

**SUPPORTING STATEMENT
PART A**

**NATIONAL STUDY OF NUTRIENT REMOVAL AND SECONDARY
TECHNOLOGIES: POTW SCREENER QUESTIONNAIRE
FOR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY**

May 1, 2021

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PART A OF THE SUPPORTING STATEMENT

*U.S. Environmental Protection Agency
National Study of Nutrient Removal and Secondary Technologies:
POTW Screener Questionnaire
EPA ICR No. 2553.01
OMB Control No. 2040-0294
Office: EPA Office of Water
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1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY AND LEGAL REQUIREMENTS THAT NECESSITATE THE COLLECTION

Over the last 50 years, the amount of nitrogen and phosphorus pollution entering the nation's waters has escalated dramatically. The excess levels of nutrients have degraded drinking water quality and environmental water quality. Nutrients have the potential to become one of the costliest and most challenging environmental problems we face. States need to be able to respond to local water quality needs and will need tools and resources to successfully achieve effective and sustained progress towards nutrient reductions. The United States Environmental Protection Agency (EPA) is collaborating with states, industry trade associations, and other stakeholders to make greater progress in accelerating the reduction of nutrient loadings discharged into the nation's waters with a non-regulatory approach. With this goal in mind, EPA's Office of Water is conducting a National Study of Nutrient Removal and Secondary Technologies that collects and presents data to evaluate the nutrient removals and related treatment plant performance by different types of water resource recovery facilities (WRRFs) nationwide, primarily consisting of publicly owned treatment works (POTWs).¹ The study seeks to identify opportunities to optimize nutrient treatment performance across the full span of POTW types in the U.S. The data collection serves to update baseline data on nutrient removal, identify current nutrient removal performance, and identify operational and maintenance practices to improve nutrient removal using existing treatment technologies. As part of this study, EPA is performing national level data collection needed to develop and share statistically representative data on the profile and performance of POTWs across the country. The full study will be conducted in phases, allowing for interactions with stakeholders and experts in each phase. To begin that process, EPA is working collaboratively with states and industry to update and supplement existing information on the universe of POTWs in the U.S. along with some basic characteristics of those POTWs. The National Study, when completed, would: provide a forum for sharing best practices, serve to encourage improved nutrient removal performance with less expense, and make available a current nutrient removal baseline upon which more realistic and achievable nutrient reduction targets can be based.

EPA regulates POTW wastewater discharges through the Clean Water Act (CWA), National Pollutant Discharge Elimination System (NPDES) program and regulates POTW treatment sludge, hazardous waste, and air emissions through other EPA statutes (e.g., Resource

¹ For purposes of this survey, the terms wastewater treatment facility, POTW, and WRRF are used interchangeably.

Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Clean Air Act (CAA)). A POTW is defined under 40 CFR section 403.3(q) as “a treatment works as defined by section 212 of the Act, which is owned by a State or municipality (as defined by section 502(4) of the Act). This definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes and other conveyances only if they convey wastewater to a POTW Treatment Plant.” To simplify and provide clarity throughout this supporting statement, the population of interest includes POTWs and tribally owned facilities, but does not include federally owned or privately owned facilities, and does not include dedicated flow control entities such as Combined Sewer Overflows (CSOs) and Sanitary Sewer Overflows (SSOs).

EPA, through this Information Collection Request (ICR) package, requests that the Office of Management and Budget (OMB) renew the ICR for a screener data collection effort. The current ICR approval expires on July 31, 2021 (OMB Control Number 2040-0294). Through this data collection, EPA will continue to obtain those data essential to characterize the universe of plants operating in the U.S., including updated facility identification and basic characteristics necessary to allow use of statistically valid methods with subsequent data collection. This screener is necessary because there are no nationwide performance data, enhanced nutrient removal has been limited to case studies, and there is no currently available dataset from which a full population can be derived. In addition, identification of the full population to create the frame needs to be completed prior to any further study design. Future data collection may evaluate nutrient loadings and performance of nutrient reduction technologies including optimization practices for nutrient removal. For example, the second phase of the National Study could be designed to collect plant operations data from a representative sample of those POTWs with specific types of secondary treatment processes. Any future data collection would occur in a separate phase of the study and would be conducted as approved under a separate and subsequent ICR.

EPA’s Office of Water plans to administer a voluntary questionnaire as a census of POTWs in the U.S. to collect identification, characterization, and technical information that would be used to develop a detailed questionnaire sample frame for use in other data collection activities for future phases of the study.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED

2(a) What Information Will Be Collected, Reported, or Recorded?

EPA is planning to conduct a census of POTWs in the U.S. as described and defined in section 1 of this supporting statement. EPA requested a list of POTWs and their mailing address and additional contact information from each NPDES-authorized state, or EPA Regional office if the state does not have NPDES program authorization. This information was used to develop the population of facilities that received the request to complete the voluntary questionnaire. EPA requested these data from states under the NPDES Program ICR (OMB Control No. 2040-0004, EPA ICR No. 0229.22). Obtaining the list directly from the responsible agency ensured that EPA

had the most complete list of POTWs possible. EPA obtained lists from 35 states prior to initiating the ICR.

EPA also obtained information on the POTW population from EPA’s Integrated Compliance Information System (ICIS). Currently, ICIS may not contain information on small facilities (see Section 4 for details). EPA is also aware that some states maintain such information in an electronic database that is not compatible with ICIS. Therefore, EPA worked directly with states to identify the current population of POTWs in each state. EPA will continue to work directly with states to refine their POTW populations and update contact information.

EPA also collaborated with the National Association of Clean Water Agencies (NACWA), the Association of Clean Water Administrators (ACWA), the Water Environment Federation (WEF), and the National Rural Water Association (NRWA) to send information regarding the questionnaire to their membership.

EPA will continue to use the compiled POTW population list to administer a voluntary questionnaire and work with relevant stakeholders to encourage responses to this census. The questionnaire is designed to collect updated identification and characterization data necessary to allow for future data collection based on a statistically valid methodology.

EPA intends to conduct up to 50 site visits (not including virtual tours) to solicit information on industry terminology, typical treatment trains and modes of operation, and nutrient removal technologies and operating practices. EPA will also continue to conduct phone or email contacts with state and/or municipality associations to collect information that will support the development of the POTW universe and profile. See section 2(c) for additional details.

The screener questionnaire is made up of 28 questions (Appendix A). However, some questions are simplified for small POTWs (defined in Section 5), and these are presented separately in the hardcopy version of the questionnaire as questions 29 through 32. The data items requested by the questionnaire and the purpose for requesting the information are shown below:

Table 2-1. POTW Study Screener Questions and Their Purpose

Question Number	Question Description	Purpose of Question
Registration (Section A)	Eligibility Confirmation	Registration (Section A) contains questions to confirm whether the facility is a POTW and should complete the remaining screener questionnaire.
Registration (Section A) Q1	Eligibility confirmation to determine if facility is a treatment works of municipal sewage.	EPA will use this information to correctly identify if the facility is in scope. If the facility is not treating municipal sewage, they do not have to complete the remainder of the screener.

