

# United States Environmental Protection Agency

## Information Collection Request

**Title:** Publicly Owned Treatment Works (POTW) Influent Per- and Polyfluoroalkyl Substances (PFAS) Study and National Sewage Sludge Survey (NSSS)

**OMB Control Number:** 2040-NEW

**EPA ICR Number:** 2799.01

**Abstract:** This data collection is intended to gather data necessary to identify and quantify sources of PFAS discharges, prioritize industrial categories for potential regulation, and establish a current national data set of sewage sludge characteristics. This data collection will support two separate United States Environmental Protection Agency (EPA) studies:

- **POTW Influent PFAS Study.** As announced in the EPA's [Effluent Guidelines Program Plan 15](#), published in January 2023, the EPA will conduct the POTW Influent PFAS Study to gather nationwide data on industrial and domestic wastewater discharges of PFAS into the environment. To accomplish this goal, the EPA will require a subset of POTWs across the United States to complete an electronic questionnaire and conduct wastewater sampling to obtain information on types and quantities of PFAS in discharges from industrial facilities, domestic wastewater or sewage, and POTW influent and effluent. The data will primarily be used to identify and prioritize industrial point source categories where additional study or regulations may be warranted to control PFAS discharges.
- **National Sewage Sludge Survey (NSSS).** The EPA also plans to conduct a NSSS to identify the presence of pollutants in sewage sludge using samples collected from POTWs. This NSSS will focus on obtaining a current national data set on PFAS concentrations and ancillary parameters found in sewage sludge. The data generated by the NSSS will inform future risk assessments and risk management options for sewage sludge.

The EPA, through this Information Collection Request (ICR) package, requests that the White House Office of Management and Budget (OMB) review and approve the ICR to support these two studies.

The EPA estimates that the total burden to the industry for approximately 400 POTWs to respond to the electronic questionnaire and 200 – 300 POTWs to conduct sampling will be approximately 25,640 hours, or \$5.5 million, including labor and other direct costs. The EPA estimates that the total burden to the Agency for the questionnaire and sampling program will be approximately 5,687 hours, or \$0.7 million, including labor costs and other direct costs. The data collection design represents the EPA's efforts to gather sufficient data to perform the analyses required to accurately review and determine whether Effluent Limitations Guidelines and Standards (ELGs) are warranted to address PFAS discharges from specific industries and administer an ICR that limits the burden placed on respondents.

### **Supporting Statement A**

#### **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.*

---

The Clean Water Act directs the EPA to develop national regulations known as ELGs to place limits on the pollutants that are discharged by categories of industry to surface waters and POTWs. Additionally, Section 405(d) of the Clean Water Act requires that the EPA establish requirements for the use or disposal of sewage sludge and review the regulations every two years to identify additional pollutants.

For many decades, industrial facilities have used and discharged PFAS into the environment. PFAS are a class of synthetic chemicals of concern to the EPA because of their widespread use and potential to accumulate in the environment. Certain PFAS are known to cause adverse ecological and human health effects. The EPA has not established national technology-based numeric standards for PFAS in wastewater discharges and few states have developed water quality standards for PFAS. Therefore, few industrial facilities have PFAS monitoring requirements, effluent limitations, or pretreatment standards for wastewater discharges.

As part of the POTW Influent PFAS Study and NSSS, the EPA estimates that approximately 400 POTWs (individual wastewater or standalone wastewater treatment plans, as defined by Section 212 of the Clean Water Act, which is owned by a state or municipality) with a daily design flow rate greater than or equal to 10 million gallons per day (MGD) and a service population greater than or equal to 50,000 people will be required to complete an electronic questionnaire.<sup>1</sup> The EPA will use the information and data collected in the questionnaire to select 200 to 300 of the 400 POTWs to conduct wastewater and sewage sludge sampling. Each POTW selected for sampling will be required to collect and analyze samples of domestic wastewater or sewage, POTW influent, POTW effluent, POTW sewage sludge, and effluent from on average 10 industrial users. The total number of industrial users sampled as part of the sampling program is approximately 2,000 facilities.

The data collection activities described in this ICR will produce a robust data set that will enable the EPA to characterize the type and quantity of PFAS in discharges from industrial facilities, domestic wastewater or sewage, and POTW influent and effluent. The wastewater sampling data will primarily be used to identify and prioritize industrial point source categories where additional study or regulations may be warranted to control PFAS discharges. The sewage sludge sampling will fulfill the EPA's data needs for the NSSS by establishing a current national data set of sewage sludge characteristics which the EPA will subsequently use to inform upcoming risk assessments and the need for future regulations and guidance pertaining to the management of sewage sludge.

This collection effort is necessary because existing data on the wastewater discharged from many industrial facilities to POTWs are typically not publicly available or accessible, are incomplete or inconsistent, are difficult to combine, are limited to certain geographic regions and industrial categories, and/or were not evaluated with standard analytical methods approved for use on wastewater matrices. Additionally, there are limited publicly accessible data on the relative PFAS contributions from industrial wastewater, domestic wastewater or sewage, and commercial sources into the environment; PFAS

---

<sup>1</sup> To simplify and provide clarity throughout this supporting statement, the population of interest includes wastewater treatment plants which store, treat, recycle, or reclaim municipal sewage or liquid industrial wastes and are owned or operated by a state, local government, municipality, or Tribal group. The population of interest does not include federally-owned or privately-owned facilities, and does not include dedicated flow control entities such as Combined Sewer Overflows (CSOs) and Sanitary Sewer Overflows (SSOs).

concentrations in sewage sludge; and the fate and transport of PFAS. The collection effort is also consistent with the EPA's October 2021 [PFAS Strategic Roadmap](#) commitments to address PFAS through investment in scientific research to fill gaps in understanding of PFAS and to prevent PFAS from entering the environment.

## 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.*

---

The EPA's Office of Water plans to administer the data collection, including a one-time questionnaire and two-phase sampling program, under the authority of Section 308 of the Clean Water Act (Federal Water Pollution Control Act, 33 USC Section 1318). Failure to respond, late filing, or failure to comply with the instructions may result in fines, civil penalties, and other sanctions, as provided by law. The EPA first plans to administer an electronic questionnaire to approximately 400 (2.7 percent) of the over 15,000 wastewater treatment facilities in the United States. All active POTWs that are selected will be required to complete the questionnaire regardless of size, location, or wastewater and sewage sludge management practices. See Section 12(a) of this supporting statement for discussion of the EPA's sample size and methodology for selecting POTWs to complete the questionnaire and sampling.

The objectives of the questionnaire will be to gather POTW-specific information and data on significant industrial users (SIUs) discharging to the POTW, known or suspected sources of PFAS discharges to the POTW, and wastewater and sewage sludge management practices of the POTW, including:

- Facility name, location, municipal authority or service agency, and contact information.
- Wastewater discharge and sewage sludge permit information and requirements.
- Quantities of wastewater transferred to the POTW and relative contribution of industrial and non-industrial wastewaters.
- Information on all significant industrial users (SIUs) permitted to discharge to the POTW and, if readily available, information on known or suspected non-SIU sources of PFAS to the POTW.
- Wastewater treatment and management practices, including existing wastewater treatment technologies in place and final destination of treated wastewater.
- Sewage sludge treatment and management practices, including the quantity and final destinations of sewage sludge generated and existing sewage sludge treatment and stabilization processes and technologies.
- PFAS and AOF monitoring requirements and laboratory capabilities.

Following receipt of the completed questionnaires and review of the questionnaire responses, the EPA will select 200 to 300 of the 400 POTWs and approximately 2,000 of their industrial users to participate in a two-phase sampling program:

- **Phase I Wastewater Sampling.** Phase I sampling will support the POTW Influent PFAS Study and will require each selected POTW to collect and analyze one-time grab samples of industrial user effluent, domestic wastewater or sewage, POTW influent, and POTW effluent for PFAS and adsorbable organic fluorine (AOF). For each POTW selected, the EPA will specify on average 10 industrial users for which the POTW must collect and analyze effluent samples. The total

number of industrial users sampled as part of the sampling program will be approximately 2,000 facilities.

- **Phase II Sewage Sludge Sampling.** Phase II sampling will support the NSSS and will require selected POTWs to collect and analyze one-time grab samples of sewage sludge for PFAS and ancillary parameters. Phase II sampling will include the same POTWs selected for Phase I and will not begin until Phase I sampling is complete.

The EPA will provide assistance to the POTWs selected for sampling prior to sample collection through virtual meetings and outreach, and during sample collection via a helpline. To avoid duplicative efforts and reduce total burden to industry, the EPA may allow POTWs with existing PFAS monitoring data meeting the sampling program requirements to submit these data to the EPA in the specified format instead of conducting additional sampling. See Section Error: Reference source not found for additional discussion about efforts to collect existing PFAS monitoring data. More information on data acceptance criteria can be found in Section Error: Reference source not found(c).

The EPA will use monitoring data collected through the sampling program to support the activities and goals below:

- Industrial user monitoring data will be used to identify and quantify industrial discharges of PFAS, allowing the EPA to determine if revisions to the current ELGs are warranted to address PFAS in industrial discharges and prioritize industrial categories for potential regulation.
- Industrial user effluent, domestic wastewater or sewage, and POTW influent sampling data will be used to determine the relative PFAS discharges from domestic, commercial, and industrial sources, allowing the EPA to identify best mechanisms to control PFAS discharges.
- POTW influent, effluent, and sewage sludge data will be used to understand PFAS fate and transport in POTWs and efficacy of existing treatment processes.
- POTW sewage sludge monitoring data will be used to fulfill the EPA's data needs for the NSSS and to inform upcoming risk assessments and risk management options, as well as potential future regulations and guidance for management of sewage sludge containing PFAS and other pollutants.

