U.S. Environmental Protection Agency
Information Collection Request

Title: Information Collection Request for the Proposed Lead and Copper Rule Improvements (LCRI)

OMB Control Number: 2040-NEW

EPA ICR Number: 2788.01

Abstract: The National Primary Drinking Water Regulations (NPDWRs) for Lead and Copper (The Lead and Copper Rule or LCR), promulgated by the U.S. Environmental Protection Agency (EPA) in 1991, is a regulation promulgated under the Safe Drinking Water Act (SDWA). The LCR's goal is to reduce the levels of lead and copper in drinking water. The proposed Lead and Copper Rule Improvements (LCRI) builds upon the LCR and subsequent revisions including the most recent 2021 Lead and Copper Rule Revisions (LCRR). The proposed LCRI would require community and non-transient non-community water systems[1] to replace lead service lines (LSLs) and galvanized requiring replacement (GRR) service lines (galvanized lines currently or previously downstream of an LSL) and, under specified conditions, install source water treatment, install and/or reoptimize corrosion control treatment (CCT), conduct public education, or distribute and maintain point-of-use (POU) treatment. The proposed LCRI also expands public education requirements for lead and requires greater public access to information on lead.

The proposed LCRI is designed to identify and reduce lead exposure at systems with elevated lead concentrations in their drinking water by establishing a new lead action level (AL) of 10 micrograms per liter (µg/L). Note, the maximum contaminant level goals (MCLGs) for both lead and copper have not been modified by the proposed LCRI. See the *Economic Analysis for the Proposed Lead and Copper Rule Improvements* (available in the docket at EPA-HQ-OW-2022-0801 at www.regulations.gov) for detailed information on the specific regulatory requirements of the rule.

Water systems include Federal, state, tribal, and local governmental entities as well as private entities. States (and tribes) that have been granted primary enforcement authority (*i.e.*, primacy) for the LCR are responsible for overseeing rule implementation by systems within their jurisdiction. In instances where a state or tribe does not have primacy, the EPA Region is the primacy agency.[2] Systems demonstrate compliance through reporting information to the State. States utilize the data to determine compliance and approve service line replacement plans that target the removal of lead service lines that, where present, are the greatest source of lead exposure in drinking water. States also are required to report a subset of the data to EPA, which utilizes this information to protect public health by ensuring compliance with the LCR, measuring progress toward meeting the LCR's goals and evaluating the appropriateness of state implementation activities. The information reported by States to EPA can be found in the Safe Drinking Water Information System (SDWIS).

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[1] Community water systems (CWSs) are public water systems (PWSs) that have at least 15 service connections used by year-round residents or regularly serve at least 25 year-round residents. Non-transient non-community water systems (NTNCWSs) are PWSs that are not CWSs but regularly serve at least 25 of the same persons over six months a year. Throughout the rest of this document, the reference to water systems, systems, utilities, and PWSs include only these two types of PWS.

[2] Throughout the rest of this document, the term State refers to a state, territory, or federally recognized tribe that has been granted primacy with respect to the LCRI or the appropriate EPA Region (where the state, territory, or tribe does not have primacy).

EPA is proposing to require water systems to replace lead service lines, remove the LCRR-established lead trigger level, reduce the lead action level to 0.010 milligrams per liter (mg/L), and strengthen tap sampling procedures, among other changes that would improve public health protection and simplify the rule relative to the 2021 LCRR. This proposed rule provides improvements in the additional following areas: CCT, public education and consumer awareness, requirements for small systems, and sampling in schools and child care facilities. EPA's proposed rule aims to address potential disproportionate impacts of lead in drinking water in communities, including through proposed lead and GRR service line replacement and public education, among other areas of the proposed rule. This proposed rule also aims to increase transparency of lead and copper sampling through proposing individual sample results be provided to consumers regardless of the level found.

This ICR supporting statement estimates the incremental burden impacts of revisions to the LCR and 2021 LCRR in terms of the burden and costs for the first three years after the rule is published (estimated as 2024 to 2027). The LCRI implementation period overlaps with the LCRR renewal and supplemental ICR and supersedes or removes some LCRR requirements. As a result, the initial burden and cost estimates for the LCRI double-count burden estimates in the requested *Information Collection Request for the Lead and Copper Rule Revisions* (OMB Control Number 2040-0297; EPA Tracking Number 2606.03). EPA provides an estimate of the double counting and subtracts that amount from the final net estimates.

During the three-year period covered by this ICR, public water systems will conduct one-time startup activities that include the following:

- reading and understanding the rule;
- assigning personnel and resources for rule implementation;
- attending training and receiving technical assistance from the State;
- updating and submitting to the State a baseline service line inventory that includes lead connector information;
- Preparing and submitting to the State a service line replacement plan; and
- developing and submitting to the State for approval public education materials for customers with lead, GRR, and unknown service lines that must be delivered annually.

During this time period, public water systems will also conduct on-going activities that include the following:

- collect service line information during normal operations and conduct targeted field operations to update the material status of unknown service lines;
- update and submit annually the service line inventory as unknown service lines are identified; and
- distribute public education materials to customers with lead, GRR, and unknown service lines annually.

Also, during the three-year period cover by this ICR, States will incur burden associated with one-time startup activities that include the following:

- adopting the rule into State regulations and developing an implementation program;
- modifying their data system;

- providing internal State staff with training for implementation;
- providing system staff with training and technical assistance;
- reviewing baseline inventories with lead connector information;
- reviewing service line replacement plans; and
- providing templates and reviewing public education materials for customers with LSLs, GRR service lines, and unknown service lines.

States will also conduct the on-going activity of reviewing systems' annual updates of their inventories in the initial three years after publication of the rule.

Activities outside the initial three-year period are not included in this ICR supporting statement's burden estimates. Exhibit 1-1 in Chapter 1, Section 1.1 of EPA's Economic Analysis of the proposed LCRI (available in the docket at EPA-HQ-OW-2022-0801 at www.regulations.gov) summarizes the additional activities required by the proposed LCRI that will take place after the initial three years covered by this ICR.

For the first three years after the rule is published, the average burden associated with this ICR is estimated to be 2,809,824 burden hours per year.[3] The corresponding costs are estimated to be $371,746,927 per year. EPA estimates the average respondent burden for PWSs to be 2,526,459 hours per year. Respondent costs for PWSs are estimated to be $354,748,901 per year. The Agency estimates that the average burden for States is 283,366 hours per year. The corresponding respondent costs for States are estimated to be an average of $16,998,026 per year. The rule implementation activities and the development of public education materials for PWSs are assumed to occur in the first year, the service line replacement plan is assumed to occur in the third year, and the updates to the service line inventory and public education distribution are spread over the first three years. The State adoption, training, and inventory review costs are distributed over the first three years while the State development of the public education template and review of the public education material is assumed to occur in the first year. The State review of the service line replacement plan is assumed to occur in the third year. There is no Agency burden or cost except where the Agency acts as the primacy agency. However, burden and costs for cases where the Agency acts as the primacy agency are accounted for under the State burden estimates.

The total number of respondents for this ICR is 67,003. Fifty-six of these respondents are States, and the remaining 66,947 respondents are water systems. As the LCRI implementation period overlaps with the submitted LCRR renewal ICR, the initial burden and cost estimates for the LCRI double-count burden estimates in the requested LCRR ICR. EPA removes that double-counting in the final net estimates. The net average burden associated with this ICR is estimated to be -1,483,636 burden hours per year. The corresponding total respondent costs are estimated to be $67,123,536 per year. EPA estimates the respondent burden for PWSs to be -1,206,521 hours per year. Respondent costs for PWSs are estimated to be $87,572,772 per year. The Agency estimates that the respondent burden for states is -277,155 hours per year. The corresponding respondent costs for States are estimated to be -$20,449,235 per year. The average annual net burden per response is -0.06 hours. The average annual net cost per response is $2.50.

Supporting Statement A

[3] Results show the upper bound estimate for the number of lead lines located in NTNCWS, Chapter 4 of the EA documents a difference of approximately 5 lines between the upper- and lower-bound estimates.

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

EPA needs comprehensive and current information on lead and copper occurrence and associated enforcement activities to implement its program oversight and enforcement responsibilities mandated by SDWA. EPA identified rule changes in the proposed LCRI that clarify the LCRR requirements and ensure and improve protection of public health through reduction in lead exposure. EPA will use the information collected to support the responsibilities outlined in SDWA. EPA will be able to strengthen rule implementation in the areas of monitoring, customer awareness, CCT, and service line replacement. The proposed LCRI does not alter the current MCLGs or treatment technique approach to controlling lead and copper in drinking water.

The authority for this collection is derived from different parts of SDWA, including the definition for a "primary drinking water regulation" under Section 1401(1)(D) of SDWA, which requires that a "primary drinking water regulation means a regulation" that "contains criteria and procedures to assure a supply of drinking water which dependably complies with such maximum contaminant levels [or treatment techniques promulgated in lieu of a maximum contaminant level]; including accepted methods for quality control and testing procedures to [e]nsure compliance with such levels and to [e]nsure proper operation and maintenance of the system…" Furthermore, Section 1445(a)(1)(A) of SDWA requires that "[e]very person who is subject to any requirement of this subchapter or who is a grantee, shall establish and maintain such records, make such reports, conduct such monitoring, and provide such information as the Administrator may reasonably require by regulation to assist the Administrator in establishing regulations under this subchapter, in determining whether such person has acted or is acting in compliance with this subchapter…" In addition, Section 1413(a)(3) of SDWA requires primacy agencies to "keep such records and make such reports…as the Administrator may require by regulation." The sections from the SDWA 1996 Amendments, discussed above, are included as Appendix A to this document.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Primary users of the data collected under this ICR are EPA, water system managers, consumers, and primacy agencies (*i.e.*, state, territorial, and tribal regulators and, in some instances, the EPA Regional Administrators). This section contains more information about how the lead and copper data generated by the proposed LCRI regulatory changes will be used. The proposed requirements discussed below pertain to the initial three-year period following promulgation of the LCRI covered by this ICR. For a detailed list of all proposed LCRI regulatory changes see Chapter 1 of the EPA's *Economic Analysis for the Proposed Lead and Copper Rule Improvements* (available in the docket at EPA-HQ-OW-2022-0801 at www.regulations.gov).

