

**SUPPORTING STATEMENT**

**US ENVIRONMENTAL PROTECTION AGENCY  
MEAT AND POULTRY PRODUCTS INDUSTRY DATA COLLECTION**

**FEBRUARY 2022**



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## **PART A OF THE SUPPORTING STATEMENT**

*US Environmental Protection Agency  
Meat and Poultry Products Industry Questionnaires  
ICR No. 2701.01  
OMB Control No. 2040-NEW  
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**

The United States Environmental Protection Agency (EPA), through this Information Collection Request (ICR) package, requests that the Office of Management and Budget (OMB) review and approve the ICR for the Meat and Poultry Products (MPP) Rulemaking. Through this collection, EPA will obtain data essential to the review of the MPP effluent limitations guidelines and standards (ELG) (40 CFR Part 432) and determine whether the ELGs should be revised.

EPA initially promulgated the MPP ELG in 1974 and amended the regulations in 2004. The current regulation covers wastewater directly discharged by meat and poultry slaughterhouses and further processors as well as independent renderers. The technology basis for existing non-small direct dischargers includes biological treatment with partial denitrification. Additionally, the current MPP ELG does not include pretreatment standards for any facilities indirectly discharging process wastewater. In the Effluent Guidelines Program Plan 14 (January 2021), EPA announced a detailed study of the MPP category. The MPP category ranked among the top two industrial categories in EPA's cross-industry review of nutrients in industrial wastewater. During the study, EPA evaluated publicly available data for direct discharging facilities, which make up a small portion of the industry, and data from publicly owned treatment works (POTWs). In addition to having high nutrient discharges, EPA determined that indirect discharging MPP facilities may be causing problems for POTWs and that some MPP facilities are already removing nutrients and achieving effluent concentrations below the current ELG requirements. In the Preliminary Effluent Guidelines Program Plan 15 (September 2021), EPA announced these findings from the detailed study and indicated a revision to the ELGs may be appropriate, thus initiating a rulemaking to revise the MPP ELGs.

Publicly available data on MPP facilities are limited. EPA has based the population of MPP facilities on data from the US Department of Agriculture (USDA) Food Safety Inspection Service (FSIS). The FSIS dataset compiles information on facility name and location, type(s) of meat and poultry processed, and limited details on size (both employees and amount processed). USDA FSIS does not report details specific to wastewater generation or wastewater treatment. EPA has also consulted the Integrated Compliance Information System National Pollutant Discharge Elimination System (ICIS-NPDES) dataset for details on MPP wastewater. But these

data are limited to only those facilities directly discharging wastewater or individual states that require pretreatment permits to be reported.

A survey of the current MPP industry is an essential portion of the rulemaking process, necessary for EPA to determine if the current regulations remain appropriate. The data collection activities described in this ICR will provide a robust dataset that characterizes wastewater generation, treatment, and discharge from MPP facilities. EPA's Office of Water plans to administer a Census Questionnaire and a Detailed Questionnaire to facilities engaging in meat and poultry processing, including those currently regulated under 40 CFR Part 432, and facilities that discharge wastewater directly to waters of the US, indirectly discharge wastewater, or do not discharge wastewater. The Census Questionnaire will be administered as a census of the industry to confirm the industry population, as well as general information on the industry, including:

- Processing details (including type of meat or poultry and type of processing),
- Type and size (both production and employees) of the facility, and
- Wastewater generation and treatment information.

Information collected through the Census Questionnaire will be used to confirm the list of facilities that fall within the MPP industry; identify which MPP facilities generate, treat, and/or discharge wastewater; and develop industry weighting factors. A statistically representative subset of MPP facilities will be asked to complete a more detailed set of questions. This Detailed Questionnaire collects the same information as the Census Questionnaire, as well as additional details on processing operations, types and amount of wastewater generated by operation, wastewater treatment details, and economic data. A small number (20 or fewer) of MPP facilities that receive the Detailed Questionnaire will also be asked to collect and analyze wastewater samples to characterize raw waste streams, wastewater treatment systems, and treated effluent for pollutants of interest.

EPA plans to conduct both questionnaires via a web-based platform, Qualtrics Survey Software (Qualtrics). Based on data primarily from USDA FSIS and ICIS-NPDES, EPA estimates the MPP industry has between 7,000 and 8,000 facilities. Because no one data source collects information from all MPP facilities, as discussed in Section 4, the exact number is unclear. EPA continues to refine the list of facilities by identifying additional or duplicate facilities and working with trade associations to identify facilities that do not process meat or poultry. For the purposes of this ICR, EPA estimates the population of MPP facilities at approximately 7,000 facilities, of which 1,633 facilities will receive the Detailed Questionnaire and the remainder will only receive the Census Questionnaire. The Detailed Questionnaire will include all questions in the Census Questionnaire. Both questionnaires will be issued at the same time and will collect data for 2021. Data from 2021 represents the most recent year for which complete technical and economic data are available as EPA expects the survey will be administered in 2022. The Detailed Questionnaire also asks for some data from 2017 and 2019. These historical data will demonstrate recent trends in industry operation and economics. The data collection will be administered under the authority of Section 308 of the Federal Water Pollution Control Act, 33 USC., Section 1318.

The MPP industry will devote time and resources to respond to this ICR. EPA estimates that the total burden to the approximately 7,000 MPP facilities for responding to the

questionnaires and conducting wastewater sampling will be approximately 70,807 hours, or \$3.22 million (including labor and O&M costs). The collection design represents EPA's efforts to gather sufficient data to perform the analysis required to accurately review and revise the MPP ELGs, yet at the same time, administer an ICR that limits the burden placed on respondents.

## **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 collect data from all MPP facilities in the US as described and defined in Section 1 of this supporting statement. EPA first compiled a list of MPP facilities and their mailing addresses using data from the following sources:

- ICIS-NPDES,
- USDA,
- Food and Drug Administration (FDA),
- D&B Hoovers,
- Dun and Bradstreet, and
- USA Data.

Indirectly discharging MPP facilities are not currently regulated under 40 CFR Part 432. Therefore, EPA expects the ICIS-NPDES list, which primarily includes direct discharging facilities who hold NPDES permits, to be incomplete. EPA will supplement the ICIS-NPDES list of facilities with facilities from USDA's FSIS. The USDA FSIS is responsible for inspecting meat, poultry, egg, and other products for safe and proper packaging and labeling of food. and the USDA FSIS also provides information on the type of MPP products for each facility. EPA is also collaborating with trade associations (US Poultry and Egg Association, National Renderers Association, National Pork Producers Council, National Chicken Council, National Beef Council, and North American Meat Institute) to further refine the list of MPP facilities.

The Census Questionnaire is designed to confirm 1) that all facilities engage in meat or poultry slaughtering, further processing, and/or rendering, 2) which facilities fall under the applicability of 40 CFR Part 432, and 3) collect updated identification information. This updated identification and characterization data will confirm the MPP population and improve the accuracy of data extrapolation. The Census Questionnaire is made up of 24 questions (Appendix A). The data items requested by the Census Questionnaire and the purpose for requesting the information are listed in **Error: Reference source not found**.

The Detailed Questionnaire, which EPA is planning to administer to a statistically representative subset of MPP facilities (see Part B, Section 6), is designed to collect the same information as the Census Questionnaire, as well as more specific characterization information on production, wastewater generation, and economics. The Detailed Questionnaire is made up of 81 questions (Appendix B). All questions from the Census Questionnaire are included in the Detailed Questionnaire in the appropriate sections (denoted in blue). The data requested by the Detailed Questionnaire and the purpose for requesting this information are listed in **Error:**

**Reference source not found.** The Detailed Questionnaire will be administered at the same time as the Census Questionnaire, but each MPP facility will complete only one questionnaire. Both questionnaires will use the same web-based platform. EPA plans to identify which facilities should receive the Detailed Questionnaire prior to sending out questionnaire notifications. When respondents access the web-based platform, they will be directed to the correct questionnaire for their facility (Census or Detailed).

Wastewater sampling data will be requested from no more than 20 facilities. These wastewater characterization data will be critical for characterizing both untreated and treated wastewaters generated by MPP facilities. EPA will target a mix of facility types, sizes, and treatment technologies to be able to characterize untreated wastewater from all types of meat and poultry and all types of processing operations. EPA will use publicly available data from permit applications, effluent and permit data reported to ICIS-NPDES, pretreatment permits, and publicly owned treatment works (POTW) annual reports to identify facilities with treatment technologies of interest. The wastewater sampling data collected will be used to characterize treatment system capabilities, estimate pollutant loadings, and used to potentially establish new effluent limitations for the industry.

**Table 2-1. MPP Census Questionnaire Questions and Their Purpose**

Question Number(s)	Question Description	Purpose of Question
1-3	Collect the following information: - Facility name, physical address - Parent company name, address, contact information - Facility contact information	EPA will use the information collected in these questions to confirm and correct errors in the facility list including facility name and address. EPA will use ownership information for parent companies to evaluate the financial structure of the industry. EPA will use contact information for the parent company and for the facility to conduct follow up as necessary.
4-5	Confirm facilities engaging in MPP operations from 2017 through 2021 or if the facility is permanently closed.	EPA will use these questions to identify facilities that should complete the questionnaire; facilities permanently closed or not engaging in MPP operations are exempted from the remainder of the questionnaire.
6	Asks for full-time equivalent (FTE) employees for 2021.	EPA will use employment information to identify small businesses per the Small Business Association (SBA) definitions.
7	Asks for 12-digit Facility Registry Service (FRS) ID.	EPA will use FRS IDs to confirm the facility and facility information in the facility list and identify any duplicate facilities.
8	Asks for the United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) ID.	EPA will use USDA FSIS IDs to confirm the facility and facility information in the facility list and identify any duplicate facilities.
9	Asks for facility and parent company North American Industry Classification System (NAICS) code(s).	EPA will use employment information to identify small businesses per the SBA definitions, confirm the facility and facility information in the facility list, and also confirm the NAICS codes impacted by the MPP ELG.



**Table 2-1. MPP Census Questionnaire Questions and Their Purpose**

Question Number(s)	Question Description	Purpose of Question
10-11	Asks for existing wastewater permit and local ordinance information (permit/ordinance number, type of permit, regulating body, and expiration date). Asks for information on the basis of limitations in NPDES permits.	EPA will use permit information to identify duplicate information in the facility list and identify the regulations applied to individual facilities and applied by whom. EPA will use information on the basis of limitations in NPDES permits to identify where current ELGs may be implemented incorrectly.
12-13	Asks about planned changes to operation in the next five years (closure/cease operation or increases or decreases in production).	EPA will use this information to determine whether the facility should be included in future populations for the rulemaking. EPA will also evaluate if changes in the industry are trending in any one direction for particular subsets of the industry (by production, by processing type, by amount of wastewater generated, etc.).
14	Asks for facilities to identify which subcategory(ies) of the current ELG best describes operations conducted at the facility.	EPA will use this information, on how each facility will categorize themselves in the existing ELG, to help identify where current ELGs may be implemented incorrectly.
15	Asks if the facility slaughtered or further processed poultry, or slaughtered, further processed, or rendered meat between 2017 and 2021. Asks for production capacities in 2021.	EPA will use this information to identify facilities that should complete subsequent questions based on processing operations, profile facilities by type(s) of operation, confirm stratification of statistical methodologies, and inform selection of facilities for site visits or future sampling. EPA will also use this information to confirm subcategories of the current ELG that apply and identify which subcategories may need revising.
16	Asks for types of poultry further processing operations conducted.	EPA will use this information to collect information on the types of further processing operations occurring at facilities and to determine if the type of further processing operation has an impact on the characteristics of wastewater generated by the facility. EPA will also use this information to profile facilities by type of further processes.
17	Asks for types of by-products further processed between 2017 and 2021.	EPA will also use this information to profile facilities by type of processing operations.
18	Asks for types of meat further processing operations conducted between 2017 and 2021.	EPA will use this information to identify the types of further processing operations occurring at facilities and to determine if the type of further processing operation has an impact on the characteristics of wastewater generated by the facility. EPA will also use this information to profile facilities by type of further processes.
19	Asks if the facility generated process wastewater from 2017 through 2021.	EPA will use this information to identify facilities that generate wastewater, determine which facilities should complete subsequent questions specific to wastewater generation and treatment.

