

Filter Adoption Survey
(EPA ICR No. 2615.02, OMB Control No. 2008-0003)

Short Characterization/Abstract

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

“Filter Adoption Survey (Renewal)” EPA ICR Number: 2615.02; OMB Control Number: 2008-0003

1(b) Short Characterization/Abstract

Under Section 1415(a)(3) of the Safe Drinking Water Act, on December 16, 2019, the U.S. EPA granted Denver Water, a public water system, a variance (2019 Variance) from the definition of “optimal corrosion control treatment” in 40 C.F.R. 141.2. On November 30, 2022, a new variance (2022 Variance) was issued in order to allow the variance conditions to be extended. Per the Variance, to determine the efficacy of the filter program, Denver Water will conduct the “Filter Adoption Survey” every other year to determine the consumer filter adoption rate and assess whether consumers are properly using and maintaining the filters. Only one survey will be conducted (in 2025) for this three-year renewal period.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

The Safe Drinking Water Act (SDWA) Section 1415(a)(3) gives the EPA the authority to issue a variance from a treatment technique requirement upon showing that an alternative is “at least as efficient” in lowering the level of the contaminant with respect to which such requirement was prescribed [in this case, optimal corrosion control treatment, OCCT].” In the 2019 Variance, the survey was a key component in statistically evaluating the lead reduction program’s (LRP) equivalency. Under the new variance, the survey will be conducted every other year to reduce survey fatigue and compensate for a smaller participant pool (as a result of lead service lines being removed).

2(b) Practical Utility/Users of the Data

EPA will use the survey results that Denver Water distributes every other year (2025) to determine the consumer filter adoption rate and to confirm whether customers are using and maintaining the filters correctly.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

The information to be obtained under this ICR has been collected in the first three years of the 2019 Variance (EPA ICR # 2615.01) but has not been collected by the EPA, any other federal agency, or Denver Water previously.

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

The EPA publicly noticed this ICR in the *Federal Register* which was published on February 17, 2023. No comments were received in response to this notice.

3(c) Consultations

The EPA has been in continuous contact with Denver Water and other interested parties on the subject of the 2019 and 2022 variances and their associated surveys.

3(d) Effects of Less Frequent Collection

The Variance requires that Denver Water conduct the survey every other year beginning in 2023. Therefore, after the 2023 survey, Denver Water must conduct another survey in 2025. The survey conducted under the 2019 Variance showed consistent results after annual surveys for three years. So, to avoid survey fatigue, it was determined that the 2022 Variance would reduce the survey frequency to a biennial basis. The filter adoption survey is related to other components of the Variance such as lead service line removal and education, communication, and outreach efforts, among other components.

3(e) General Guidelines

None of the collection activities described within this trigger or exceed the conditions cited at 5 CFR 1320.5(d)(2) as requiring special justification.

3(f) Confidentiality

EPA will receive summarized information from the surveys in Denver Water's 2025 annual report. Denver Water will submit the report to the EPA through encrypted emails that will be opened only on a secured network. EPA will store the report on restricted drives.

3(g) Sensitive Questions

The survey results may contain sensitive information in the form of customer IDs that are used to identify specific households. These are included to assist Denver Water should it need to provide specific communications, outreach, or educational information to specific households based upon their filter adoption survey results. Additionally, the survey includes optional sensitive

questions related to race, gender, age, education, income, and primary languages spoken in the household. This information will inform Denver Water, CDPHE, and the EPA of the filter adoption rate by neighborhood or demographic group so Denver Water's health equity and environmental justice principles set forth in their variance request can be evaluated. Denver Water will utilize this information to help inform future decisions pertaining to lead service line removal schedules and to improve its communication, education, and outreach efforts aimed at vulnerable populations at greatest risk from lead exposure. For example, as Denver Water's variance submittal notes, if certain geographic areas or demographic groups are not responding to the survey, then Denver Water would carry out additional communication, outreach, and education activities to understand the issue and improve survey responses. This information will also help ensure Denver Water's follow-up efforts are linguistically and culturally appropriate for the communities targeted.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

Eligible respondents for the survey are individuals 18 years of age or older who are customers of the water system that Denver Water owns and operates (as well as integrated systems as referenced in the Variance). Respondents will be those homeowners confirmed to be enrolled in the filter program and have a LSL, are likely to have a LSL, or have galvanized lines requiring replacement. No businesses are targeted for this survey so Standard Industrial Classification (SIC) codes are not required. For each survey year an estimated 20,000 of these customers will be randomly selected to receive the survey from Denver Water. This number was set to ensure the minimum number of surveys (as defined in the Variance) is met assuming a 10% response rate. It is expected that those who have not received a survey in past or current rounds of the survey will be targeted in future rounds.