Table 2-1. POTW Study Screener Questions and Their Purpose

Question Number	Question Description	Purpose of Question
Registration (Section A) Q2	Eligibility confirmation to determine if facility is publicly owned.	EPA will use this information to correctly identify if the facility is in scope. If the facility is not publicly owned, they do not have to complete the remainder of the screener.
Registration (Section A) Q3	Eligibility confirmation to determine if the treatment works is physically capable of directly discharging effluent to a surface water.	EPA will use this information to identify POTWs with direct discharge capability.
Section B	POTW Identification	Section B confirms the POTW identification and contact information.
Section B Q4	Requests facility's name as it appears on their discharge permit.	EPA will use this information to identify the POTW and correct any errors on the mailing list.
Section B Q5	Requests facility's mailing address and physical location.	EPA will use this information to correct any errors on the mailing list.
Section B Q6	Requests establishment's contact for any follow up questions.	EPA will use this information to contact the facility with any follow-up questions or issues.
Section B Q7	Requests the facility's National Pollutant Discharge Elimination System (NPDES) ID or state-issued wastewater discharge permit number.	EPA will use this information to confirm facility identification information and to address any duplicate information in the mailing list and database.
Section C	POTW Operations and Treatment Characteristics	Section C collects information about the POTW's characteristics and operations
Section C Q8	Requests the maximum population served by the treatment plant (ranges presented for selection).	EPA will use this information for the industry profile and future data collection based on plant size and treatment capacity.
Section C Q9	Asks whether the population varies seasonally by more than 50 percent.	EPA will use this information for the industry profile and future data collection based on plant size and treatment capacity.
Section C Q10	Asks whether the facility is a package plant. Package plants are pre-manufactured treatment works used in small communities or on individual properties.	EPA will use this information for the industry profile and future data collection based on plant size and type.
Section C Q11	Asks which discharge or disposal methods (e.g., direct discharge to surface water, discharge to another POTW) are employed, whether the treatment works discharged continuously or controlled/intermittently, requests surface water name(s), and requests the name, NPDES ID, and mailing address of POTW receiving indirect discharge.	EPA will use this information to obtain discharge information and confirm direct discharge capability.
Section C Q12	Asks whether the treatment works' daily flow increased by 30 percent or more after a typical rainfall event.	EPA will use this information for the industry profile and future data collection based on flow information.

Table 2-1. POTW Study Screener Questions and Their Purpose

Question Number	Question Description	Purpose of Question
Section C Q13	Asks whether the treatment works' design capacity flow is less than 1 million gallons per day (MGD), requests the design capacity flow and maximum capacity or peak capacity flow, if the facility's design capacity flow is the facility's NPDES permitted flow, and if the facility's design capacity flow is based on the Recommended Standards for Wastewater Facilities (i.e., the "Ten State Standards").	EPA will use this information for the industry profile and future data collection based on plant size and flow data. This question is also used to redirect those POTWs with small flows to a reduced set of questions.
Section C Q14	Requests actual operational flows in MGD.	EPA will use this information for the industry profile and future data collection based on plant size and existing flow data.
Section C Q15	Asks which type of collection system(s) feed into the treatment plant.	EPA will use this information for the industry profile and future data collection based on collection system type.
Section C Q16	Requests the percentage of wastewater source types treated at the facility.	EPA will use this information for the industry profile and future data collection based on wastewater source types.
Section C Q17	Requests the types of industrial sources treated at the facility.	EPA will use this information for the industry profile and may use this information to help identify treatment works that receive wastewaters with high nutrient content.
Section C Q18	Requests the type of treatment technologies included in the treatment works and the seasonal operational temperatures of the treatment works.	EPA will use this information for the industry profile and for future data collection based on treatment types.
Section C Q19	Requests process control operations types and parameters monitored.	EPA will use this information for the industry profile and to help identify facilities that are optimizing control operations for nutrient removal.
Section C Q20	Asks whether the treatment works has or is planning capital upgrades or operational changes for nutrient removal or energy efficiency.	EPA will use this information for the industry profile and for future data collection.
Section C Q21	Asks whether the facility was designed or has optimized operations to achieve nutrient removal, specific effluent nitrogen or phosphorus quality standards, or resource recovery.	EPA will use this information to assess whether the system has nutrient control and to help select facilities for future data collection.
Section C Q22	Asks whether the facility has more than one outfall.	EPA will use this information to obtain discharge information and confirm direct discharge capability.
Section C Q23	Requests concentrations of cBOD ₅ (carbonaceous biochemical oxygen demand), COD (chemical oxygen demand), and TSS (total suspended solids).	EPA will use this information to assess treatment system performance and to help select facilities for future data collection.

Table 2-1. POTW Study Screener Questions and Their Purpose

Question Number	Question Description	Purpose of Question
Section C Q24	Requests ammonia monitoring locations.	EPA will use this information to assess whether and where facilities collect ammonia-specific nutrient data that could be collected to support EPA's study and to help select facilities for future data collection.
Section C Q25	Requests ammonia concentrations at each monitoring location in ranges.	EPA will use this information to assess ammonia-specific nutrient data that could be collected to support EPA's study and to help select facilities for future data collection.
Section C Q26	Requests monitoring location for nutrients other than ammonia.	EPA will use this information to assess whether and where facilities collect nutrient data other than ammonia that could be collected to support EPA's study and to help select facilities for future data collection.
Section C Q27	Requests concentrations of other nutrients at each monitoring location in ranges.	EPA will use this information to assess whether facilities may have existing nutrient data that could be collected to support EPA's study and to help select facilities for future data collection.
Section C Q28	Final comments.	Allows respondents to enter any clarifying information.
Section C Q29	Requests the type of treatment technologies included in the treatment works.	EPA will use this information for the industry profile and for future data collection based on treatment types. Small POTWs answer this shorter version of question 18 to reduce burden.
Section C Q30	Requests ammonia monitoring locations.	EPA will use this information to assess whether and where facilities collect ammonia-specific nutrient data that could be collected to support EPA's study and to help select facilities for future data collection. Small POTWs answer this version of question 24, and do not answer an equivalent to question 25, to reduce burden.
Section C Q31	Requests nitrogen and phosphorus monitoring locations.	EPA will use this information to assess whether and where facilities collect nutrient data other than ammonia that could be collected to support EPA's study and to help select facilities for future data collection. Small POTWs answer this shorter version of question 26, and do not answer an equivalent to question 27, to reduce burden.
Section C Q32	Final comments.	Allows respondents to enter any clarifying information.

2(b) From Whom Will the Information Be Collected?

The screener will collect information from an estimated 16,500 POTWs located in the U.S. The respondents affected by this ICR are classified under the North American Industry Classification System identification number 221320 – Sewage Treatment Facilities. Those states

with authorized NPDES programs that have not yet fully implemented the NPDES Electronic Reporting Rule would be contacted to obtain a mailing list of all POTWs covered by a NPDES permit (or state equivalent).