**Table 2-1. MPP Census Questionnaire Questions and Their Purpose**

<b>Question Number(s)</b>	<b>Question Description</b>	<b>Purpose of Question</b>
20	Asks if the facility operates a wastewater treatment system.	EPA will use this information to identify facilities that treat wastewater, determine which facilities should complete subsequent questions specific to wastewater treatment.
21	Asks for the number of discharge locations and types of those destinations.	EPA will use this information to profile the industry by type of discharge location and confirm stratification. EPA will also use this information to characterize surface waters which receive discharges from MPP facilities and assess environmental benefits.
22	Asks for information for each discharge destination, the type of wastewater, type of destination, and flow in 2021.	EPA will use this information to profile the industry by type of discharge location and flow. EPA will evaluate the amount of wastewater discharge relative to production levels and type of production. EPA will also use this information to characterize current discharges from the industry, estimate pollutant loadings, and assess the impacts of those discharges on the environment.
23	Asks for system name and location of any publicly or privately owned treatment works to which the facility discharges.	EPA will use this information to assess indirect discharge and identify POTWs or PrOTWs receiving MPP wastewater.
24	Asks for average annual concentrations of a short list of pollutants in untreated process wastewater in 2021.	EPA will use this information to characterize untreated wastewater and evaluate if untreated wastewater characteristics are impacted by type of process or production.
NA	Space for facility to provide additional comments or elaborate on any questions throughout the questionnaire.	EPA will use this information, specific to the question number as indicated, to adjust responses as needed or take into account any additional information as part of evaluating national level estimates based on facility-specific information.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
1 - Facility Information	1-3	Collect the following information: - Facility name, physical address - Parent company name, address, contact information - Facility contact information	EPA will use the information collected in these questions to confirm and correct errors in the facility list including facility name and address. EPA will use ownership information for parent companies to evaluate the financial structure of the industry and pair with financial data collected later in the questionnaire. EPA will use contact information for the parent company and for the facility to conduct follow up as necessary.
2 - Eligibility Confirmation	4-5	Confirm facilities engaging in MPP operations from 2017 through 2021 or if the facility is permanently closed.	EPA will use these questions to identify facilities that should complete the questionnaire; facilities permanently closed or not engaging in MPP operations are exempted from the remainder of the questionnaire.
3- Facility Information	6	Asks the year the facility began operating.	EPA will use this information to determine the age of facilities and whether operations, wastewater flow or characterization, or production levels vary by age.
	7-8	Asks for full-time equivalent (FTE) employees for 2021 and operating shifts for 2021.	EPA will use employment information to identify small businesses per the Small Business Association (SBA) definitions. Shift-level information will help EPA determine if staffing and/or operations vary throughout the year and if staffing and/or operations vary drastically shift to shift.
	9	Asks for 12-digit Facility Registry Service (FRS) ID.	EPA will use FRS IDs to confirm the facility and facility information in the facility list and identify any duplicate facilities.
	10	Asks for the United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) ID.	EPA will use USDA FSIS IDs to confirm the facility and facility information in the facility list and identify any duplicate facilities.
	11	Asks for facility and parent company North American Industry Classification System (NAICS) code(s).	EPA will use employment information to identify small businesses per the Small Business Association (SBA) definitions, confirm the facility and facility information in the facility list, and also confirm the NAICS codes impacted by the MPP ELG.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
4 - Production Information	12-13	Asks for existing wastewater permit and local ordinance information (permit/ordinance number, type of permit, regulating body, and expiration date). Asks for information on the basis of limitations in NPDES permits.	EPA will use permit information to identify duplicate information in the facility list and identify the regulations applied to individual facilities and applied by whom. EPA will use information on the basis of limitations in NPDES permits to identify where current ELGs may be implemented incorrectly.
	14-15	Asks about planned changes to operation in the next five years (closure/cease operation or increases or decreases in production).	EPA will use this information to determine whether the facility should be included in future populations for the rulemaking. EPA will also evaluate if changes in the industry are trending in any one direction for particular subsets of the industry (by production, by processing type, by amount of wastewater generated, etc.).
	16	Asks for facilities to identify which subcategory(ies) of the current ELG best describes operations conducted at the facility.	EPA will use this information, on how each facility will categorize themselves in the existing ELG, to help identify where current ELGs may be implemented incorrectly.
	17	Asks if the facility slaughtered or further processed poultry, or slaughtered, further processed, or rendered meat between 2017 and 2021. Asks for production capacities in 2021.	EPA will use this information to identify facilities that should complete subsequent questions based on processing operations, profile facilities by type(s) of operation, confirm stratification of statistical methodologies, and inform selection of facilities for site visits or future sampling. EPA will also use this information to confirm subcategories of the current ELG that apply and identify which subcategories may need revising.
	18	Asks for types of poultry further processing operations conducted between 2017 and 2021.	EPA will use this information to collect information on the types of further processing operations occurring at facilities and to determine if the type of further processing operation has an impact on the characteristics of wastewater generated by the facility. EPA will also use this information to profile facilities by type of further processes.
	19	Asks the days poultry processing operated by month in 2017, 2019, and 2021.	EPA will use this information to evaluate continuous or intermittent operation and changes due to seasonal fluctuation in operations. EPA will also evaluate trends in operation year to year among the industry.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
	20	Asks for annual poultry production data for 2017 and 2019 and monthly production data for 2021 by type of product, byproduct, and source.	EPA will use this information to evaluate the volume of wastewater and mass of pollutant generated per mass of product. This will be used to determine if certain product types generate different types of wastewater, and if the subcategories need revising. In addition, EPA will use this information to identify the types and levels of production performed at the facility to inform developing production-normalized effluent limits, profile facilities by type of operation and production level, confirm stratification by production volumes, and evaluate seasonal/annual operations.
	21	Asks for types of meat by-products further processing between 2017 and 2021.	EPA will also use this information to profile facilities by type of processing and determine if processing of by-products impact wastewater characteristics.
	22	Asks the days meat slaughtered by month in 2017, 2019, and 2021.	EPA will use this information to evaluate continuous or intermittent operation and changes due to seasonal fluctuations in operations. EPA will also evaluate trends in operation year to year among the industry.
	23-24	Asks for annual meat slaughter data for 2017 and 2019 and monthly production data for 2021 by type of animal slaughtered, by-product, and source.	EPA will use this information to evaluate the volume of wastewater and mass of pollutant generated per mass of product. This will be used to determine if certain product types generate different types of wastewater, and if the subcategories need revising. In addition, EPA will use this information to identify the types and levels of production performed at the facility to inform developing production-normalized effluent limits, profile facilities by type of operation and production level, confirm stratification by production volumes, and evaluate seasonal/annual operations.
	25	Asks for types of meat further processing operations conducted.	EPA will use this information to collect information on the types of further processing operations occurring at facilities and to determine if the type of further processing operation has an impact on the characteristics of wastewater generated by the facility. EPA will also use this information to profile facilities by type of further processes.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
	26	Asks the days meat further processing operated by month in 2017, 2019, and 2021.	EPA will use this information to evaluate continuous or intermittent operation and changes due to seasonal fluctuation in operations. EPA will also evaluate trends in operation year to year among the industry.
	27	Asks for annual meat finished product production data for 2017 and 2019 and monthly production data for 2021 by type of product, byproduct, and source.	EPA will use this information to evaluate the volume of wastewater and mass of pollutant generated per mass of product. This will be used to determine if certain product types generate different types of wastewater, and if the subcategories need revising. In addition, EPA will use this information to identify the types and levels of production performed at the facility to inform developing production-normalized effluent limits, profile facilities by type of operation and production level, confirm stratification by production volumes, and evaluate seasonal/annual operations.
	28	Asks the days rendering operated by month in 2017, 2019, and 2021.	EPA will use this information to evaluate continuous or intermittent operation and changes due to seasonal fluctuations in operations. EPA will also evaluate trends in operation year to year among the industry.
	29	Asks for annual rendering production data for 2017 and 2019 and monthly production data for 2021 by material and animal type.	EPA will use this information to evaluate the volume of wastewater and mass of pollutant generated per mass of product. This will be used to determine if certain product types generate different types of wastewater, and if the subcategories need revising. In addition, EPA will use this information to identify the types and levels of production performed at the facility to inform developing production-normalized effluent limits, profile facilities by type of operation and production level, confirm stratification by production volumes, and evaluate seasonal/annual operations.
5 - Process Flow Diagram	30	Asks if the facility generated process wastewater from 2017 through 2021.	EPA will use this information to identify facilities that generate wastewater, determine which facilities should complete subsequent questions specific to wastewater generation and treatment.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
	31	Asks for flow diagrams.	EPA will use this information to identify operations that generate wastewater, the relative amount of wastewater, and how the wastewater flows through the facility. With this information EPA will inform selection of facilities for site visits or future sampling, assess whether the facility's system has nutrient control/pollutant removal treatment-in-place, and identify treatment system configuration and treatment unit redundancy.
	32	Asks for an aerial map of the facility.	EPA will use this information to determine if facilities have land area available for installation or expansion of equipment required for compliance with potential regulatory options and understand the general layout of the facility.
6 - Wastewater Generation Information	33	Asks for annual wastewater flows generated by the facility for 2017 and 2019 and for monthly wastewater flows generated by the facility for 2021.	EPA will use this information to relate wastewater generation to production levels and type of production. EPA will use this information to inform selection of facilities for site visits or future sampling, confirm stratification of statistical methodologies, and assess seasonality in wastewater generation.
	34	Asks if any wastewater generation varies throughout the day, and if so, asks for types of wastewater, minimum and maximum flows, and the shifts within which the minimum and maximum flows are experienced.	EPA will use this information to determine which wastewater generation varies through the day or by shift and to what extent the flow fluctuates. EPA will use this information to inform selection of facilities for site visits or future sampling.
	35	Asks if facility receives wastewater from offsite.	EPA will use this to identify whether other wastewater streams are received by the facility and determine if subsequent questions are relevant to the facility. EPA will use this information to inform selection of facilities for site visits or future sampling.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
	36-37	Asks for details on the source, flow, and destination of offsite wastewaters.	EPA will use this information to assess which facilities receive relatively large amounts of offsite wastewaters and identify sources of this wastewater and understand how these streams are handled. EPA will use this information to evaluate if offsite wastewaters are impacting treatment of MPP process wastewater across the industry and evaluate which facilities may be selected for site visits or future sampling.
7 - Wastewater Treatment	38	Asks if the facility operates a wastewater treatment system.	EPA will use this information to identify facilities that treat wastewater, determine which facilities should complete subsequent questions specific to wastewater treatment.
	39	Asks for types of treatment units and treatment details such as design parameters, actual flow and residence time, and purpose of the unit. For recent additions, asks for cost information.	EPA will use this information to identify current and new treatment technologies in place and identify new treatment technologies and best management practices. This information combined with production and process information will be used to identify treatment trends in the industry. EPA will also use this to inform selection of facilities for site visits or future sampling. Recent costing data for treatment unit installation will be used to validate costing data for similar treatments across the industry and from other sources (e.g., vendors).
	40	Asks for details on chemicals added to the wastewater treatment process in 2021.	EPA will use this information to identify types and amounts of chemical(s) added in treatment, which may also be found in the wastewater and assess whether the system has nutrient/pollutant control treatment-in-place. EPA will also use this information to inform whether there are chemicals added in the treatment process and whether these should not have limits since they are added in the treatment process.
	41	Asks about operational changes to treatment system from 2017 through 2021.	EPA will use this information to identify new treatment best practices and trends in the industry. EPA may also use this information to inform selection of facilities for site visits.



**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

<b>Section</b>	<b>Question Number(s)</b>	<b>Question Description</b>	<b>Purpose</b>
	42-43	Asks about solids generation from the treatment system and destination in 2021.	EPA will use this information to understand how facilities are handling sludge from the treatment system, including practices/end uses.
	44-45	Asks about land area currently owned and occupied by the facility and availability of underdeveloped land.	EPA will use this information to determine which facilities have land area available for the expansion of wastewater treatment systems.
	46	Asks for the number of discharge locations and types of those destinations.	EPA will use this information to profile the industry by type of discharge location and confirm stratification. EPA will also use this information to characterize the types of surface waters which receive discharges from MPP facilities and assess environmental benefits.
	47	Asks for information for each discharge destination, the type of wastewater, type of destination, and flow in 2021.	EPA will use this information to profile the industry by type of discharge location and flow. EPA will evaluate the amount of wastewater discharge relative to production levels and type of production. EPA will also use this information to characterize current discharges from the industry, estimate pollutant loadings, and assess the impacts of those discharges on the environment.
	48-51	Asks for information on any wastewaters discharged to publicly or privately owned treatment works. Collects information on system name, location, contact information, significant industrial user (SIU) status, financial relationships, and fee structure associated with the treatment system.	EPA will use this information to assess indirect discharge frequency, types and amount of wastewater discharged, and define relationship with the receiving system. EPA will also use fee structure and financial information to evaluate the economic impact of changing regulations on the MPP facility and the public or private treatment works.
	52-54	Asks about biogas collection, volume of biogas, destinations, and whether the biogas is used to offset energy needs.	EPA will use the information to profile the industry and evaluate the extent to which biogas is collected and utilized within the MPP industry.
8 - Monitoring Data Collected	55	Asks if data outside of discharge monitoring reports (DMRs) were collected from 2017 through 2021.	EPA will use this information to identify facilities that have wastewater sampling data not already reported in DMR data and which facilities should continue within the subsection.
	56	Asks for annual average concentrations of a short list of pollutants in untreated process wastewater in 2021.	EPA will use this information to characterize untreated wastewater and evaluate if untreated wastewater characteristics are impacted by type of process or production.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
9 - Environmental Management and Pollution Prevention	57	Asks for any sampling data for a specific set of pollutants.	EPA will use this information to characterize untreated and treated wastewater at MPP facilities. EPA will use this data to evaluate whether characteristics change based on production levels, types of processes employed, and types of treatment operations. EPA is interested in gathering data to characterize treatment system effectiveness, which include data from the headworks of the treatment system, at points within the treatment system, and data for pollutants in the effluent that may be available but not reported in DMRs because they are not permit requirements. EPA will assess the performance of treatment technologies on varying level of pollutants in influent wastewater and against the current production-based effluent guidelines.
	58	Asks if the facility recycles or reuses process wastewater.	EPA will use this information to profile the industry and determine which facilities should continue with remaining questions in the subsection about recycle and reuse.
	59	Asks about the water that is reused or recycled within the facility.	EPA will use this information to profile the industry and determine the extent to which MPP facilities are reusing/recycling wastewater, determine what portion of process wastewater is diverted to reuse to identify the actual amount of process wastewater generated by the facility and correlate this amount with reported production levels. EPA will use the information to evaluate if national standards or best practices on water reuse could be established.
	60	Asks if the facility implements any wastewater conservation practices other than reuse.	EPA will use this information to profile the industry and determine the extent to which MPP facilities are conserving water. EPA will use the information to evaluate if national standards or best practices on water reuse could be established.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
	61	Asks about environmental management, monitoring, and pollution prevention measures implemented at the facility.	EPA will use this information to profile the industry and determine the extent to which MPP facilities implement pollution prevention measures. EPA will use the information to evaluate if national standards or best practices on pollution prevention and environmental management could be established.
	62-64	Asks about ground water monitoring, frequency, and concentrations.	EPA will use this information to assess non-surface water environmental impacts and the potential for human health impacts. EPA will use this information to understand the potential of MPP wastewater released on land via land application, deep well injection or unintentional release pathways to impact potential drinking water sources, such as shallow aquifers and wells.
	65-66	Asks about air permit identifiers and for information on what pollutants are monitored and concentration and monitoring frequency.	EPA will use the information to identify whether the facility has a Title V permit and determine which and how many facilities have an air pollution permit. EPA will use information to characterize current GHG emissions and evaluate changes in GHG emissions with potential ELG revisions.
10 - Environmental Assessment Information	67	Asks about environmental assessments and environmental effects studies.	EPA will use this information, provided in submitted studies, to evaluate how MPP discharges are impacting receiving waters and assess non-surface water environmental impact(s). This information will allow EPA to assess environmental impact of MPP discharges from the facility and identify which and how many facilities perform environmental assessments.
11 - Financial Information	68-70	Asks for details on the parent company including corporation type, public or private status, and company and facility level FTEs in 2017, 2019, and 2021.	EPA will use this information to determine the impact on individual sites due to proposed regulations. This data is also necessary to determine a site's tax status and the availability of public data for the economic analysis. EPA collects available data from secondary sources to reduce burden on recipients. Secondary sources provide data for multi-site, publicly reporting companies.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
	71-73	Asks for parent company's discount rate or cost of capital and the estimated interest rate to finance capital improvements, as well as their mix of debt and equity used to finance capital improvements	EPA will use the information to estimate the site's cost for financing capital improvements. The economic analysis will use these data to annualize the cost of future wastewater treatment investments. Data from these questions will be used to conduct a closure analysis using information on current assets, the values of land, buildings, and equipment. Sites that may close due to pollution control requirements will be identified.
	74	Asks about other facilities owned by the same company.	EPA will use this information to aggregate data from the site level to the company level, and with estimating impacts at the company level.
	75	Asks about revenue, cost, and expenses for the facility and the company for 2017, 2019, and 2021.	EPA will use this information to predict future incomes. Multiple years are requested so EPA can identify unusually good or bad years and can use forecasting techniques to predict variations in site cash flow.
	76	Asks if the facility has a parent company.	EPA will use this information to identify whether the business is owned, controlled, or managed by an ultimate parent company to determine if subsequent sections of the questionnaire are relevant to the facility.
	77-79	Asks about the facility's relationship with the parent company and state or international affiliations.	Because financing decisions are commonly made at company-level rather than the site-level, EPA will use this information to assess economic impacts at the company-level. If a company is owned by a parent company, it affects the ability of the company to access capital and finance capital improvements. It is also necessary to accurately identify the number of companies that are small businesses, which is necessary under the Small Business Regulatory Enforcement Fairness Act (SBREFA).
	80	Asks if the parent company is a small business.	EPA will use the information to identify whether the parent company is a small business to determine if subsequent questions are relevant to the facility.