4(b) Information Requested

4(b)(i) Data items, including recordkeeping requirements

The recordkeeping requirements that Denver Water must comply with under the Variance, including those related to the filter adoption survey, are consistent with recordkeeping requirements under the existing Lead and Copper Rule. Denver Water is required to submit a summary of the information collected from the survey, including the filter adoption rate and information about filter use and maintenance in the 2025 annual report to the EPA and CDPHE.

4(b)(ii) Respondent Activities

To assemble this information collection, Denver Water composed the filter adoption survey. Denver Water will submit the survey analysis results to the EPA and CDPHE electronically. Denver Water will store the information on its own information platforms as described in Part B of the supporting statement. The respondents to the survey will experience only minimal burden associated with assembling and reporting their information. It is not expected they will retain or store their responses.

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

5(a) Agency Activities

EPA will review the summary of results that Denver Water will submit in their 2025 annual report. The EPA will store the annual report in a restricted drive.

5(b) Collection Methodology and Management

Information about the survey, its processing, and the database that Denver Water will use is detailed in Part B. The survey information will be obtained online, through mail, and in-person. Denver Water anticipates sending as many as 20,000 surveys in multiple waves (in English and Spanish) primarily through direct mail. Those receiving the survey via direct mail, will have the option to return their results on the prepaid mailer/form or online. Direct mail pieces will have a unique code used to track the location of returned surveys. The same questions used in the mailed and electronic surveys will be used during the 50 in-person interviews that Denver Water is required to conduct every six months. These 300+ in-person customer surveys are figured in to the 20,000 distributed, and 2,000 returned, response counts noted above. The burden for those respondents contacted for an in-person survey should be the same or less than respondents who are responding to the survey by mail or electronically because Denver Water will simultaneously conduct the in-person survey during its visit with the customer to collect compliance tap samples and customers will be able to either directly hand the survey responses back to the Denver Water staff person (rather than having to mail it in) or submit their surveys electronically. The estimated burden for customer respondents, including those responding in-person, is further described in Section 6(e)(i), Table 1, below.

5(c) Small Entity Flexibility

This survey will be administered to individuals, not businesses. Thus, no small entities will be affected by this information collection.

5(d) Collection Schedule

The surveys are scheduled to be sent to respondents in the estimated timeframe of August 31 through September 4, 2025. Denver Water will have until the end of the calendar year to analyze and report the data to the EPA.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

The EPA and Denver Water estimate that on average it will take each respondent about 15 minutes to review the introductory materials, complete the survey, and mail or submit the survey.

Denver Water is expected to spend roughly 468 hours (or 159 on average annually) working to prepare and distribute the survey, record and analyze responses, and include results in the Annual Report.

6(b) Estimating Respondent Costs

6(b)(i) Estimating Labor Costs

Estimated respondent costs were based on the Bureau of Labor Statistic’s mean hourly wage for all occupations in the Denver metro area (\$32.09). This wage rate was then multiplied by the standard overhead factor of 1.6, resulting in a loaded hourly wage rate of \$51.34.

6(b)(ii) Estimating Capital and Operations and Maintenance (O&M) Costs

Denver Water encouraged participation by offering a drawing for a monetary reward in the form of gift cards in past surveys for 1,000. Denver Water will continue to encourage participation in the survey by offering respondents the opportunity to participate in a drawing for a \$1,000 gift cards. This \$1,000 expense is included in the 2025 survey costs. See Table 2.

6(c) Estimating Agency Burden and Costs

Agency costs arise from staff reviewing and approving the survey and reviewing the summary data in the annual report. See the detailed data in the table in section 6(e).

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

The EPA expects Denver Water to send up to 20,000 surveys in 2025 and receive approximately 2,000 responses in return. Denver Water is also considered a single respondent. The total annual burden and cost for survey respondents and Denver Water is approximately 322.66 hours and \$22,111.33 for the 2025 survey. Burden and costs associated with the 2025 survey have been divided by three (the approval period for an ICR) to produce average annual figures. See section 6(e) for details.

6(e) Bottom Line Burden Hours and Costs Tables

Please see 6(e)(i) through 6(e)(iii).

Respondent Category	Burden Hours per year	Total Cost per year
Denver Water customers	166.67 *	\$8,556.83 **
Denver Water	156***	\$ 13,554.66
Total cost per year	322.67 hours	\$22,111.33

for respondents		
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*2,000 surveys will take each respondent .25 hours or 500 hours in 2025 or 166.67 hours per year..