EPA site visits will be conducted at selected POTWs. Phone contacts will be made to state agencies and small municipalities associations.

2(c) What Will the Information Be Used For?

EPA will use the screener data to develop a population and an updated profile of POTWs in the U.S. from which additional data collection or studies may be based.

EPA plans to collect a list of POTWs and their mailing address and facility contact information from each NPDES-authorized state to determine the frame for the POTW questionnaire. This information would be obtained from the EPA Regional office if the state does not have NPDES program authorization. This information may be similar to some information that is collected under the NPDES Program (Renewal) ICR (EPA ICR No. 0229.22), particularly as each state will likely be in various stages of implementing the NPDES Electronic Reporting Rule issued in September 2015. In most cases states are still several years away from fully implementing the NPDES Electronic Reporting rule. This ICR includes a burden estimate for requesting states to compile the POTW data elements in advance of the NPDES Electronic Reporting rule implementation milestones.

EPA also intends to continue to conduct site visits. EPA conducted approximately 50 site visits under the current ICR and plans to conduct up to 50 additional visits under this renewal ICR. EPA plans to conduct some site visits virtually through phone and video conferences. Site visits result in a better understanding of the treatment technology in place at POTWs, nutrient treatment issues, and support future data collection efforts.

2(d) How Will the Information Be Collected? Does the Respondent have Multiple Options for Providing the Information? What Are They?

EPA will continue to conduct a census in the form of a voluntary survey of POTWs. EPA mailed an announcement about the questionnaire to each POTW identified in EPA's mailing list in October 2019, made announcements in collaboration with states, and provided information on the EPA website (<https://www.epa.gov/eg/potw-nutrient-survey>). EPA will continue to work with states and industry trade groups to promote the questionnaire. POTWs are directed to a website with instructions on how to register for and receive a customized link to complete the screener questionnaire. The registration page is used to insure only POTWs proceed to the questionnaire, and to reduce the possibility of invalid survey responses. If a POTW cannot access the questionnaire online, the facility can request a hardcopy questionnaire to complete and return. EPA opened the screener questionnaire for responses on October 22, 2019 and received 1,510 completed responses as of October 30, 2020.

Upon receipt of completed questionnaires, EPA and its contractors review the responses for completeness. All responses are reviewed for consistency and reasonableness. Follow up calls are conducted as needed to clarify inconsistencies found in the responses. The database created using the questionnaire responses will be used by EPA to profile the POTW population

and to support future statistically valid data collection efforts. EPA intends to make the database publicly available.

The Agency has conducted, is conducting, or will conduct the following activities to administer the POTW Study screener questionnaire:

- Develop the screener questionnaire;
- Develop the population by requesting POTW lists and mailing address and contact information for authorized states or Regions;
- Develop the ICR;
- Conduct stakeholder meetings and public webinars that provide the draft questionnaire for review by trade associations, industry representatives, public interest groups, state regulating agencies, EPA workgroup, OMB, and other stakeholders;
- Revise the screener questions based on comments from trade associations, industry representatives, public interest groups, state regulating agencies, EPA workgroup members, OMB, and other stakeholders;
- Develop a mailing list database and mailing labels;
- Develop a tracking system for the questionnaire cover letter mail-out and non-online questionnaire return activities;
- Develop the online questionnaire and backend database;
- Distribute the questionnaire cover letter and instructions;
- Develop and maintain help lines for respondents who require assistance in completing their questionnaire;
- Receive and review responses;
- Summarize and analyze responses; and
- Conduct technical analyses.

The Agency will transfer any data not directly input into the online questionnaire into the master database for future use.

2(e) How Frequently Will the Information Be Collected?

The information covered by this ICR is a one-time information collection.

2(f) Will the Information Be Shared With Any Other Organizations Inside or Outside EPA or the Government?

EPA will share the information collected through this ICR within EPA, and with other Government agencies, the industry, trade associations, and the public.

2(g) If This Is an Ongoing Collection, How Have the Collection Requirements Changed Over Time?

This ICR request is an ongoing collection, but the collection requirements have not changed.

3. TO WHAT EXTENT DOES THE COLLECTION OF INFORMATION INVOLVE THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGY COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY

EPA developed the questionnaire as a web-based survey that facilities fill out and submit online. The electronic questionnaire was developed to meet the 1998 Government Paperwork Elimination Act (GPEA). Given that POTWs with a NPDES permit generally submit their Discharge Monitoring Report (DMR) data electronically, EPA anticipates that most respondents are familiar and comfortable with electronic submission forms. Additionally, the electronic questionnaire allows for automatic population of a database with responses—reducing the potential for errors introduced through key-entry of data. EPA provides a mechanism for POTWs to respond with a mailed response if the contact cannot access the internet. Finally, EPA partnered with trade associations such as NRWA to provide training and a demonstration of the electronic survey, thereby allowing the trade associations to assist their members with the survey where requested.

EPA designed the questionnaire to include burden-reducing features. For example, in addition to the registration screening function, the questionnaire itself also contains “screening” questions that direct respondents that do not qualify as the population of interest to indicate their status and then submit their response without the need to respond to the remaining questions. The smallest POTWs are identified early in the screener, and once identified as such proceed to a shorter version of the screener with fewer questions and less-detailed responses. The questionnaire is also designed with drop down choices to simplify responses, minimizing the number of text responses.

4. EFFORTS TO IDENTIFY DUPLICATION AND WHY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSES DESCRIBED IN ITEM 2

EPA identified several existing data sources that may contain data useful for identifying the population of POTWs throughout the U.S., as well as information useful for developing an industry profile and future sample frames for more detailed data collection. Table 4-2 lists sources of existing data that EPA has collected and reviewed for the study.

Table 4-2. Existing Data Sources

Data Source Name	Date of Data Collection	Population Included	Types of Data Available
ICIS-NPDES ^a	As of November,	POTWs reporting Discharge Monitoring	Design flow, actual flow, and effluent concentration data for specific pollutants with

Table 4-2. Existing Data Sources

Data Source Name	Date of Data Collection	Population Included	Types of Data Available
	2018	Reports for external outfalls.	permit requirements.
FRS	June 2017	Used to supplement addresses if they were not available through ICIS-NPDES.	FRS identification number, latitude, longitude, and facility address.
CWNS	2004	Assumed to include all operating POTWs at the time of the questionnaire.	Flow data (actual, design, and future flows identified by municipal, industrial, infiltration, and wet weather peak contributions), ownership, service population, treatment units.
CWNS	2008	Subset of POTWs reported, only those meeting requirements of 2008 CWNS. ^b	Flow data (actual, design, and future flows identified by municipal, industrial, infiltration, and wet weather peak contributions), ownership, service population, treatment units.
CWNS	2012	Subset of POTWs reported, only those meeting requirements of 2012 CWNS. ^b	Flow data (actual, design, and future flows identified by municipal, industrial, infiltration, and wet weather peak contributions), ownership, service population, treatment units.
State Permit Data	2015	POTWs in states with permits describing lagoon systems. Also, NPDES permitted POTWs treating sanitary/municipal sewage.	Various (e.g., design flow, municipal flow).
EPA Provided Data (301(h) Secondary Waivers)	1994	Subset of POTWs, only those discharging to oceans under a 301(h) waiver.	Ownership information.
State Lists	2016, 2017	Alabama, Alaska, California, Colorado, Connecticut, Delaware, Florida, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky, Maryland, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Jersey, New Mexico, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Dakota, Tennessee, Utah, Vermont, Virginia, Washington, Wisconsin and Wyoming.	Through EPA outreach efforts, states provided EPA the list of POTWs in their state, the NPDES permit number, and in some cases the mailing address and/or contact information. Additional states may still provide a list of POTWs in their states.