**Table 2-2. MPP Detailed Questionnaire Questions and Their Purpose**

Section	Question Number(s)	Question Description	Purpose
12 - Comments	81	Asks for parent company total revenue for only small businesses in 2017, 2019, and 2021.	Because financing decisions are commonly made at the company level rather than the site-level, EPA intends to assess economic impacts at the company level also. If a company is owned by a parent company, it effects the ability of the company to access capital and finance capital improvements. It is also necessary for accurately identifying the number of companies that are small businesses, which is necessary under the Small Business Regulatory Enforcement Fairness Act (SBREFA).
	NA	Space for facility to provide additional comments or elaborate on any questions throughout the questionnaire.	EPA will use this information, specific to the section and question number as indicated, to adjust responses as needed or take into account any additional information as part of evaluating national level estimates based on facility-specific information.

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

Together, the Census and Detailed Questionnaires will collect information from an estimated 7,000 MPP facilities located in the US. The respondents affected by this ICR are classified under the following North American Industry Classification System (NAICS) identification numbers:

- 311611 – Animal (except Poultry) Slaughtering.
- 311612 – Meat Processed from Carcasses.
- 311613 – Rendering and Meat Byproduct Processing.
- 311615 – Poultry Processing.
- 311111 – Dog and Cat Food Manufacturing.
- 311119 – Other Animal Food Manufacturing.
- 311999 – All Other Miscellaneous Food Manufacturing.

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

EPA will use the Census Questionnaire data to develop a population and an updated profile of MPP facilities in the US from which additional data collection, including site calls or sampling, may be based. EPA will use the results of the Census Questionnaire to confirm the sample frame of the Detailed Questionnaire and develop industry weights to allow for extrapolation of Detailed Questionnaire responses.

EPA will use the Detailed Questionnaire data to evaluate the current technology-based ELG and determine if revised requirements are warranted. EPA will collect and analyze information pertaining to wastewater characteristics (e.g., pollutants discharged, wastewater flows), wastewater treatment technologies (e.g., pollution prevention techniques, pretreatment systems, end-of-pipe treatment systems), and the economic impacts of installing and operating treatment technologies. Specifically, EPA will use responses to characterize the pollution discharged from MPP facilities and to determine if pollutant discharges can be controlled beyond current requirements for any set or subset of MPP facilities.

Of the thousands of MPP facilities, only roughly 500 are direct dischargers that submit self-monitoring data required by their permits in DMRs. While the requirements for submitting DMRs vary by state, at a minimum any MPP facility subject to the existing MPP ELGs will be required to submit DMRs, indicating that the existing ELGs only apply to a small portion of the industry. Publicly available data on the characterization of discharges from indirect dischargers, which comprise a large portion of the MPP industry, are not available. EPA will use the Detailed Questionnaire to collect a consistent dataset across the industry that will be used to characterize operations and wastewater characteristics for all MPP facilities, including large and small facilities, all types of meat and poultry processes, facilities that generate but do not discharge wastewater, and both direct and indirect discharging facilities.

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

Each MPP facility will receive a questionnaire notification letter which provides instructions, a URL to an EPA webpage, and a facility-specific entry code. Facilities will access the URL, be directed via a button link on the EPA webpage to the login webpage, and log in using the code in the notification letter. The web-based survey will allow for electronic review and completion of the questionnaire. The questionnaire notification letter will also include instructions for respondents unable to access the online version. This letter will be sent via Federal Express or similar delivery service to each facility to ensure that a point of contact (the facility contact person) receives and signs for it. Each facility selected for the Census Questionnaire will be allowed 45 calendar days and each facility selected for the Detailed Questionnaire will be allowed 60 calendar days from the time of receipt to submit the completed questionnaire.

EPA will include a helpline e-mail address and phone number in the instructions that respondents can use to request assistance in completing the questionnaire. Using these assistance methods enables respondents to receive a timely response to any inquiries they may have. E-mail and telephone communication will also reduce any misinterpretations of the questionnaire and the burden of follow-up phone calls and letters to respondents.

Questionnaire login process will direct respondents to the appropriate questionnaire version, Census or Detailed, for their facility. Each questionnaire will include the purpose, general instructions, and glossary. The Introduction section provides the purpose and use of the questionnaire, helpline information, and information on how to submit or return the completed questionnaire. The General Instructions section will give the respondent guidance on completing the responses. The Glossary provides respondents with all pertinent definitions, references, and acronyms to understand and complete the questionnaire sections. On the EPA website (whose URL is included in the notification letter), downloadable PDF copies of the questionnaires will be available for respondents to print out and use as a working copy, helping them gather and organize response data before beginning data entry.

Facilities that are unable to access the online version will be directed to contact EPA. Upon contacting EPA, staff will mail a package via Federal Express, or other trackable delivery service, containing a hardcopy questionnaire. Respondents may also request a locked PDF version of the questionnaire be delivered via e-mail that they can print onsite. Hardcopy questionnaires can be filled out by hand and returned to EPA by mail. EPA and its contractors will enter the hardcopy questionnaire responses into Qualtrics so all responses can be reviewed and analyzed in a consistent format.

Once the questionnaire response period is complete, EPA and its contractors will export all responses from Qualtrics and review the questionnaire responses for completeness and confidential business information (CBI) claims. Responses will also be reviewed for consistency and reasonableness and follow-up calls will be conducted as needed to clarify inconsistencies found in the responses. Questionnaire responses will be imported into a questionnaire database which will be used by EPA to perform data analysis for the purpose of revising the MPP ELG.

In addition to chemical data provided by facilities in the survey, EPA may need to collect and analyze wastewater samples to supplement this data for certain treatment technologies. In

this case, each MPP facility selected to conduct sampling and analysis of analytical data will be contacted by EPA directly with instructions on how to participate in wastewater sampling activities. EPA will coordinate with each facility to develop detailed site-specific sampling plans and determine when sampling should occur.

The Agency has conducted, is conducting, or will conduct the following activities to administer the MPP Questionnaires:

- Develop the questions for the Census and Detailed Questionnaires.
- Estimate the facility population by evaluating data from ICIS-NPDES and USDA FSIS.
- Conduct stakeholder meetings with trade associations and industry representatives to review the population of MPP facilities.
- Develop the ICR Supporting Statement.
- Continue conducting stakeholder meetings with trade associations, industry representatives, public interest groups, state regulating agencies, EPA workgroup, OMB, and other stakeholders for input on the facility list and questionnaires.
- Revise the questionnaires based on comments from trade associations, industry representatives, public interest groups, state regulating agencies, EPA workgroup members, OMB, and other stakeholders.
- Finalize the facility list by making any updates based on comments from trade associations, industry representatives, and public interest groups.
- Develop mailing labels.
- Develop the web-based questionnaire platform in Qualtrics.
- Develop and distribute the cover letters and instructions to notify facilities of the ICR.
- Develop a tracking system for the questionnaire cover letter mail-out and offline questionnaire return activities.
- Test the final Census and Detailed Questionnaires in Qualtrics prior to survey launch.
- Develop a questionnaire database to house and analyze responses.
- Develop and maintain helplines (phone and e-mail) for respondents who require assistance in completing their questionnaires.
- Receive and review responses, including data entry and review of hardcopy responses into Qualtrics.
- Follow up with facilities on responses as needed.
- Summarize and analyze responses.
- Conduct technical analyses.



**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 all information not identified as confidential business 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 not an ongoing collection.

**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 plans to develop the Census and Detailed Questionnaires in Qualtrics, which allows respondents to fill out and submit questionnaires online. The Qualtrics questionnaires will be developed to meet the 1998 Government Paperwork Elimination Act (GPEA). EPA anticipates that most respondents will be familiar and comfortable with online submission forms and have received verbal feedback from industry representatives indicating this. Additionally, the questionnaires rendered in Qualtrics will include automatic checks to minimize data entry errors and allow for automatic export of a response dataset, reducing the potential for errors introduced by key-entry of data. EPA's helpline will also be available during the response period to assist facilities as needed with submitting responses.

EPA designed the questionnaires to include burden-reducing features. For example, in addition to the initial facility eligibility confirmation function, the questionnaires also contain "screening" questions that direct respondents that do not qualify as the population of interest for a particular subset of questions to indicate their status and then bypass this subset of questions to continue their response. The questionnaire is also designed with drop down menus to simplify responses, minimizing the number of text responses.

EPA will provide a mechanism for facilities to respond with a hardcopy mailed response if the contact cannot access the internet. EPA anticipates this situation to affect less than 1 percent of the total population for both questionnaires.

**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 MPP facilities, as well as information useful for evaluating facility

characteristics and wastewater characterization. Table 4 -1 lists sources of existing data that EPA has collected and reviewed for the study.

**Table 4-1. Existing Data Sources**

<b>Data Source Name</b>	<b>Date of Data Collection</b>	<b>Population Included</b>	<b>Types of Data Available</b>
ICIS-NPDES	2019	Any facilities under 40 CFR 432.1 with individual permits. (20 records not already included in 2018 dataset)	<ul style="list-style-type: none"> <li>• Facility Name</li> <li>• Address</li> <li>• NPDES Permit ID</li> <li>• FRS number</li> <li>• Latitude/Longitude</li> <li>• SIC code</li> </ul>
ICIS-NPDES	2018	All facilities associated with Standard Industrial Classification (SIC) codes listed under 40 CFR Part 432.1. (1,476 records)	<ul style="list-style-type: none"> <li>• Facility Name</li> <li>• Address</li> <li>• NPDES Permit ID</li> <li>• FRS number</li> <li>• Latitude/Longitude</li> <li>• SIC code</li> </ul>
National Renderer's List of Members	2018	List of member facilities. (150 records)	<ul style="list-style-type: none"> <li>• Facility Name</li> <li>• Address</li> <li>• Contact person</li> <li>• List of products</li> <li>• Other notes</li> </ul>
POTW Annual Reports	2018	Publicly available POTW pretreatment reports from seven states (CA, TN, TX, WA, IN, MI, and NH).	<p>The level of information collected from these reports varied by state and report.</p> <ul style="list-style-type: none"> <li>• Facility Name</li> <li>• Address</li> <li>• Receiving POTW</li> <li>• General information on operations</li> </ul>
Toxic Release Inventory (TRI)	2017	Data for facilities listing NAICS codes associated with 40 CFR Part 432.1. (437 records)	<ul style="list-style-type: none"> <li>• Facility Name</li> <li>• City and State</li> <li>• TRI Facility ID</li> <li>• FRS number</li> <li>• Direct, indirect, or both discharger</li> </ul>
US Food and Drug Administration	2020	List of MPP facilities from US Food and Drug Administration's Center for Veterinary Medicine. (252 records)	<ul style="list-style-type: none"> <li>• Facility Name</li> <li>• Address</li> <li>• FDA district</li> <li>• Operation state</li> <li>• Firm type</li> <li>• Program risk</li> <li>• Last inspection date</li> <li>• Indication if facility handles feed for ruminant animals</li> </ul>
USDA FSIS	2020	All MPP facilities subject to USDA's FSIS requirements. (6,532 records)	<ul style="list-style-type: none"> <li>• Unique establishment number</li> <li>• Establishment name</li> <li>• Address</li> <li>• Coordinate data (latitude/longitude)</li> </ul>

**Table 4-1. Existing Data Sources**

Data Source Name	Date of Data Collection	Population Included	Types of Data Available
USDA FSIS	2018 and 2019	All MPP facilities subject to USDA's FSIS requirements. (6,385 records)	<ul style="list-style-type: none"> <li>• Unique establishment number</li> <li>• Establishment name</li> <li>• Address</li> <li>• Phone number</li> <li>• General list of activities.</li> <li>• Production size</li> <li>• Species slaughtered</li> <li>• Aggregate categorical production</li> </ul>

EPA identified the USDA FSIS dataset as the most comprehensive listing of MPP facilities currently available. The USDA dataset, however, is quite limited for EPA's purpose in that it lacks wastewater generation and characterization data, details on wastewater treatment technologies, or wastewater discharge information. In addition, the USDA FSIS dataset includes only limited information on the MPP facility type, size, and economics.