** 166.83 hours per year multiplied by Denver area wage multiplied by the standard overhead of 1.6 or \$51.34 per hour.

***Estimates from Denver Water.

6(e)(i) Respondent Tally

Estimated time and burden for the customer respondents is

Table 1 Total Estimated Burden and Cost for Customers to Complete the Survey				
Number of respondents over a three year period	Hours per respondent	Hourly rate per respondent	Cost Per Year	Total Cost over three Years
<u>2,000 surveys*</u>	<u>.25 hours</u>	<u>\$51.34 per hour**</u>	<u>\$8,556.67</u>	<u>\$25,670</u>
<p>*Denver Water’s response rate since 2013 for an end-user survey yields a response rate between 9% and 13%. EPA has decided to use and expected response rate of 10% for this survey and its ICR. Approximately 15% of these surveys will constitute the in-person surveys.</p> <p>**This estimate is from Bureau of Labor (below) and is the mean average of all occupations in the Denver area as of January 2023 and includes the standard overhead factor of 1.6 https://www.bls.gov/oes/current/oes_19740.htm#00-0000</p> <p>***2,000 surveys will take each respondent .25 hours or 500 hours in 2025 or 166.67 hours per year. 166.67 hours per year multiplied by the mean Denver area wage (\$34.52) multiplied by the standard overhead of 1.6 for a loaded average wage of \$51.34 per hour.</p>				

Table 2 Total Estimated Burden and Cost for respondent Denver Water per year *			
Description	Hours	Hourly Rate	Cost
Revise and approve survey for 2025 per year	Staff: 3.33 Management: 0.66	Staff: \$110 ** Management: \$220***	\$366.3 \$145.2
Identify participants and conduct in-person surveys for (include travel time to these customer premises).	Staff: 98	Staff: \$50	\$4,900
Database development	Database Development: Staff: 2.33 Database Development Staff: 2.33 Database Development Management: 1	Database Development: Staff: \$110 Database Development Staff: \$150***** Database Development Management: \$220	\$256.3 \$349.5 \$220
Mail surveys and cost of the mailings	Assume 20,000 surveys sent Staff: 1	Staff: \$50	\$50 Cost to print \$133.33 Cost to mail \$1,111
Process survey responses and any associated additional costs	Assume 2,000 surveys returned (10% + in-person) Process Surveys Staff: 18 Process Surveys Management: 2.6	Process Surveys Staff: \$110 Process Surveys Management: \$220	\$1,980 \$572
Collect and input data into a data base, time to organize and sort and analyze the data and time to develop a report per the LRPP, time for other activities (staff, management, administrative)	Assume 2,000 surveys returned (10% + in-person) Input Survey Data Staff: 18 Report Preparation Staff: 4.6 Process Surveys Management: 2.66	Input Survey Data Staff: \$110 Report Preparation Staff: \$110 Process Surveys Management: \$220	\$1,980 \$506 \$585.2
Gift cards (O&M)	Report Preparation Staff: 4	Report Preparation Staff: \$50	\$ 200 \$333.33 gift cards Total 1,200
Total (hours and cost) Budget	158.5		\$13,554.66

Table 2 Total Estimated Burden and Cost for respondent Denver Water per year *			
Description	Hours	Hourly Rate	Cost
Total Budget per year		\$ 13,554.66	
Total Budget (three years) 468 (hours)		\$40,663.98	

*The wage rates are the average wage rates for employees that Denver Water pays for salaries as of 2023.

**Consultant staff admin support rate.

***Consultant staff program manager rate.

****Denver Water Administrative Assistant Mid-Range.

*****Consultant staff database lead rate

6(e)(ii) The Agency Tally

Estimated time and burden for EPA Region 8 to approve the Survey

Table 3 Total Estimated Burden and Cost Summary for EPA			
Technical staff	3 hours	GS 13 step 10 67.60 per hour	\$202.8
Attorney	2 hours	GS 14 Step 10 79.89 per hour	\$159.78
Management	2 hours	GS 14 Step 10 79.89 per hour	\$159.78
Annual Cost			\$522.36

Estimated time and burden for EPA Region 8 to review the data related to the survey per the annual report

Table 4 Total Estimated Burden and Cost Summary for EPA			
Technical staff	1 hours	GS 13 step 10 67.60 per hour	\$67.60
Attorney	1 hours	GS 14 Step 10 78.89 per hour	\$78.89
Management	1 hours	GS 14 Step 5 78.89 per hour	\$78.89
Annual Cost			\$227.38

Note: The burden for EPA is less when compared to the surveys required under the 2019 Variance because only one survey will be conducted during this ICR renewal period, in 2025 (rather than every year).

6(e)(iii) Variations in the Annual Bottom Line

We do not anticipate significant variation (>25%) in the respondent reporting/recordkeeping burden.

6(f) Reasons for Change in Burden

No changes in burden.

6(g) Burden Statement

For the Filter Adoption Survey, the public reporting burden is estimated to average 0.25 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers 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 Number R08-OW-2019-0404], which is available for online viewing at www.regulations.gov, or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view 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. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ or R08-OW-2019-0404 and OMB Control Number 2008-NEW in any correspondence.