POTWs will also benefit from the information and data generated by the sampling program by identifying sources of PFAS entering POTWs, allowing them to establish controls for these point sources.

### **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 questionnaire will be administered as a web-based, electronic questionnaire using Qualtrics Survey Software (Qualtrics). The EPA will also use Qualtrics to allow POTWs to electronically submit sample results from the sampling program. The Qualtrics questionnaire and sampling data submission tool will be developed to meet the 1998 Government Paperwork Elimination Act (GPEA). The EPA anticipates that all respondents will be familiar and comfortable with online submission forms and has received

verbal feedback from industry representatives indicating this. Additionally, the Qualtrics questionnaire and sampling data submission tool will include automatic validation checks to minimize data entry errors and allow for automatic export of a response data set, reducing the potential for errors introduced by entry of data. The EPA's email and phone helpline will also be available during the response period to assist facilities as needed with submitting responses.

The EPA designed the questionnaire to include burden-reducing features. For example, the questionnaire contains applicability questions that direct respondents that do not qualify as the population of interest for a particular subset of questions to bypass this subset of questions to continue their response. The questionnaire is also designed with drop down menus and multiple-choice options to simplify and standardize responses, minimizing the number of narrative text responses.

Each of the POTWs selected to complete the questionnaire will receive a notification letter which will provide instructions, a link to an EPA webpage, and a facility-specific Questionnaire ID and entry code. The selected POTWs will access the EPA webpage, be directed via a button link to the Qualtrics login webpage, and log in using their Questionnaire ID and entry code as provided in the notification letter. The web-based questionnaire will allow for electronic review and completion of the questionnaire. This letter will be sent via a trackable mailing service (i.e., the United States Postal Service or Federal Express (FedEx)) to each facility to ensure that a facility point of contact receives and signs for it. Each facility selected for the questionnaire will be allowed 45 calendar days to submit the completed questionnaire.

The EPA will include a helpline email address and phone number in the instructions that respondents can use to request timely technical assistance in completing the questionnaire. Email and phone communication will reduce any misinterpretations of the questionnaire, and the burden of follow-up phone calls and letters to respondents following the response period.

The notification letters and Qualtrics will include information relevant to the purpose and authority under which the EPA is conducting the data collection; instructions for accessing, completing, and submitting the questionnaire; and a glossary with all pertinent definitions, references, and abbreviations to understand and complete the questionnaire. A downloadable, watermarked PDF copy of the questionnaire will be available for respondents to print out to use as a working copy, helping them gather and organize response data before beginning data entry.

Once the questionnaire response period is complete, the EPA and its contractors will export all questionnaire responses from Qualtrics and review the responses for completeness. Responses will also be reviewed for consistency and reasonableness and follow-up calls will be conducted as needed to clarify inconsistencies found in the responses. Data will be imported into a questionnaire database which will be used by the EPA to perform data analysis.

In addition to technical data provided by facilities in the questionnaire, the EPA will require a subset of the respondents to collect and analyze samples to characterize types and quantities of PFAS and other pollutants in industrial user effluent; domestic wastewater or sewage; and POTW influent, effluent, and sewage sludge. Each of the POTWs selected to participate in the sampling program will receive a second notification letter with instructions and a link to an EPA webpage where they can log in using their facility-specific credentials and submit the required sampling results. POTWs selected for sampling will also be required to notify the EPA of the date of sample collection and the date samples are received by laboratories. Prior to conducting the sampling program, the EPA will provide POTWs with a generic

sampling and analysis plan including specific requirements and procedures for sample collection, preservation/cooling, shipping, analysis, review, and submittal. The EPA will coordinate with the POTWs selected for sampling to understand the facility-specific sampling points and determine when sampling should occur. Each facility selected for the sampling program will be allowed 120 calendar days to submit the required monitoring data.

#### **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.*

---

The EPA's Clean Watersheds Needs Survey (CWNS) is an assessment of capital investment needed nationwide for publicly-owned wastewater collection and treatment facilities to meet the water quality goals of the Clean Water Act. The EPA used information and data from the 2022 CWNS, the most recent CWNS data set publicly available, to determine the number of POTWs in the United States and estimate daily flow rates (as reported in the Current Design Flow field of 2022 CWNS) for each POTW. The 2022 CWNS includes facility-specific information on POTWs such as facility name, location, design flow rate, service population, NPDES permit number, municipal authority name, and watershed; however, the 2022 CWNS does not include information on sources of wastewater to POTWs, industrial users or potential PFAS sources, or PFAS monitoring data for industrial user effluent; domestic wastewater or sewage; and POTW influent, effluent, and sewage sludge.

There is not currently a national, centralized public data source that contains the information and data that will be collected via the questionnaire and sampling program. Most industrial users and POTWs are not required to sample or report PFAS in their wastewater or sewage sludge. As concerns regarding PFAS have increased over recent years, several states and regulatory agencies have begun implementing PFAS monitoring requirements for POTWs and certain industrial categories or have otherwise conducted studies characterizing PFAS in industrial user effluent; domestic wastewater or sewage; and POTW influent, effluent, and sewage sludge. The EPA issued a memo in December 2022 containing guidance and direction to states on how to implement PFAS monitoring requirements through NPDES discharge permits. States and regulatory agencies may choose how and when to implement such requirements. The EPA will review monitoring data obtained through state, regional, and independent efforts to augment the data collection. However, existing sources of POTW and industrial user PFAS monitoring data are not sufficient to fulfill the objectives of the POTW Influent PFAS Study and NSSS due to the following reasons:

- Existing data do not capture PFAS discharge data from all industrial categories, including some that the EPA has determined historically or currently use PFAS.
- Existing data are not reported to a centralized, national data system; rather, existing data are confined only to the geographical reach of the regulatory agency that requires the data to be reported.
- Existing data are not publicly available in a format that would allow download or not compiled in a consistent format that would allow cross-source comparison and analysis.
- Existing POTW monitoring data only include aqueous or solids samples and are not paired samples, which does not allow the EPA to determine the partitioning and fate of PFAS in POTW influent.

- Where wastewater and sewage sludge samples have been collected and analyzed for PFAS and AOF, the analyses have not been performed using an EPA-approved standard method. EPA Method 1633 was finalized in January of 2024 and is the first analytical method validated by the EPA for analysis of PFAS in wastewater and solids matrices. EPA Method 1621 was also finalized in January 2024 and is the first analytical method validated by the EPA for analysis of AOF (a surrogate for PFAS) in aqueous matrices.

Although the consulted sources have provided valuable industry information, and the EPA has and will continue to use this information to understand current POTW practices, these sources do not provide the Agency with complete and up-to-date industrial PFAS discharge data that are crucial to the POTW Influent PFAS Study.

As part of the questionnaire, the EPA will collect information and data to identify POTWs that have existing PFAS monitoring requirements and have collected PFAS monitoring data like what will be generated by the sampling program. To avoid duplicative efforts and reduce total burden to industry, the EPA may allow POTWs with existing PFAS monitoring data meeting the sampling program requirements to submit these data to the EPA instead of conducting additional sampling. The EPA will coordinate with POTWs with existing data to determine whether these data are of acceptable quality for use in the POTW Influent PFAS Study and NSSS and requirements for submitting these data. More information on data acceptance criteria can be found in Section 12(c).

The EPA will also develop a public-facing, web-based data submission tool (hereafter referred to as “Voluntary Data Submission Portal”) which will allow states, municipal authorities or service agencies, POTWs (including those not selected to complete the questionnaire or sampling program), and other stakeholders to voluntarily submit relevant existing data characterizing PFAS and AOF in industrial user effluent; domestic wastewater or sewage; and POTW influent, effluent, and sewage sludge. Through this tool, the EPA will allow submission of industrial user and POTW PFAS or AOF monitoring data collected from any period of time, for any purpose, and analyzed using any analytical method. The EPA will require all relevant PFAS and AOF monitoring data to be submitted in a standardized workbook format and meet general acceptance criteria. The template workbook may be downloaded from EPA’s POTW Influent PFAS Study and NSSS webpage. The EPA will consider relevant data collected through this Voluntary Data Submission Portal to augment data the EPA collects through the mandatory sampling program as part of the POTW Influent PFAS Study and NSSS. The EPA anticipates that this Voluntary Data Submission Portal will increase the volume of PFAS monitoring data collected and decrease duplicative efforts of requiring POTWs currently monitoring PFAS to collect additional samples.

## 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 accordance with the requirements of the Regulatory Flexibility Act (RFA), the EPA must assess whether actions would have “a significant impact on a substantial number of small entities” (SISNOSE). Small entities include small businesses, small organizations, and small governmental jurisdictions.

Whether a respondent is defined as a small business depends on the size of the domestic parent and is based on the appropriate Small Business Administration (SBA) entity size criterion (codified at 13 CFR Part 121). The criteria for entity size determination vary by the organization/operation category of the

parent entity and for public entities, “facilities owned by municipalities and other political units with population less than 50,000 were considered to be small.” Thus, the size criterion for public entities is based on the number of residents belonging to the applicable ownership entity. As this information is not readily available for POTWs, the EPA utilized a closely related metric—POTW service population number—as the size criterion for determining small business status. The EPA estimated that POTWs with a service population (as reported in the Total Population Receiving Treatment field of 2022 CWNS) of fewer than 50,000 persons may be a small business. To avoid undue burden on small businesses, the EPA will not require POTWs with service populations less than 50,000 persons to complete the questionnaire or conduct sampling.

The EPA also utilized other metrics for assessing POTW size and potential to be small organizations such as the National Pollutant Discharge Elimination System (NPDES) permit framework which defines “minor” POTWs as those with a design flow rate of 1 million gallons per day (MGD) or less. The EPA will only select POTWs with daily flow rates greater than 10 MGD to complete the questionnaire and conduct sampling; therefore, the population of POTWs impacted by this data collection will all be classified as “major” POTWs under the NPDES permit program.