The proposed LCRI assumes that systems will have completed an initial service line inventory to comply with the requirements of the LCRR. This initial assessment is based on a comprehensive service line materials inventory that identifies LSLs, GRR service lines (galvanized pipes that are currently or have been downstream of an LSL), lead status unknown (service line material is not known to be lead,

GRR, or a non-lead service line), and non-lead service lines. The proposed LCRI includes additional requirements to review records for information on connector materials and include lead connectors in the baseline inventory by the compliance data of the proposed LCRI. This updated inventory must include a street address with each service line and connector. As with the LCRR, this inventory must be made publicly accessible, and available online for systems serving greater than 50,000 people. The proposed LCRI requires all service line inventories to be updated annually. The inventory will be used to:

- inform system specific needs and planning associated with service line replacement;
- provide information that will be used in the selection of lead and copper tap sampling sites;
- improve targeting of public education materials to high risk customers;
- evaluate the quality of water delivered to customers; and
- assess compliance and determine when it is necessary to alert the public of possible health risks resulting from non-compliance with federal or State regulations.

The proposed LCRI also includes requirements for systems to update the educational materials designed to annually inform customers at locations with LSL, GRR, and unknown service lines of the potential health risks from drinking water lead exposure and steps they can take to mitigate their risks including participating in the system's service line replacement program.

The proposed LCRI requires mandatory full service line replacement (both LSLs and GRR service lines) regardless of a system's 90th percentile lead tap concentration. In order to implement service line replacement, the proposed LCRI requires all systems with at least one lead, GRR, or unknown service line to develop the service line replacement plan (as required in the LCRR), but also develop a strategy to inform customers and consumers about the plan and replacement program and identify any legal requirements or water tariff agreement provisions that govern the system's ability to gain access to conduct full service line replacement. This service line replacement plan must be made publicly accessible; and available online for systems serving greater than 50,000 people. This plan would: provide information to affected customers on future mitigation efforts; help to identify potential impediments to achieving compliance with rule requirements and provide state approved strategies to improve compliance.

Primary users of the data collected under this ICR are water systems and their customers, primacy agencies, and EPA. The information collected by EPA is available to the public, via EPA's website (https://www3.epa.gov/enviro/facts/sdwis/search.html) or by requesting the data under the Freedom of Information Act (FOIA; 40 CFR, Chapter 1, Part 2). Other organizations and individuals that may utilize the data include, but are not limited to, the following:

- Individual consumers, realtors, potential homebuyers, homeowners, households, and other members of the public;
- News organizations;
- Staff from other EPA programs (such as Superfund, the Resource Conservation and Recovery Act, and the Office of Enforcement and Compliance Assurance);
- The Federal Emergency Management Administration;
- Centers for Disease Control and Prevention;
- U.S. Department of Health and Human Services;

- Military bases;
- Farmers Home Administration;
- U.S. Department of Interior;
- U.S. Department of Housing and Urban Development;
- U.S. Army Corps of Engineers;
- White House Task Forces;
- American Water Works Association;
- Association of Metropolitan Water Agencies;
- National Rural Water Association;
- Rural Community Assistance Partnership;
- National Association of Water Companies;
- Association of State Drinking Water Administrators;
- Natural Resources Defense Council; and
- Consumers Federation of America.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The data generated as a result of the regulatory changes will be integrated in the existing quarterly SDWIS reporting process. The collection methodology and management of SDWIS is described in the ICR entitled Public Water System Supervision Program (OMB control number 2040-0090).

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

EPA has consulted with other federal agencies, state agencies, industry organizations, water systems, and tribal organizations to ensure non-duplication of this information collection. To the best of the Agency's knowledge, data required by the proposed LCRI revisions are not available from any other source.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

In developing the proposed LCRI, EPA considered the requirement of the Small Business Regulatory Enforcement Fairness Act (SBREFA) to minimize the burden of information collections on small entities. Small entities include “small businesses,” “small organizations” and “small government jurisdictions,” and, are defined as follows:

- A small business is any business that is independently owned and operated and not dominant in its field, as defined by the Small Business Administration regulations under section 3 of the Small Business Act.

- A small organization is any non-profit enterprise that is independently owned and operated and not dominant in its field.
- A small governmental jurisdiction is the government of a city, county, town, township, village, school district, or special district that has a population of fewer than 50,000. This definition may also include tribal governments.

The major requirement under SBREFA is a regulatory flexibility analysis of all rules that have a "significant economic impact on a substantial number of small entities."

EPA considered the particular needs of small businesses, small governments, and small organizations when proposing rule changes in the LCRI. For example, EPA has prepared a Regulatory Flexibility Act analysis for the rule, which can be found in the Economic Analysis for the proposed LCRI. EPA recognizes that many water systems are small entities; therefore, the proposed LCRI reduces to the extent practicable and appropriate the burden on PWSs, especially smaller systems. The regulations include the following examples of reduced burden for small systems:

- Different monitoring, compliance, or reporting requirements or schedules that take into account the resources available to smaller water systems.
- Consolidated or simplified compliance and reporting requirements.
- No unnecessary or redundant requirements.

The proposed LCRI incorporates additional flexibility for small CWSs serving 3,300 or fewer people and all NTNCWSs by allowing these entities to select, in consultation with their State, the compliance option that best protects public health, recognizing the unique nature of these systems. This flexibility applies to CWSs serving 3,300 or fewer people and all NTNCWSs that exceed the lead action level of 0.010 mg/L. The compliance options for these systems after an action level exceedance include CCT; provision, monitoring, and maintenance of POU devices; and replacement of all lead-bearing materials. Small systems can work with their State to identify the treatment technique most appropriate to reduce drinking water lead exposure.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

EPA has considered a wide range of alternatives for frequency of data collection. EPA has chosen to require the least frequent collection that remains consistent with the overall goal of protecting public health. If data are collected less frequently, States may not identify in a timely fashion significant sources of lead exposure that might threaten the health and safety of drinking water consumers.

Systems must take steps to identify lead content service lines, as part of the service line inventory requirements of the proposed LCRI, in order to inform their consumers of the potential health risks from drinking water lead exposure and steps they can take to mitigate their exposure including participating in the system's service line replacement program. Both the inventory information and the service line replacement plan are critical in the implementation of the mandatory service line replacement requirements of the proposed LCRI. The replacement of the lead content service lines will significantly reduce drinking water customer exposure to lead.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Apart from the two instances noted below, this ICR will not violate the guidelines codified under 5 CFR 1320.5(d)(2). Records are required to be retained for a period greater than three years. In particular, the 1991 LCR requires all PWSs to retain on their premise original records of all sampling data and analyses, reports, surveys, letters, evaluations, schedules and any other information required by the state for no fewer than 12 years. Primacy agencies are subject to the same record retention period, except that States are required to retain information relating to the decisions in §142.14(d)(8) indefinitely, until a new decision, determination, or designation has been issued. The Agency justified these record retention periods and received approval for them under the original 1991 LCR ICR.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

To comply with the 1995 Amendments to the Paperwork Reduction Act, the Agency is soliciting public comment on this draft ICR during a 30-day public comment period coinciding with the comment period for the proposed LCRI. EPA is requesting comment on the estimated respondent burden and other aspects of this information collection associated with the proposed LCRI regulatory requirements. Comments received will be considered by the Agency and used to adjust the burden and costs estimates presented in the final ICR prior to submission to the OMB.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This section provides a summary of EPA's engagements and consultations that occurred as part of the LCRR Review and additional engagements and consultations that EPA held to support the development of the proposed LCRI. EPA's summaries and presentation materials, or other documents from meetings and consultations discussed in these sections are available in the docket for the proposed rule under EPA-HQ-OW-2022-0801 at https://www.regulations.gov. For the consultations specifically conducted to support the proposed LCRI also see Section X of the proposed LCRI Federal Register Notice.

LCRR Review

On January 15, 2021, EPA published the "National Primary Drinking Water Regulation: Lead and Copper Rule Revisions" (86 FR 4198; USEPA, 2021b) (LCRR) with an effective date of March 16, 2021, and a compliance date of January 16, 2024. On January 20, 2021, President Biden issued the "Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis" (Executive Order 13990).

Section 1 of Executive Order 13990 states that it is "the policy of the Administration to listen to the science, to improve public health and protect our environment, to ensure access to clean air and water; … and to prioritize both environmental justice and the creation of the well-paying union jobs necessary to deliver on these goals." Executive Order 13990 directs the heads of all Federal agencies to immediately review regulations that may be inconsistent with, or present obstacles to, the policy it establishes. On March 12, 2021, EPA published the National Primary Drinking Water Regulations: Lead and Copper Rule Revisions; Delay of Effective Date (86 FR 14003; USEPA, 2021c), which delayed the effective date of the LCRR from March 16, 2021, to June 17, 2021. On the same day, EPA published the National Primary Drinking Water Regulations: Lead and Copper Rule Revisions; Delay of Effective and Compliance Dates (86 FR 14063; USEPA, 2021d), which proposed further delaying the effective date of LCRR to December 16, 2021 to allow EPA to "conduct a review of the LCRR and consult with stakeholders, including those who have been historically underserved by, or subject to discrimination in, Federal policies and programs prior to the LCRR going into effect" (86 FR 14063; USEPA, 2021d). On June 16, 2021, EPA published a final rule, the National Primary Drinking Water Regulations: Lead and Copper Rule Revisions; Delay of Effective and Compliance Dates (86 FR 31939; USEPA, 2021e), which delayed the LCRR effective date until December 16, 2021, and the compliance date until October 16, 2024. While the LCRR was delayed, EPA engaged with stakeholders to better understand their thoughts and concerns about the LCRR.

