and temperature, as necessary to meet requirements.
- Entry point residual monitoring for filtered systems.
- Entry point residual monitoring for unfiltered systems.

Estimates for primacy agency burden for the SWTR are based on assumptions carried forward from the 2012 DDBP/Chem/Rads Rules ICR. Section 6(f) describes the reasons for changes between the burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

¹⁰ New burden estimates from the revised State Workload Model will be incorporated into the subsequent DDBP/Chem/Rads Rules ICR. See section 5(b) of the PWSS ICR for additional information.

6) Arsenic Rule

For the Arsenic Rule, annual state burden is estimated to be 0.079 million hours. The annual state burden is based on assumptions carried forward from the 2016 DDBP/Chem/Rads Rules ICR and the 2000 Arsenic Rule ICR. Burden is calculated for primacy agency staff for oversight of monitoring activities. Burden is based on recordkeeping, reporting, and compliance tracking and analysis. In this 3-year ICR period, states will additionally incur burden to review waiver applications submitted by systems with existing waivers. Section 6(f) describes the reasons for changes between burden reported in the 2016 DDBP/Chem/Rads Rules ICR and this ICR.

7) Lead and Copper Rule

The EPA estimates that the annual burden incurred by primacy agencies for activities associated with the lead and copper regulation is approximately 0.18 million hours. This estimate includes costs for employing a corrosion control expert and costs to review various letters and results submitted by water systems in accordance with the LCR. It includes the additional burden associated with the LCR short term revisions, which estimate that states will spend extra time reviewing systems' plans for changing treatment or adding a new source.

6(b) Respondent Costs

6(b)(i) Cost to Public Water Systems

Exhibit 6 shows the annual costs for PWSs over the three-year ICR period. Annual costs are estimated at approximately \$365 million, which consists of \$112 million in labor costs, \$5.4 million in capital, and \$248 million in O&M (numbers may not add due to rounding).

Labor costs are based on the number of hours times the average hourly wage rate, including overhead. In addition to labor costs, there are O&M costs associated with each of the rules covered by this ICR. These O&M costs reflect non-labor costs associated with sample shipping and analysis for each of the rules, as well as material costs associated with public education materials and postage. These costs vary by rule according to the frequency and cost of a particular analysis.

In addition to O&M costs, the requirements of one rule (i.e., SWTR) result in capital costs to affected PWSs. Capital costs are incurred to buy and replace monitoring equipment necessary for on-site analysis of disinfectant residuals and water pH. Capital costs are based on vendor estimates for both in-line and portable equipment, as required by regulations. Equipment costs are based on a seven-year replacement cycle.

6(b)(ii) Cost to Primacy Agencies

Exhibit 7 shows that the annual cost to primacy agencies is estimated at approximately \$91 million, which is comprised of labor costs. There are some O&M costs associated with the LCR (\$4,861). There are no primacy agency capital costs associated with this ICR.

Exhibit 6
Annual PWS Burden and Cost
September 1, 2019 - August 31, 2022

Activity	Annual Burden Hours	Cost			
		Annual Labor Cost (\$K)	Annual O&M Cost (\$K)	Annual Capital Cost (\$K)	Total Annual Cost (\$K)
Stage 1 DBPR	505,606	\$17,490	\$103,217		\$120,707
Stage 2 DBPR	47,458	\$1,661	\$5,496		\$7,157
Chemical Phases Rules (Phases II/IIB/V)	352,665	\$12,340	\$73,350		\$85,690
Radionuclides Rule	17,689	\$619	\$4,179		\$4,798
Disinfectant Residual Monitoring and Associated Activities under SWTR	1,051,045	\$36,778	\$55,017	\$5,442	\$97,237
Arsenic Rule	179,473	\$6,280	\$1,378		\$7,658
Lead and Copper Rule	1,036,644	\$36,795	\$4,868		\$41,663
TOTAL	3,190,581	\$111,963	\$247,505	\$5,442	\$364,910

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

Exhibit 7
Annual Primacy Agency Burden and Cost
September 1, 2019 - August 31, 2022