Based on available information, the EPA believes that 100 percent of POTWs that are requested to complete the questionnaire or conduct sampling would not meet the SBA entity size criterion to be small businesses or small entities. Nonetheless, the EPA has taken steps to ensure that the respondent burden is minimized for all entities, while collecting sufficient and accurate information. To minimize the burden of responding to the questionnaire, the EPA provides a standardized set of pre-populated responses (e.g., a drop-down menu or multiple-choice options) and requests similar types of information together to facilitate review of pertinent records and completion of the questionnaire. Additionally, the questions are phrased with commonly used terminology and the EPA will provide technical assistance to respondents via a helpline.

## **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.*

---

The questionnaire and sampling program are to be administered as a one-time data collection only. If the data collection is not conducted, the EPA will not have sufficient data to identify industrial categories that may require revisions to existing ELGs or new ELGs to address industrial PFAS discharges. The currently available monitoring data for industrial categories that primarily discharge to POTWs do not include wastewater quantity and quality characteristics information, particularly for PFAS. Information on POTW pollution control practices and technologies is available in some permits and/or permit applications, but this information requires manual review of permit and permit application documents which may not be publicly available or accessible, and information would not be available for all POTWs. As described in Section Error: Reference source not found, some states and municipalities are implementing PFAS monitoring and reporting requirements for POTWs and certain industrial categories; however, in most instances these data are not publicly accessible, are incomplete or inconsistent, are difficult to combine, do not include PFAS monitoring for all industrial categories known to use PFAS, and/or were not evaluated with standard analytical methods approved for use on wastewater matrices.

Without the information sought in this one-time data collection, the EPA will be required to rely on the publicly available data which is not sufficient to assess the characterization of POTW influent, effluent, and sewage sludge or discharges from industrial categories that predominantly discharge to POTWs. In short, the EPA will not be able to fulfill its statutory requirements to review and revise existing ELGs to address industrial discharges of PFAS or meet the PFAS Strategic Roadmap commitments to prevent PFAS releases at the source.

The EPA has conducted three NSSSs, performed in 1988-1989, 2001, and 2006-2007, to collect national concentration data on contaminants found in sewage sludge. With this upcoming fourth NSSS, the objective is to provide a national data set on PFAS concentrations found in sewage sludge. Conducting this data collection is critical to obtain national PFAS occurrence data to help inform upcoming risk assessments and risk management options for PFAS in sewage sludge. This data is necessary for the scientific and economic analysis to inform the need for potential future rulemaking. This data collection will provide the first comprehensive national data set on PFAS industrial and domestic wastewater or sewage sources, pretreatment options to reduce PFAS sources, and PFAS transformation and fate throughout the wastewater and sewage sludge treatment process.

## **7. GENERAL GUIDELINES**

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

---

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR §1320.5(d)(2).

## **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.*

The EPA published a notice in the *Federal Register* on March 26, 2024, announcing the EPA's intent to submit a request for a new ICR and to collect comments on the draft questionnaire and POTW Influent PFAS Study and NSSS data collection effort. The notice included a description of the entities to be affected by the proposed data collection, a brief explanation of the need for the data collection, identification of the authority under which the data collection will be issued, an estimate of burden to be incurred by POTWs selected to complete the questionnaire and sampling program, and an estimate of burden to be incurred by the EPA to administer the data collection. The Agency requested comments and suggestions regarding the questionnaire and proposed POTW Influent PFAS Study and NSSS data collection and the reduction of data collection burden. Pursuant to the Paperwork Reduction Act §3506(c)(2)(A), the EPA solicited comments and information to enable it to:

- Evaluate whether the proposed data collection is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility.

- Evaluate the accuracy of the Agency's estimate of burden of the proposed data collection, including the validity of the methodology and assumptions used.
- Enhance the quality, unity, and clarity of the information to be collected.
- Minimize the burden of the data collection on those who are to respond.

The EPA received 25 comments in response to the March 26, 2024 *Federal Register* notice. Key issues raised in the comments are summarized below.

- Multiple entities asserted that the EPA underestimated the burden for POTWs to complete the questionnaire and sampling program. Commenters cited higher sampling analysis costs than what was estimated by the EPA and expressed concern about analytical laboratory capacity and turnaround time. The EPA acknowledges that, because EPA Method 1633 and EPA Method 1621 were only finalized in January 2024, there is limited laboratory capacity and this is inflating analysis costs in some regions. The EPA anticipates that, by the time the sampling program commences (calendar year 2025), additional laboratory capacity will exist which will reduce cost for analysis. Additionally, in order to distribute demand for environmental laboratories completing sample analysis, the EPA will divide the POTWs selected for wastewater sampling into four groups and stagger required Phase I sampling over a 16-month period.
- Commenters requested a 120-day period for facilities to complete and submit their responses to the questionnaire and a 180-day period (i.e., an additional 60 days) for facilities to conduct sampling. Because the questionnaire is only 20 questions and only requests POTWs to provide readily available data, the EPA believes a 45-day period to complete the questionnaire will be sufficient. Additionally, in order to distribute demand for environmental laboratories completing sample analysis, the EPA will divide the POTWs selected for wastewater sampling into four groups and stagger required Phase I sampling over a 16-month period. The EPA will require all POTWs selected for sampling to collect samples within 30 calendar days from notice and will consider written requests for extensions for submitting the sampling data to EPA in the event of laboratory delays or other qualifying reasons.
- Commenters asserted that there is sufficient existing data on PFAS in industrial wastewater discharges and from POTWs through state and local sampling efforts and requested that EPA collect and evaluate existing data before requiring facilities to sample. The EPA has found that existing data is not available in a centralized consistent format, was analyzed using a variety of analytical methods not approved for PFAS analysis of wastewater matrices, and does not capture all types of industry known to use and potentially discharge PFAS. There is also a data gap for industries that are not already suspected of having PFAS discharges. The EPA may allow POTWs with existing PFAS and AOF monitoring data meeting the sampling program requirements to submit that data in lieu of collecting new samples as discussed in Section Error: Reference source not found.
- Commenters requested that the EPA provide training and/or guidance on how to submit data to the Voluntary Data Submission Portal. The EPA will develop instruction and conduct outreach to increase awareness and understanding of the Voluntary Data Submission Portal.
- Commenters provided suggestions for site selection criteria that concerned topics of geographic distribution, number of facilities selected for the population, types of industrial users to include in sampling, and municipal burden. The EPA is already considering all these factors and the methodology for site selection will be included in the final report. See Section Error: Reference

source not found(a) for additional information about the site selection methodology and criteria.

- Commenters asserted that the data sources used to determine flow and service population are outdated and that those metrics are not appropriate selection criteria. The EPA updated their POTW data set to reflect current data from the 2022 CWNS and ICIS-NPDES. The EPA also believes that facilities with high flow and service population will receive industrial wastewater from a wider variety of point source categories and are more likely to have the resources to complete the ICR.
- Utilities expressed concern that they will have to collect additional information on their industrial users to determine if they are a source of PFAS. The EPA does not intend for facilities to generate new data to fill out the questionnaire. Facilities can select “unknown” if they do not have information on potential sources of PFAS.
- Commenters asserted that EPA Methods 1633 and 1621 are not finalized or promulgated and, therefore, should not be used for regulatory decision-making or in rulemaking analysis. The EPA has finalized these methods and is in the process of promulgating them as the first methods approved for PFAS and AOF analysis for wastewater matrices in 40 CFR Part 136. The EPA will proceed with requiring use of EPA Methods 1633 and 1621.
- Commenters expressed concern that one-time grab samples are impacted by environmental conditions at the time of sampling and will not be representative of variable wastestreams. The EPA will not require additional grab samples or composite sampling to minimize burden on industry; however, the EPA may accept existing data that consists of composite samples, provided that the data meets the acceptance criteria. Additionally, the EPA will accept any other historical sampling data via the Voluntary Data Submission Portal.
- Commenters expressed concern regarding public reactions and potential liability resulting from findings and sampling results. The EPA intends to report aggregated wastewater results in the final POTW Influent PFAS Study report.
- Commenters asserted that the collection of sewage sludge data is outside the scope of the ELGs program and sewage sludge should be its own study. This ICR includes the data collection for two separate studies – the POTW Influent PFAS Study and the NSSS. The data generated by the NSSS will inform future risk assessments and risk management options for sewage sludge.

The data collected through this ICR will allow the EPA to collect data necessary to identify and quantify sources of PFAS discharges, prioritize industrial categories for potential regulation, and establish a current national data set of sewage sludge characteristics. The EPA is continuing to pursue the POTW Influent PFAS Study and NSSS data collection.

### **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.*

The EPA's Office of Water has conducted consultation with individuals in the POTW industry and its trade associations and consultants to solicit their input on the need and use of a questionnaire and sampling program. From August 2023 through July 2024, the EPA discussed the design and objectives of the POTW Influent PFAS Study and NSSS with representatives from the National Association of Clean Water Agencies (NACWA), Association of Clean Water Administrators (ACWA), the Environmental Council of the States (ECOS), and states and EPA Regions participating in the EPA's monthly national pretreatment meetings. The EPA plans to continue meeting and soliciting comments from these stakeholders throughout the development and administration of the questionnaire and sampling program.

Since the EPA announced the POTW Influent PFAS Study in *Effluent Guidelines Program Plan 15* in January 2023, the EPA has engaged with state environmental agencies, local permitting/municipal authorities, and other stakeholders to discuss the POTW Influent PFAS Study and NSSS and availability of PFAS monitoring data for POTWs and industrial users:

- California Water Boards.
- Maine Department of Environmental Protection.
- Michigan Department of Environment, Great Lakes, and Energy (EGLE).
- Rhode Island Department of Environmental Management.
- San Francisco Estuary Institute (SFEI).
- South Carolina Department of Health and Environmental Control (DHEC).
- Wisconsin Department of Natural Resources (DNR).