EPA hosted a series of virtual engagements from April to August 2021 to obtain public input on the review of the LCRR. EPA also opened a docket, from April 5, 2021 to July 30, 2021, to accept written comments, suggestions, and data from the public. Summaries of these engagements, including summaries of the meetings and written comments, can be found in the docket, EPA-HQ-OW-2021-0255 at https://www.regulations.gov/. Recordings of the public listening sessions and community, tribal, and national stakeholder association roundtables can also be found in the docket. The virtual engagement meetings included two public listening sessions, ten community roundtables, a tribal roundtable, a national stakeholder association roundtable, a national co-regulator meeting, and a meeting with organizations representing elected officials. A diverse group of individuals and associations provided feedback through these meetings and the docket, including people from communities impacted by lead in drinking water, local governments, water utilities, tribal communities, public health organizations, environmental groups, environmental justice organizations, and co-regulators.

EPA specifically sought engagement with communities that have been disproportionately impacted by lead in drinking water, especially lower-income people and communities of color that have been underrepresented in past rule-making efforts. EPA hosted roundtables with individuals and organizations from Pittsburgh, Pennsylvania; Newark, New Jersey; Malden, Massachusetts; Washington, D.C.; Newburgh, New York; Benton Harbor and Highland Park, Michigan; Flint and Detroit, Michigan; Memphis, Tennessee; Chicago, Illinois; and Milwaukee, Wisconsin. These geographically focused roundtables included a range of participants including local government entities, community organizations, environmental groups, local public water utilities, and public officials. EPA worked with community representatives to develop meeting agendas that reflected community priorities. Each

community roundtable included a presentation by local community members. EPA held a separate roundtable with representatives from tribes and tribal communities. Participants in all roundtables were invited to share diverse perspectives with the agency through verbal discussion and a chat feature. EPA obtained detailed, valuable feedback from these engagements, which often focused on the lived experiences of people impacted by lead in drinking water.

On December 17, 2021, EPA published its findings from the review (86 FR 71574, December 17, 2021, USEPA, 2021a). EPA identified priority improvements for a revised rule known as the Lead and Copper Rule Improvements (or the LCRI) including:

- Proactive and equitable lead service line replacement,
- Strengthening compliance tap sampling to better identify communities most at risk of lead in drinking water and to compel lead reduction actions, and
- Reducing the complexity of the regulation by improving the action and trigger level construct.

Consultations and Engagements to Support the Development of the Proposed LCRI

EPA held consultations and engagements during September 2022 through August 2023 to obtain additional feedback on areas EPA identified for improvement during the LCRR Review. A summary of these consultations and engagements is provided below. Also see Section X of the proposed LCRI Federal Register Notice for additional detail on the consultations and engagements.

Small Business Stakeholders

On September 12, 2022, EPA conducted a Small Business Advocacy Review (SBAR) pre-panel outreach meeting to solicit input from 11 small entity representatives (SERs) on the potential small systems implications of the forthcoming proposed LCRI. On November 29, 2022, EPA convened a second SBAR outreach panel to solicit further input from SERs. Through these panels, the SERs provided feedback on key areas, including achieving 100% LSLR in small systems; compliance with the revised tap sampling protocols; compliance with a revised AL; reducing rule complexity; sustained elevated lead levels; public notice requirements; considerations for schools; and small system flexibility.

Public Meeting on Environmental Justice

EPA held two public meetings related to environmental justice and the development of the proposed LCRI on October 25, 2022 and November 1, 2022. These sessions provided opportunities for EPA to share information about the upcoming LCRI rulemaking and for individuals to offer input on environmental justice considerations related to the rule. During the meeting, EPA presented a brief overview of lead health effects, lead occurrence in drinking water, and the SDWA process for developing a drinking water regulation, in particular highlighting the EJ-related components. EPA received public input through verbal and written public comments, as well as interactive polling responses. EPA received a total of 30 public comments during the 60-day post meeting comment period. Public comments included incorporating equity into 100 percent LSLR replacement goals, methods of identifying and prioritizing disadvantaged communities who are disproportionately impacted by lead in in drinking water for LSLR, and methods of overcoming customers' financial and access barriers to full LSLR. A summary report of the views expressed during both environmental justice consultations is available in the docket (EPA-HQ-OW-2022-0801) at www.regulations.gov.

Consultation with Tribal Governments

EPA initiated consultations and coordination with federally recognized Indian tribes to obtain input on the Agency's proposed LCRI, pursuant to Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (Executive Order 13175). EPA signed a tribal consultation notification letter inviting tribal officials to participate in consultation and coordination events and provide comments to EPA, and emailed this letter to all 574 federally-recognized tribal leaders at that time. In addition to the consultation invitation letter, EPA provided a consultation and coordination plan background information, and an invitation to two national informational webinars for tribal governments. All tribal consultation materials were made available via EPA's Tribal Consultation Opportunities Tracking System (https://tcots.epa.gov).

The national informational webinars were held on October 27, 2022, and November 9, 2022. Consistent with the EPA Policy on Consultation and Coordination with Indian Tribes (May 4, 2011), EPA consulted with tribal officials to gain an understanding of tribal views of key areas of the proposed LCRI. As part of the meeting, EPA representatives presented background information on the pre-2021 LCR and LCRR regulations regarding lead and copper content in drinking water. EPA also presented on the rule considerations for the proposed LCRI. During the consultation process, EPA requested input from tribal governments on considerations to inform the development of the proposed LCRI, including elements related to potential regulatory requirements and suggestions that would assist tribal governments in implementing and complying with the rule. Four specific areas of the proposed rule on which EPA requested input included achieving 100 percent LSLR, tap sampling and compliance, reducing rule complexity, and small system flexibility.

A total of 11 tribal representatives participated in the two webinars. Webinar participants provided verbal comments, but EPA did not receive any written consultation comments from tribal organizations during the comment period that followed the webinars.

SAB Consultation

EPA consulted with the 37 members of the Science Advisory Board (SAB) on tools, indicators, and measures for use in future analyses to determine environmental justice impacts of LSL presence and replacement in drinking water systems. Prior to the meeting, which was held on November 3, 2022, EPA

provided the charge to the SAB and shared the Agency's preliminary analyses and draft results on case studies for three cities to help inform the Agency's environmental justice analysis for the proposed LCRI (USEPA, 2022). The SAB provided its final report to the EPA Administrator on December 20, 2022 regarding the Agency's environmental justice analysis for LCRI (USEPA SAB, 2022).

NDWAC Consultation

On December 1, 2022, EPA held a public meeting with the National Drinking Water Advisory Council (NDWAC). EPA provided background on lead in drinking water and the LCR, an overview of the LCRR published in January 2021, annualized cost estimates from the LCRR EA, and a summary of the outcome of EPA's review of the LCRR. The NDWAC provided key input on four key areas: achieving 100 percent LSLR, tap sampling and compliance, reducing rule complexity, and small system flexibility. The public was also given an opportunity to provide their comments to the NDWAC.

2022 Federalism/Unfunded Mandates Reform Act (UMRA) Consultation

The Federalism Consultation began on October 13, 2022 and ended on December 13, 2022. On September 29, 2022, the Director of the Office of Ground Water and Drinking Water (OGWDW), Jennifer McLain, signed a Federalism consultation notification letter inviting state and local government officials as well as their representative associations to participate in a meeting and consultation and provide comments to EPA during the consultation process. EPA sent this letter to a number of state and local agencies as well as several water and utility professional organizations that may have state and local government members.

EPA held the Federalism and UMRA meeting on October 13, 2022. During the meeting, EPA presented background information and questions for feedback on key areas of the proposed rule. EPA specifically requested input on the following key rule areas: achieving 100 percent LSLR, tap sampling and compliance, reducing rule complexity, and small system flexibility. Fifteen organizations, as well as several associations with expertise in drinking water, were represented at the Federalism/UMRA consultation meeting. Although this virtual briefing was for intergovernmental association staff only, participants were able to schedule follow-up briefings for their memberships and were encouraged to forward the briefing information and materials to their members. EPA provided a 60-day public comment period following the October 13, 2022 meeting.

Meetings with ASDWA

EPA met with the Association of State Drinking Water Administrators (ASDWA) on October 5, 2022 and November 2, 2022 to solicit feedback from state co-regulators on the development of LCRI. EPA presented background regarding the pre-2021 LCR, an overview of LCRR, and cost information for actions to reduce drinking water lead levels. ASDWA and state co-regulators provided feedback on how quickly systems can achieve 100 percent LSLR, factors that impact a system's rate of LSLR, barriers to engaging customers for full LSLR, how systems can ensure equity in replacements, tap sampling and compliance and opportunities to reduce complexity mainly around the action level and trigger level construct. In addition, ASDWA and state co-regulators provided input on CCT, WQPs, find-and-fix provisions, school and childcare sampling, public education, and SDWIS capabilities to track data.

Public Water Systems

On December 7, 2023, EPA sent a questionnaire to nine water systems regarding the burden and cost to develop and maintain a service line inventory under the LCRR. EPA requested feedback by February 28, 2023 and received responses from three water systems, Grand Rapids, Michigan; Pittsburgh, Pennsylvania; and Cincinnati, Ohio (available in the docket at EPA-HQ-OW-2022-0801 at

www.regulations.gov). EPA used the information from these three water systems among other sources to help develop burden and cost related to service line inventory updates and validation.

8. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

9. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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

10. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are included in any of the information collection requirements outlined in this ICR.

11. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

12a. Respondents/NAICS Codes

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

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

The North American Industry Classification System (NAICS) code for privately owned PWSs is 22131. The NAICS codes for state agencies that include drinking water programs are 92411 (Administration of Air and Water Resources and Solid Waste Management Programs) or 92312 (Administration of Public Health Programs). Ancillary systems (systems where providing water is ancillary to a primary business, e.g., mobile home parks) cannot be categorized in a single NAICS code. For ancillary systems, the NAICS code is that of the primary establishment or industry.

12b. Information Requested

For activities occurring in the first three years of proposed LCRI implementation, and **Exhibit 2** list the data items required from PWSs and States, respectively.

EXHIBIT 1. PWSS REPORTING DATA ITEMS

Requirement	Requirement Category	Frequency
System reads and understands the LCRI	Implementation activity	Once
System assigns personnel and resources for rule implementation	Implementation activity	Once
System attends training and receives technical assistance from the State during implementation of the LCRI	Implementation activity	Once
System reviews records for lead connector material to prepare the updated initial inventory	Service Line Inventory	Once
System submits the updated initial inventory with lead connector information	Service Line Inventory	Once
System conducts normal and field operations to update unknown service lines	Service Line Inventory	Annually until all service lines are identified
System updates service line inventory and submits updated inventory to the State	Service Line Inventory	Annually until all service lines are identified and lead service lines are replaced
System prepares a service line replacement plan and submits to the State	Service Line Replacement Plan	Once
System develops public education materials for customers with service lines with lead or unknown content and submits material to state for review	Public Education	Once
System distributes public education materials to customers with service lines with lead or unknown content	Public Education	Annually until all service lines are identified and lead service lines are replaced

EXHIBIT 2. STATE/PRIMACY AGENCY REPORTING DATA ITEMS

Requirement	Requirement Category	Frequency
State adopts the rule and develops program to implement the LCRI	Implementation activity	Once
State modifies their data system while implementing the LCRI	Implementation activity	Once
State provides internal staff with training during implementation of the LCRI	Implementation activity	Once
State provides system staff with training and technical assistance during implementation of the LCRI	Implementation activity	Once
State reviews updated initial inventories with lead connector information	Service Line Inventory	Once
State reviews annual inventory updates	Service Line Inventory	Annually until all service lines are identified and lead service lines are replaced
State reviews service replacement plan	Service Line Replacement Plan	Once
State provides systems with a public education template and reviews developed material	Public Education	Once

12c. Respondent Activities

Implementation activity

Activities for Systems

Systems must conduct planning and mobilize for the implementation of the proposed LCRI, including 1) reading and understanding the rule, 2) assigning personnel and resources, and 2) dedicating staff to attend training and receive technical assistance from the state.

Activities for Primacy Agencies

States must 1) adopt the rule into State regulations and develop an implementation program, 2) modify data management systems, 3) train State staff, and 4) provide training and technical assistance to systems.

Developing and reporting the service line inventory

Activities for Systems

Systems must review and update their initial service line inventory with information on lead connectors developed through the use of system records. They must also continue to investigate service lines of unknown material during normal operations and conducting specific field investigations, and update and submit their service line inventories based on these investigations.

Activities for Primacy Agencies

States must review the submission of the updated initial service line inventory with lead connector information. States must also review the submissions from systems for annual updates of their service line inventories.

Developing and reporting the service line replacement plan

Activities for Systems

Systems with LSL, GRR, and/or unknown material service lines must create and submit to the State a lead service line replacement plan. The plan would include the following elements:

- A strategy for determining the composition of lead status unknown service lines in its inventory.
- A standard operating procedure for conducting full service line replacement.
- A strategy for informing customers before a full or partial service line replacement.
- A funding strategy for conducting service line replacement that includes ways to accommodate customers that are unable to pay to replace the portion of the service line they own.
- A procedure for consumers and customers to flush service lines and premise plumbing of particulate lead following a disturbance and post-replacement.
- A strategy to prioritize service line replacement.
- A communication strategy to inform both consumers and owners of rental properties with LSLs, GRR service lines, and service line of unknown material about the replacement plan and program.

Identification of any State and local laws, regulations, and/or water tariff agreements relevant to the water system's ability to gain access to conduct full replacement.

Activities for Primacy Agencies

States must review the lead service line replacement plans submitted by systems.

Developing and distributing public education material

Activities for Systems

Systems with LSL, GRR, and/or service lines with unknown content must develop public education material, submit the material to the States, and distribute the material to customers. The public education material must provide customers served by lead, GRR, or unknown service lines with information on the health effects and sources of lead in drinking water, how to have water tested for lead, actions customers can take to reduce exposure to lead, and information about the opportunities for service line replacement.

Activities for Primacy Agencies

EPA assumed that States would incur burden and cost for providing systems that have LSL, GRR, and/or unknown material service lines with templates for the required public education outreach. States must also review the public education material submitted by the systems.

Additional Activities Required by Proposed LCRI

Exhibit 1-1 in Chapter 1, Section 1.1 of EPA's Economic Analysis of the proposed LCRI (available in the docket at EPA-HQ-OW-2022-0801 at www.regulations.gov) summarizes the additional activities required by the proposed LCRI that will take place after the initial three years covered by this ICR.

12d. Respondent Burden Hours and Labor Costs

This section describes the estimates of burden and direct costs to water systems and states associated with the regulatory changes.[4]

This ICR provides estimates of the incremental burdens to comply with the LCR as amended by the proposed LCRI. The LCRI implementation period overlaps the LCRR renewal and supplemental ICR and supersedes or removes some LCRR requirements. As a result, the initial burden and cost estimates for the LCRI double-count burden estimates in the requested Information Collection Request for the Lead and Copper Rule Revisions (OMB Control Number 2040-0297; EPA Tracking Number 2606.03). EPA provides an estimate of the double counting and subtracts that amount from the final net estimates.

The burden and cost estimates in this ICR are based on the calculations documented in the Economic Analysis for the Proposed Lead and Copper Rule Improvements (available in the docket at EPA-HQ-OW-2022-0801 at www.regulations.gov). Major underlying burden assumptions, data sources, and calculations are detailed in Chapter 4 of that document.

For the proposed LCRI the Agency considered a wide range of alternatives for frequency of data collection and chose the option that requires the least frequent collection possible while still protecting public health. The collection schedule for the first three years assumes that public water system rule implementation (read rule, assign staff, attend training), and public education materials development activities would take place in the first year, the service line replacement plan would be developed and submitted in the third year, and the implementation of the service line inventory and public education distribution requirements are spread uniformly over the first three years. States are assumed to conduct implementation activities, review initial service line inventory updates with lead connector information, and review annual service line inventory updates across each of the first three years. States would also provide templates to systems for public education on service lines with lead, GRR or unknown content and review the systems' developed materials in the first year covered by this ICR. They would review the systems' SLR plans in the third year.

Burden to Public Water Systems

During the three-year period covered by this ICR, public water systems will conduct one-time startup activities that include the following:

- reading and understanding the rule;
- assigning personnel and resources for rule implementation;
- attending training and receiving technical assistance from the State;
- updating and submitting to the State a service line inventory that includes lead connector information;

[4] There are two types of costs that may result from the proposed LCRI – direct and indirect. Direct costs are from those activities that are specified by the rule change, such as costs for distribution of consumer notices. A second type of cost may also result when systems and States use the information generated by the directly related rule activities to modify or enhance practices to reduce lead levels. Section 6 focuses solely on the estimation of direct costs for implementation activities.

- preparing and submitting to the State the SLR plans; and
- developing and submitting to the State for approval public education materials for customers with lead, GRR, and unknown service lines that must be delivered annually.

During this time period, public water systems will also conduct on-going activities that include the following:

- collect service line information during normal operations and conduct targeted field operations to update the material status of unknown service lines;
- update and submit annually the service line inventory as unknown service lines are identified; and
- distribute public education materials to customers with lead, GRR, and unknown service lines annually.

The number of systems performing each task, shown in **Exhibit 3**, varies depending on estimated LSL, GRR and unknown service line presence. See Chapter 4 of the *Economic Analysis for the Final Lead and Copper Rule Revisions* (available in the docket at EPA-HQ-OW-2022-0801 at www.regulations.gov) for a detailed presentation of the data and formulas used in generating the burden estimates.

EXHIBIT 3. TOTAL PWS RESPONDENTS, RESPONSES, AND BURDEN FOR THE PROPOSED LCRI ICR

Requirement	Responses	Respondents	Average Burden Hours per Response per Respondent	Total Burden
System reads and understands the LCRI	66,947	66,947	4	267,788
System assigns personnel and resources for rule implementation	66,947	66,947	8	535,576
System attends training and receives technical assistance from the state during implementation of the LCRI	66,947	66,947	8	535,576
Systems review records for connector material to prepare the updated initial inventory	200,841	66,947	0.5 - 7,431	4,406,882
Systems submit the updated initial inventory with connector information	200,841	66,947	1 - 15	381,190
Systems conduct normal and field operations to update	14,648,784	25,562	Non-labor cost	Non-labor cost

unknown service lines				
Systems update and submit inventory to State annually	78,000	26,000	1	78,000
Systems prepare a service line replacement plan and submit it to the State	26,000	26,000	12 - 36	374,384
Systems develop public education materials for customers on service lines with lead, GRR, or unknown content and submit to States for review	26,000	26,000	7	182,000
Systems distribute public education materials for customers on service lines with lead, GRR, or unknown content	59,995,291	26,000	0.003 - 0.443	817,980
System Total	**75,376,598**	**66,947**	**42 – 7,510**	**7,579,376**

Notes: Range presented in average burden reflects differences in system type and size. Detail may not add exactly to total due to independent rounding. Results show the upper bound estimate for the number of lead lines located in NTNCWS, Chapter 4 of the EA documents a difference of approximately 5 lines between the upper- and lower-bound estimates. Aggregate respondent totals across responses will vary according to the type of responses required and the number systems reporting to a State.