Activity	Annual Burden Hours	Cost			
		Annual Labor Cost (\$K)	Annual O&M Cost (\$K)	Annual Capital Cost (\$K)	Total Annual Cost (\$K)
Stage 1 DBPR	147,204	\$6,713			\$6,713
Stage 2 DBPR	50,822	\$2,437			\$2,437
Chemical Phases Rules (Phases II/IIB/V)	1,354,532	\$61,767			\$61,767
Radionuclides Rule	2,228	\$107			\$107
Disinfectant Residual Monitoring and Associated Activities under SWTR	157,278	\$7,542			\$7,542
Arsenic Rule	79,345	\$3,805			\$3,805
Lead and Copper Rule	179,366	\$8,601	\$5		\$8,606
TOTAL	1,970,776	\$90,971	\$5	N/A	\$90,975

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

6(c) Agency Burden and Costs

Burden and costs to the federal government are incurred by the EPA's drinking water program to assist states in implementing drinking water regulations. The EPA burden and costs for general drinking water program implementation activities are accounted for under the PWSS Program ICR. Burden and costs included in the PWSS Program ICR cover all cross-cutting, non-rule specific regulatory activities associated with compliance tracking, regulatory enforcement, and rule development activities.¹¹

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

Respondents for this ICR include both PWSs and primacy agencies. This ICR estimates that the number of PWS respondents is 146,715 PWSs.¹² However, all PWSs are not necessarily subject to each of the information collection requirements contained in this ICR. The regulations associated with each rule identify the numbers and types of PWSs that are subject to each particular provision. In addition to the PWS respondents, this ICR assumes 57 primacy agencies (50 states plus D.C., U.S. Territories, and the Navajo Nation).¹³ Therefore, the total number of respondents is 146,772. The total costs and burden for these respondents are summarized in Exhibits 7 and 8.

6(e) Bottom Line Burden Hours and Costs

The bottom line burden hours and costs for this ICR are presented in Exhibit 8. The total annual respondent burden associated with this ICR, which includes burden for PWSs and primacy agencies, is estimated to be approximately 5.2 million hours. The corresponding total annual respondent costs (labor, capital, and O&M) are estimated to be \$455.9 million. The portion of the total annual respondent costs attributable to capital and O&M costs is \$253.0 million.

¹¹ The EPA burden for activities where EPA acts as a primacy agent counts as primacy agency burden and is included in totals for primacy agency burden.

¹² Source: SDWIS/FED Data from October 2018.

¹³ For several of these entities, primacy activities are actually implemented by EPA regional offices. However, as a simplifying assumption, they are included with the states for respondent calculations under this ICR.

Exhibit 8
Bottom Line Annual Burden and Cost
September 1, 2019 - August 31, 2022

Annual Number of Respondents	146,772 (=)	
	146,715 (+)	Existing PWSs
	57	Primacy agencies
Total Annual Responses	12,796,605 (=)	
	11,832,971 (+)	PWS responses (see Exhibit 6)
	963,634	Primacy agency responses (see Exhibit 7)
Number of Responses per Respondent	87.2 (=)	
	12,796,605 (/)	Total annual responses from above
	146,772	Total annual respondents from above
Total Annual Respondent Hours	5,161,356 (=)	
	3,190,581 (+)	PWS hours (see Exhibit 6)
	1,970,776	Primacy agency hours (see Exhibit 7)
Hours per Response	0.40 (=)	
	5,161,356 (/)	Total annual respondent hours from above
	12,796,605	Total annual responses from above
Annual O&M and Capital Cost (\$K)	\$252,952 (=)	
	\$247,505 (+)	Total PWS O&M costs (see Exhibit 6)
	\$5,442 (+)	Total PWS capital costs (see Exhibit 6)
	\$5	Total primacy agency O&M costs (see Exhibit 7)
Total Annual Respondent Cost (Labor, Capital, and O&M) (\$K)	\$455,885 (=)	
	\$364,910 (+)	For PWSs (see Exhibit 6)
	\$90,975	For primacy agencies (see Exhibit 7)
Total Annual Hours (resp. plus Agency)	5,161,356 (=)	
	5,161,356 (+)	Total annual respondent hours from above
	0	Total the EPA hours
Total Annual Cost (resp. plus Agency) (\$K)	\$455,885 (=)	
	\$455,885 (+)	Total annual respondent cost from above
	0	Total the EPA cost