The EPA was not able to conduct outreach to every state agency, nor did every state have the same types of data or level of detail available for POTWs.

## **9. PAYMENTS OR GIFTS TO RESPONDENTS**

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

---

No payments or gifts are provided to respondents.

## **10. 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.*

---

The EPA anticipates the information collected in the questionnaire will not be claimed as Confidential Business Information (CBI) because:

- Effluent data cannot be claimed as CBI;
- All facilities required to complete the questionnaire and sampling are public entities;
- It is unlikely that POTWs will have taken measures to protect the confidentiality of the basic information solicited in this questionnaire; and

- The information is reasonably obtainable without the business's consent by use of legitimate means.

## 11. 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 sensitive questions pertaining to private or personal information, such as sexual behavior or religious beliefs, will be asked in the questionnaire or as part of the sampling program.

## 12. 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

The questionnaire will collect information from approximately 400 POTWs, representing approximately 2.7 percent of the total population located in the United States. POTWs that administer pretreatment programs for industrial users serve as a centralized data source for indirect industrial wastewater discharges. The EPA will therefore use POTWs as a proxy for collecting discharge data on industrial dischargers across industrial categories.

The EPA compiled publicly available technical data on 800+ POTWs that reported a design or average daily flow rate equal to or greater than 10 MGD and a service population equal to or greater than 50,000 people based on information collected from the 2022 CWNS, 2022 Discharge Monitoring Reports (DMRs), and the EPA's Integrated Compliance Information System - National Pollutant Discharge Elimination System (ICIS-NPDES) database. The EPA established these criteria to focus the data collection on POTWs with the largest daily flow rates which will likely capture the largest number and diversity in types of industrial users and wastewater influents. These criteria are intended to select POTWs which have sufficient resources to complete the data collection and minimize burden to small businesses/entities and POTWs with minor NPDES POTWs. The EPA will consider the following factors when selecting POTWs to receive the questionnaire:

- **Number of Industrial Users.** The EPA will prioritize facilities that reported a higher number of significant industrial users (SIUs) and categorical industrial users (CIUs).

- **Flow Rates.** The EPA will prioritize facilities that reported higher daily flow rates because these likely capture the largest number and diversity in types of industrial users.
- **Geographic Distribution.** The EPA will include POTWs from all states and territories with POTWs meeting the acceptance criteria and select no more than 20 POTWs in an individual state or territory.
- **Municipal Authority Burden.** The EPA intends to limit the number of selected POTWs in an individual city or operated by a single municipal authority to fewer than 5.
- **Biosolids Programs.** The EPA will prioritize facilities with biosolids NPDES permits and/or sewage sludge generation and management information.
- **Ownership Type.** The EPA will only select publicly owned and/or operated facilities to eliminate collection of CBI.

The respondents affected by the questionnaire are primarily classified under North American Industry Classification System (NAICS) code 221320 (Sewage Treatment Facilities).

The subsequent sampling program will require a subset of 200-300 POTWs that completed the questionnaire to also collect and analyze samples from on average 10 industrial users (effluent only); domestic wastewater or sewage; and POTW influent, effluent, and sewage sludge. The total number of industrial users sampled as part of the sampling program will be approximately 2,000 facilities. The EPA will select which POTWs will collect and analyze samples based on location, flow rate, types of influent wastewater and industrial users, wastewater and sewage sludge management practices, and other information and data collected from the questionnaire. POTWs will be responsible for completing all sampling program requirements in accordance with the generic sampling and analysis plan; therefore, the respondents affected by the sampling program are POTWs and primarily classified under NAICS code 221320 (Sewage Treatment Facilities).

## **12b. Information Requested**

The questionnaire consists of 20 questions. A copy of the draft questionnaire is included in Appendix A. The EPA believes that all the information and data requested in the questionnaire is readily available to facilities; the EPA does not anticipate facilities will need to generate new information or data to complete the questionnaire. The data items requested in the questionnaire and the purpose for requesting the information are listed in table 12 -1.

The EPA prepared the questionnaire to be applicable to a variety of POTW operations; therefore, not all questions will apply to every respondent. The questionnaire includes instructions to note when respondents do not need to complete a section or series of questions.

The questionnaire will primarily collect data for calendar year 2023, which represents the most recent year for which complete technical data will be available as the EPA expects the questionnaire will be administered in 2024. The questionnaire is a one-time data collection effort.

**TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE**

Section	Question Number	Question Description	Purpose
1 – General Facility Information	1	Provide the facility name, municipal authority/service agency name, physical address, and mailing address.	Confirm and correct errors in the POTW list, including facility name and address. Confirm the number of POTWs operated by each municipal authority/service agency.
	2	Provide contact information (i.e., name, phone number, email) for technical information reported in the questionnaire response.	Use contact information reported for the facility to conduct follow up for questionnaire responses and contact regarding sampling, as necessary.
	3	Provide information relevant to existing water discharge and sewage sludge requirements (e.g., NPDES permits, state permits for sewage sludge management, underground injection control permits, local ordinances), including identification number, type of requirement, regulatory agency, expiration date, and whether it includes PFAS monitoring requirements.	Understand how regulatory authorities are implementing water discharge requirements and sewage sludge management requirements. Determine facilities that are already required to conduct PFAS monitoring of water discharges or sewage sludge.
	4	Identify if facility has completed a NPDES Permitting Program Application Form 2S (New and Existing Treatment Works Treating Domestic Sewage) or the equivalent state form. If so, requests the respondent to upload the applicable forms and specify the regulatory agency receiving the most recent Form 2S (or the equivalent state form) and submission date.	Identify which POTWs have completed Form 2S (or the equivalent state form) and the regulatory agency which received it.
2 – Wastewater Influent and Industrial Sources	5	Report the facility's design maximum daily influent flow rate, annual average daily influent flow rate, and seasonal average daily influent flow rates for 2023.	Determine the quantity of water managed by the facility and seasonal variations in flow rate, which will be used to determine relative size of the facility, determine when sampling should be conducted, and augment sampling data.
	6	Report the total influent flow rate to the facility for 2023.	
	7	Estimate the total influent flow rate or relative contribution of industrial wastewater and non-industrial wastewater (e.g., domestic wastewater or sewage, commercial/institution wastewater, stormwater, groundwater) to the facility in 2023. May be reported as gross value or relative percent.	Understand the relative contributions of different types of wastewater to the POTW and determine if there are trends between PFAS concentrations and types of wastewater received by the POTW.

**TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE**

Section	Question Number	Question Description	Purpose
	8	Identify whether the facility administered a local pretreatment program regulated by 40 CFR §403.8(a) in 2023.	Provides insight into the facility's understanding and oversight of industrial wastewater discharges to the POTW, and to determine if the POTW has the authority to collect samples from industrial users.
	9	Report all SIUs permitted to discharge to the POTW in 2023. Also, report up to 10 additional non-SIU facilities that are known or suspected to discharge PFAS to the POTW. <sup>2</sup> For each facility, report the facility name, address, city, state, whether the facility is a SIU, point source category, NAICS code(s), average daily discharge flow rate, and whether the facility monitors for PFAS, has effluent limitations for PFAS, or is a known or suspected source of PFAS discharges. Complete response using an EPA-provided Excel template workbook.	Determine facilities and categories that monitor PFAS, have existing effluent limitations for PFAS, or are known or suspected of PFAS discharges. Identify specific facilities to be included in the list of 2,000 industrial users to select for wastewater sampling as part of Phase I of the sampling program.
3 – Wastewater Management Practices	10	Provide wastewater treatment diagram(s) depicting the source, wastewater treatment/management practices, and destination of wastewaters transferred to the wastewater treatment system in 2023. The diagram should include the types of wastewaters transferred to the facility, each wastewater treatment unit and solids treatment/stabilization unit operated on site, the influent and effluent to each treatment unit, any pollutant monitoring or PFAS sample locations at the facility, and all interim and final destinations of each wastewater.	Understand the flow of wastewater from POTW influent to wastewater treatment to final destination. Understand the configuration of existing wastewater treatment units and current management practices. Use to identify specific sample collection locations for POTW influent, effluent, and sewage sludge if the POTW is selected for the sampling program.
	11	Identify the wastewater treatment technologies operated at the facility during 2023. Specify the wastewater treatment technologies installed specifically to treat, remove, or destroy PFAS.	Understand the wastewater treatment operations currently in place at the facility and whether the facility is effectively reducing PFAS prior to discharge.

<sup>2</sup> Only SIUs are required to be reported. Non-SIU facilities may be reported as known or suspected sources of PFAS to the POTW if the information requested is readily available or the respondent has reasonable cause. However, submission of information on known or suspected sources of PFAS to the POTW is not required and is provided at the discretion of the respondent. The respondent is not required to generate or collect new data to complete this question. If there is uncertainty or inadequate available data to identify a discharger as a known or suspected PFAS source, the respondent will select "Unknown."

**TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE**

Section	Question Number	Question Description	Purpose
	12	Report the total flow rate of treated wastewater to each final destination in 2023. Final destinations may include surface water, land application, underground injection, recycle/reuse, evaporation, offsite treatment, and other.	Determine how treated wastewater is managed by the facility.
4- Sewage Sludge and Biosolids Management	13	Identify if the facility generated any sewage sludge at any time during 2023. If so, report the total weight of sewage sludge generated during 2023.	Identify which facilities produce sewage sludge to inform selection of which POTWs to participate in the Phase II sampling program. Determine the quantity of sewage sludge generated by POTWs. Facilities that did not generate any sewage sludge during 2023 are instructed to skip the remainder of Section 4.
	14	Identify whether the facility submitted a Sewage Sludge (Biosolids) Annual Report for 2023. If so, provide the Biosolids NPDES ID and a copy of the report.	Identify sources of information for sewage sludge production and collect annual report information for future review.
	15	Report the total weight of sewage sludge sent to each final destination during 2023. Final destinations include land application, offsite Class 1 sludge management facilities, surface disposal, municipal solid waste landfill, hazardous waste landfill, surface impoundment, incineration, pyrolysis, gasification, supercritical water oxidation, and other.	Determine sewage sludge management practices and determine potential risks associated with improper management of PFAS-containing sewage sludge.
	16	Identify if the facility produced biosolids at any time during 2023 and, if so, report the total weight of each type of biosolids produced during 2023.	Determine the relative portion of sewage sludge that becomes biosolids at each POTW and quality of these biosolids.
	17	Identify the sewage sludge treatment and stabilization processes/technologies performed at the facility to produce biosolids in 2023.	Determine how POTWs treat and stabilize sewage sludge to produce biosolids. Determine whether PFAS and other pollutants present in sewage sludge may be removed or transformed during sewage sludge treatment and stabilization.
	18	Estimate the average onsite storage time of sewage sludge and biosolids prior to transfer to the final destination during 2023.	Determine the residence time for sewage sludge and produced biosolids.

**TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE**

Section	Question Number	Question Description	Purpose
5 – Monitoring and Sample Analysis	19	Identify whether the POTW has conducted any PFAS or AOF sampling or collected PFAS monitoring data for the influent, effluent, domestic wastewater or sewage, sewage sludge, or industrial user effluent since 2022. Identify the analytical methods used to quantify PFAS or AOF.	Determine whether the facility has previously collected PFAS characterization data that can inform the study's goals and sampling plans.
	20	Identify whether the facility or municipality will operate an onsite laboratory for analysis of aqueous wastewater and/or sewage sludge samples by December 31, 2024. If yes, identify if the laboratory will be capable of performing the following analytical methods: EPA Method 1633 and EPA Method 1621 for aqueous samples; EPA Method 1633, Standard Method 2540, EPA Method 6010, and EPA Method 9060 for sewage sludge samples.	Identify facilities that can perform onsite sample analysis, and therefore may incur lower costs, for the sampling program.
6 – Comments	NA	Space for facility to provide additional comments or elaborate on any questions throughout the questionnaire.	Augment questionnaire responses.

## 12c. Respondent Activities

This ICR collects data to support two studies – the POTW Influent PFAS Study and the NSSS. The data collection effort will require approximately 400 POTWs to devote time and resources to produce acceptable responses to a questionnaire. A subset of 200 to 300 questionnaire respondents will be required to collect and analyze samples to characterize the types and quantity of pollutants in industrial user effluent; domestic wastewater or sewage; and POTW influent, effluent, and sewage sludge. The EPA expects that wastewater treatment plant operators, engineers, and operations managers at the facilities will devote time toward reviewing EPA instruction, gathering requested information and data, completing all sections of the questionnaire, reviewing and submitting the final responses to the questionnaire, coordinating and planning sampling with the EPA staff, collecting and shipping samples, and reviewing and compiling sampling results. The EPA estimated the costs to the respondents' facilities associated with these time commitments by multiplying the time spent in each labor category by an appropriately loaded hourly labor rate.

Table 12-2 breaks down the burden (in hours) per anticipated respondent activity and per labor category necessary to complete the questionnaire. For purposes of estimating burden associated with the questionnaire, the EPA assumes that 400 POTWs will be required to complete the electronic questionnaire and the POTW response rate will be 100 percent.

The EPA expects that questionnaire response will be led by the operator as most questions are specific to wastewater and sewage sludge management and treatment. The EPA included hours for engineering staff to support collecting data and entering technical data in the questionnaire. The EPA also included hours for the operations manager to review the questionnaire response and coordinate submission.

**TABLE 12-2. ESTIMATED QUESTIONNAIRE RESPONSE BURDEN BY ACTIVITY AND LABOR CATEGORY**

Activity	Labor Category and Burden (hours)			
	Operator <sup>a</sup>	Engineer	Operations Manager	Total Burden <sup>a</sup>
Review Instructions & Access Qualtrics Questionnaire	1	1	1	3
Complete Questionnaire	12	4	--	16
Review & Submission	--	--	4	4
<b>Total</b>	<b>13</b>	<b>5</b>	<b>5</b>	<b>23</b>

a – Total burden presented in this table does not account for coordination with the helpline. The EPA estimates that 10 percent of the questionnaire respondents will have an operator spend 1 hour coordinating with the helpline.

In addition to completing the questionnaire, the EPA will require a subset of 200 to 300 POTWs to collect wastewater and sewage sludge samples and contract laboratories to analyze the samples using the specified analytical methods. Prior to conducting the sampling program, the EPA will provide POTWs with a generic sampling and analysis plan including specific requirements and procedures for sample collection, shipping, analysis, and submittal. POTWs will spend time and resources to review the generic sampling and analysis plan and engage with the EPA on specific sampling points required for the facility. Facilities will be responsible for acquiring sampling bottles and supplies, coordinating and contracting

with accredited analytical laboratories, collecting samples, preserving/cooling samples, shipping samples to laboratories, notifying the EPA that samples have been received by the laboratories, reviewing sample results, and providing sample data to the EPA. POTWs will be required to complete all sampling program requirements in accordance with the generic sampling and analysis plan. The EPA will also provide assistance to the POTWs selected for sampling prior to sample collection through virtual meetings and outreach, and during sample collection via a helpline.

The sampling program will be conducted in two phases, as described below.

#### **Phase I Wastewater Sampling – POTW Influent PFAS Study**

Phase I sampling will support the POTW Influent PFAS Study and will require each selected POTW to collect and analyze one-time grab samples of industrial user effluent, domestic wastewater or sewage, POTW influent, and POTW effluent. For each POTW selected, the EPA will specify on average 10 industrial users for which the POTW must collect and analyze effluent samples. The total number of industrial users sampled as part of the sampling program will be approximately 2,000 facilities. All aqueous samples collected from the POTWs and industrial users will be analyzed for the following:

- PFAS using EPA Method 1633, and
- adsorbable organic fluorine (AOF) using EPA Method 1621.

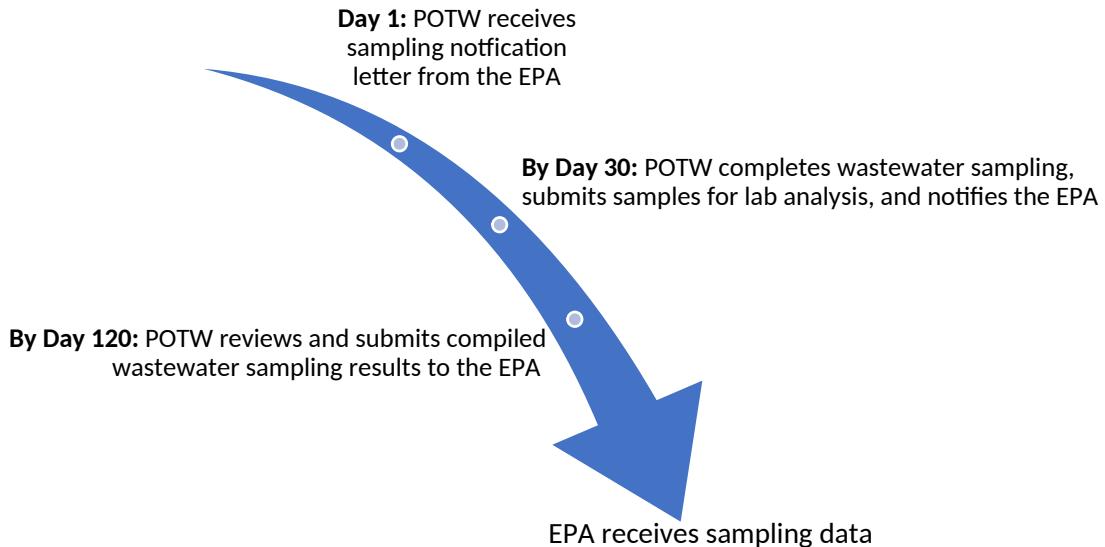
Phase I sampling will be staggered in order to distribute demand for environmental laboratories completing sample analysis. The EPA will divide the POTWs selected for wastewater sampling into four groups that contain 50-75 POTWs located across the nation. Groups will sample sequentially (i.e., Group 1 will sample and submit results to the EPA, then Group 2 will sample and submit results to the EPA, etc.) over a 16-month period.

Each group of POTWs will be given 120 calendar days (approximately 4 months) to collect, analyze, review, compile, and submit the required wastewater sampling results to the EPA. As shown in Figure 1, the EPA will require POTWs in each group to meet the following deadlines:

- Collect and send the required wastewater samples to the contracted laboratory for analysis within 30 calendar days following notification.
- Notify the EPA of the date(s) of sample collection, date(s) samples are received by the analytical laboratory, and the analytical laboratory(ies) conducting PFAS and AOF analysis within 30 calendar days following notification.
- Review, compile, and submit wastewater sampling results to EPA in the specified format within 120 calendar days following notification.

POTWs are required to immediately notify the EPA in writing if there are any delays in sample collection or analysis (e.g., laboratory analysis wait times exceed 90 days). The EPA understands that these types of delays may occur and will work with individual POTWs on a case-by-case basis.