Acronyms: CWNS – Clean Watershed Needs Survey; ICIS – Integrated Compliance Information System; NPDES – National Pollutant Discharge Elimination System; POTW - Publicly Owned Treatment Works.

a – ICIS-NPDES does not currently contain all general permit information. The use of this database for general permits is expanding as a result of the Electronic Reporting Rule.

b – EPA has identified differences in the population of facilities included in the CWNS data for 2008 and 2012 as compared to data from 2004, as well as varying levels of specificity in the types of unit operations reported.

EPA identified the ICIS-NPDES database as the most comprehensive listing of facilities currently available. EPA used the ICIS-NPDES facility indicator flag to develop the POTW population. However, EPA found errors in the facility indicator flag and potential ICIS-NPDES data gaps including the absence of POTWs covered by a general permit, POTWs covered by a permit issued to the municipality, and very small POTWs for which no data has been entered into ICIS. Facilities are only required to enter information required in their permit into ICIS-NPDES. For example, the POTW may collect nutrient effluent data, even though the NPDES permit does not require the POTW to do so; such data is typically not included in the ICIS database because there is not a requirement to do so. Similarly, influent and in-plant data are not reported in ICIS. Most of the other data sources in Table 4-1, such as CWNS, derived facility information from ICIS, and therefore reflect a subset of those POTWs identified in ICIS. In all other cases the data source is explicitly identified as a subset of POTWs.

EPA used information from ICIS-NPDES and the state submitted lists to develop a draft population and mailing list of POTWs in the U.S. Additional evaluation indicates that there are potential duplicates, missing or invalid address information, and inconsistencies between the various data sources. EPA improved the draft population and mailing list by collecting population information directly from the authorized permitting authority (state or Region), as indicated in section 2(a) and 2(c) of this supporting statement. EPA acknowledges that if there are states for which this information is not received, the population of POTWs would not result in a national frame; in this case, the population would only be a reliable frame for those participating states. This would result in changes to the design of the National Study, which would be addressed in phase 2 of the National Study and the corresponding ICR for that phase.

Additionally, while technical information such as POTW treatment technologies is available from the CWNS databases, the most recent of these datasets represent only a small subset of the population of interest. The 2004 CWNS dataset represents a more expansive universe of POTWs; however, that dataset represents information that is potentially out of date with current treatment in-place, and the format of the information does not easily lend itself to the purpose of this study since the data were originally collected for a different purpose and audience.

The value of any future data collection through a statistical sampling effort depends on use of an accurate and current sample frame of POTWs as the starting point. Therefore, while information collected through the screener may duplicate some existing information (such as certain data elements already found in ICIS), EPA needs to either confirm the information or update the information that is missing or inaccurate. This ICR will allow EPA to develop an industry profile that is both accurate and current for use in further data collection.

5. COLLECTION OF INFORMATION IMPACTS TO SMALL BUSINESSES OR OTHER SMALL ENTITIES AND METHODS TO MINIMIZE THE BURDEN

In accordance with requirements of the Regulatory Flexibility Act (RFA), EPA must assess whether actions would have “a significant impact on a substantial number of small entities” (SISNOSE). Small entities include small businesses, small organizations, and small governmental jurisdictions. EPA has estimated that no more than 16,500 POTWs will respond to this questionnaire. Whether a respondent is defined as a small business depends on the size of the domestic parent and is based on the appropriate Small Business Administration (SBA) entity size criterion (codified at 13 CFR part 121). The criteria for entity size determination vary by the organization/operation category of the parent entity and for public entities, “facilities owned by municipalities and other political units with population less than 50,000 were considered to be small.” Thus, the size criterion for public entities is partially based on the number of residents belonging to the applicable ownership entity. As this information was not readily available for POTWs, EPA utilized a closely related metric—POTW service population number—as the size criterion for determining small business status. EPA categorized any POTW with a service population of fewer than 50,000 persons as a small business. EPA estimated that approximately 94 percent of the screener population, or approximately 15,510 of the 16,500 potential respondents have a service population of fewer than 50,000 persons and would be categorized as small businesses. Other metrics for POTW size—for example, plants categorized as “minor” facilities which are those POTWs discharging fewer than 1 million gallons per day of effluent—result in lower estimates (on the order of 72 percent) of the screener population. Either approach results in a determination that the majority of the POTW screener questionnaire respondents would be considered “small entities.”

EPA has designed the screener to minimize respondent burden while obtaining sufficient and accurate information. Where possible, the survey provides a limited set of potential responses for respondents to choose from. The questions are phrased with commonly used terminology. Questions requesting similar types of information are arranged together to facilitate review of pertinent records and completion of the screener. EPA revised the screener in response to public comments on this information collection request to minimize respondent burden while ensuring the practical utility of the data as described in Section 8. Specifically, for small businesses, EPA modified the screener to identify small POTWs and direct them to an abbreviated version of the questionnaire consisting of only 17 questions rather than 28. EPA will provide a helpline to answer questions respondents might have when completing the questionnaire.

6. CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY AND ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN

This screener questionnaire is to be administered one time only. If this screener questionnaire is not conducted and the national population of all POTWs is not identified, it will not be possible to create a frame, develop a statistically valid national profile, or conduct future assessments of the performance of POTWs in achieving nutrient removal. In addition, the

specific data sought in this survey would not be available for other interested parties' use in developing other detailed data collection efforts or for EPA/industry's evaluations or studies related to nutrient loadings and removals from POTWs nationally. For example, modeling by the U.S.G.S. would continue to rely on outdated textbook values, and the U.S. Department of Energy would be hindered in its analysis of energy efficiency and renewable energy. Reliance on current datasets alone would significantly impair both EPA and industry's ability to conduct statistically accurate data collection efforts in the future.

Most recently, efforts by state and federal government to provide for and monitor circumstances associated with the coronavirus (COVID-19) were hindered by the absence of a comprehensive database and mailing list of POTWs in the U.S. Specific examples of the U.S. Department of Health and Human Services activities delayed due to the lack of a national database and mailing list include: timely tracking of the virus in wastewater, ascertaining emergency needs of treatment plants, emergency funding for changes in plant operations to increase worker safety, safety equipment for essential treatment plant workers, deployment of COVID-19 testing at municipalities, and provisions for vaccine deployment to essential treatment plant personnel.