The ICIS-NPDES database includes more specific wastewater characterization information, including flow data, pollutant effluent concentrations, and discharge permit information. However, the data included in the ICIS-NPDES database only includes MPP facilities required to submit DMRs, which comprises a small portion (<10 percent) of the MPP industry. As stated in Section 2, the current ELGs for the MPP industrial category do not include effluent requirements for indirect discharging facilities.

To capture more information on indirect dischargers, EPA collected pretreatment permits for MPP facilities and pretreatment reports for receiving POTWs from select states.<sup>1</sup> EPA reviewed these pretreatment reports, which are specific to the MPP facility, for details on operations, any pretreatment, and the POTW receiving the MPP wastewater. POTW annual pretreatment reports were reviewed to identify any MPP facilities that may be discharging to a POTW and identified as significant or categorical users.

EPA also consulted trade associations, including the American Meat Institute, the National Renderers Association, and the US Poultry & Egg Association, for lists of members and other facility-specific details.

EPA has used the existing data sources listed in Table 4-1 to construct a list of MPP facilities and evaluate wastewater treatment and wastewater characterization. As discussed in Section 1, because EPA has had to construct the list of MPP facilities by combining data from multiple sources, it has been difficult to identify overlap between datasets and where multiple datasets may be identifying the same facility. Facility names and addresses are often inconsistent and may change over time as ownership changes or addresses of record change. Based on the data evaluated to date, EPA estimates the population of MPP facilities to be between 7,000 and 8,000 facilities. EPA's facility list currently includes just over 8,000 records. While EPA has attempted to identify duplicate records based on similar facility name, city/state address, and

<sup>1</sup> Pretreatment permits and pretreatment reports from CA, TN, TX, WA, IN, MI, and NH were available through state websites and/or state databases. EPA also coordinated with EPA Region contacts for additional pretreatment permits and/or reports.

other unique identifiers, some duplicate records may still exist. EPA continues to coordinate with industry trade associations on identifying additional duplicate records and facilities included on the facility list that may not process meat or poultry or may no longer be operating.

Although the consulted sources have provided valuable industry information, and EPA has and will continue to use this information to understand current industry practices, these sources do not provide the Agency with complete and up-to-date site-specific technical and economic data that covers the entire MPP industry and are crucial to the review of the MPP ELG.

## **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 taken steps to ensure that the respondent burden is minimized for small entities, while collecting sufficient data to evaluate regulatory flexibility for small entities. EPA will identify the size of the business entity according to Small Business Administration definitions from questionnaire information through sales revenues and company employment. The financial and economic information collected in the questionnaire is necessary to perform the economic analysis of any proposed revision to the MPP ELG in order to meet the requirements of the Small Business Regulatory Enforcement Fairness Act (SBREFA).

To minimize the burden of responding to the questionnaires, EPA has developed a shortened list of questions, the Census Questionnaire, that will be sent to the majority of the facilities identified as most likely to be small entities and has limited the number of Detailed Questionnaires it is sending to these facilities. Finally, the questions are phrased with commonly used terminology and the tables are organized in formats familiar to financial officers in the respondent industry.

## **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**

The Census and Detailed Questionnaires are to be administered one time only. If the data collection is not conducted, EPA will not be able to fulfill its statutory requirement to consider revising the MPP ELG. The currently available data do not include wastewater quantity and quality characteristics information, except for those facilities currently with permit limits. Information on treatment technologies is available in select permits and/or permit applications, but this information requires manual review of permit and permit application documents and not all permit applications are publicly available. In addition, if the national population of all MPP facilities is not identified, it will not be possible to confirm whether population estimates are

accurate and whether the sample frame is statistically valid. Without the data sought in these questionnaires, EPA will be required to rely on the publicly available data obtained through ICIS-NPDES and USDA FSIS and any additional data trade associations may provide from self-operated surveys. In general, these datasets are inconsistent and difficult to combine. Typically, the only overlapping data element between datasets is the facility name. In EPA's experience, matching data on only facility name or city/state details is time consuming and often inaccurate as facility names change over time. In addition, particularly for this industry, city/state and street address information can also be confusing as some facilities may share the same building/space but are not the same entity, or the address available is for an office located offsite of the production facility. The publicly available data are not sufficient to assess the current industry population, evaluate subcategories in the current ELG or future ELGs, determine characteristics of wastewater and wastewater treatment currently occurring at MPP facilities, or evaluate new treatment technologies that are being used, especially for indirect discharging facilities which comprise the vast majority of the sector. Also, data collected by any trade association's voluntary efforts will likely be incomplete as trade associations do not represent all MPP facilities, particularly many of the small facilities in this industry.

The Census Questionnaire will collect data from all MPP facilities on production, waste streams generated, and general wastewater treatment. Production data from all facilities will help EPA create an accurate sample frame based on production type and size, type of wastewater discharge, and other aspects of facility operation. Data on wastewater generation and treatment will allow EPA to establish an accurate current profile of the MPP industry to estimate the loadings discharged from the entire MPP industry. If this questionnaire is not conducted, EPA would need to estimate or interpolate data for those facilities where these data are not available. Publicly available data on production from USDA FSIS are general at best, indicating type of animal and volume as one of five general categories. Data on wastewater generation and wastewater treatment are only available through discharge permits which are held by only a small portion of the industry and are limited in level of detail.

The Detailed Questionnaire will collect more specific information on production, wastewater generation, wastewater treatment, and economics from a subset of facilities. This detailed information will allow EPA to determine if facility operations and/or wastewater generation varies by different aspects (e.g., shifts, type of production, year-to-year, seasonality). Wastewater treatment details will provide insight into the type and design of current treatment technologies employed and treatment system capabilities. Economics data will be evaluated to determine the economic health of the industry. Detailed information on production and wastewater generation and treatment is not available publicly. Limited economic data are available through public sources; however, those data are aggregated and not useful for determining affordability within industry subcategories or sizes. If the Detailed Questionnaire is not conducted, EPA will not be able to evaluate current treatment capabilities, identify the extent to which pollutant discharges could be reduced or eliminated within the industry, or evaluate the potential economic impact that new or revised ELGs would impose on MPP facilities nor would developing new or revising existing ELGs be possible.

Wastewater sampling data collected through this ICR are critical for characterizing the wastewater generated by MPP facilities and the treated effluent discharged by MPP facilities, as well as evaluating the effectiveness of technologies used to treat MPP wastewater. These

characterization data will be used to estimate current pollutant loadings for the industry and to potentially establish new ELG requirements. The only current publicly available concentration data are self-monitoring permit data collected through DMRs. DMR data do not include a complete set of concentration data for the entire MPP industry. These data typically only include final effluent from direct discharging facilities, represent predominantly larger MPP facilities (those with current ELG requirements), and only include a small subset of pollutants (only those specified in permits). Little data on the wastewater generated or discharged from indirect facilities are available through DMRs reported by POTWs. Older data on untreated wastewater characterization data are available from information collected by EPA in 2001 in support of the 2004 MPP ELG, but more recent data will help EPA evaluate if wastewater characteristics have changed in the past 20 years or if new subcategories should be established based on differing wastewater characteristics. EPA will not be able to calculate pollutant removal efficiencies for treatment technologies without wastewater sampling data.

## **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 November 19, 2021, announcing the Agency's intent to submit a request for a new ICR and to collect comments on draft initial questionnaires and the draft list of MPP facilities in the US. The notice included a description of the entities to be affected by the proposed questionnaires, a brief explanation of the need for the questionnaires, 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 facility list and the reduction of data collection burden.

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

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

EPA received one unique comment letter signed by several entities in response to the Federal Register Notice. The comments received and EPA's responses are summarized below.

- Commentors expressed support for updating the MPP ELGs based on concerns over environmental justice impacts, noting water pollution from both direct and indirect dischargers in the industry disproportionately harms people living in vulnerable and under-resourced communities.
- Commentors also expressed concern that the existing technology limitations in the MPP ELG are no longer appropriate and requested that EPA determine best available technology (BAT) based on the best performing plants.
- Commentors requested that EPA collect information on technology installed at the “best-performing slaughterhouses,” stating that plants with biological nutrient removal (BNR) technologies perform well beyond the existing ELGs.
- Commentors requested that EPA also collect information on the use of nutrient removal technologies in other industries, such as enhanced nutrient removal (ENR) used at POTWs or denitrification used at ore refining plants.

Commentors did not make requests relative to the specific items noted in this ICR. The data collected through this ICR will allow EPA to profile the MPP industry, assess current discharges from the industry and their location, identify treatment technologies currently utilized by the industry, and thoroughly assess the concerns raised by the commentors. EPA is continuing to evaluate the MPP ELG and pursue the data collection.

### **8(b) Consultations**

The Engineering and Analysis Division (EAD) of EPA's Office of Water has consulted with individuals in EPA Offices, Regions and States, clean water organizations, and other federal agencies including the USDA FSIS, USDA Economic Research Service (ERS), and the FDA. EAD has also engaged industry trade associations (US Poultry and Egg Association, National Cattlemen's Beef Association, North American Meat Institute and National Pork Producers Council) and consultants. EAD has also met with community and environmental groups in March, July, September, and October 2021. EAD also plans to attend a series of site visits to facilities between February and April 2022.

Consultations with the USDA FSIS, USDA ERS, and the FDA have yielded a directory of facilities with some information about meat type and processes, facility size, and production. However, the size data are limited in accuracy as they were self-reported, and the production data are reported as lumped categories and do not provide the detail needed to complete the ELG review. Also, these data do not provide information about wastewater generation, treatment, or discharge.

EPA first met with MPP trade associations in February 2020. Since then, the MPP trade associations have reviewed the directory of facilities and provided videos of facility operations and waste treatment for two facilities awarded US Poultry and Egg Association's Clean Water Award. However, the membership of these trade associations is primarily larger facilities. In

addition, EPA does not expect trade associations will be able to collect the financial data needed to determine whether treatment technology options are economically achievable.

EPA has also reached out to the clean water organizations which represent the POTWs, such as the National Rural Water Association (NRWA) and the National Association of Clean Water Agencies (NACWA), to get a better understanding of whether and how POTWs are impacted by MPP facilities. These organizations have provided a POTW contact that receives wastewater from MPP industrial users. EPA has also collected POTW annual reports from EPA Regions and States to identify MPP indirect discharging facilities. While the information collected through these consultations has been helpful, it does not represent the overall industry in each subcategory and size category, and additional information is needed to represent the industry.

EPA distributed draft copies of the Census and Detailed Questionnaires along with specific points of discussion to trade association and clean water organizations on September 23, 2021. EPA then met with some of these organizations on October 15, 2021 to discuss the timeline for the ICR, the mechanism of questionnaire delivery, and the types of information solicited in the questionnaires.

Error: Reference source not found includes a list of all non-Agency organizations that EPA has consulted with as part of the MPP ICR development.

**Table 8-1. Non-Agency Consultations**

<b>Association</b>
Association of Clean Water Administrators
Bayard Ridge Group
Hampton Roads Sanitation District
Iowa Department of Natural Resources
JBS
National American Meat Institute
National Association of Clean Water Agencies
National Cattlemen’s Beef Association
National Chicken Council
National Pork Producers Council
National Rural Water Association
North American Meat Institute
Pilgrims
Smithfield Foods
The Policy Group
Tyson Foods
United Egg Producers
US Poultry & Egg Association
USDA
Water Environment Federation

**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 STATUE, REGULATION, OR AGENCY POLICY**

In accordance with 40 CFR, Part 2, Subpart B, Section 2.203, the MPP Questionnaires inform respondents of their right to claim information as confidential. Each questionnaire provides instructions for claiming confidentiality and informs respondents of the terms and rules governing the protection of CBI under the Clean Water Act and 40 CFR 2.203(B). Each question which requests potentially confidential information will have a corresponding CBI checkbox. Respondents will be requested to check all CBI boxes which correspond to responses they claim as confidential.

EPA and its contractors will follow EAD's existing procedures to protect data labeled as CBI. These procedures include the following:

- Ensure secure handling of submitted and exported questionnaire data to preclude access by unauthorized personnel.
- Store exported questionnaire data and databases in secured areas of offices and system networks and restrict access to authorized EPA and contractor personnel only.
- Restrict any publication or dissemination of confidential results or findings to aggregate statistics and coded listings. Individual respondents will not be identified in summary reports.