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

6(f) Reasons for Change in Burden

This section presents the change in burden and the reasons for the change in burden. The discussion is divided into two parts—

- Section 6(f)(i) summarizes any restructuring adjustments being made for the addition of new stand-alone ICRs to the DDBP/Chem/Rads Rules ICR. See Exhibit 10.
- Section 6(f)(ii) summarizes other adjustments to the annual burden estimates associated with each rule in the 2012 DDBP/Chem/Rads Rules ICR. See Exhibits 11 through 13.

Exhibit 9 summarizes how each of these changes affects the overall burden inventory for the DDBP/Chem/Rads Rules ICR.

Exhibit 9
Summary of Changes in Annual Burden
(Includes both PWS and Primacy Agency Burden)

Type of Change	Burden (hours)	Running Total	Comment
Burden Estimated in the 2016 DDBP/Chem/Rads Rules ICR	5,305,696	5,305,696	This burden serves as the baseline for the 2019 DDBP/Chem/Rads Rules ICR.
Restructuring Adjustments—see Section 6(f)(i)	0	5,305,696	2019 DDBP/Chem/Rads Rules ICR is not appended with burden from any new ICRs.
Other Adjustments to Burden—see Section 6(f)(ii)	(144,339)	5,161,356	Burden for which the EPA seeks approval in this ICR.

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

6(f)(i) Restructuring Adjustments

No restructuring adjustments are being made for the addition of new stand-alone ICRs to the DDBP/Chem/Rads Rules ICR, as shown in Exhibit 10. In the next revision to the DDBP/Chem/Rads Rules ICR any burden from relevant standalone ICRs that have expired will be newly incorporated into the DDBP/Chem/Rads Rules ICR.

Exhibit 10
Restructuring Adjustments to the Annual Burden Inventory
for the DDBP/Chem/Rads Rules ICR
(Includes both PWS and Primacy Agency Burden)

Action	Annual Burden Hours	Brief Explanation
N/A	5,305,696	Inventory for the 2016 DDBP/Chem/Rads Rules ICR carried forward as the baseline for 2019 DDBP/Chem/Rads Rules ICR (includes PWS and state burden)
Add	0	2019 DDBP/Chem/Rads Rules ICR is not appended with burden from any new ICRs.
Total	5,305,696	2019 DDBP/Chem/Rads Rules ICR inventory based on current burden inventories

6(f)(ii) Other Burden Adjustments

Changes in calculated burden are a result of updating relevant baseline information for each rule with the most current and accurate information available. Where appropriate and available, estimated violation, waiver, and other associated rates have also been updated to reflect current information on rule compliance. Exhibits 11 and 12 summarize reasons for these changes and quantify the changes by rule. Burden adjustments associated with PWS activities resulted in a burden decrease of 0.13 million hours and are detailed in Exhibit 11. Burden adjustments for primacy agencies result in a decrease of 0.01 million hours per year, as shown in Exhibit 12.

Exhibit 11
Adjustments to PWS Burden from Previous ICR Estimates

Activity	Previous Annual Burden Estimate (Hours)	2019 Annual Burden Estimate (Hours)	Annual Change in Burden (Hours)	Reason for Change in Annual Burden
Stage 1 DBPR	503,623	505,606	1,983	The increase in burden is attributed to a 0.8% increase in the number of public water systems serving more than 10,000. This increase in number of public water systems resulted in an increase in the number of locations that require residual disinfectant sampling under the Stage 1 DBPR.
Stage 2 DBPR	48,820	47,458	(1,361)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory used to calculate monitoring burden.
Chemical Phases Rules (Phases II/IIB/V)	356,602	352,665	(3,938)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory used to calculate monitoring burden.
Radionuclides	45,631	17,689	(27,941)	The decrease in burden is associated to the fact that many public water systems were required to monitor during the previous ICR period. Systems only have to monitor every 9 years for radionuclides. These systems are scheduled to monitor again in 2027.
Disinfectant Residual Monitoring and Associated Activities under SWTR	1,059,363	1,051,045	(8,319)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory used to calculate monitoring burden.
Arsenic Rule	200,280	179,473	(20,807)	The decrease in burden is attributable to decrease in overall system inventory used to calculate monitoring burden. The sampling frequency is modeled as the average of a 9-year cycle in this ICR period.
Lead and Copper Rule	1,108,924	1,036,644	(72,280)	The decrease in burden is attributable to decrease in overall system inventory used to calculate monitoring burden. The 1.6% loss of small PWS inventory drives monitoring burden.
TOTAL	3,323,243	3,190,581	(132,663)	Adjusted PWS Burden