7. SPECIAL CIRCUMSTANCES

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. PUBLICATION OF THE FEDERAL REGISTER NOTICE AND PUBLIC RESPONSE

8(a) Federal Register Notice Publication

EPA published a notice in the Federal Register on September 19, 2016, announcing the Agency's intent to submit a request for a new ICR and to collect comments on a draft initial questionnaire and the draft mailing list of POTWs in the U.S. The notice included a description of the entities to be affected by the proposed questionnaire, a brief explanation of the need for the questionnaire, identification of the authority under which the questionnaire will be issued, and an estimate of burden to be incurred by questionnaire respondents. The Agency requested comments and suggestions regarding the questionnaire and draft mailing list and the reduction of data collection burden.

Pursuant to section 3506(c)(2)(A) of the Paperwork Reduction Act, EPA solicited comments and information to enable it to:

1. 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.
2. Evaluate the accuracy of the Agency's estimate of burden of the proposed collection of information, including the validity of the methodology and assumptions used.

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3. Enhance the quality, unity, and clarity of the information to be collected.
 4. Minimize the burden of the collection of information on those who are to respond.

EPA received 60 comments from 46 entities in response to the Federal Register Notice. Three additional entities emailed comments to EPA following the close of the public comment period. In response to comments, EPA made the following revisions:

- EPA revised the first phase of the National Study to make the screener questionnaire voluntary, and a Certification Statement is no longer included.
- EPA designed the screener questionnaire to identify small POTWs and direct them to an abbreviated screener questionnaire to reduce burden on this population.
- EPA added questions to collect information on chemical oxygen demand (COD), carbonaceous biochemical oxygen demand (cBOD), and total suspended solids (TSS) influent concentrations and seasonal variation in flow data.
- EPA modified terminology and added a Glossary and Acronym list.
- EPA has revised the login and registration process for the electronic version of the screener questionnaire to use NPDES identification number. EPA is using Registration (Section A) to avoid ineligible respondents from proceeding to the questionnaire. Also, respondents are no longer asked to provide their POTW's Facility Registry Service (FRS) ID number.
- EPA made minor modifications of Section C: POTW Operations and Treatment Characteristics to clarify questions and reduce information collected in certain questions.

EPA is not proposing any additional revisions in this ICR renewal.

On October 20, 2016, EPA mailed a letter to all facilities included on the mailing list included in the first Federal Register Notice announcing the study and the public comment period. Between November 2016 and January 2017, EPA received 38 completed copies of the screener questionnaire, even though EPA was not at that time requesting facilities to complete the questionnaire. EPA also received several hundred phone calls, which requested a shorter and more simple survey for the smaller facilities. Based on a review of these responses, EPA modified screener questionnaire content for clarity.

EPA published the second Federal Register notice on December 29, 2017 announcing that the screener questionnaire has been forwarded to the Office of Management and Budget (OMB) for review and approval. OMB approved the screener with an expiration date of July 31, 2021 (OMB Control Number 2040-0294).

8(b) Consultations

The Engineering and Analysis Division (EAD) of EPA's Office of Water has conducted initial consultations with individuals in the POTW industry and its trade associations and consultants to solicit their input on the need and use of a survey effort. From July 18, 2016 through August 2, 2016, EAD discussed the general study design with representatives of NACWA, WEF, Water Environment Research Foundation (WERF), ACWA, NRWA, and the Environmental Council of the States (ECOS).

EPA published a Federal Register Notice on September 19, 2016 announcing the planned data collection. Since the first Federal Register Notice, EPA has continued meeting with the stakeholders listed above. EPA participated in the following meetings:

- March 29, 2017 and April 13, 2017 conference calls with representatives from NACWA.
- March 30, 2017 conference call with representatives from ACWA.
- August 22, 2017 Annual Meeting with ACWA.
- June 26, 2017 annual in-service training with NRWA.

The first three discussions focused on specific revisions to questions found in Section C of the screener questionnaire to reduce respondent burden and improve clarity. Participants also expressed ideas for opportunities to provide technical support to respondents and helped gauge possible impacts of the results from this study.

EPA also conducted two site visits to POTWs in Lovettsville, Virginia and Poolesville, Maryland. Industry representatives encouraged EPA to include small POTWs in the National Study, but also requested that the survey be kept simple for such respondents. The screener questionnaire has a reduced number of questions for small POTWs.

EPA continued to work with representatives from states, trade associations, and industry throughout the initial screener data collection. EPA conducted 55 site visits to learn about POTW operations directly from operators and promote the screener data collection. EPA obtained screener surveys from 48 site visit POTWs as of October 31, 2020. EPA is also continuing to refine the POTW population and contact information through interaction with state agencies.

9. PAYMENT OR GIFT TO RESPONDENTS

No payments or gifts are provided to respondents.

10. ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY

EPA does not anticipate that any of the information collected in the screener questionnaire will be claimed as Confidential Business Information (CBI) because:

-
- The information being requested is unlikely to cause substantial harm to most POTW's competitive position because the primary population of interest consists of publicly owned facilities;
 - The same type of information has already been reported by a small subset of POTWs in other venues such as ICIS and CWNS;
 - Information more detailed than that requested in the census has already been provided in publicly available case studies;
 - Effluent data cannot be claimed as CBI;
 - It is unlikely that POTWs will have taken measures to protect the confidentiality of the basic information solicited in this questionnaire; and
 - The information is reasonably obtainable without the business's consent by use of legitimate means.

11. QUESTIONS OF A SENSITIVE NATURE

No sensitive questions pertaining to private or personal information, such as sexual behavior or religious beliefs, will be asked in the screener, during site visits, or as part of any contacts to state or small municipalities associations.

12. ESTIMATES OF RESPONDENT BURDEN FOR THE INFORMATION COLLECTION

Each respondent received a cover letter providing a URL to allow for electronic review and completion of the screener questionnaire as well as instructions to follow if the respondent cannot access the questionnaire online. The weblink to register for the questionnaire was also provided through the trade association newsletters including WEF and NACWA, from the state organizations working in collaboration with EPA including ACWA and NRWA, conferences, and webpages. EPA continues to promote the screener data collection through hardcopy mailings and targeted email campaigns.

The screener questionnaire includes the screener purpose, general instructions, and glossary. The Introduction section provides the purpose and use of the questionnaire, e-mail/help line information, and information on how to submit or return the completed questionnaire. The General Instructions section provides guidance on completing the responses. The Glossary provides respondents with all pertinent definitions and acronyms to understand and complete the questionnaire sections.

EPA estimates the target population to consist of 16,500 facilities. The respondents review the instructions to understand the questionnaire. Other respondent activities will include consulting records and reviewing plant information regarding population served, flow rates, and influent and effluent nutrient concentrations (as available for the calendar year 2018). It is expected that the respondent will have general knowledge of the treatment plant technologies and operations in place, discharge status, and types of wastewater accepted. They will also have to compile and review information and complete the questionnaire. The respondents submit the completed questionnaire to EPA online or through the mail. The respondents are encouraged to

retain a copy of the completed questionnaire for up to two years in the event that EPA has to contact the facility for clarification of any response. There is no need for the respondents to maintain any new records because this is a one-time information collection effort, and the screener questionnaire does not request any new data be collected.