**FIGURE 1: VISUALIZATION OF PHASE I SAMPLING PROCESS**



#### Phase II -NSSS

Phase II sampling will support the NSSS and will require selected POTWs to collect and analyze one-time grab samples of sewage sludge. Phase II sampling will include the same POTWs selected for Phase I and will not begin until Phase I sampling is complete. All POTWs will sample at the same time. Up to four sewage sludge samples will be collected per POTW; two samples will be shipped to the POTW's contracted laboratory for immediate analysis and an additional two samples will be shipped to the EPA for long-term frozen storage. The two sewage sludge samples collected for immediate laboratory analysis will be analyzed for the following:

- PFAS using EPA Method 1633,
- metals using EPA Method 6010,
- total organic carbon using EPA Method 9060, and
- total solids, volatile solids, and fixed solids using Standard Method 2540.

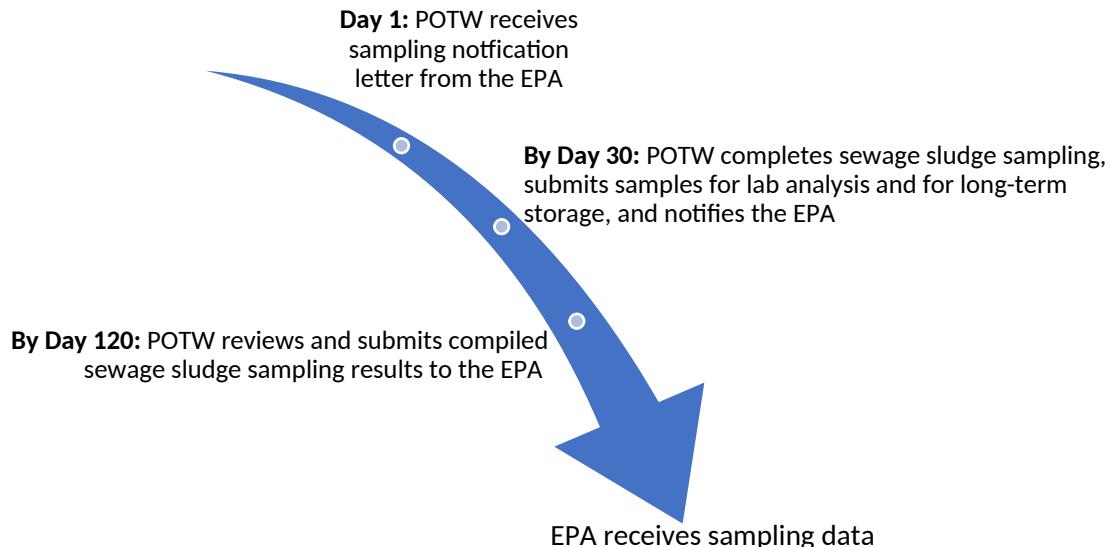
As shown in Figure 1, the EPA will require POTWs to meet the following deadlines:

- Collect and send the required sewage sludge samples to the contracted laboratory for analysis and to the EPA for long-term frozen storage within 30 calendar days following notification.
- Notify the EPA of the date(s) of sample collection, date(s) samples are received by the analytical laboratory, and the analytical laboratory(ies) conducting analysis of PFAS and ancillary parameters within 30 calendar days following notification.
- Review, compile, and submit sewage sludge sampling results to EPA in the specified format within 120 calendar days following notification.

POTWs are required to immediately notify the EPA in writing if there are any delays in sample collection or analysis (e.g., laboratory analysis wait times exceed 90 days). The EPA understands that these types of delays may occur and will work with individual POTWs on a case-by-case basis.

The long-term frozen storage samples will serve as an archive of sewage sludge samples for the NSSS. These samples may be used for any of the proposed laboratory analyses if extra is needed, as well as for future EPA studies, pending funding (e.g., non-targeted analysis and targeted analysis of additional PFAS analytes besides the 40 PFAS listed in EPA Method 1633). Archive samples have also been collected for past NSSSs, including the [2001 NSSS](#) and [2006-2007 Targeted NSSS](#). POTWs will not be required to analyze the long-term storage samples – only collect and ship the sample volumes to the specified EPA storage facility. The exact number, type, and collection locations of samples will vary by POTW and will be specified by the EPA prior to the sampling episode. Additionally, POTWs will be required to collect QA/QC samples as specified by the listed methods above.

**FIGURE 2: VISUALIZATION OF PHASE II SAMPLING PROCESS**



For the purposes of estimating burden associated with the sampling program, the EPA estimates that 200 POTWs will be required to sample and each of these POTWs will collect 16 aqueous samples (13 wastewater samples plus 3 QC/QA samples) during Phase I and 5 sewage sludge samples (2 samples for immediate analysis, 2 samples for long-term frozen storage, and 1 QC/QA sample) during Phase II. On a case-by-case basis, POTWs may be able to submit existing data in lieu of conducting additional sampling if the existing data meets all the requirements of the EPA's sampling program, such as including all required sampling locations and PFAS and AOF sample results analyzed using EPA Methods 1633 and 1621.

Table 12-3 presents estimated burden (in hours) for the sampling episodes on a per facility basis by labor category. The EPA expects that operators and operations managers will be involved in planning and conducting the wastewater and sewage sludge sampling.

**TABLE 12-3. ESTIMATED BURDEN FOR THE SAMPLING PROGRAM BY ACTIVITY AND LABOR CATEGORY**

Activity	Labor Category and Burden (hours)		
	Operator	Operations Manager	Total Burden
Pre-Sampling Episode Planning (e.g., pre-sampling coordination with the EPA, review of generic sampling and analysis plan requirements)	10	5	15
Sampling Preparation (e.g., reviewing site-specific sampling requirements, acquiring sampling bottles and supplies, coordinating with laboratories for analysis)	16	5	21
Sample Collection (assumes one full day for two POTW operators to collect required Phase I wastewater samples, one half day for two POTW operators to collect required Phase II sewage sludge samples, and 4 hours for manager oversight)	24	4	28
Sample Cooling and Shipment (e.g., cooling samples, packing and preparing coolers for shipment)	6	--	6
Sample Results Review and Submission (e.g., receipt and review of laboratory results, compiling data into standardized format, submission to the EPA)	8	4	12
<b>Total Per Facility</b>	<b>64</b>	<b>18</b>	<b>82</b>

#### 12d. Respondent Burden Hours and Labor Costs

The EPA obtained mean labor rates from the May 2022, United States Department of Labor, Bureau of Labor Statistics website for NAICS code 221300 (Water, Sewage and Other Systems). Table 12-4 presents the labor data for 2022 (the latest year for which data are available) for the labor categories representing an operator, engineer, and operations manager. To account for additional costs to the employer for benefits and overhead, the EPA calculated an 80 percent increase in the mean hourly pre-tax earnings rate for each labor category. The EPA used these calculated labor rates for the burden estimates.

**TABLE 12-4. 2022 MEAN HOURLY RATES BY LABOR CATEGORY**

Labor Category	Operator <sup>a</sup>	Engineer <sup>b</sup>	Operations Manager <sup>c</sup>
Mean Hourly Rates	\$45.88/hour	\$77.56/hour	\$109.37/hour

Wage Data Source: May 2022 National Occupational Employment and Wage Estimates for NAICS Code 221300 Water and Wastewater Treatment Plant and System Operator (occupation code 51-8031), Engineers (occupation code 17-2000), and General and Operations Managers (occupation code 11-1021). Available at [https://www.bls.gov/oes/current/naics4\\_221300.htm](https://www.bls.gov/oes/current/naics4_221300.htm).

Benefits/Overhead Load Rate Source: EPA 2020 Handbook on Valuing Changes in Time use Induced by Regulatory Requirements and Other EPA Actions (EPA-236-B-15-001). Available at [https://www.epa.gov/sites/default/files/2020-12/documents/epa\\_handbook\\_on\\_valuing\\_changes\\_in\\_time\\_use\\_121520\\_final\\_508.pdf](https://www.epa.gov/sites/default/files/2020-12/documents/epa_handbook_on_valuing_changes_in_time_use_121520_final_508.pdf)

a - Operator unloaded mean hourly wage of \$25.49/hour multiplied by 1.8 (overhead/benefits) = \$45.88/hour.

b - Engineer unloaded labor rate of \$43.09/hour multiplied by 1.8 (overhead/benefits) = \$77.56/hour.

c - Operations manager unloaded labor rates of \$60.76/hour multiplied by 1.8 (overhead/benefits) = \$109.37/hour.

The EPA calculated the estimated respondent burden for completion of the questionnaire using the estimated total response time per activity shown in Table 12-2 as well as the labor rates shown in Table 12-4 to calculate a total labor cost shown in Table 12-5.

**TABLE 12-5. TOTAL ESTIMATED RESPONDENT LABOR BURDEN FOR THE QUESTIONNAIRE PER RESPONDENT**

Operator Total Labor Costs a	Engineer Total Labor Costs	Operations Manager Total Labor Costs	Total Labor Burden Cost a
\$550.58	\$387.81	\$546.84	<b>\$1,485.23</b>

a - Total burden cost presented in this table does not account for coordination with the helpline. The EPA estimates that 10 percent of the questionnaire respondents will have an operator spend 1 hour (equivalent to \$45.88) coordinating with the helpline.

The total burden for the questionnaire is the sum of the estimated burden per facility for all facilities the EPA expects will respond. As noted previously in this supporting statement, the EPA estimates the population of POTWs selected to complete the questionnaire at 400. The EPA assumes that all the POTWs selected will respond to the questionnaire. Table 12-6 includes the number of respondents, total burden, and total cost for the industry to respond to the questionnaire. The values presented in Table 12-6 also include hours for a portion of the respondents to consult with the EPA's helpline. The EPA estimates that 10 percent of the questionnaire respondents will have an operator spend 1 hour (equivalent to \$45.88) coordinating with the helpline. All values presented in Table 12-6 are rounded to the nearest whole hour or dollar.