<u>Burden to States</u>

During the three-year period cover by this ICR, States will incur burden associated with one-time startup activities that include the following:

- adopting the rule into State regulations and developing an implementation program;
- modifying their data system;
- providing internal State staff with training for implementation;
- providing system staff with training and technical assistance;
- reviewing updated initial inventory with lead connector information;
- reviewing the initial SLR plan; and
- providing templates and reviewing public education material for customers with LSL, GRR, and unknown material service lines.

During this time period, States will also conduct the on-going activity of reviewing systems' annual updates of water system inventories.

During the three-year period (2024 to 2027), States will incur burden associated with completing the rule implementation, service line inventory, service line replacement plan, and public education activities listed in **Exhibit 4**.

EXHIBIT 4. TOTAL STATE RESPONDENTS, RESPONSES, AND BURDEN FOR THE PROPOSED LCRI ICR

Requirement	Responses	Respondents	Average Burden Hours per Response per Respondent	Total Burden
State adopts the rule and develops program to implement the LCRI	56	56	640	107,520
State modifies their data system to implement the LCRI	56	56	740	124,320
State provides internal State staff with training for implementation of the LCRI	56	56	196	32,928
State provides system staff with training and technical assistance during implementation of the LCRI	56	56	800	134,400
State reviews updated initial inventories with connector information	200,841	56	1	200,841
State reviews annual inventory update	78,000	56	0.5	39,000
State reviews service line replacement plan	26,000	56	6 - 18	187,192
State provides templates to systems for public education on service lines with lead, GRR, or unknown content and reviews system developed materials	26,000	56	0.88 - 2.38	23,896
Primacy Agency Total	**331,065**	**56**	**2,384 – 2,398**	**850,097**

Notes: Range presented in average burden reflects differences in system type and size. Detail may not add exactly to total due to independent rounding. Results show the upper bound estimate for the number of lead lines located in NTNCWS, Chapter 4 of the EA documents a difference of approximately 5 lines between the upper- and lower-bound estimates. Aggregate respondent totals across responses will vary according to the type of responses required and the number systems reporting to a state.

Cost to Public Water Systems

The labor rates associated with the system activities during the ICR period apply to all 66,947 CWSs and NTNCWSs that must comply with the LCRI. The fully loaded labor rate estimates range from $36.56 to $57.40 per hour depending on system size. Based on these labor rates, **Error: Reference source not found** through **Error: Reference source not found** present the costs to systems for each of the activities conducted in the three years covered by the ICR.

Exhibit 5. Burden and Costs for Public Water Systems for Implementaion Activities (Reading Rule, Assigning Personnel, Attending Training)

Respondent Type (service population size category)	Respondents	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100	20,120	20	402,400	$36.56	$14,711,691
101-500	21,464	20	429,280	$36.56	$15,694,420
501-1,000	6,908	20	138,160	$36.56	$5,051,111
1,001-3,300	8,838	20	176,760	$36.56	$6,462,322
3,301-10,000	5,188	20	103,760	$43.59	$4,522,971
10,001-50,000	3,411	20	68,220	$46.74	$3,188,569
50,001-100,000	572	20	11,440	$50.49	$577,644
100,001-1,000,000	422	20	8,440	$57.40	$484,441
>1,000,000	24	20	480	$57.40	$27,551
System 3-year Total	**66,947**	**not applicable**	**1,338,940**	**not applicable**	**$50,720,720**
Annual Average	**not applicable**	**not applicable**	**446,313**	**not applicable**	**$16,906,907**

Notes: Detail may not add exactly to total due to independent rounding.

Exhibit 6. Burden and Costs for Public Water Systems Conducting a Records Review to Identify Lead Connectors

Respondent service population size category and type	Responses	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100, CWS	35,196	0.50	17,717	$36.56	$647,726
101-500, CWS	45,252	1.99	89,969	$36.56	$3,289,243
501-1,000, CWS	15,990	5.65	90,341	$36.56	$3,302,844
1,001-3,300, CWS	23,901	14.08	336,523	$36.56	$12,303,233
3,301-10,000, CWS	15,078	32.64	492,095	$43.59	$21,450,770
10,001-50,000, CWS	10,122	106.99	1,082,945	$46.74	$50,616,298
50,001-100,000, CWS	1,713	294.60	504,653	$50.49	$25,481,615
100,001-1,000,000, CWS	1,263	880.49	1,112,055	$57.40	$63,829,938
>1,000,000, CWS	72	7,431.47	535,065	$57.40	$30,711,799
<=100, NTNCWS	25,164	0.50	12,667	$36.56	$463,103
101-500, NTNCWS	19,140	1.99	38,054	$36.56	$1,391,234
501-1,000, NTNCWS	4,734	5.65	26,746	$36.56	$977,840
1,001-3,300, NTNCWS	2,613	14.08	36,791	$36.56	$1,345,063

3,301-10,000, NTNCWS	486	32.64	15,861	$43.59	$691,410
10,001-50,000, NTNCWS	111	106.99	11,876	$46.74	$555,069
50,001-100,000, NTNCWS	3	294.60	884	$50.49	$44,626
100,001-1,000,000, NTNCWS	3	880.49	2,641	$57.40	$151,615
>1,000,000, NTNCWS	0	0	0	0	$0
System 3-year Total	**200,841**	**not applicable**	**4,406,882**	**not applicable**	**$217,253,425**
Annual Average	**66,947**	**not applicable**	**1,468,961**	**not applicable**	**$72,417,808**

Notes: Detail may not add exactly to total due to independent rounding.

Exhibit 7. Burden and Costs for Public Water Systems to Submit Updated Inventory Based on Records Review of Lead Connectors

Respondent service population size category and type	Responses	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100, CWS	35,196	1	35,196	$36.56	$1,286,761
101-500, CWS	45,252	1	45,252	$36.56	$1,654,407
501-1,000, CWS	15,990	1	15,990	$36.56	$584,592
1,001-3,300, CWS	23,901	1	23,901	$36.56	$873,817
3,301-10,000, CWS	15,078	2	30,156	$43.59	$1,314,521
10,001-50,000, CWS	10,122	2	20,244	$46.74	$946,194
50,001-100,000, CWS	1,713	4	6,852	$50.49	$345,980
100,001-1,000,000, CWS	1,263	4	5,052	$57.40	$289,976
>1,000,000, CWS	72	4	288	$57.40	$16,531
<=100, NTNCWS	25,164	3.75	94,365	$36.56	$3,449,972
101-500, NTNCWS	19,140	3.75	71,775	$36.56	$2,624,085
501-1,000, NTNCWS	4,734	3.75	17,753	$36.56	$649,029
1,001-3,300, NTNCWS	2,613	3.75	9,799	$36.56	$358,241
3,301-10,000, NTNCWS	486	7.5	3,645	$43.59	$158,888
10,001-50,000, NTNCWS	111	7.5	833	$46.74	$38,911
50,001-100,000, NTNCWS	3	15	45	$50.49	$2,272
100,001-1,000,000, NTNCWS	3	15	45	$57.40	$2,583
>1,000,000, NTNCWS	0	0	0	0	$0
System 3-year Total	**200,841**	**not applicable**	**381,190**	**not applicable**	**$14,596,761**
Annual Average	**66,947**	**not applicable**	**127,063**	**not applicable**	**$4,865,587**

Notes: Detail may not add exactly to total due to independent rounding.

Exhibit 8. Costs for Public Water Systems Identifying Unknown Service Lines Through Normal Operations and Targeted Field Investigations

Respondent service population size category and type	Responses	Non-labor Cost (2022 USD)	Cost (2022 USD)
<=100, CWS	40,594	$57.44	$2,331,526
101-500, CWS	204,295	$57.44	$11,733,733
501-1,000, CWS	202,567	$57.44	$11,634,485
1,001-3,300, CWS	766,495	$51.58	$39,533,018
3,301-10,000, CWS	1,733,004	$54.21	$93,951,201
10,001-50,000, CWS	4,589,681	$49.53	$227,349,074
50,001-100,000, CWS	2,041,237	$50.94	$103,985,748
100,001-1,000,000, CWS	4,766,123	$39.18	$186,747,630
>1,000,000, CWS	304,788	$39.18	$11,942,293
System 3-year Total	**14,648,784**	**not applicable**	**$689,208,707**
Annual Average	**4,882,928**	**not applicable**	**$229,736,236**

Notes: Detail may not add exactly to total due to independent rounding. EPA assumes NTNCWS have no unknown service lines following the creation of their initial inventory.

Exhibit 9. Burden and Costs for Public Water Systems to Update and Submit Annual Inventory Report

Respondent service population size category and type	Responses	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100, CWS	16,872	1	16,872	$36.56	$616,838
101-500, CWS	21,669	1	21,669	$36.56	$792,216
501-1,000, CWS	7,722	1	7,722	$36.56	$282,315
1,001-3,300, CWS	11,613	1	11,613	$36.56	$424,570
3,301-10,000, CWS	9,342	1	9,342	$43.59	$407,224
10,001-50,000, CWS	7,176	1.0	7,176	$46.74	$335,403
50,001-100,000, CWS	1,266	1	1,266	$50.49	$63,925
100,001-1,000,000, CWS	954	1	954	$57.40	$54,758
>1,000,000, CWS	72	1	72	$57.40	$4,133
<=100, NTNCWS	612	1	612	$36.56	$22,375
101-500, NTNCWS	513	1	513	$36.56	$18,755
501-1,000, NTNCWS	102	1	102	$36.56	$3,729
1,001-3,300, NTNCWS	72	1	72	$36.56	$2,632
3,301-10,000, NTNCWS	12	1	12	$43.59	$523
10,001-50,000, NTNCWS	3	1	3	$46.74	$140
50,001-100,000, NTNCWS	0	1	0	$50.49	$0
100,001-1,000,000, NTNCWS	0	1	0	$57.40	$0
>1,000,000, NTNCWS	0	1	0	$57.40	$0
System 3-year Total	**78,000**	**not applicable**	**78,000**	**not applicable**	**$3,029,536**
Annual Average	**26,000**	**not applicable**	**26,000**	**not applicable**	**$1,009,845**

Notes: Detail may not add exactly to total due to independent rounding.