For EPA site visits, any facilities selected for a visit will be contacted via phone and email and will be expected to provide a facility representative on the day of the visit to escort the site visit team and to answer questions or to provide a process flow diagram and plant description prior to a call with the site visit team. EPA has visited approximately 50 sites to date and estimates that up to 50 additional POTWs will be part of the site visit program. For EPA contacts to small municipalities associations, EPA estimates that up to 100 contacts could be made.

In the original burden estimate, EPA included the burden to authorized states (i.e. states delegated the NPDES program) for providing an updated POTW population list, mailing address, and contact information. Whereas each state has an obligation to track every facility covered by a NPDES permit, each delegated state handles its responsibilities in different ways. Estimated burden is included in this ICR as an acknowledgement that the data may be compiled in different ways. Further, each state has a plan for implementing the NPDES Electronic Reporting rule by the 2025 deadline. EPA recognizes there are different approaches undertaken by each delegated state, including different schedules and priorities for submitting those data specific to POTWs. EPA requested a list of all POTWs in each state, including those covered by general permits or the other scenarios mentioned above. This includes the facility name, mailing address, and where known, an email address for a contact for the POTW. In some cases, this list may already be identified in a data system, spreadsheet, or other working file used by the state. In other cases, this information is already consolidated and publicly available. In other states, tracking of permits may be kept as a paper file. Thus, the burden may be zero for some states, and there may be some burden to compile the information in other states. EPA has received lists from 39 states, though data received did not always include all data elements requested. EPA is including burden in this ICR for the remaining authorized states as a conservative estimate of burden for this activity. The burden for EPA Regions to provide lists for the unauthorized states is included in the Agency burden estimates included in Section 14.

12(a) Estimate of Respondent Hour Burden

For the purpose of estimating the burden, EPA estimates the target population to consist of 16,500 facilities. EPA has received responses from approximately 1,500 POTWs. Therefore, the burden estimates described in this section are based on receiving a maximum of 15,000 additional screener questionnaires. The burden to respondents includes the time necessary to read through all instructions and questions, gather data, transfer data to the questionnaire, and review/check the responses. The questionnaire is expected to be completed by the treatment plant operator and reviewed by an operations manager. The burden estimates reflect the assumption that the treatment plant operator will devote their time to reading instructions, gathering information and completing the survey form; the operations manager will devote their time to reading instructions and reviewing survey responses. EPA assumed that 80 percent of POTWs will respond to the screener – 5 percent will complete only Registration (Section A) of the questionnaire (regarding eligibility) and 75 percent will complete all screener sections. For purposes of estimating the burden, EPA did not distinguish between the lower burden for small

POTWs using the shorter version of the questionnaire. EPA reviewed start and end dates and times associated with questionnaires submitted online in the first two months of data collection. EPA determined that the average time to complete the long version of the online questionnaire, based on 691 questionnaires, was 1.1 hours and, based on 145 questionnaires, the time to complete the small version was 26 minutes. In the first three months after the questionnaire was made available, the Helpline received 188 inquiries. Only eight of these inquiries were technical in nature, while the other 180 inquiries related to eligibility, accessibility, and requests for questionnaire documentation (e.g., hardcopies, certificates of completion). The original burden estimate assumed it would take three hours to complete the full questionnaire and one hour to complete the Registration (Section A). EPA decreased the burden to 2.25 hours for the full questionnaire and 15 minutes for Registration (Section A) based on this information.

EPA estimates the total industry burden for completing the screener to be approximately 8,747 hours. Error: Reference source not found presents a summary of the average hourly and total burden by labor category associated with the screener for the 75 percent of respondents who are estimated to complete all sections of the screener and for the 5 percent of respondents who are estimated to complete only the Registration (Section A). Error: Reference source not found presents a summary of the total burden by labor category.

Table 12-3. Estimated Respondent Burden by Activity and Respondent Category

Activity	Respondent Category and Burden (Hours)		
	Plant Operator	Plant Manager	Total Burden per Activity
Respondents Completing the Full Screener Questionnaire			
Complete Registration (Section A)	0.25	0	0.25
Review instructions	0.25	0	0.25
Gather data	0.50	0.00	0.50
Complete the screener	0.75	0.00	0.75
Review	0.00	0.50	0.50
Total	1.75	0.50	2.25
Respondents Completing Only Registration (Section A) of the Screener Questionnaire			
Registration (Section A)	0.25	0.00	0.25
Total	0.25	0.00	0.25

Table 12-4. Total Estimated Respondent Burden Hours for the Screener Questionnaire

Activity	Estimated Number of Respondents	Plant Operator Hours	Plant Manager Hours	Estimated Total Hours of Respondent Burden
Complete Part A only	750	188	0	188
Complete full screener	11,250	19,688	5,625	25,313
Total Burden	12,000	19,875	5,625	25,500

EPA estimates that total POTW personnel burden for EPA’s site visits to be approximately 400 hours based on eight hours of burden per visit and a total of 50 site visits. This estimate includes initial planning and logistics, a half day visit, and follow-up correspondence to review the site visit notes.

EPA estimates that the total respondent burden for small municipalities association calls from EPA to increase screener questionnaire support to be approximately 100 hours based on a one-hour phone call with no more than 100 respondents.

EPA included the burden to the remaining 11 authorized states and territories for providing an updated POTW population list, mailing address, and contact information. EPA assumed the state burden would vary by the estimated number of POTWs in each state but did not estimate a reduced burden for those states that have already implemented the NPDES Electronic Reporting rule for the POTWs in their state. EPA assumed states with the most POTWs would require the most time as they may have decentralized regional offices. Table 12-3 provides EPA’s assumptions for the burden hours for states to submit an updated population list.

Table 12-5. Total Estimated State Burden² Hours for Providing POTW Population Information

Estimated Number of POTWs	Burden Hours Per State	States ^a
≥500	40	2 – Illinois, New York,
≥100 and <500	20	7 – Arkansas, Georgia, Louisiana, Maine, Mississippi, North Carolina, South Carolina
<100	10	2 – Arizona, Virgin Islands
Total Burden	240	

² For these burden estimates, EPA did not consider whether the state had a searchable database online. Some public databases can only be searched by permit (facility name/number) rather than by facility type and some may not have the address information as part of the database.

a – Unauthorized states and territories include American Samoa, District of Columbia, Guam, Idaho, Massachusetts, Northern Mariana Islands, and Puerto Rico. The burden for these states is included in the federal government burden presented in Section 14.

12(b) Estimate of Respondent Labor Costs

EPA obtained mean labor rates for the POTW industry and Civil Engineers from the November 2020, U.S. Department of Labor, Bureau of Labor Statistics website. Table 12 -6 presents the labor data for 2020 (the latest year for which data are available) for the labor categories used for the burden estimates.