EPA has ensured that Qualtrics meets EAD's policies to protect CBI data. EPA has designed the Qualtrics questionnaires to require authentication and verification of the respondents to allow access to the questionnaire, allow users to mark information as CBI, provide secure storage and limit access to EPA and EAD's contractors, and require users to certify submitted questionnaires.

Each EPA contractor that collects, processes, or stores CBI is responsible for the proper handling of that data. Each contractor shall safeguard information as described in Section 2.211 (d) of Subpart B and is obligated to use or disclose information only as permitted by the contract under which the information is furnished.

## **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 Census or Detailed Questionnaires or as part of the wastewater sampling.

## 12. ESTIMATES OF RESPONDENT BURDEN FOR THE INFORMATION COLLECTION

### 12(a) Estimate of Respondent Hour Burden

The MPP data collection (Census Questionnaire, Detailed Questionnaire, and wastewater sampling) will require recipient facilities to devote time and resources to produce acceptable responses to the EPA data requests. EPA expects that engineers, supervisors, and technical staff at the sites will devote time toward gathering and preparing the final responses to the questionnaires, coordinating and planning sampling with EPA staff, and collecting wastewater samples. The costs to the respondents' facilities associated with these time commitments can be estimated by multiplying the time spent in each labor category by an appropriately loaded hourly rate.

To develop the burden estimates, EPA estimated the number of hours required to complete all questions in the Census and Detailed Questionnaires (including reviewing instructions, researching data sources, gathering data, entering the information requested, reviewing responses, and submitting the questionnaire). Error: Reference source not found and Error: Reference source not found break down the burden (in hours) per anticipated respondent activity and per labor category presumed necessary to complete the Census and Detailed Questionnaires, respectively. EPA expects that wastewater treatment plant operators, engineers, financial manager, and facility managers will all be involved in responding to the data request. In both Error: Reference source not found and Error: Reference source not found, EPA has differentiated the hours that will be spent by two different types of responses for either questionnaire, facilities that complete the full questionnaire and facilities for which portions of the questionnaire are non-applicable. For both the Census and Detailed Questionnaires, EPA expects that a fraction of the respondent population does not generate wastewater or does not fall under the applicability of the MPP ELG. These facilities will not be required to complete the full questionnaire. They will be directed to the end of the questionnaire via specific questions placed strategically within the Census and Detailed Questionnaires. As a result, these facilities will not be required to complete large portions of questions resulting in less burden. Throughout the remainder of this supporting statement these will be referred to as "non-applicable" questionnaire facilities.

EPA expects that questionnaire response will be led by the wastewater plant operator as most questions are specific to wastewater generation and treatment. EPA has included hours for engineering staff to support collecting data and entering details related to production as well as financial staff to support details related to financial information requested in the Detailed Questionnaire. EPA has also included hours for the facility manager to review the questionnaire response.

**Table 12-2. Estimated Respondent Burden by Activity and Respondent Category for the Census Questionnaire in Qualtrics**

Activity	Respondent Category and Burden (Hours)				
	Wastewater Plant Operator	Engineer	Finance Manager	Facility Manager	Total Burden per Activity
<i>Census Questionnaire – Non-applicable Facilities</i>					
Login, print working hardcopy, and provide basic facility information	0.25	0	0	0	0.25
Review Instructions	0.75	0.75	0	0.75	2.25
Gather data	0	0	0	0	0
Complete the Questionnaire	0	0	0	0	0
Review and Submission	0	0	0	0.5	0.5
Contact Helpline	0.5	0	0	0	0.5
<b>Total</b>	<b>1.5</b>	<b>0.75</b>	<b>0</b>	<b>1.25</b>	<b>3.50</b>
<i>Census Questionnaire – Full Response Facilities</i>					
Login, print working hardcopy, and provide basic facility information	0.25	0	0	0	0.25
Review Instructions	0.75	0.75	0	0.75	2.25
Gather data	1	1	0	0	2
Complete the Questionnaire	1	1	0	0	2
Review and Submission	0	0	0	0.5	0.5
Contact Helpline	0.5	0	0	0	0.5
<b>Total</b>	<b>3.5</b>	<b>2.75</b>	<b>0</b>	<b>1.25</b>	<b>7.5</b>

**Table 12-3. Estimated Respondent Burden by Activity and Respondent Category for the Web-Based Detailed Questionnaire**

Activity	Respondent Category and Burden (Hours)				
	Wastewater Plant Operator	Engineer	Finance Manager	Facility Manager	Total Burden per Activity
<i>Detailed Questionnaire – Non-applicable Facilities</i>					
Login, print working hardcopy, and provide basic facility information	0.25	0	0	0	0.25
Review Instructions	0.75	0.75	0.75	0.75	3
Gather data	0	0	0	0	0
Complete the Questionnaire	0	0	0	0	0
Review and Submission	0	0	0	3	3
Contact Helpline	0.5	0	0	0	0.5
<b>Total</b>	<b>1.5</b>	<b>0.75</b>	<b>0.75</b>	<b>3.75</b>	<b>6.75</b>
<i>Detailed Questionnaire – Full Response Facilities</i>					

**Table 12-3. Estimated Respondent Burden by Activity and Respondent Category for the Web-Based Detailed Questionnaire**

Activity	Respondent Category and Burden (Hours)				
	Wastewater Plant Operator	Engineer	Finance Manager	Facility Manager	Total Burden per Activity
Login, print working hardcopy, and provide basic facility information	0.25	0	0	0	0.25
Review Instructions	0.75	0.75	0.75	0.75	3
Gather data	5	5	2	0	12
Complete the Questionnaire	5	5	2	0	12
Review and Submission	0	0	0	3	3
Contact Helpline	0.5	0	0	0	0.5
<b>Total</b>	<b>11.5</b>	<b>10.75</b>	<b>4.75</b>	<b>3.75</b>	<b>30.75</b>

In addition to the questionnaires, EPA intends to seek new sampling data from a select group of 20 MPP facilities. These facilities will perform 5-day long sampling episodes to collect data on MPP wastewater characteristics. Each MPP facility selected for sampling will be asked to engage with EPA to develop site-specific plans to standardize sampling across all facilities. EPA will provide each facility with a sampling kit, with all sampling supplies included. Facilities will be responsible for executing the sampling plan by collecting samples, preserving samples, and shipping wastewater samples to specific laboratories identified by EPA. EPA will contract with accredited analytical laboratories for each method included in the sampling plan; facilities will ship wastewater samples according to instructions provided by EPA. By EPA contracting directly with laboratories, this ensures that all wastewater samples will be analyzed to the same precision and using the same method for each analyte.

EPA estimates that each facility will collect 24-hour composite samples for five consecutive days from up to three locations, such as the influent to the wastewater treatment system, a midpoint in the wastewater treatment system, and the treated effluent. The exact sample location may vary by facility based on the treatment system configuration and/or type of operations. For the purposes of the ICR estimate, EPA estimates that all facilities will collect samples from three locations for each day of the sampling episode for a total of 15 wastewater samples per facility. In addition, EPA expects the facility will also collect one quality assurance sample each day of the sampling episode. These quality assurance samples could include laboratory required quality assurance volumes or field quality assurance samples. **Table 12 -4** presents the estimated burden per facility to collect wastewater samples for the five-day sampling episode. Error: Reference source not found presents estimated burden to support the wastewater sampling program on a per facility basis by labor category. EPA expects that wastewater treatment plant operators and facility managers will be involved in planning and implementing the wastewater treatment protocols.

**Table 12-4. Estimated Burden for 5-Day Sampling per Facility**

Activity	Hours	Units	People	Total Burden per Activity
Prep work – Planning, purchasing supplies, labeling bottles, organizing, and packing materials.	4	per sampling day	2	8
Sampling Collection – Collect two grab samples every four hours for a 24-hr period.	7.5	per sampling day	2	15
Sample Preservation/Shipment – Label and preserve samples. Package samples in coolers and prepare for shipment. Transport to shipping vendor.	6	per sampling day	3	18
<b>Total Hours per Facility per Day</b>				<b>41</b>
<b>Total Hours per Facility for 5-day Period</b>				<b>205</b>

**Table 12-5. Estimated Burden for Sampling Program by Activity and Labor Category**

Activity	Respondent Category and Burden (Hours)		
	Wastewater Plant Operator	Facility Manager	Total Burden per Activity
Planning Work - Coordinating with EPA to plan and develop sampling plan	40	40	80
Sampling Activities	205	0	205
Sampling Oversight	0	20	20
<b>Total</b>	<b>245</b>	<b>60</b>	<b>305</b>

**12(b) Estimate of Respondent Labor Costs**

EPA obtained mean labor rates from the May 2020, US 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 representing a wastewater treatment plant operator, engineer, finance specialist, and an operations manager. EPA used these labor rates for the burden estimates.

**Table 12-6. 2020 Labor Rate Data**

<b>Job Category</b>	<b>WWT Plant Operator<sup>1</sup></b>	<b>Engineer<sup>2</sup></b>	<b>Finance Specialist<sup>3</sup></b>	<b>Operations Manager<sup>4</sup></b>
<b>Mean Hourly Earnings (\$/hour)</b>	27.66	54.35	45.16	64.45

<sup>1</sup> Wastewater treatment plant operator unloaded mean hourly wage of \$22.55/hour times 1.3 loading = \$29.32/hour. EPA assumed a 30 percent increase for overhead and benefits.

<sup>2</sup> Engineer unloaded labor rate of \$45.40/hour times 1.3 loading = \$59.02/hour. EPA assumed a 30 percent increase for overhead and benefits.

<sup>3</sup> Finance specialist unloaded labor rates of \$34.74/hour times 1.3 loading = \$45.16/hour. EPA assumed a 30 percent increase for overhead and benefits.

<sup>4</sup> Operations manager unloaded labor rate of \$49.58/hour times 1.3 loading = \$64.45/hour. EPA assumed a 30 percent increase for overhead and benefits.

Source: 2020 National Occupational Employment and Wage Estimates for water and wastewater treatment plant and systems operators – occupation code 51-8031, engineer – occupation code 17-2000, finance specialist – occupation code 13-2000, and general and operations managers – occupation code 11-1021.

[https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)

The direct labor cost to respondents to complete the Census or Detailed 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 as described in item 12a. EPA calculated the estimated respondent burden for completion of both questionnaires using the estimated total response time per activity shown in Table 12-2, Table 12-3, Table 12-4 as well as the labor rates shown in Table 12-6 to calculate a total labor cost shown in Table 12-7. EPA expects that some portion of facilities will have questions about how to complete either the Census or the Detailed Questionnaire. Table 12-7 includes estimates for both types of respondents: non-applicable facilities and full questionnaire responses.

**Table 12-7. Total Estimated Respondent Labor Burden for the Census and Detailed Questionnaire per Respondent**

<b>Respondent Category</b>	<b>Wastewater Plant Operator Total Labor Costs</b>	<b>Engineer Total Labor Costs</b>	<b>Finance Manager Total Labor Costs</b>	<b>Facility Manager Total Labor Costs</b>	<b>Total Labor Burden (\$)</b>
<i>Census Questionnaire</i>					
Non-Applicable	\$41	\$41	\$0	\$81	\$163
Full Responses	\$97	\$149	\$0	\$81	\$327
<i>Detailed Questionnaire</i>					
Non-Applicable	\$41	\$41	\$34	\$242	\$358
Full Responses	\$318	\$584	\$215	\$242	\$1,359

The total burden for the Census Questionnaire and Detailed Questionnaire equals the estimated burden per facility for all facilities EPA expects will respond to the questionnaires. As noted previously in this supporting statement, for the purposes of estimating burden to the industry, EPA estimates the population of MPP facilities at approximately 7,000. EPA expects that some number of facilities will not respond to the questionnaires. Although this ICR will be

mandatory, the typical non-response rate for effluent guidelines questionnaires is 10 percent, which is consistent with the non-response rate from for the ICR Supporting EPA's 2004 MPP ELG. As described in Part B, Section 7, EPA expects that 67 percent of questionnaire population will be full responses. Factoring in the expected number of non-responses and the assumed full responses, this results in 23 percent of facilities as non-applicable facilities that will not be required to complete the entire questionnaire. [able 12 -8](#) includes the number of respondents in each category (non-applicable, non-responses, and full responses), total burden, and total cost for the industry to respond to both the Census and the Detailed Questionnaires. The values presented in [able 12 -8](#) also include hours for a portion of the respondents to consult with EPA's helpline. EPA estimates that 10 percent of Census Questionnaire respondents and 20 percent of the Detailed Questionnaire respondents, both non-applicable responses and full responses, will spend 0.5 hour coordinating with the helpline.