Exhibit 10. Burden and Costs for Public Water Systems to Prepare and Submit a Service Line Replacement Plan

Respondent service population size category and type	Respondents	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100, CWS	5,624	12	67,488	$36.56	$2,467,352
101-500, CWS	7,223	12	86,676	$36.56	$3,168,863
501-1,000, CWS	2,574	12	30,888	$36.56	$1,129,261
1,001-3,300, CWS	3,871	12	46,452	$36.56	$1,698,279
3,301-10,000, CWS	3,114	20	62,280	$43.59	$2,714,829
10,001-50,000, CWS	2,392	20	47,840	$46.74	$2,236,018
50,001-100,000, CWS	422	36	15,192	$50.49	$767,095
100,001-1,000,000, CWS	318	36	11,448	$57.40	$657,095
>1,000,000, CWS	24	36	864	$57.40	$49,592
<=100, NTNCWS	204	12	2,448	$36.56	$89,499
101-500, NTNCWS	171	12	2,052	$36.56	$75,021
501-1,000, NTNCWS	34	12	408	$36.56	$14,916
1,001-3,300, NTNCWS	24	12	288	$36.56	$10,529
3,301-10,000, NTNCWS	4	12	48	$43.59	$2,092
10,001-50,000, NTNCWS	1	12	12	$46.74	$561
50,001-100,000, NTNCWS	0	0	0	$0	$0
100,001-1,000,000, NTNCWS	0	0	0	$0	$0
>1,000,000, NTNCWS	0	0	0	$0	$0
System 3-year Total	**26,000**	**not applicable**	**374,384**	**not applicable**	**$15,081,002**
Annual Average	**not applicable**	**not applicable**	**124,795**	**not applicable**	**$5,027,001**

Notes: Detail may not add exactly to total due to independent rounding.

Exhibit 11. Burden and Costs for Public Water Systems to Develope and Submit Public Education Materials

Respondent service population size category and type	Respondents	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100, CWS	5,624	7	39,368	$36.56	$1,439,289
101-500, CWS	7,223	7	50,561	$36.56	$1,848,503
501-1,000, CWS	2,574	7	18,018	$36.56	$658,736
1,001-3,300, CWS	3,871	7	27,097	$36.56	$990,663
3,301-10,000, CWS	3,114	7	21,798	$43.59	$950,190
10,001-50,000, CWS	2,392	7	16,744	$46.74	$782,606
50,001-100,000, CWS	422	7	2,954	$50.49	$149,157
100,001-1,000,000, CWS	318	7	2,226	$57.40	$127,768
>1,000,000, CWS	24	7	168	$57.40	$9,643
<=100, NTNCWS	204	7	1,428	$36.56	$52,207
101-500, NTNCWS	171	7	1,197	$36.56	$43,762
501-1,000, NTNCWS	34	7	238	$36.56	$8,701
1,001-3,300, NTNCWS	24	7	168	$36.56	$6,142
3,301-10,000, NTNCWS	4	7	28	$43.59	$1,221
10,001-50,000, NTNCWS	1	7	7	$46.74	$327
50,001-100,000, NTNCWS	0	0	0	$0	$0
100,001-1,000,000, NTNCWS	0	0	0	$0	$0
>1,000,000, NTNCWS	0	0	0	$0	$0
System 3-year Total	**26,000**	**not applicable**	**182,000**	**not applicable**	**$7,068,916**
Annual Average	**not applicable**	**not applicable**	**60,667**	**not applicable**	**$2,356,305**

Notes: Detail may not add exactly to total due to independent rounding.

Exhibit 12. Burden and Costs for Public Water Systems to Distribute Public Education Materials to Customers Served by LSL, GRR, and Unknown Material Service Lines

Respondent service population size category and type	Responses	Burden per Response (hours)	Burden (hours)	Labor Rate 2022 USD/hour)	Non-labor Cost (2022 USD)	Cost (2022 USD)
<=100, CWS	138,288	0.443	61,200	$36.56	$0.52	$2,309,983
101-500, CWS	696,967	0.107	74,659	$36.56	$0.52	$3,095,081
501-1,000, CWS	692,811	0.063	43,318	$36.56	$0.52	$1,947,072
1,001-3,300, CWS	2,626,232	0.026	67,437	$36.56	$0.52	$3,842,944
3,301-10,000, CWS	7,270,758	0.035	252,705	$43.59	$0.52	$14,829,154
10,001-50,000, CWS	18,322,527	0.011	203,977	$46.74	$0.52	$19,144,055
50,001-100,000, CWS	8,316,186	0.005	43,527	$50.49	$0.52	$6,559,705
100,001-1,000,000, CWS	18,229,218	0.003	60,229	$57.40	$0.52	$13,018,370
>1,000,000, CWS	3,700,990	0.003	9,614	$57.40	$0.52	$2,493,006
<=100, NTNCWS	612	1	612	$36.56	$0.09	$22,428
101-500, NTNCWS	513	1	513	$36.56	$0.09	$18,800
501-1,000, NTNCWS	102	1	102	$36.56	$0.09	$3,738
1,001-3,300, NTNCWS	72	1	72	$36.56	$0.09	$2,639
3,301-10,000, NTNCWS	12	1	12	$43.59	$0.09	$524
10,001-50,000, NTNCWS	3	1	3	$46.74	$0.09	$140
50,001-100,000, NTNCWS	0	0	0	$0	$0	$0
100,001-1,000,000, NTNCWS	0	0	0	$0	$0	$0
>1,000,000, NTNCWS	0	0	0	$0	$0	$0
System 3-year Total	**59,995,291**	**not applicable**	**817,980**	**not applicable**	**not applicable**	**$67,287,637**
Annual Average	**19,998,430**	**not applicable**	**272,660**	**not applicable**	**not applicable**	**$22,429,212**

Notes: Detail may not add exactly to total due to independent rounding.

Based on the estimated burden and cost presented in **Error: Reference source not found** through **Error: Reference source not found**, **Error: Reference source not found** presents the labor costs to systems for each of the activities conducted during the three years covered in the ICR. It also provides the non-labor cost estimates for each activity category for the three years.

Exhibit 13. Public Water System Total Burden and Costs for the Proposed LCRI ICR

Requirement	Burden (Hours)	Labor Cost (2022 USD)	Non-labor Cost (2022 USD)	Total Cost (2022 USD)
System implementation activities (read rule, assign staff, attend training)	1,338,940	$50,720,720	$0	$50,720,720
Systems review records for connector material to prepare the updated initial inventory	4,406,882	$217,253,425	$0	$217,253,425
Systems submit the updated initial inventory with connector information	381,190	$14,596,761	$0	$14,596,761
Systems conduct normal and field operations to update unknown service lines	0	$0	$689,208,707	$689,208,707
Systems update and submit inventory to state annually	78,000	$3,029,536	$0	$3,029,536
Systems develop and submit an service line replacement plan	374,384	$15,081,002	$0	$15,081,002
Systems develop public education materials for customers on service lines with lead or unknown content and submit to States for review	182,000	$7,068,916	$0	$7,068,916
Systems distribute public education materials for customers on service lines with lead or unknown content	817,980	$35,820,383	$31,467,255	$67,287,637
Total	**7,579,376**	**$343,570,742**	**$720,675,962**	**$1,064,246,704**

The total burden and cost estimates in **Error: Reference source not found** partially double count the requested burden and costs for the LCRR in the *Information Collection Request for the Lead and Copper Rule Revisions* (OMB Control Number 2040-0297, EPA Tracking Number 2606.03). That request covered system and State burdens from January 1, 2024 through December 31, 2026 for the following groups of data collection and reporting activities under the LCRR: the normal and field operations to update unknown service lines and submission of updates, the development and submission of a service line replacement plan, the development, submission and distribution of public education materials for customers on service lines with lead, GRR, or unknown content. The overlap period is 16 of the 36 months. Therefore, EPA applied a multiplicative factor of 16/36 to the LCRR ICR total burden and cost estimates to estimate the potential overlap. **Error: Reference source not found** shows the adjustments EPA used to estimate the proposed LCRI burden and costs net of the double counting. The increase in responses and non-labor costs with the decrease in burden reflect refinements in the underlying assumptions used to estimate the cost of normal and field investigations of unknown service lines.

Exhibit 14. Public Water System Net Total and Average Annual Burden and Costs for the Proposed LCRI ICR

Item	Responses	Total Burden	Labor Costs (2022 USD)	Total Costs (2022 USD)
[a] Total for LCRR ICR Renewal (USEPA 2022) – All Activities	166,068,857	25,197,612	$1,080,398,986	$1,803,438,877
[b] Estimated Overlap with LCRR ICR Renewal ([a] x 16/36)	73,808,381	11,198,939	$480,177,327	$801,528,390
[c] Total for proposed LCRI ICR – All Activities	75,376,598	7,579,376	$343,570,742	$1,064,246,704
[d] Net Total for proposed LCRI ICR – All Activities ([c] – [b])	**1,568,217**	**-3,619,563**	**-$136,606,585**	**$262,718,315**
Net Average Annual for proposed LCRI ICR – All Activities ([d]/3)	**522,739**	**-1,206,521**	**-$45,535,528**	**$87,572,772**

Cost to States

Fifty-six primacy agencies, referred to as States in this ICR, will review and implement the proposed LCRI, which includes 49 states, 5 territories, 1 tribe, and EPA.[5] The fully loaded labor rate applied to State costs for the three years covered in this ICR is $59.99 per hour, in 2022 USD. Based on this labor rate, the total cost to primacy agencies for implementation activities (adopting the rule, modifying data systems, and providing training to internal and system staff) is $23,944,566 (56 agencies x 7,128 hours/agency x $59.99/hour), an average of $7,981,522 per year. **Error: Reference source not found** presents the labor costs to States for reviewing the updated initial inventor with the lead connector information. **Error: Reference source not found** presents the labor costs to States for reviewing the annual inventory updates from systems. **Error: Reference source not found** presents the labor cost to States for conferring on and reviewing service line replacement plans. **Error: Reference source not found** presents the labor costs to States for providing public education templates and reviewing material submitted by systems.