Table 12-6. 2015 Labor Rate Data

Job Category	WWT Plant Operator¹	Operations Manager²	Civil Engineer³
Mean Hourly Earnings (\$/hour)	33.96	79.92	70.78

¹ Wastewater treatment plant operator unloaded mean hourly wage of \$23.26/hour times 1.46 loading = \$33.96/hour. EPA assumed a 46 percent increase for overhead and benefits, based on the calculated ratio of total benefits to wages and salaries for all occupations, using 2018 values obtained from ECEC Benefits and Wages, https://www.bls.gov/news.release/archives/ecec_03192019.pdf.

² Operations manager unloaded labor rate of \$54.74/hour times 1.46 loading = \$79.92/hour.

³ Civil engineer unloaded labor rate of \$48.48/hour times 1.46 loading = \$70.78/hour; EPA assumed that any small municipalities association representatives would have a background in civil engineering.

Source: November 2020 National Occupational Employment and Wage Estimates for NAICS code 22130 Water, Sewage, and Other Systems for occupation codes 51-8031 (water and wastewater treatment plant and systems operators), 11-9199 (managers, all other), and 17-2051 (civil engineers). https://www.bls.gov/oes/current/naics4_221300.htm.

The direct labor cost to respondents to complete the questionnaire equals the time required to read through and understand all of the instructions, gather data, transfer it to the questionnaire, and review/check the responses. EPA anticipates minimal non-labor costs as discussed in item 13.

Error: Reference source not found shows the total costs for the screener, site visits, and outreach calls using the information described above. EPA calculated the estimated respondent burden for completion of the screener questionnaire using the estimated total response time per activity shown in Error: Reference source not found and the labor rates shown in Table 12 -6 to calculate a total cost of \$1,118,132 for the full screener questionnaire, as shown in Error: Reference source not found. For the labor costs associated with site visits, EPA assumed up to 8 hours of a wastewater treatment plant operator’s time per visit. For the labor costs associated with EPA calls to small municipalities associations, EPA assumed up to 100 calls at one hour per contact and assumed that the respondents would be likely to have a background in civil engineering.

Table 12-7. Total Estimated Respondent Labor Burden

Activity	Plant Operator Total Labor Costs	Plant Manager Total Labor Costs	State or Association Contact Total Labor Costs	Total Labor Burden (Dollars)
Complete Part A only	\$6,367	-	-	\$6,367
Complete full screener	\$668,580	\$449,552	-	\$1,118,132
Site visits	\$13,584	-	-	\$13,584
Small municipalities association contacts	-	-	\$29,878	\$29,878
Total	\$688,531	\$449,552	\$29,878	\$1,167,961

13. TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION

13(a) Estimating Capital/Start-up Operating and Maintenance Costs

EPA estimates there will be minimal other direct costs associated with responding to the screener. All of the information requested in the screener should be available from existing plant records and/or monitoring. Plants are not required to collect and analyze additional samples to respond to the screener.

Other costs for completing the questionnaire include printing/duplication, shipping for those respondents that are unable to respond to the online screener, and phone costs for calling the helpline if needed. EPA has assumed that 1 percent of the respondents will mail their response as opposed to the online submittal. Most respondents will complete an online screener questionnaire, which will reduce burden and ensure efficient transfer of data. EPA assumes the respondents will incur a printing rate of \$0.10 per page for a paper copy for use as a working copy or a hardcopy file. EPA also assumes that any POTWs submitting a paper screener will return the completed questionnaire via Federal Express or a comparable delivery carrier that requires a signature to acknowledge receipt.

Based on calls to the helpline thus far, EPA continues to assume that 10 percent of respondents will contact the helpline via phone for 30 minutes or less. Most of the questions EPA received related to registration issues, eligibility, or certificates of completion. This suggests that POTWs were not having issues responding to the technical questions.

Table 13 -8 presents the estimated Other Direct Costs for respondents related to the screener questionnaire.

Table 13-8. Total Other Direct Costs to Respondents for the Screener Questionnaire

Number of Respondents	Total Printer/Photocopying Costs ¹	Total Shipping Cost ²	Total Telephone Cost ³	Total
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12,000	\$8,000	\$200	\$600	\$8,800
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¹ Assumes printing of 20 pages; \$0.10/page print cost.

² Assumes 1 percent (or 150 respondents) of POTWs will send in a paper screener questionnaire via Federal Express (or another shipper with tracking). Assumes \$5.00 shipping fee/package.

³ Assumes 10 percent of respondents will contact the helpline via phone with a question, that any telephone time will be less than 30 minutes and assumes \$0.05/minute.

13(b) Annualizing Capital Costs

EPA estimates that there will be no capital costs associated with responding to the screener, conducting the site visits, or participating in EPA/contractor contacts.

14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

Error: Reference source not found presents an estimate of the burden and labor costs that EPA will incur to administer the screener. The table identifies the collection administration tasks to be performed by EPA employees and contractors, with the associated hours required for each grouping of related tasks. EPA determined Agency labor costs by multiplying Agency burden hours by an average hourly Agency labor rate for technical and managerial support using the Salary Table 2020-GS from the U.S. Office of Personnel Management. EPA determined contractor labor costs by multiplying contractor burden figures by an average contract labor rate of \$95 per hour.

For EPA and contractor O&M costs, EPA assumed the following costs for continuing the screener data collection:

- For mailing costs, EPA assumes an additional Federal Express letter would be sent to 120 POTWs unable to complete the screener questionnaire online (assuming that 1 percent of all respondents would need to respond with a paper survey). EPA assumes the per letter Federal Express rate is \$5/package (2-day standard delivery; includes tracking) for a total of \$600. To help increase responses for small POTWs, EPA will also mail a paper copy to up to 1,500 small POTWs to assist them in completing the questionnaire. The quoted price from a contracted vendor to print and mail 500 copies is \$1,200. EPA estimates three batches of 500 paper copies will be mailed in stages for a total print and mail cost amount to EPA of \$3,600.
- For site visit travel costs, EPA assumed that only 25 site visits would be conducted in person versus virtually through a video conference. For non-local trips, EPA assumed one EPA and one contractor staff for each visit, one day for each site (inclusive of local travel time), and up to 4 facilities visited per trip (by area). The six non-local trips (by area) were assumed to occur as follows: two to the West Coast (using Sacramento, CA as the proxy location); two trips to the Western Desert area (using Las Vegas, NV as the proxy location); and two trips to the Midwest area (using Columbus, OH as the proxy location). The contractor

will be responsible for all logistics, preparations, and drafting of summary reports for all site visits. For the site visit travel and other direct costs, EPA assumed \$17,466 per person (for airfare, hotel, per diem, car rental, long-distance charges, and other miscellaneous ODCs) to conduct a total of 50 site visits.