Table 12-8. Total Estimated Respondents for Questionnaires and Total Estimated Burden

Respondent Category	Number of Responses	Number of Respondents Contacting Helpline	Total WW Plant Operator Labor (Hours)	Total Engineer Labor (Hours)	Total Finance Manager Labor (Hours)	Total Facility Manager Labor (Hours)	Total Labor (Hours)	Total WW Plant Operator Labor Cost (\$)	Total Engineer Labor Cost (\$)	Total Finance Manager Labor Cost (\$)	Total Facility Manager Labor Cost (\$)	Total Labor Cost (\$)
<i>Census Questionnaire</i>												
Non-applicable	1,234	123	1,296	926	0	1,543	3,765	\$35,856	\$50,320	\$ -	\$99,453	\$185,630
Non-respondents	537	0	0	0	0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -
Full Responses	3,596	360	10,967	9,889	0	4,495	25,351	\$303,404	\$537,480	\$ -	\$289,712	\$1,130,596
<b>Total</b>	<b>5,367</b>	<b>483</b>	<b>12,264</b>	<b>10,815</b>	<b>0</b>	<b>6,038</b>	<b>29,116</b>	<b>\$339,260</b>	<b>\$587,801</b>	<b>\$ -</b>	<b>\$389,165</b>	<b>\$1,316,226</b>
<i>Industry Questionnaire</i>												
Non-applicable	376	75	413	282	282	1,408	2,385	\$11,429	\$15,311	\$12,722	\$90,781	\$130,243
Non-respondents	163	0	0	0	0	0	0	\$ -	\$ -	\$ -	\$ -	\$ -
Full Responses	1,094	219	12,145	11,762	5,197	4,103	33,206	\$335,969	\$639,283	\$234,708	\$264,449	\$1,474,409
<b>Total</b>	<b>1,633</b>	<b>294</b>	<b>12,558</b>	<b>12,043</b>	<b>5,479</b>	<b>5,511</b>	<b>35,591</b>	<b>\$347,398</b>	<b>\$654,594</b>	<b>\$247,430</b>	<b>\$355,230</b>	<b>\$1,604,652</b>
<b>Industry Total Hours</b>							<b>64,707</b>	<b>Industry Total Cost</b>				<b>\$2,920,878</b>



For labor costs associated with sampling, EPA assumed that all sampling activities described in Section 12(a) will be completed by a combination of wastewater plant operation staff and the facility manager as shown in Table 12 -5. To estimate the labor cost, EPA combined the hours presented in Table 12 -5 with the labor rates shown in Table 12 -6. The total labor cost for sampling per facility is shown in Table 12 -9.

**Table 12-9. Total Estimated Labor Burden for 5-Day Sampling per Facility**

<b>Wastewater Plant Operator Total Labor Cost (\$)</b>	<b>Facility Manager Total Labor Cost (\$)</b>	<b>Total Labor Burden (\$)</b>
\$6,778	\$3,867	\$10,645

Using the total industry labor cost for the questionnaires shown in able 12 -8 and the total labor cost for sampling per facility shown in Table 12 -9 combined with the number of facilities participating in sampling, EPA estimates the total labor cost associated with activities described in this ICR. The total labor associated with the MPP Census Questionnaire, Detailed Questionnaire, and wastewater sampling is \$3.13 million, as shown in Table 12 -10.

**Table 12-10. Total Estimated Respondent Labor Burden MPP Data Collection**

<b>Activity</b>	<b>Number of Facilities Participating</b>	<b>Total Labor Burden (Dollars)</b>
Census Questionnaire	5,367	\$1,316,226
Detailed Questionnaire	1,633	\$1,604,652
Wastewater Sampling	20	\$212,898
<b>Total</b>		<b>\$3,133,776</b>

### **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 Census Questionnaire and Detailed Questionnaire. All information requested in either questionnaire should be available from existing facility records and/or monitoring. Facilities are not required to collect and analyze additional samples to respond to the questionnaires.

Other costs for completing the questionnaires include printing/duplication of working copies and, for a select few facilities, shipping for those respondents that are unable to respond to the online platform. EPA has assumed that one percent of Census Questionnaire and one percent of Detailed Questionnaire respondents will respond with mailed hardcopies as opposed to online submittals. Most respondents will submit electronic questionnaires, which will reduce burden and ensure efficient transfer of data. EPA assumes all 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 facility submitting a paper response will return the completed questionnaire via Federal

Express or a comparable delivery carrier that requires a signature to acknowledge receipt. EPA also included cost for long distance phone charges. Although, most facilities likely have access to cell phones or other internet-based phone mechanisms that do not charge for long distance calls, EPA has included these costs at \$0.05 per minute for calls into the helpline to cover facilities in rural areas.

Table 13 -11 presents the estimated Other Direct Costs for respondents related to the Census and Detailed Questionnaires.

**Table 13-11. Total Other Direct Costs for Respondents to the Questionnaires**

Activity	Number of Respondents	Total Printer/Photocopying Cost <sup>1</sup>	Total Shipping Cost <sup>2</sup>	Total Phone/Calling Costs <sup>3</sup>	Total
Census Questionnaire	5,367	\$4,830	\$430	\$726	\$5,986
Detailed Questionnaire	1,633	\$7,349	\$131	\$443	\$7,922
<b>Total</b>		<b>\$12,179</b>	<b>\$561</b>	<b>\$1,169</b>	<b>\$13,908</b>

<sup>1</sup> Assumes printing of 10 pages for the Census Questionnaire and 50 pages for the Detailed Questionnaire; \$0.10/page print cost. Assumes all facilities will print the questionnaire once as a working copy.

<sup>2</sup> Assumes one percent of Census Questionnaire respondents and one percent of Detailed Questionnaire respondents will send in a paper questionnaire via Federal Express (or another shipper with tracking). Assumes \$8.90 shipping fee/package.

<sup>3</sup> Assumes 10 percent of Census Questionnaire respondents and 20 percent of Detailed Questionnaire respondents will contact the helpline for 30 minutes at a rate of \$0.05/minute. EPA expects this to be an overestimate of the long-distance costs associated with the Questionnaire.

As described in Section 12, wastewater sampling of MPP facilities will be conducted by MPP facility staff. This burden estimate assumes that EPA will contract directly with laboratories and provide each facility with a set of sampling supplies. The only sampling supplies not provided by EPA would be ice required to cool wastewater samples immediately after collection and/or during preservation. Sampled facilities will be responsible for any long-distance phone charges associated with planning, supplies not provided by EPA, and shipping samples to the laboratories within the holding times specified in the sampling plan. In addition to ice needed during sample collection, EPA estimates that each sampled facility will need to provide ice for filling coolers and keeping samples at the proper temperature during shipping and postage to ship all wastewater samples in coolers provided by EPA. EPA estimates these other direct costs associated with wastewater sampling include those elements shown in Table 13 -12.

**Table 13-12. Total Other Direct Costs for Five-Day Sampling**

Activity	Units Cost	Units	Number	Direct Cost (\$)
Planning Calls (phone charges)	\$3	\$ per hour	6 hours	\$18
Shipping Costs (ice and postage)	\$110	\$ per cooler	5 coolers per sample day	\$550
Sample Supplies Not Provided by EPA (ice)	\$10	\$ per wastewater sample	15 wastewater samples	\$150
<b>Total Cost per Facility</b>				\$3,590
<b>Total Cost for Sampling at All Facilities</b>				\$71,800

**13(b) Annualizing Capital Costs**

EPA estimates that there will be no recurring capital costs associated with responding to the Census Questionnaire, responding to the Detailed Questionnaire, or wastewater sampling.

The one-time burden to respondents includes labor costs described in Section 12 and O&M costs described in Section 13(a). Table 13-13 presents the total burden to the industry for the MPP Questionnaires and wastewater sampling.

**Table 13-13. Total Estimated Respondent Burden and Cost Summary**

Information Collection Activity	Number of Participating Facilities	Total Burden (Hours)	Total Labor Cost (\$)	Total O&M Cost (\$)	Total Cost (\$)
Census and Detailed Questionnaire	7,000 <sup>1</sup>	64,707	\$2,920,878	\$13,908	\$2,934,786
Wastewater Sampling	20	6,100	\$212,898	\$71,800	\$284,698
<b>Total</b>		<b>70,807</b>	<b>\$3,133,776</b>	<b>\$85,708</b>	<b>\$3,219,484</b>

1 – All 7,000 MPP facility will complete one questionnaire, either the Census or the Detailed.

EPA estimates that the total burden to the industry for responding to the Census Questionnaire, Detailed Questionnaire, and wastewater sampling will be approximately 70,807 hours, or \$3.22 million (including labor and O&M costs).

Burden means the total time, effort, and financial resources expended by persons to generate, maintain, retain, and 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-2021-0736, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 17<sup>th</sup> Street, NW, Washington, DC. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID No. (EPA-HQ-OW-2021-0736) in any correspondence.

#### **14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT**

Table 14-14 presents an estimate of the burden and labor costs that EPA will incur to administer the Census and Detailed Questionnaires. 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 figures by an average hourly Agency labor rate (\$45.51/hour) for technical and managerial support using the Salary Table 2021-GS from the US Office of Personal Management. This table can be found at the website [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf). The government employee labor rates are \$38.08 per hour for technical (GS-13, Step1) and \$52.93 per hour for managerial (GS-15, Step 1). EPA determined contractor labor costs by multiplying contractor burden figures by an average contract labor rate of \$100 per hour. This rate is consistent with current Agency contracts.

For EPA and contractor O&M costs, EPA assumed mailing a cover letter announcing the questionnaire effort to all MPP facilities and mailing hardcopy questionnaires to one percent of all respondents as described in Section 13(a). Table 14-15 presents the other direct costs associated with administering the questionnaires that will be incurred by EPA.

Table 14-16 presents a list of the tasks EPA and its contractors will perform associated with the MPP wastewater sampling. These tasks include the following:

- Selecting facilities for wastewater sampling.
- Developing site-specific sampling plans.
- Planning and conducting audits of each sampling episode.
- Ordering sampling supplies and preparing sampling kits for each sampled facility.
- Reviewing and analyzing sampling results and documenting results of each sampling episode.

Table 14-16 includes an estimate of the burden and labor costs for each task and the total labor cost. O&M costs associated with wastewater sampling include travel costs (for EPA’s contractor staff to audit each wastewater sampling facility), costs for sample collection supplies, shipping

costs to get sampling kits to facilities, and sample analysis costs. Table 14-17 shows the other direct costs incurred by EPA per sampled facility and the total cost for all 20 sampled facilities.

Table 13-13 and Table 14-18 summarize the total costs that the industry and the Agency will incur as a result of the ICR.

**Table 14-14. Estimated Agency Burden and Labor Costs for Census and Detailed Questionnaires**

Activities	Burden (hours)			Labor Cost		
	Agency	Contractor	Total Hours	Agency (\$45.51/hr)	Contractor (\$100/hr)	Total Cost
Develop Census Questionnaire instrument	150	1,800	1,950	\$6,827	\$180,000	\$186,827
Develop Detailed Questionnaire instrument						
Meet with trade association representatives	150	200	350	\$6,827	\$20,000	\$26,827
Publish notice of anticipated ICR in Federal Register						
Respond to all comments received						
Revise questionnaire instruments based on reviewers' comments						
Design sampling approach	400	1,800	2,200	\$18,204	\$180,000	\$198,204
Develop a mailing list database						
Develop a system to track mailing and receipt activities to improve mailing list						
Develop notification letters						
Mail questionnaire notification letters						
Develop and maintain e-mail and phone helplines	75	588	663	\$3,413	\$58,849	\$62,262
Maintain helpline database and develop documentation						
Track survey responses	250	4,132	4,382	\$11,378	\$413,246	\$424,623
Review responses and assess potential for bias due to missing data						
Engineering follow-up to clarify responses						
Develop questionnaire database	40	500	540	\$1,820	\$50,000	\$51,820
Upload and verify data						
Enter hardcopy survey responses	50	308	358	\$2,276	\$30,798	\$33,074
<b>Total</b>	<b>1,115</b>	<b>9,229</b>	<b>10,344</b>	<b>\$50,744</b>	<b>\$922,892</b>	<b>\$973,636</b>

**Table 14-15. Estimated Other Direct Costs for the Agency to Administer the Questionnaires**

Activity	Unit Costs <sup>1</sup>		Number of Units <sup>2</sup>		Total Cost (\$)
Questionnaire Notification Mailout	\$0.58	per letter	7,000	letters	\$4,060
Hardcopy Census Questionnaires	\$8.90	per package	54	packages	\$145
Hardcopy Detailed Questionnaires	\$8.90	per package	16	packages	\$478
<b>Total</b>					<b>\$4,683</b>

<sup>1</sup> Questionnaire notifications will be sent out via USPS with a letter. Hardcopy questionnaires will be sent via Federal Express (or another shipper with tracking) at \$8.90 shipping fee/package.

<sup>2</sup> Assumes one percent of Census Questionnaire respondents and one percent of Detailed Questionnaire respondents will not have access to the internet and request hardcopy questionnaires.

**Table 14-16. Estimated Agency Burden and Labor Costs for Wastewater Sampling**

Activities	Burden (hours)			Labor Cost		
	Agency	Contractor	Total Hours	Agency (\$45.51/hr)	Contractor (\$100/hr)	Total Cost
Select MPP facilities	50	100	150	\$2,276	\$10,000	\$12,276
Develop site-specific sampling plans - Calls with facilities and write/review plans	200	720	920	\$9,102	\$72,000	\$81,102
Plan and conduct sampling audits	80	510	590	\$3,641	\$51,050	\$54,691
Prepare sample collection kits	0	80	80	\$0	\$8,000	\$8,000
Review sampling data results, enter data into database, analyze data	1,200	3,080	4,280	\$54,612	\$308,000	\$362,612
<b>Total</b>	<b>1,530</b>	<b>4,490</b>	<b>6,020</b>	<b>\$69,630</b>	<b>\$449,000</b>	<b>\$518,630</b>

**Table 14-17. Estimated Other Direct Costs for the Agency to Conduct Wastewater Sampling**

Activity	Unit Costs		Number of Units		Total Cost (\$)
Sampling Audit Travel (airfare, hotel, per diem, car rental, long-distance charges and other miscellaneous ODCs)	\$900	\$ per trip	1	trip per facility	\$900
Sample Collection Supplies (bottles, labels, preservation supplies, sampling equipment)	\$1,150	\$ per set of supplies	1	set of supplies per facility	\$1,150
Sample Analysis	\$3,030	\$ per wastewater sample	20	wastewater and QA samples per facility	\$60,600
Shipping Sample Kits to Facilities	\$80	\$ per box	6	boxes of supplies per facility	480
<b>Total Cost per Facility</b>					\$63,148
<b>Total Cost for All Facilities</b>					<b>\$1,262,960</b>

**Table 14-18. Total Estimated Agency Burden and Cost Summary**

Total Burden (Hours)	Total Labor Cost (\$)	Total O&M Cost (\$)	Total Cost (\$)
16,364	\$1,492,266	\$1,267,643	\$2,759,909

EPA estimates that the total burden to the Agency for the MPP Census Questionnaire, Detailed Questionnaire, and wastewater sampling will be approximately 16,364 hours, or \$2.76 million (including labor and O&M costs). EPA estimates that there will be no start-up or capital costs associated with completing the Census or Detailed Questionnaires.