[5] EPA regions will conduct primacy activities on behalf of states, tribes, and territories that do not have primacy. The burden and costs for these activities are included in the primacy agency burden.

Exhibit 15. Burden and Costs for States to Review Inventories with Lead Connector Information

System Type (service population size category, type)	Responses (Reviews)	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100	60,360	1	60,360	$59.99	$3,620,766
101-500	64,392	1	64,392	$59.99	$3,862,631
501-1,000	20,724	1	20,724	$59.99	$1,243,154
1,001-3,300	26,514	1	26,514	$59.99	$1,590,474
3,301-10,000	15,564	1	15,564	$59.99	$933,625
10,001-50,000	10,233	1	10,233	$59.99	$613,839
50,001-100,000	1,716	1	1,716	$59.99	$102,936
100,001-1,000,000	1,266	1	1,266	$59.99	$75,943
>1,000,000	72	1	72	$59.99	$4,319
State 3-year Total	**200,841**	**not applicable**	**200,841**	**not applicable**	**$12,047,686**
Annual Average	**66,947**	**not applicable**	**66,947**	**not applicable**	**$4,015,895**

Notes: Detail may not add exactly to total due to independent rounding. Any inventory submitted by systems with EPA primacy will be reviewed by EPA Regional staff. LCRI modeling does not track the number of systems reporting to EPA as the primacy agency.

Exhibit 16. Burden and Costs for States to Review Annual Updates of Service Line Inventories

System Type (service population size category)	Responses (Reviews)	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100	17,484	0.5	8,742	$59.99	$524,399
101-500	22,182	0.5	11,091	$59.99	$665,307
501-1,000	7,824	0.5	3,912	$59.99	$234,666
1,001-3,300	11,685	0.5	5,843	$59.99	$350,469
3,301-10,000	9,354	0.5	4,677	$59.99	$280,555
10,001-50,000	7,179	0.5	3,590	$59.99	$215,320
50,001-100,000	1,266	0.5	633	$59.99	$37,971
100,001-1,000,000	954	0.5	477	$59.99	$28,613
>1,000,000	72	0.5	36	$59.99	$2,160
State 3-year Total	**78,000**	**not applicable**	**39,000**	**not applicable**	**$2,339,461**
Annual Average	**26,000**	**not applicable**	**13,000**	**not applicable**	**$779,820**

Notes: Detail may not add exactly to total due to independent rounding. Any inventory submitted by systems with EPA primacy will be reviewed by EPA Regional staff. LCRI modeling does not track the number of systems reporting to EPA as the primacy agency.

Exhibit 17. Burden and Costs for States to Review Service Line Replacement Plans

System Type (service population size category, type)	Responses (Reviews)	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100, CWS	5,624	6	33,744	$59.99	$2,024,174
101-500, CWS	7,223	6	43,338	$59.99	$2,599,681
501-1,000, CWS	2,574	6	15,444	$59.99	$926,427
1,001-3,300, CWS	3,871	6	23,226	$59.99	$1,393,239
3,301-10,000, CWS	3,114	10	31,140	$59.99	$1,867,970
10,001-50,000, CWS	2,392	10	23,920	$59.99	$1,434,870
50,001-100,000, CWS	422	18	7,596	$59.99	$455,655
100,001-1,000,000, CWS	318	18	5,724	$59.99	$343,361
>1,000,000, CWS	24	18	432	$59.99	$25,914
<=100, NTNCWS	204	6	1,224	$59.99	$73,423
101-500, NTNCWS	171	6	1,026	$59.99	$61,546
501-1,000, NTNCWS	34	6	204	$59.99	$12,237
1,001-3,300, NTNCWS	24	6	144	$59.99	$8,638
3,301-10,000, NTNCWS	4	6	24	$59.99	$1,440
10,001-50,000, NTNCWS	1	6	6	$59.99	$360
50,001-100,000, NTNCWS	0	0	0	$0	$0
100,001-1,000,000, NTNCWS	0	0	0	$0	$0
>1,000,000, NTNCWS	0	0	0	$0	$0
System 3-year Total	**26,000**	**not applicable**	**187,192**	**not applicable**	**$11,228,934**
Annual Average	**not applicable**	**not applicable**	**62,397**	**not applicable**	**$3,742,978**

Notes: Detail may not add exactly to total due to independent rounding. Any plan submitted by systems with EPA primacy will be reviewed by EPA Regional staff. LCRI modeling does not track the number of systems reporting to EPA as the primacy agency.

Exhibit 18. Burden and Costs for States to Provide Templates and Review Public Education Materials

System Type (service population size category, type)	Responses	Burden per Response (hours)	Burden (hours)	Labor Rate (2022 USD/hour)	Cost (2022 USD)
<=100, CWS	5,624	0.88	4,921	$59.99	$295,192
101-500, CWS	7,223	0.88	6,320	$59.99	$379,120
501-1,000, CWS	2,574	0.88	2,252	$59.99	$135,104
1,001-3,300, CWS	3,871	0.88	3,387	$59.99	$203,181
3,301-10,000, CWS	3,114	0.88	2,725	$59.99	$163,447
10,001-50,000, CWS	2,392	0.88	2,093	$59.99	$125,551
50,001-100,000, CWS	422	2.38	1,002	$59.99	$60,121
100,001-1,000,000, CWS	318	2.38	755	$59.99	$45,305
>1,000,000, CWS	24	2.38	57	$59.99	$3,419
<=100, NTNCWS	204	0.88	179	$59.99	$10,708
101-500, NTNCWS	171	0.88	150	$59.99	$8,975
501-1,000, NTNCWS	34	0.88	30	$59.99	$1,785
1,001-3,300, NTNCWS	24	0.88	21	$59.99	$1,260
3,301-10,000, NTNCWS	4	0.88	4	$59.99	$210
10,001-50,000, NTNCWS	1	0.88	1	$59.99	$52
50,001-100,000, NTNCWS	0	0	0	$0	$0
100,001-1,000,000, NTNCWS	0	0	0	$0	$0
>1,000,000, NTNCWS	0	0	0	$0	$0
System 3-year Total	**26,000**	**not applicable**	**23,896**	**not applicable**	**$1,433,430**
Annual Average	**not applicable**	**not applicable**	**7,965**	**not applicable**	**$477,810**

Notes: Detail may not add exactly to total due to independent rounding. Any material submitted by systems with EPA primacy will be reviewed by EPA Regional staff. LCRI modeling does not track the number of systems reporting to EPA as the primacy agency.

Based on the estimated burden and cost presented above for States, **Error: Reference source not found** presents the labor costs to States for each of the activities conducted during the three years covered by this ICR.

Exhibit 19. States Total Burden and Costs for the Proposed LCRI ICR

Requirement	Burden (Hours)	Total Cost (2022 USD)
State implementation activities (read rule, adopt rule, modify data systems, provide training)	399,168	$23,944,566
State reviews updated initial inventories with connector information	200,841	$12,047,686
State reviews annual inventory update	39,000	$2,339,461
State reviews service line replacement plan	187,192	$11,228,934
State provides a template to systems for public education on service lines with lead, GRR, or unknown content and reviews system developed materials	23,896	$1,433,430
State Total	**850,097**	**$50,994,078**

The total State burden and costs shown above also double count requested burden and costs for the LCRR in the *Information Collection Request for the Lead and Copper Rule Revisions* (OMB Control Number 2040-0297, EPA Tracking Number 2606.03) for the review of annual inventory updates, review of service line replacement plans, and the provision of public education templates and review of system developed education materials for customers on service lines with lead, GRR, or unknown content. Therefore, EPA applied a multiplicative factor of 16/36 to the LCRR ICR's total burden and cost estimates to estimate the potential overlap with this LCRI ICR. See the PWS net cost calculation description above for additional details. EPA subtracted the prorated values from the LCRR to estimate the net total and annual average burden and costs (see **Error: Reference source not found**) for the proposed LCRI ICR.

Exhibit 20. States Net Total and Average Annual Burden and Costs for the Proposed LCRI ICR

Item	Responses	Total Burden	Total Costs (2022 USD)
[a] Total for LCRR ICR Renewal (USEPA 2022) – All Activities	2,098,812	3,783,245	$252,769,014
[b] Estimated Overlap with LCRR ICR Renewal ([a] x 16/36)	932,805	1,681,442	$112,341,784
[c] Total for proposed LCRI ICR – All Activities	331,065	850,097	$50,994,078
[d] Net Total for proposed LCRI ICR – All Activities ([c] – [b])	**-601,740**	**-831,345**	**-$61,347,706**
Net Average Annual for proposed LCRI ICR – All Activities ([d]/3)	**-200,580**	**-277,115**	**-$20,449,235**

Total Combined Burden and Costs

This section provides a description of bottom-line estimates for implementation of the proposed LCRI over the first three years following rule promulgation. As the LCRI implementation period overlaps with the LCRR renewal and supplemental ICR, the bottom-line estimates remove the double-counted burden. The bottom-line burden hours and costs for systems and States are the summaries of the hours and costs collectively incurred for all activities. The first part of this section describes the estimated costs and hourly burdens for respondents to the proposed rule. The second part discusses the potential cost and burden to EPA. **Error: Reference source not found** presents a summary of the total respondent burden over three years for PWSs and states.