**TABLE 12-6. ESTIMATED QUESTIONNAIRE RESPONDENTS BY RESPONSE CATEGORY AND TOTAL ESTIMATED BURDEN**

Response Category	Number of Responses	Number of Respondents Contacting Helpline	Total Wastewater Plant Operator Labor (hours)	Total Engineer Labor (hours)	Total Operations Manager Labor (hours)	Total Labor (hours)	Total Operator Labor Cost (\$)	Total Engineer Labor Cost (\$)	Total Operations Manager Labor Cost (\$)	Total Labor Cost (\$)
Full Response	400	40	5,240	2,000	2,000	9,240	\$240,422	\$155,124	\$218,736	<b>\$614,282</b>
<b>Total</b>	<b>400</b>	<b>40</b>	<b>5,240</b>	<b>2,000</b>	<b>2,000</b>	<b>9,240</b>	<b>\$240,422</b>	<b>\$155,124</b>	<b>\$218,736</b>	<b>\$614,282</b>

For labor costs associated with the sampling program, the EPA combined the hours presented for each activity listed in Table 12-3 with the labor rates shown in Table 12-4. The total labor cost for sampling per facility is shown in Table 12-7. All values presented in Table 12-7 are rounded to the nearest dollar.

**TABLE 12-7. TOTAL ESTIMATED LABOR BURDEN FOR SAMPLING PER FACILITY**

Operator Total Labor Cost (\$)	Operations Manager Total Labor Cost (\$)	Total Labor Burden (\$)
\$2,936	\$1,969	\$4,905

Using the total industry labor cost for the questionnaire shown in Table 12-6 and the total labor cost for sampling per facility shown in Table 12-7 combined with the number of facilities participating in sampling, the EPA estimates the total labor cost associated with activities described in this ICR. The total labor cost associated with the questionnaire and the sampling program is \$1.6 million, as shown in Table 12-8. All values presented in Table 12-8 are rounded to the nearest whole hour or dollar.

**TABLE 12-8. TOTAL ESTIMATED RESPONDENT LABOR BURDEN FOR DATA COLLECTION ACTIVITIES**

Activity	Number of Facilities Participating	Total Labor Burden (Dollars)
Questionnaire	400	\$614,282
Sampling Program	200	\$981,014
<b>Total</b>		<b>\$1,595,296</b>

### **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.*

#### **13a. Estimating Capital/Start-up Operating and Maintenance Costs**

The EPA estimates there will be minimal other direct costs associated with responding to the questionnaire. All information requested in the questionnaire should be available from existing facility records. Facilities are not required to generate any new data to respond to the questionnaire.

The EPA included costs for all respondents to print an unofficial copy of the PDF questionnaire to collect relevant information and data before entering responses into the Qualtrics questionnaire. The EPA assumes a printing rate of \$0.10 per page for a 25-page working copy. The EPA also included costs for long distance phone charges. Although, most facilities have access to cell phones or other internet-based phone mechanisms that do not charge for long distance calls, the EPA has included these costs at \$0.05 per minute for calls into the helpline. Table 13-1 presents the estimated other direct costs for respondents related to the questionnaire. All values presented in Table 13-1 are rounded to the nearest dollar.

**TABLE 13-9. TOTAL OTHER DIRECT COSTS FOR RESPONDENTS TO THE QUESTIONNAIRE**

Activity	Number of Respondents	Total Printer/Photocopying Cost <sup>a</sup>	Total Phone/Calling Costs <sup>b</sup>	Total
Questionnaire	400	\$1,000	\$120	\$1,120

a - Assumes printing of 25 pages for the questionnaire; \$0.10/page print cost. Assumes all facilities will print the questionnaire once as a working copy.

b - Assumes 10 percent of respondents will contact the helpline for 60 minutes at a rate of \$0.05/minute.

As described in Section Error: Reference source not found, a subset of POTWs will be required to have facility staff collect wastewater and sewage sludge samples and transfer them to an accredited laboratory for analysis. This burden estimate assumes that 200 POTWs will acquire sampling bottles and supplies, coordinate and contract with accredited analytical laboratories, collect samples, and ship coolers of iced samples to the laboratory. The sampled facilities will be responsible for collecting and shipping two sewage sludge samples for long-term frozen storage, but the Agency will incur the cost for storage and analysis. The EPA estimates the direct costs associated with wastewater and sewage sludge sampling in Table 13-2. All values presented in Table 13-2 are rounded to the nearest dollar.

**TABLE 13-10. TOTAL OTHER DIRECT COSTS FOR FACILITIES SELECTED FOR SAMPLING**

Activity	Unit Cost	Units	Number of Units	Direct Cost (\$)
Sample Bottles and Sampling Supplies <sup>a</sup>	\$900	\$ per set of supplies	1	\$900
Federal Express (coolers of iced samples to laboratories)	\$50	\$/cooler shipped	10	\$500
<i>Aqueous Sample Analyses</i>				
EPA Method 1633 (PFAS)	\$450	\$/sample analysis	16	\$7,200
EPA Method 1621 (AOF)	\$550	\$/sample analysis	16	\$8,800
<i>Sewage Sludge Sample Analyses</i>				

EPA Method 1633 (PFAS)	\$450	\$/sample analysis	3	\$1,350
EPA Method 6010 (Metals)	\$120	\$/sample analysis	3	\$360
EPA Method 9060 (Total Organic Carbon)	\$100	\$/sample analysis	3	\$300
Standard Method 2540 (Solids)	\$14	\$/sample analysis	3	\$42
<b>Total Cost per Facility</b>				<b>\$19,452</b>
<b>Total Cost for Sampling at All Facilities</b>				<b>\$3,890,400</b>

a - Accounts for 173 sample bottles (includes 10 percent contingency), 8 liters of PFAS-free field blank water, 10 coolers, bottle labels, tape, bags, packing supplies, gloves, traffic reports, ice, and associated tax and shipping fees.

### 13b. Annualizing Capital Costs

The EPA estimates that there will be no recurring capital costs associated with responding to the questionnaire or the sampling program. The one-time burden to respondents includes labor costs described in Section 12 and other direct costs described in Section 13(a). Table 13-3 presents the total burden to the industry for the questionnaire and sampling. All values presented in Table 13-3 are rounded to the nearest whole hour or dollar.

**TABLE 13-11. TOTAL ESTIMATED RESPONDENT BURDEN AND COST SUMMARY**

Information Collection Activity	Number of Facilities	Total Burden (Hours)	Total Labor Cost (\$)	Total Other Direct Cost (\$)	Total Cost (\$)
Questionnaire	400	9,240	\$614,282	\$1,120	\$615,402
Sampling	200	16,400	\$981,014	\$3,890,400	\$4,871,414
<b>Total</b>		<b>25,640</b>	<b>\$1,595,296</b>	<b>\$3,891,520</b>	<b>\$5,486,816</b>

The EPA estimates that the total burden to the industry for responding to the questionnaire and sampling program will be approximately 25,640 hours, or \$5.5 million, including labor and other direct costs.

## 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

Table 14-1 presents the administration tasks to be performed by EPA employees and contractors, with the associated hours required for each grouping of related tasks.

**TABLE 14-12. ESTIMATED AGENCY BURDEN FOR THE QUESTIONNAIRE**

Activity	Burden (hours)		
	Agency	Contractor	Total Hours
Develop questionnaire instrument (PDF and Qualtrics)	100	600	700
Meet with trade association representatives and stakeholders	100	370	470
Publish notice of anticipated ICR in the Federal Register			

**TABLE 14-12. ESTIMATED AGENCY BURDEN FOR THE QUESTIONNAIRE**

Activity	Burden (hours)		
	Agency	Contractor	Total Hours
Respond to comments received			
Revise questionnaire instrument based on comments			
Design distribution approach			
Develop a mailing list database			
Develop a system to track mailing and receipt activities to improve mailing list	60	410	470
Develop notification letters			
Mail questionnaire notification letters			
Develop and maintain email and phone helplines			
Maintain helpline database and develop documentation	50	160	210
Track questionnaire responses			
Review responses	50	160	210
Follow-up to clarify responses			
Develop questionnaire database			
Upload and verify data	20	100	120
<b>Total</b>	<b>380</b>	<b>1,800</b>	<b>2,180</b>

Table 14-2 presents a list of the tasks the EPA and its contractors will perform associated with the wastewater sampling program and hours required for each task.

**TABLE 14-13. ESTIMATED AGENCY BURDEN FOR THE SAMPLING PROGRAM**

Activity	Burden (hours)		
	Agency	Contractor	Total Hours
Select POTWs and industrial users to sample	80	300	<b>380</b>
Pre-sampling coordination (e.g., develop generic sampling and analysis plans, site-specific requirements, and guidance to industry)	200	1,000	<b>1,200</b>
Laboratory and analytical support	80	847	<b>927</b>
Review and analyze sampling results (process and compile sampling results into database, analyze data)	200	800	<b>1,000</b>
<b>Total for All Facilities</b>	<b>560</b>	<b>2,947</b>	<b>3,507</b>

**14b. Agency Labor Cost**

The EPA estimated the average hourly Agency labor rate (\$64.14/hour) for technical and managerial support using the Salary Table 2023-GS from the United States Office of Personal Management. The government employee labor rates for the Washington-Baltimore-Arlington locality are \$53.67 per hour for technical roles (GS-13, Step 1) and \$74.60 per hour for managerial roles (GS 15, Step 1). To account for additional costs to the federal government for benefits and overhead, the EPA also calculated an 80 percent increase in the mean hourly Agency wage rate. The EPA determined Agency labor costs by multiplying Agency burden figures by an average hourly Agency labor rate (\$115.44/hour). The EPA determined contractor labor costs by multiplying contractor burden figures by an average contract labor rate of \$123.07 per hour. This rate accounts for employer costs associated with benefits and overhead and is consistent with current Agency contracts. Table 14-3 includes an estimate of the Agency labor costs for each task associated with the questionnaire and the total labor cost.