## **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 changes to the information collection since the last OMB approval.

## **16. COLLECTION OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED**

### **16(a) Technical Analyses Supported by the Questionnaire**

EPA will use the data collected through this ICR to determine if a revision to the MPP ELG is warranted. If EPA determines a revision is warranted, EPA anticipates also using data in support of future rulemaking efforts. EPA will use the data collected through the Census and Detailed Questionnaires and wastewater sampling to support the following analyses:

- Subcategorization - The Agency will survey facilities from the MPP industry to fully capture the range of processes, wastewater types, and in-place treatment technologies for



the entire sector. Data from the respondents will help the Agency determine whether the existing subcategorization of the industry is appropriate or additional/revised subcategorization is necessary for effluent limitations. Under such a regime, the Agency will develop estimates of pollutant loadings, and estimates of compliance costs associated with any proposed regulatory options for each subcategory. It is important that EPA fully understand these differences to construct subcategories that are meaningful and effluent limitations guidelines and standards that incorporate differences within the industry.

- Evaluation of MPP Industry Processes and Wastewaters - EPA will use data collected through the questionnaires to analyze meat and poultry products industry manufacturing processes, pollution prevention practices, and wastewater treatment systems. Specifically, EPA will analyze each manufacturing process, including the water use, production, and wastewater discharge rates; pollution prevention techniques associated with each process; and the characteristics of wastewater generated from each process. EPA will also analyze facility-wide pollution prevention practices and wastewater treatment systems to determine the wastewaters that require treatment, the treatment technologies that are applicable to those wastewaters, the effectiveness of these systems, and the final discharge characteristics from meat and poultry products facilities.
- Technical Feasibility Analysis - EPA will evaluate technically feasible technology options, including control technologies and pollution prevention and recycle practices, for all subcategories. The Agency will assess the technical feasibility of each technology option by determining its availability within the industry as well as the degree to which it effectively eliminates the generation of pollutants and/or removes or destroys specific pollutants.
- Assessment of Technology Costs - EPA will use data collected through the questionnaires to estimate the direct costs of the wastewater treatment and control technologies and pollution prevention/management practices evaluated as potential technology basis options for MPP effluent guidelines. These data include wastewater flow rates, production rates, data related to treatment technologies already in place, and pollutant concentrations. EPA will use data collected through the questionnaires to assess the following direct costs: treatment equipment capital costs; annual operating expenses (e.g., power costs, chemical costs); and waste disposal costs.
- Estimation of Effluent Limitations - EPA may develop preliminary and final effluent limitations guidelines and standards. The Agency will base these preliminary limitations upon a detailed statistical analysis of treated effluent data from sites that implement the potential control technologies and pollution prevention/management practices and that have well-operated treatment systems. EPA may develop preliminary effluent limitations for maximum daily and average monthly discharge levels. In addition, EPA may evaluate the volume of wastewater, as well as the mass of pollutant generated per ton of product (e.g., gallons of wastewater per pounds of meat slaughtered, pounds of ammonia

generated per pound of raw material processed). This evaluation may be used to determine if certain product types generate different types of wastewater, and if subcategorization is appropriate. EPA may develop production-normalized flows and/or pollutant loadings on which to base the limitations calculations for possible subcategories.

- Environmental Assessment - EPA will perform an environmental assessment to determine the potential impacts of MPP discharges on aquatic life and human health, as well as on the proper operation of POTWs and other treatment works. This assessment will characterize the potential risk posed by the discharges and will assist the Agency in projecting the environmental and economic benefits of the regulation.
- Estimation of Impacts on Sites - EPA will evaluate the economic impact of possible technology options on individual sites. The analysis will combine site-specific costs of compliance with site financial data suitably weighted for questionnaire respondents. These results will be statistically weighted to estimate the total costs and impacts of the possible regulation. A goal of the analysis will be to identify sites that might close due to pollution control requirements. A standard financial decision model would predict closure if the net present value of future income is negative. The forecasted income for the site is a major determinant of the net present value of continued operations. The income projections are calculated using the revenue information collected in the questionnaire, including the tax status of the site or its business entity. An estimated percentage of costs that the market will allow to pass through to the consumer will be incorporated into the projected revenue estimates. To complete the closure analysis, the questionnaire also provides data relevant to calculating the salvage value of the site, such as current assets, and the book value of land, buildings, and equipment, if deemed appropriate. Direct losses in output, revenue, and employment are calculated directly from the closure analysis results and questionnaire responses.
- Estimation of Impacts on Companies - The costs for all MPP sites that a given company owns will be estimated and aggregated. The combined cost to the company will be analyzed in the context of the company's financial status to evaluate the overall impact. The company-level impact analysis allows EPA to assess the effect of an effluent guideline at a different level of business organization. Companies that own multiple sites may not be able to afford the total cost of upgrading all facilities, even if it makes economic sense for each individual site. Because such financing decisions are commonly made at company-level rather than the site-level, EPA needs to assess economic impacts at the company-level in addition to the site-level. In the case of single-establishment firms, this component of the analysis is unnecessary because site-level and company-level impacts will coincide. Whenever possible, EPA will collect data needed to assess company-level impacts from secondary sources. This reduces the burden on questionnaire recipients. Secondary sources provide data for multi-site, publicly reporting

companies but are inadequate for single-site companies or multi-site, non-publicly reporting companies.

- Estimation of Secondary Impacts - EPA will assess the secondary impacts of projected site closures on other segments of the economy. For example, employment losses and reductions in derived demand for input goods/services could potentially erode the economic condition of households and firms in communities around closing MPP sites. Estimation of these community impacts depends upon employment and labor income data from the questionnaire effort, macroeconomic multipliers, general economic data, and economic data from secondary sources. EPA also plans to consider the secondary impacts felt by small businesses and foreign trade. EPA will utilize secondary sources whenever possible during these analyses to minimize the burden placed upon questionnaire recipients. Data from secondary sources will include detailed industry trade statistics, labor cost and commodity price indices, labor and commodity input requirement coefficients, regional income multipliers, regional employment, small business statistics, and other relevant secondary source information.

**16(b) Collection Schedule**

The specific dates for distribution, response receipt, and data collection activities for the questionnaire have not yet been established but will include the activities in Table 16-19.

**Table 16-19. Collection Schedule**

Activity	Estimate of Schedule
EPA notification to questionnaire recipients	15 days after OMB Approval
Facilities submit responses	1 - 2 months following receipt
EPA reviews responses and evaluates need for follow-up	3 months
EPA conducts follow-up to collect all missing or incomplete information	2 months
EPA completes questionnaire database	3 weeks
EPA selects and notifies sites for wastewater data request	1 month after OMB Approval
Wastewater data collection occurs	5 months
Wastewater data reviewed and analytical database populated	10 months

**16(c) Publication of Results**

All responses containing or consisting of CBI will be so identified in the questionnaire database. Regulations governing confidentiality of business information appear at 40 CFR Part 2 Subpart B, and these are adhered to strictly by EPA and its contractors. Safeguards and procedures for CBI are described in written plans maintained by EPA and its contractors.

Information not classified as CBI could potentially be shared with any interested parties. Such information is subject to Freedom of Information Act (FOIA) requests. Results of EPA's

analyses become publicly available most often in three ways: (1) within materials placed in the public docket supporting the rulemaking, (2) within development and supporting documents otherwise published in support of the rulemaking, and (3) within any proposed and final rules published in the *Federal Register* if the data is to be used in any rulemaking effort. These documents are available through EPA's website and on regulations.gov.

#### **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.

## **PART B OF THE SUPPORTING STATEMENT**

### **1. QUESTIONNAIRE RATIONALE**

The MPP Questionnaires will provide information essential to establishing a need for and developing, as necessary, revised regulations under Section 304(m) of the Clean Water Act. These data are essential for characterizing the nationwide and industry-specific status of MPP facilities' locations, the types of operations, wastewater characteristics, wastewater management technology, and for assessing the financial status of the industry potentially affected by proposed regulations.

#### **1(a) Population of Interest**

EPA intends to use responses from these questionnaires to inform further and more detailed analyses in the future. To obtain valuable information on the MPP industry's wastewater management practice, EPA has targeted MPP facilities with slaughtering, by-product processing, rendering, and further processing operations. The basic 5 domains of interest are: 1) Poultry slaughterers, 2) Meat slaughterers, 3) Poultry further processors, 4) Meat further processors, and 5) Renderers.

For the Census Questionnaire, EPA estimates the target population to consist of all MPP facilities in the US, approximately 7,000 facilities. This includes facilities of all sizes that perform operations across all five domains of interest.

For the Detailed Questionnaire, EPA estimates the target population to consist of 1,633 MPP facilities in the US, distributed across the industry based on size and type of operation. Large facilities are defined as those with operating production values based on data available from USDA. Details on how this target population was defined is addresses in Part B Section 2(a) Stratification/Sample Selection.

#### **1(b) Response rate/Non-response**

Non-response is relatively low for questionnaires sent under the authority of Section 308 of the Clean Water Act. The typical non-response rate for effluent guidelines questionnaires is 10 percent. EPA will employ several measures to reduce non-responses. The cover letter and instructions will explain the legal authority, responsibility to respond, reasons for the questionnaires, and penalty for nonresponse. Delivery or non-delivery of cover letters will be tracked using Federal Express or other traceable delivery option; thus, signatures of the recipients will be required to confirm receipt. E-mail and telephone helplines will be operated while the questionnaires are in the field so that technical, financial, and administrative questions can be addressed. Recipients not responding to the Census Questionnaire or Detailed Questionnaire by the deadline date may be telephoned or notified again by mail to encourage response, to answer questions, and to determine the reason(s) for the nonresponse.

To minimize non-response, EPA solicited comments on a draft list of questions and worked closely with industry experts to refine questions so that they are easy to understand with clearly defined and familiar terms, are formatted in a logical sequence, and request data that are

readily available within the industry. In this manner, EPA expects to minimize inaccurate or incomplete responses to questions that can occur due to misunderstanding and misinterpretation as well as the unintentional skipping of questions by respondents who respond via hardcopy (the electronic version of the questionnaires will prevent incomplete submissions).

The design and implementation of the questionnaires will employ several quality assurance techniques to reduce the frequency of such errors. These techniques include the following:

- Review of question language for ambiguity and clarity.
- Use of an easily followed sequence of questions and stopping points.
- Avoidance of questions requiring an open-ended response.
- Provision of a limited number of carefully considered responses to each question.
- Provision of clear definitions of units of measurement and of technical terms.
- Provision of clear instructions with references to the definitions.
- Provision of helplines via e-mail and a toll-free number to assist respondents.
- Review of questions by engineers, scientists, and economists who will telephone respondents to obtain missing information and resolve problems and inconsistencies.
- Use of a web-based questionnaire platform (Qualtrics) to require completion of all required questions.
- Provision of the Qualtrics platform to require specific response formats (e.g., numeric values where a number is requested) and acceptable value ranges.
- Use of double-entry keypunch verification on any hardcopy submittals.

## **2. COLLECTION OF INFORMATION**

### **2(a) Stratification/Sample Selection**

As the Census Questionnaire is to be distributed as a census, intended for response by all MPP facilities, no stratification or sampling scheme has been designed. The main data sources that contributed to the industry population are described in Part A Section 2(a) What Information Will Be Collected, Reported, or Recorded?

A stratification/sampling scheme has been designed for distribution of the Detailed Questionnaire. EPA will survey approximately 1,633 facilities with the Detailed Questionnaire. Stratification increases precision (reducing one source of uncertainty) for estimates of costs, benefits, and other quantities. The strata will be based on the stage of operation (slaughterer, processor, renderer), the meat type (meat, poultry), and the production volume based on production categories available from USDA FSIS. EPA has defined strata of 32 groups; however, five of these 32 groups have zero facilities, and therefore, will not be included in the Detailed Questionnaire population. This leaves a remaining 27 strata. Using the data available from USDA FSIS, EPA identified the following production volume categories:

- Volume 1 (very small facilities) – Less than 10,000 pounds per month processed and less than 1,000 head slaughters per year,
- Volume 2 (small facilities) – Between 10,000 and 100,000 pounds per month processed and between 1,000 and 10,000 head slaughtered per year,
- Volume 3 (medium facilities) – Between 100,000 and 1,000,000 pounds per month processed and between 10,000 and 100,000 head slaughtered per year,
- Volume 4 (large facilities) – Between 1,000,000 and 10,000,000 pounds per month processed and between 100,000 and 10,000,000 head slaughtered per year,
- Volume 5 (very large facilities) – Greater than 10,000,000 pounds per month processed and greater than 100,000,000 head slaughtered per year.