Exhibit 21. Bottom Line Total Burden and Costs

(2022 USD)

Number of Respondents	**67,003 =** **66,947** +56	Public water systems States
Number of Responses	**966,477 =** 1,568,217 -601,740	Public water systems States
Total Respondent Burden Hours	**-4,450,908 =** -3,619,563 -831,345	Public water system hours State hours
Hours per System for Public Water Systems	**-54.07 =** -3,619,563 /66,947	Total PWS hours from above Total PWS from above
Hours per State for States	**-14,845 =** -831,345 /56	Total state hours from above Total states from above
Total Respondent Cost	**$201,370,609 =** $262,718,315 -$61,347,706	Public water system costs State costs
Average Cost per System for Public Water Systems	**$3,924 =** $262,718,315 /66,947	Total PWS costs from above Total PWS from above
Average Cost per State for States	**-$1,095,495** = -$61,347,706 /56	Total state costs from above Total states from above

Note: Detail may not add exactly to total due to independent rounding.

For the first three years after the final rule is published, the average burden associated with this ICR is estimated to be 2,809,824 burden hours per year. The corresponding average total respondent costs are estimated to be $371,746,927 per year.

EPA estimates the average respondent burden for PWSs to be 2,526,459 hours per year. Respondent costs for PWSs are estimated to be $354,748,901 per year. The Agency estimates that the burden for states is 283,366 hours per year. The corresponding costs for states are estimated to be $16,998,026 per year.

The net average burden is estimated to be -1,483,636 burden hours per year. The corresponding net average total respondent costs are estimated to be $67,123,536 per year.

EPA estimates the net average respondent burden for PWSs to be -1,206,521 per year. Net respondent costs for PWSs are estimated to be $87,572,772 per year. The Agency estimates that the burden for states is -277,155 hours per year. The corresponding costs for states are estimated to be -$20,449,235 per year.

EPA assumes the rule implementation and public education materials development activities will take place in the first year, development and submission to the State of the service line replacement plan is assumed to occur in the third year, while the implementation of the service line inventory and public education distribution requirements are spread uniformly over the first three years. Exhibit 22 and Exhibit 23 show the resulting distribution of burden and cost, respectively.

Exhibit 22. Distribution of Burden over the ICR Period

Requirement	Year 1 Burden (hours)	Year 2 Burden (hours)	Year 3 Burden (hours)
System implementation activities (read rule, assign staff, attend training)	1,338,940	0	0
Systems review records for connector material to prepare the updated initial inventory	1,468,961	1,468,961	1,468,961
Systems submit the updated initial inventory with connector information	127,063	127,063	127,063
Systems conduct normal and field operations to update unknown service lines	not applicable	not applicable	not applicable
Systems update and submit inventory to state annually	26,000	26,000	26,000
Systems develop and submit a service line replacement plan	0	0	374,384
Systems develop public education materials for customers on service lines with lead, GRR, or unknown content and submit to states for review	182,000	0	0
Systems distribute public education materials for customers on service lines with lead or unknown content	272,660	272,660	272,660
System Subtotal	**3,415,624**	**1,894,684**	**2,269,068**
System Estimated Overlap of Average Annual for LCRR ICR Renewal	**3,732,980**	**3,732,980**	**3,732,980**
System Net Subtotal	**-317,356**	**-1,838,296**	**-1,463,912**
State implementation activities (read rule, adopt rule, modify data systems, provide training)	133,056	133,056	133,056
State reviews updated initial inventories with connector information	66,947	66,947	66,947
State review annual inventory update	13,000	13,000	13,000
State reviews service line replacement plan	0	0	187,192
State provides templates to systems for public education on service lines with lead,	23,896	0	0

GRR, or unknown content and reviews system developed materials			
State Subtotal	**236,899**	**213,003**	**400,195**
State Estimated Overlap of Average Annual for LCRR ICR Renewal	**560,481**	**560,481**	**560,481**
State Net Subtotal	**-323,582**	**-347,478**	**-160,286**
Combined Systems and State	**3,652,523**	**2,107,687**	**2,669,263**
Combined Systems and State Net Total	**-640,937**	**-2,185,773**	**-1,624,197**

Exhibit 23. Distribution of Cost over the ICR Period (2022 USD)

Requirement	Year 1 Burden (cost)	Year 2 Burden (cost)	Year 3 Burden (cost)
System implementation activities (read rule, assign staff, attend training)	$50,720,720	$0	$0
Systems review records for connector material to prepare the updated initial inventory	$72,417,808	$72,417,808	$72,417,808
Systems submit the updated initial inventory with connector information	$4,865,587	$4,865,587	$4,865,587
Systems conduct normal and field operations to update unknown service lines	$229,736,236	$229,736,236	$229,736,236
Systems update and submit inventory to State annually	$1,009,845	$1,009,845	$1,009,845
Systems develop and submit a service line replacement plan	$0	$0	$15,081,002
Systems develop public education materials for customers on service lines with lead, GRR, or unknown content and submit to States for review	$7,068,916	$0	$0
Systems distribute public education materials for customers on service lines with lead or unknown content	$22,429,212	$22,429,212	$22,429,212
System Subtotal	**$388,248,325**	**$330,458,689**	**$345,539,691**
System Estimated Overlap of Average Annual for LCRR ICR Renewal	**$267,176,130**	**$267,176,130**	**$267,176,130**
System Net Subtotal	**$121,072,195**	**$63,282,559**	**$78,363,561**
State start-up activities (read rule, adopt rule, modify data systems, provide training)	$7,981,522	$7,981,522	$7,981,522
State reviews updated initial inventories with connector information	$4,015,895	$4,015,895	$4,015,895

State review annual inventory update	$779,820	$779,820	$779,820
State reviews service line replacement plan	$0	$0	$11,228,934
State provides templates to systems for public education on service lines with lead, GRR, or unknown content and reviews system developed materials	$1,433,430	$0	$0
State Subtotal	**$14,210,668**	**$12,777,238**	**$24,006,172**
State Estimated Overlap of Average Annual for LCRR ICR Renewal	**$37,447,261**	**$37,447,261**	**$37,447,261**
State Net Subtotal	**-$23,236,594**	**-$24,670,023**	**-$13,441,089**
Combined Systems and State	**$402,458,993**	**$343,235,927**	**$369,545,863**
Combined System and State Net Subtotal	**$97,835,602**	**$38,612,535**	**$64,922,472**

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

PWSs will incur non-labor costs associated with the tasks of identifying unknown service lines through normal operations and targeted field investigations (See Exhibit 8) and distributing public education materials to customers serviced by LSL, GRR, and unknown material service lines (see Exhibit 12). The total non-labor costs for respondents is estimated to be $720,675,962 or $240,225,321 on average annually (See Exhibit 13). These costs are incorporated into the total and net costs described in Exhibits 21-23.

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such

as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

The Agency is responsible for promulgating and overseeing the implementation of the LCRI. The Agency is involved in the following activities that assist States in implementing the modifications:

- Develop the revised regulations,
- Respond to questions on the revised regulations, and
- Collect data at the national level in SDWIS.

The Agency will also conduct primacy activities for States, tribes, and territories that do not have primacy. Specifically, EPA Regions will be involved in the following activities:

- Reviewing lead service line replacement plans.
- Reviewing updated initial inventories with lead connector information.
- Reviewing annual updates of the service line inventories.
- Providing templates and reviewing public education material.

However, burden and costs for these activities are accounted for under the State burden.

14b. Agency Labor Cost

The Agency will conduct primacy activities in states, tribes, and territories that do not have primacy. However, burden and costs for these activities are accounted for under the State burden. Additional information-related activities that may be undertaken by both EPA headquarters and regional offices include reviewing, interpreting, and explaining the new regulations to states that ask for guidance. For example, during the implementation process, EPA headquarters or regions might be asked for explanations or interpretations of the intent of the new regulations. EPA believes that these regulatory changes are relatively straightforward and limited in scope and expects that the preamble language will generally be sufficient for the purpose of explaining EPA's intent. Therefore, the additional burden incurred by headquarters and regional offices is expected to be minimal.

Further, the additional burden and costs incurred by EPA's drinking water program at headquarters and regional offices to assist states in implementing drinking water regulations are already included in existing ICRs. EPA burden and costs for ongoing regulatory development and support activities for all EPA drinking water regulations are accounted for under the Public Water System Supervision Program ICR.[6] This proposed rule does not create any additional Agency burden beyond that which is already described in the latest version of the PWS Supervision Program ICR (2040-0090, EPA ID 1895.10).

14c. Agency Non-Labor Costs

Any additional burden or cost that EPA may incur as a result of the proposed LCRI implementation activities is expected to be minimal and is already accounted for in existing ICRs.

15) REASONS FOR CHANGE IN BURDEN

[6] Information Collection Request for the Public Water System Supervision Program, OMB control number 2040-0090.

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

The proposed LCRI requirements are intended to strengthen the LCRR in the areas of CCT, customer awareness, and service line replacement. The changes are expected to ensure and enhance the protection of public health through the reduction in lead exposure in drinking water. EPA needs comprehensive and current information on lead and copper occurrence and exposure and associated enforcement activities to implement its program oversight and enforcement responsibilities mandated by the SDWA. States need the information to identify significant sources of lead that might threaten the health and safety of drinking water consumers in a timely fashion.

Over the next three years, the proposed LCRI would require respondents to undertake some actions requested in the ICR entitled *Information Collection Request for the Lead and Copper Rule Revisions* (OMB Control Number 2040-0297, EPA Tracking Number 2606.03) and additional actions beyond those covered in the LCRR ICR. In total these proposed LCRI requirements would decrease the burden by approximately 1.48 million hours and increase the cost by $67.12 million annually over the next three years when compared to the LCRR ICR.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The Agency does not intend to publish information gathered through this information collection.

17) DISPLAY OF EXPIRATION DATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

18) CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.