Notes:

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

(2) PWS burden adjustments for all rules in Exhibit 11 take into account burden reductions associated with the anticipated transition from the current SDWIS (the existing compliance database of record) to SDWIS Prime, a cloud-based reporting system.

Exhibit 12
Adjustments to Primacy Agency Burden from Previous ICR Estimates

Activity	Previous Annual Burden Estimate (Hours)	2019 Annual Burden Estimate (Hours)	Annual Change in Burden (Hours)	Reason for Change in Annual Burden
Stage 1 DBPR	148,906	147,204	(1,702)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory used to calculate monitoring burden. (Primacy agency burden is driven by overall inventory.)
Stage 2 DBPR	50,822	50,822	N/A	States will continue recordkeeping and compliance activities for additional routine monitoring and operational evaluations. The state compliance schedule, which is based on the standalone ICR, assumes that once systems begin additional routine monitoring and operational evaluations the associated annual state review burden for these activities remains constant.
Chemical Phases Rules (Phases II/IIB/V)	1,354,532	1,354,532	N/A	The state burden for this rule is based on the State Workload Model, which has not changed.
Radionuclides	5,476	2,228	(3,248)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory, and the fact that many systems only have to monitor every 9 years and took samples during the previous ICR period, but do not have to take samples during this ICR period.
Disinfectant Residual Monitoring and Associated Activities under SWTR	157,975	157,278	(696)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory used to calculate monitoring burden.
Arsenic Rule	80,704	79,345	(1,359)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory used to calculate monitoring burden. The sampling frequency is modeled as the average of a 9-year cycle in this ICR period.
Lead and Copper Rule	184,037	179,366	(4,671)	The decrease in burden is attributable to a 1.5% decrease in overall system inventory used to calculate monitoring burden. Primacy agency burden is not as responsive to the increase in large PWS as water system burden.
TOTAL	1,982,452	1,970,776	(11,677)	Adjusted Primacy Agency Burden

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

Exhibit 13 shows the effect of these adjustments on the bottom line burden. Subtracting 0.13 million hours to account for the adjustment to the PWS burden and subtracting 0.01 million hours to account for the adjustment to the primacy burden yields 5.2 million hours.

Exhibit 13
Adjustments to Annual Burden Carried Forward from Previous ICR Estimates
(Includes both PWS and Primacy Agency Burden)

Action	Annual Burden Hours	Brief Explanation
None	5,305,696	2016 DDBP/Chem/Rads Rules ICR inventory based on current burden inventories (see Exhibit 11).
Add	(132,663)	Adjustment to the PWS burden carried forward from previous ICRs (see Exhibit 12).
Add	(11,677)	Adjustment to the primacy agency burden carried forward from previous ICRs (see Exhibit 13).
Total	5,161,356	Hours requested in 2019 DDBP/Chem/Rads Rules ICR.

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

6(g) Burden Statement

The reporting burden for collections included in this ICR is detailed in Exhibit 13 above. The annual respondent burden is estimated to average approximately 5.2 million hours, of which 3.2 million hours are attributable to PWSs and 2.0 million hours to primacy agencies. These estimates include time for gathering information as well as developing and maintaining records.

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

To support comment on the EPA's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OW-2011-0439, which is available for online viewing at www.regulations.gov, or in person viewing at the Water Docket in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Water Docket is (202) 566-2426. An electronic version

of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, to access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Comments can also be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for the EPA. Please include the EPA Docket ID Number (EPA-HQ-OW-2011-0439) and the OMB Control Number 2040-0204 in any correspondence.