A size measure based on water discharged would be preferable, but this information does not exist in any available data source. It is assumed that the largest water dischargers will have larger production volumes, so using production as a stratification variable is a logical alternative. Table 2-20 presents the stratification scheme developed for the MPP industry. Table 2-21 shows the count of facilities in each stratum. These strata are based on the information in EPA’s facility list and include production volume, meat type, and type of processing. These counts include 316 renderers and 493 animal feeds facilities of unknown production. EPA also included separate strata for facilities that directly discharge wastewater. EPA identified these facilities as those with individual NPDES permits.

The sample for the Detailed Questionnaire will be from approximately 7,000 facilities. Facilities can fall into multiple strata with stratification as described above. Approximately 50 facilities will be selected with certainty to obtain information determined to be necessary for evaluating facility operations and best technology options. Also, it is anticipated that many very small facilities will not be eligible for the Detailed Questionnaire (e.g., out of business, not discharging water), not all sections and questions will be applicable. In drawing a sample, EPA used systematic sampling (with a random starting point in the frame) within each stratum, and sampling the same proportion across strata. Table 2-3 presents the sample size by stratum for the Detailed Questionnaire.

**Table 2-20. Detailed Questionnaire Stratification Levels**

Strata Level 1	Strata Level 2	Strata Level 3 <sup>a</sup>
Further Processing- Identified by SIC code 2047 and 2048 (dog and cat food, animal feed)		
Renderers		
Meat Slaughter	Production Volume 1	
Poultry Slaughter	Production Volume 1	
Further Processing (All Types)	Production Volume 1	
Meat Slaughter	Production Volume 1	Direct discharge
Poultry Slaughter- Direct	Production Volume 1	Direct discharge
Further Processing (All Types)	Production Volume 1	Direct discharge
Meat Slaughter	Production Volume 2	
Poultry Slaughter	Production Volume 2	
Further Processing (All Types)	Production Volume 2	

**Table 2-20. Detailed Questionnaire Stratification Levels**

<b>Strata Level 1</b>	<b>Strata Level 2</b>	<b>Strata Level 3<sup>a</sup></b>
Meat Slaughter	Production Volume 2	Direct discharge
Poultry Slaughter- Direct	Production Volume 2	Direct discharge
Further Processing (All Types)	Production Volume 2	Direct discharge
Meat Slaughter	Production Volume 3	
Poultry Slaughter	Production Volume 3	
Further Processing (All Types)	Production Volume 3	
Meat Slaughter	Production Volume 3	Direct discharge
Poultry Slaughter- Direct	Production Volume 3	Direct discharge
Further Processing (All Types)	Production Volume 3	Direct discharge
Meat Slaughter	Production Volume 4	
Poultry Slaughter	Production Volume 4	
Further Processing (All Types)	Production Volume 4	
Meat Slaughter	Production Volume 4	Direct discharge
Poultry Slaughter- Direct	Production Volume 4	Direct discharge
Further Processing (All Types)	Production Volume 4	Direct discharge
Meat Slaughter	Production Volume 5	
Poultry Slaughter	Production Volume 5	
Further Processing (All Types)	Production Volume 5	
Meat Slaughter	Production Volume 5	Direct discharge
Poultry Slaughter- Direct	Production Volume 5	Direct discharge
Further Processing (All Types)	Production Volume 5	Direct discharge

a – Strata level 3, those that have a direct discharge were identified based on which facilities have an individual NPDES permit.



Table 2-21. Detailed Questionnaire Stratification

Strata	Production Volume 1 <sup>a</sup>	Production Volume 2 <sup>b</sup>	Production Volume 3 <sup>c</sup>	Production Volume 4 <sup>d</sup>	Production Volume 5 <sup>e</sup>	Unknown Production Volume	All Production Volumes
Meat Slaughter	268	276	134	100	3	0	781
Poultry Slaughter	4	19	32	78	119	0	252
Further Processing - All	1,057	1,790	1,108	713	345	2	5,015
Further Processing - Dog and cat food, animal feed						493	493
Renderers						316	316
Meat Slaughter - Direct discharge	0	2	5	23	0	0	30
Poultry Slaughter - Direct discharge	0	0	0	6	48	0	54
Further Processing All - Direct discharge	1	6	13	25	75	0	120
<b>Total</b>	<b>1,330</b>	<b>2,093</b>	<b>1,292</b>	<b>945</b>	<b>590</b>	<b>811</b>	<b>7,061</b>

a - Less than 10,000 pounds per month processed and less than 1,000 head slaughters per year,

b - Between 10,000 and 100,000 pounds per month processed and between 1,000 and 10,000 head slaughtered per year,

c - Between 100,000 and 1,000,000 pounds per month processed and between 10,000 and 100,000 head slaughtered per year,

d - Between 1,000,000 and 10,000,000 pounds per month processed and between 100,000 and 10,000,000 head slaughtered per year,

e - Greater than 10,000,000 pounds per month processed and greater than 100,000,000 head slaughtered per year.

**Table 2-22. Detailed Questionnaire Sample Size**

<b>Strata</b>	<b>Production Volume 1<sup>a</sup></b>	<b>Production Volume 2<sup>b</sup></b>	<b>Production Volume 3<sup>c</sup></b>	<b>Production Volume 4<sup>d</sup></b>	<b>Production Volume 5<sup>e</sup></b>	<b>Unknown Production Volume</b>	<b>All Production Volumes</b>
Meat Slaughter	106	107	84	73	3	0	373
Poultry Slaughter	4	19	32	65	80	0	200
Further Processing - All	132	136	132	126	112	0	638
Further Processing - Dog and cat food, animal feed						120	120
Renderers						110	110
Meat Slaughter - Direct discharge	0	2	5	23	0	0	30
Poultry Slaughter - Direct discharge	0	0	0	6	48	0	54
Further Processing All - Direct discharge	1	6	13	25	63	0	108
<b>Totals</b>	<b>242</b>	<b>270</b>	<b>266</b>	<b>318</b>	<b>306</b>	<b>230</b>	<b>1,633<sup>f</sup></b>

a - Less than 10,000 pounds per month processed and less than 1,000 head slaughters per year,

b - Between 10,000 and 100,000 pounds per month processed and between 1,000 and 10,000 head slaughtered per year,

c - Between 100,000 and 1,000,000 pounds per month processed and between 10,000 and 100,000 head slaughtered per year,

d - Between 1,000,000 and 10,000,000 pounds per month processed and between 100,000 and 10,000,000 head slaughtered per year,

e - Greater than 10,000,000 pounds per month processed and greater than 100,000,000 head slaughtered per year.

f – Approximately 50 facilities across all strata will be selected with certainty.

### **3. ESTIMATION PROCEDURE**

As the Census Questionnaire is designed as a census, no sample size estimation is needed. However, there will be some nonresponse, thus EPA will not have perfect information and will analyze this after results are received.

The sample size identified in Table 2-3 is based on anticipated response rates. EPA estimated the response rate when calculating the sample size based on historic data and information from the ICR conducted in support of the previous MPP ELG. As noted previously in this supporting statement, the typical non-response rate for effluent guidelines questionnaires is 10 percent. The ICR conducted as part of the 2004 MPP ELG was consistent with this standard, with response rates from 91 to 93 percent (a non-response rate of 7 to 9 percent). EPA expects the non-response rate to the Detailed Questionnaire to be similar, roughly 10 percent. The rate of full responses, facilities that found all or almost all sections of the previous MPP ICR applicable, was roughly 67 percent. To estimate the required sample size for this Detailed Questionnaire, EPA assumed a similar rate of full responses. EPA estimates that 10 percent of facilities will not respond, 23 percent of facilities will be non-applicable for all parts of the questionnaire, and the remaining 67 percent will provide full responses.

### **4. ACCURACY/PRECISION**

The Census Questionnaire is being distributed as a census; therefore, no estimation of sample size is needed. While 5,367 facilities will complete only the Census Questionnaire, the same questions will be completed by those facilities selected to complete the Detailed Questionnaire. As a result, EPA's resulting dataset will include responses to the Census questions for all MPP facilities.

EPA is developing a national rule and is concerned with the precision of the overall facility-level estimates which inform the industry profile, and the estimates made within strata which inform the industry subcategories and economics at various production scales. Because a sample of facilities will be given the Detailed Questionnaire rather than all facilities within the target population, it follows that some degree of uncertainty will be associated with estimates made from the data collected. The precision of these estimates depends on both the sample design and the sample size – that is, the number of facilities selected. One measure of precision is the width of the confidence interval for the estimate. Confidence intervals provide a range of values for a particular estimate that would be likely if the study were repeated an infinite number of times. EPA estimated the number of questionnaire responses needed for each stratum based on a 95 percent confidence level and 10 percent acceptable sampling error within each stratum (with a conservative assumption about percentage responding to a binary yes/no question). A survey plan must balance the desired level of detail, acceptable error, and sample size. More detail, such as sampling each production volume category, meat type and process type requires more strata, which requires a larger sample size. A low acceptable error also requires a larger sample size. For example, an error of +/- 5 percent would require 3,715 facilities receive the questionnaire. Aggregating strata and/or increasing the acceptable error are ways to decrease the sample size but results in lower detail and higher error. For example, an error of 20 percent would reduce the sample size to 590 facilities. The numbers and analysis discussed above are all based on reporting unweighted statistics at the level of the strata.

EPA expects to include certainty select facilities as part of the Detailed Questionnaire sample frame. These certainty selects will be primarily larger facilities.

## **5. SPECIALIZED SAMPLING PROCEDURES**

No special sampling procedures are planned for this questionnaire.

## **6. DATA COLLECTION**

This will be a single incident data collection; no periodic data collection is planned at this stage. Under this ICR, EPA intends to conduct a Census Questionnaire and Detailed Questionnaire of the MPP industry. The collection methods for each of these efforts have been described previously in this supporting statement.

## **7. RESPONSE RATE/NON-RESPONSE/DATA UTILITY**

### **7(a) Response Rate**

EPA expects that the response rate will be relatively high for this mandatory questionnaire effort, which will be conducted under the authority of Section 308 of the Clean Water Act. The sample size for the Census and Detailed Questionnaire is 7,000 facilities. The typical non-response rate for effluent guidelines questionnaires is 10 percent. EPA has adjusted the sample size for the Detailed Questionnaire to help ensure that the effective sample sizes (i.e., respondents) would be sufficient for precision requirements based on the non-response rate and estimated full responses described in Part B, Section 3. In addition to increasing the initial sample size, EPA would strive to improve the response rate by reminder letters, emails, and/or telephone calls. Furthermore, after receiving the responses, EPA intends to adjust the questionnaire weights based on the actual non-response rate and to review publicly available information in order to determine if non-respondents appear to have different characteristics than respondents. EPA would examine these characteristics both for the entire industry and for subgroups in the analyses. For any differences, EPA intends to determine the major causes, and to incorporate appropriate adjustments for bias.<sup>2</sup>

### **7(b) Non- response**

EPA recognizes that some non-response is unavoidable, and in past questionnaire efforts, EPA has waived the duty to respond in extreme and rare cases (e.g., natural disasters) which also might occur for this survey effort. As noted throughout this supporting statement, EPA will implement efforts to reduce non-response, including use of an easy-to-use format, operating helplines, and following up with potential non-respondents.

### **7(c) Burden Reduction**

EPA designed the Census and Detailed Questionnaires to include burden-reducing features. The Census Questionnaire contains initial screening questions that direct respondents

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<sup>2</sup> Bias is the difference between the expected value of an estimate and the true value of a parameter or quantity being estimated. If the data collection process generates estimates that are consistently (or on average) above or consistently below the true value, the data collection process is biased

that do not qualify as MPP facilities to indicate their status and then submit their initial responses without the need to respond to the remaining questions. The sections within the Detailed Questionnaire also contain screening questions which direct respondents to skip questions or whole sections that reference activities or operations that are not conducted at the MPP facility. The Census and Detailed Questionnaires also group similar topic questions together and will offer drop-down menu and checkbox selections to simplify responses, thus minimizing the number of text responses requiring input.

The Census Questionnaire consists of 24 questions and should not require a burden of more than 6 hours (on average) for each facilities' respondents to complete, verify, and submit. The Detailed Questionnaire consists of 81 questions and should not require a burden of more than 24 hours (on average) for each facility's respondents to complete, verify, and submit. EPA will implement the questionnaires online which will facilitate access and completion.

For those respondents without internet access, the cover letter and instruction packet will inform the respondent on how to request a paper questionnaire that can then be completed and mailed to EPA's contractor for input into the electronic system. EPA therefore concludes that completing the questionnaires does not represent an overly burdensome task.

#### **7(d) Data Utility**

The data collected through this ICR will serve to update current information, fill in missing data, and profile the universe of MPP facilities with sufficient information to support ELG revisions. Subsequently, if EPA pursues a rulemaking, data will be used to conduct further analyses of the MPP industry and support proposed and/or final rulemaking analyses.

### **8. TESTS OF PROCEDURES**

EPA does not intend to pre-test the questionnaires. For more than 30 years, EPA's Engineering and Analysis Division (EAD) has conducted surveys of numerous industrial sectors to collect information to support regulation development activities in the effluent guidelines program. While EPA develops different questionnaires for each industry, there are common elements for all industries. The questionnaires collect the same basic data such as information about processes, treatment, and financial status. Thus, when EPA develops a questionnaire for a particular industry, it generally tailors the questions for specific terms and processes used by that industry. In past years, EPA has relied predominantly on active participation by trade groups and their members in reviewing the questionnaires. In EPA's experience, such collaboration generally tends to better reflect the industry at large than pre-tests. As discussed in Part A of this supporting statement, EPA has already engaged several trade associations and industry experts regarding this data collection. EPA expects to continue to discuss and refine this questionnaire with industry experts prior to implementation. For this reason, EPA considers additional review through the pre-test process to be unnecessary for this industry.

### **9. CONTACT INFORMATION**

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