- For long-distance phone charges for EPA's contractor related to follow-up calls to respondents to clarify responses and to answer helpline questions, EPA assumed contacts would be made to 10% of the 12,000 respondents and used an average call length of 30 minutes and \$0.05/minute rate for long-distance phone charges of \$1,800.
- For long-distance phone charges related to the 100 small municipalities association calls for EPA's contractor, EPA assumed a \$0.05/minute rate for long-distance phone charges of \$150.
- Based on informal feedback from operator trade associations, EPA expects to continue to provide hard copy surveys upon request and mail copies of the survey to smaller municipalities particularly where reliable internet access is not available.

EPA Regions will incur costs to provide an updated POTW population with mailing address and contact information for the 7 authorized states and territories that have not yet provided a list. EPA used the same burden hour assumptions as listed in Table 14-1 and the same average hour labor rate as above. The total burden hours for the Regions to provide the population information is 90 hours and \$4,055.

Error: Reference source not found and Error: Reference source not found summarize the total costs that the industry and the Agency will incur as a result of the ICR.

Table 14-1. Estimated Agency Burden and Labor Costs

Screener Questionnaire Activities	Burden (hours)			Labor Cost		
	Agency	Contractor	Total Hours	Agency (\$45.05/hr)	Contractor (\$95/hr)	Total Cost
Maintain mailing list database	50	200	250	\$2,253	\$19,000	\$21,253
Questionnaire Maintenance and Distribution	100	100	200	\$4,505	\$9,500	\$14,005
Helpline	100	300	400	\$4,505	\$28,500	\$33,005
Questionnaire Post-processing/review	100	400	500	\$4,505	\$38,000	\$42,505
Follow up calls	100	150	250	\$4,505	\$14,250	\$18,755
Publish notice of anticipated ICR in Federal Register	200	100	300	\$9,010	\$9,500	\$18,510
Respond to all comments received						
Review questionnaire responses for consistency and reasonableness, QC tasks	25	300	325	\$1,126	\$28,500	\$29,626
Summarize and analyze questionnaire responses; conduct technical analyses	25	250	275	\$1,126	\$23,750	\$24,876
Total Screener Questionnaire Activities Labor	700	1,800	2,500	\$31,535	\$171,000	\$202,535
Conduct Site Visits	300	750	1,050	\$13,515	\$71,250	\$84,765
Promotion and Outreach to small municipalities associations	100	0	100	\$4,505	\$0	\$4,505
Hours for state support request	90	0	90	\$4,055	\$0	\$4,055
Total Agency/Contractor Hours			3,740			\$295,860

^a Salary data taken from Salary Table 2020-GS from the U.S. Office of Personnel Management (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/GS_h.pdf) Agency rate is the average of \$37.70 per hour for technical (GS-13, Step1) and \$52.40 per hour for managerial (GS-15, Step 1). Contractor labor rate is consistent with current Agency contracts.

Table 14-9. Total Estimated Respondent Burden and Cost Summary

Information Collection Activity	Number of Respondents	Total Burden (Hours)	Total Labor Cost	Total O&M Cost	Total Cost
Screener Questionnaire	12,000	8,747	\$389,320	\$8,800	\$398,120
Total	12,000	8,747	\$389,320	\$8,800	\$398,120

Table 14-10. Total Estimated Agency Burden and Cost Summary

Information Collection Activity	Total Burden (Hours)	Total Labor Cost	Total O&M Cost	Total Cost
Screener Questionnaire	2,500	\$202,535	\$6,000	\$208,535
Site Visits	1,050	\$84,765	\$17,466	\$102,231
Small Municipalities Association Contacts	100	\$4,505	\$150	\$4,655
State Mailing Lists	90	\$4,055	\$0	\$4,055
Total	3,740	\$295,860	\$23,616	\$319,476

EPA estimates that the total burden to the industry for responding to the screener, site visits, and contacts will be approximately 26,240 hours, or \$1,194,361 (including labor and O&M costs). EPA estimates that there will be no start-up or capital costs associated with completing the screener.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2016-0404, which is also available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. An electronic version of the public docket is available through the Federal Data Management System (FDMS) at <http://www.regulations.gov>. Use FDMS to view and submit public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "Advanced Search" then key in the Docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and

Budget, 725 17th Street, NW, Washington, DC. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID No. (EPA-HQ-OW-2016-0404) in any correspondence.

15. REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS IN BURDEN ESTIMATES FROM THE PREVIOUS APPROVED ICR

Since this is a one-time information collection, there are no program changes to the information collection since the last OMB approval. Adjustments in burden estimates reflect a smaller number of respondents and a lower hours burden as detailed above.

16. COLLECTION OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED

16(a) Technical Analyses Supported by the Questionnaire

EPA will analyze the identification and characterization data gathered in the questionnaire to clearly define the universe of POTWs in the U.S. Due to the large number of POTWs, it is expected that any future and more detailed data collection efforts will need to be done using a statistical sampling approach with the population of interest identified by this screener questionnaire. Therefore, updated facility identification and characterization forms the frame for such an approach. Specific analyses using the questionnaire data are described below.

Identification of the Population of Interest of POTWs in the U.S.

EPA will use the data provided by the screener and the information provided by states to supplement and/or confirm ICIS data entries to prepare a current universe of POTWs including their names, locations, and facility identification numbers (NPDES ID). Information collected on the ownership type of the treatment plant will distinguish those plants that are part of the population of interest (i.e. POTWs are the population of interest). Information collected on the discharge status (whether the plant discharges directly to a surface water) will also support EPA determinations of plants that are part of the population of interest (i.e. those with an NPDES permit or state equivalent).

Profile of POTWs in the U.S.

EPA will use the data provided by the screener, site visits, and state and small municipal associations phone calls to develop a profile of POTWs in the U.S. The profile will characterize facilities by:

- Location (Street, City, State, Zip code);
- Size (population served and flow);
- Influent wastewater types (residential, commercial, industrial, other);
- Collection system type (separate and/or combined sewer collection systems);
- Level of treatment (primary, secondary, tertiary/advanced);
- Technology in place (including an indication of whether the plant system is designed or optimized to remove nutrients); and

- Whether influent and/or effluent nutrient concentrations are measured by the facility. Note no new or additional measurement values will be necessary for a facility to collect under this ICR, rather this ICR will request only values that have already been collected/measured by the respondent.

16(b) Collection Schedule

The specific dates for distribution, response receipt, and data collection activities for the screener have not yet been established but will include the activities in Table 16 -11.

Table 16-11. Collection Schedule

Activity	Estimate of Schedule
POTWs complete screener	Throughout ICR approval period
EPA conducts screener follow-up	Throughout response period
EPA analyzes screener responses and updates database	3 months after ICR expires

16(c) Publication of Results

EPA will publish the results of the study through its website:
<https://www.epa.gov/eg/national-study-nutrient-control-and-water-treatment-technologies>.

17. DISPLAY OF THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. CERTIFICATION FOR REDUCTION ACT SUBMISSIONS

The Agency is able to comply with all provisions of the Certification for Paperwork Reduction Act Submissions.