**TABLE 14-14. ESTIMATED AGENCY LABOR COSTS FOR THE QUESTIONNAIRE**

Activity	Labor Cost		
	Agency	Contractor	Total Cost
Develop questionnaire instrument (PDF and Qualtrics)	\$11,544	\$73,842	<b>\$85,386</b>
Meet with trade association representatives and stakeholders			
Publish notice of anticipated ICR in the <i>Federal Register</i>	\$11,544	\$45,536	<b>\$57,080</b>
Respond to comments received			
Revise questionnaire instrument based on comments			
Design distribution approach			
Develop a mailing list database			
Develop a system to track mailing and receipt activities to improve mailing list	\$6,927	\$50,459	<b>\$57,385</b>
Develop notification letters			
Mail questionnaire notification letters			
Develop and maintain email and phone helplines	\$5,772	\$19,691	<b>\$25,463</b>
Maintain helpline database and develop documentation			
Track questionnaire responses			
Review responses	\$5,772	\$19,691	<b>\$25,463</b>
Follow-up to clarify responses			
Develop questionnaire database	\$2,309	\$12,307	<b>\$14,616</b>
Upload and verify data			
<b>Total</b>	<b>\$43,868</b>	<b>\$221,526</b>	<b>\$265,394</b>

Table 14-15 includes an estimate of the Agency labor costs for each task associated with the sampling program and the total labor cost.

**TABLE 14-15. ESTIMATED AGENCY LABOR COSTS FOR THE SAMPLING PROGRAM**

Activity	Labor Cost		
	Agency	Contractor	Total Cost
Select POTWs and industrial users to sample	\$9,235	\$36,921	<b>\$46,156</b>
Pre-sampling coordination (e.g., develop generic sampling and analysis plans, site-specific requirements, and guidance to industry)	\$23,089	\$123,070	<b>\$146,159</b>
Laboratory and analytical support	\$9,235	\$105,000	<b>\$114,235</b>
Review and analyze sampling results (process and compile sampling results into database, analyze data)	\$23,089	\$98,456	<b>\$121,545</b>
<b>Total for All Facilities</b>	<b>\$64,648</b>	<b>\$363,447</b>	<b>\$428,095</b>

#### 14c. Agency Non-Labor Costs

Table 14-16 presents the other direct costs associated with administering the questionnaire that will be incurred by the EPA. For the EPA and contractor other direct costs, the EPA assumed mailing a notification letter announcing the questionnaire effort to all facilities.

**TABLE 14-16. ESTIMATED OTHER DIRECT COSTS FOR THE AGENCY TO ADMINISTER THE QUESTIONNAIRE**

Activity	Unit Cost <sup>a</sup>		Number of Units	Total Cost (\$)
Questionnaire Notification Mailout	\$10	per letter	400 letters	\$4,000
			<b>Total</b>	<b>\$4,000</b>

a – Questionnaire notification letters will be sent via Federal Express (or another shipper with tracking) at \$10.00 shipping fee/package.

Table 14-17 shows the other direct costs incurred by the EPA per sampled facility and the total cost for a sampling program of 200 POTWs. Other direct costs associated with sampling include costs associated with planning calls and long-term storage for sewage sludge samples.

**TABLE 14-17. ESTIMATED OTHER DIRECT COSTS FOR THE AGENCY FOR SAMPLING**

Activity	Unit Cost		Number of Units	Total Cost (\$)
Planning Calls (phone charges)	\$3	per hour	10 1-hour calls	\$30
Long-Term Sewage Sludge Sample Storage	\$10	2-year storage per sample, including supplies and travel	550 samples	\$5,500
<b>Total Cost per Facility</b>				<b>\$28</b>
<b>Total Cost for All Facilities</b>				<b>\$5,530</b>

Table 14-18 summarizes the total costs that the Agency will incur as a result of the ICR. All values presented in these tables are rounded to the nearest whole hour or dollar.

**TABLE 14-18. TOTAL ESTIMATED AGENCY BURDEN AND COST SUMMARY**

	Total Burden (hours)	Total Labor Cost (\$)	Total Other Direct Cost (\$)	Total Cost (\$)
Questionnaire	2,180	\$265,394	\$4,000	\$269,394
Sampling Program	3,507	\$428,095	\$5,530	\$433,625
<b>Total</b>	<b>5,687</b>	<b>\$693,489</b>	<b>\$9,530</b>	<b>\$703,019</b>

The EPA estimates that the total burden to the Agency for the questionnaire and the sampling program will be approximately 5,687 hours, or \$0.7 million, including labor costs and other direct costs. The EPA estimates that there will be no start-up or capital costs associated with completing the questionnaire.

#### 15) REASONS FOR CHANGE IN BURDEN

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

Since this is a one-time information collection, there are no changes to the information collection since the last OMB approval.

## **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 EPA will use information and data generated by the questionnaire and the sampling program to identify and quantify sources of PFAS to POTWs and prioritize industrial categories for further study and potential regulation. POTW sewage sludge monitoring data generated through the sampling program will fulfill data needs for the NSSS and will be used to develop regulations and guidance for management of sewage sludge containing PFAS and other pollutants.

To complete these objectives, the EPA will use the data collected through the questionnaire and the sampling program in the following types of analyses:

- **Profile of Industrial Users.** Information on industrial users will be used to identify the type of industrial facilities that discharge wastewater to POTWs and the relative wastewater flow rates. In addition, the EPA will request POTWs to identify suspected or known non-SIU sources of PFAS to POTW influent, if readily available. These data will allow the EPA to determine which industrial users should be selected for sampling based on existing understanding of PFAS contributions and potential impact on POTW operations.
- **Characterization of Industrial User Wastewaters.** Wastewater sampling results will be used to estimate the types and quantities of PFAS discharged by various categories of industry. The EPA may use the PFAS sampling results in combination with wastewater flow rates (collected via the questionnaire) to estimate mass loads of PFAS discharged by different types of industrial facilities and determine which types of PFAS are commonly associated with different types of industrial facilities. These analyses will inform the EPA's decisions to revise existing ELGs and may also be used by POTWs to understand sources of PFAS discharges to POTWs and establish point source controls.
- **Characterization of Sewage Sludge.** The ancillary parameters assessed for the POTW sewage sludge will be used to better understand the PFAS results (e.g., potential influences on PFAS partitioning behavior) and provide a more comprehensive sample characterization, similar to past NSSSs.
- **PFAS Fate and Transport.** POTW influent, effluent, and sewage sludge PFAS sampling results will be used to develop a fundamental understanding of PFAS fate and transport in POTWs. The EPA will use sampling results to assess efficacy of existing POTW pollution controls to reduce or eliminate PFAS in POTW influent. The EPA will also use effluent and sewage sludge sampling results to determine the extent that current management practices (e.g., land application) may result in release of and exposure to PFAS.

The specific dates for distribution, response receipt, and data collection activities for the questionnaire have not yet been established but will include the activities in Table 16-19. The EPA's intention is to ensure that facilities have 45 days to prepare and submit their response to the questionnaire.

**TABLE 16-19. COLLECTION SCHEDULE**

Activity	Estimate of Schedule
The EPA sends notification to questionnaire recipients	Within 30 calendar days following OMB approval
Deadline for submission of complete questionnaires to the EPA	Within 45 calendar days following notification
The EPA begins sending notification to facilities participating in Phase I of the sampling program	Within calendar 120 days following questionnaire response period
Facilities collect and send the required wastewater samples to the contracted laboratory for analysis	Within 30 calendar days following notification
Facilities notify the EPA of the date of sample collection, the name of the analytical laboratory conducting analysis, and the date that samples are received by the analytical laboratory	Within 30 calendar days following notification
Deadline for submission of compiled wastewater sampling results <sup>a</sup>	Within 120 calendar days following notification
The EPA begins sending notification to facilities participating in Phase II of the sampling program	Within 120 calendar days following Phase I
Facilities collect and send the required sewage sludge samples to the contracted laboratory for analysis and to long-term storage	Within 30 calendar days following notification
Facilities notify the EPA of the date of sample collection, the name of the analytical laboratory conducting analysis, and the date that samples are received by the analytical laboratory	Within 30 calendar days following notification
Deadline for submission of compiled sewage sludge sampling results <sup>a</sup>	Within 120 calendar days following notification

a - POTWs are required to immediately notify the EPA in writing if there are any delays in sample collection or analysis (e.g., laboratory analysis wait times exceed 90 calendar days). The EPA understands that these types of delays may occur and will work with individual POTWs on a case-by-case basis.

The EPA intends to prepare publicly available summaries of information and data collected via the questionnaire and sampling program.

All responses containing or consisting of information claimed as CBI will be so identified in the questionnaire and sampling database. The EPA regulations governing CBI appear at 40 CFR Part 2 Subpart B. Information that has not been claimed as CBI may be shared with any interested parties. Nonexempt information is not protected from disclosure under the Freedom of Information Act (FOIA). Results of the EPA's analyses become publicly available most often in three ways: (1) within materials placed in the public docket supporting the study, (2) within development and supporting documents otherwise published in support of the study, and (3) within any subsequent proposed and final rules published in the *Federal Register* if the data are to be used in any subsequent rulemaking effort. These documents are available through the EPA's website and on [www.regulations.gov](http://www.regulations.gov).

## **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 EPA 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.”*

---

The EPA can comply with all provisions of the Certification for Paperwork Reduction Act Submissions.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, or any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2023-0580, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. An electronic version of the public docket is available through the Federal Data Management System (FDMS) at <http://www.regulations.gov>. Use the FDMS to view and submit public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select “Advanced Search” then key in the Docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17<sup>th</sup> Street, NW, Washington, DC. 20503, Attention: Desk Officer for the EPA. Please include the EPA Docket ID No. (EPA-HQ-OW-2023-0580) in any correspondence