U.S. Environmental Protection Agency

Information Collection Request

EXECUTIVE SUMMARY

IDENTIFICATION OF THE INFORMATION COLLECTION – TITLE AND NUMBERS

Title:	Performance Evaluation Studies on Wastewater Laboratories (Renewal)
OMB Control Number:	2080-0021
EPA ICR Number:	0234.15
Docket ID Number:	EPA-HQ-OECA-2013-0547

ABSTRACT:

This is a request to renew an existing Information Collection Request (ICR) to support the collection of Proficiency Testing (PT) data on the performance of laboratories that conduct discharge analyses for the Discharge Monitoring Report – Quality Assurance (DMR-QA) study program. This request will replace the expiring ICR, Performance Evaluation Studies on Wastewater Laboratories (OMB Control No. 2080-0021, EPA ICR No. 0234.14). This ICR refers only to DMR-QA. Therefore, the figures for burdens only support DMR-QA. EPA is requesting a standard three-year clearance for this ICR.

The National Pollutant Discharge Elimination System (NPDES) program is implemented by the United States Environmental Protection Agency (EPA) and the states that EPA has authorized to implement the program. In accordance with terms and conditions of NPDES permits, chemical monitoring data for wastewater are submitted from a variety of laboratories to the appropriate NPDES permitting authority every year. EPA and states must rely on these results when carrying out permitting, compliance, and enforcement activities. In order to provide an objective demonstration that these laboratories are submitting reliable information, the subject Performance Evaluation (PE) studies were developed. Participation in the DMR-QA studies is mandatory for major dischargers and selected minor dischargers under the NPDES program. Major municipal dischargers are defined as facilities designed to discharge at least 1 million gallons per day of wastewater, service a population of at least 10,000, or have a discharge that causes significant water quality impacts. Non-municipal major facilities are defined as major facilities based on a numerical rating system that evaluates their significance using criteria such as toxic pollutant potential, flow volume and water quality factors. Minor dischargers are selected to monitor the analytes/toxics discharged by the facility.

EPA formerly administered and prepared test standards for the DMR-QA program as part of the Agency's mandate to assure the quality of environmental monitoring data submitted by NPDES permit holders (permittees). Preparation, distribution and grading of the test standards have now

been privatized to lessen EPA's burden in carrying out this mandate. The public- and private-sector organizations that manufacture and distribute test samples to contract and in-house laboratories are known as Proficiency Testing (PT) providers. The laboratories submit their analytical results to the PT Providers for evaluation. The PT Providers evaluate the submitted data and send the graded results back to the laboratories. These laboratories then forward copies of their graded data to their permittee clients, who will review the results and forward the data to their designated certifying/enforcement authorities. PT Providers also send electronic copies of the graded results to the designated certifying/enforcement authorities and to EPA. Graded results include the names and addresses of the laboratories, analytes tested, concentration of the analytes, and the acceptance criteria and evaluations.

EPA is required to conduct this ICR analysis because more than nine non-Federal entities will be asked to respond to this data request. Because state agencies use the resulting data for their own laboratory certification/enforcement programs and are not reporting any information from the PE studies to EPA, they do not incur any burden under this ICR. In addition, cost and burden to PT Providers are not considered in this ICR because the vendor costs associated with this program are accounted for in the pricing of their standards (i.e., the costs incurred by the Providers is factored into the cost of the PT standards).

The total annual burden and costs incurred by the 5,500 permittees associated with this ICR are estimated to be 36,300 hours and $6,632,670 per year over the 3-year ICR period (calendar years 2026-2028), which includes $2,412,685 per year in labor costs and $4,219,985 per year in operations and maintenance (O&M) costs. EPA estimates that it takes 6.6 hours and costs $1,205.94 per year per respondent to comply with this requirement; this estimated annualized per-respondent cost breaks down to $438.67 per respondent in labor costs and $767.27 per respondent in O&M costs. Respondent labor costs are associated with the time it takes to read and understand the annual DMR-QA announcement sent by EPA, plan activities, analyze PT standards, report information to the PT Providers, and maintain records. Respondent O&M costs are associated with purchasing the PT standards. No costs or burden to PT Providers or state regulatory agencies are associated with this ICR.

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.

Laboratory Performance Evaluation (PE) studies are designed to fulfill the need to monitor the quality of analytical data for select critical analytes within major point-source discharge samples. Results from the PE studies over time have generally shown a slow but regular improvement in average performance by the laboratories producing the monitored data. By helping laboratories identify and correct analytical problems, the PE studies are also responsible for documented improvement in this data.

The Clean Water Act, and the related regulations in 40 CFR part 136, require extensive analyses of water and wastewater samples by permittee-owned laboratories and third-party laboratories contracted by such permittees to control point-source discharges and protect ambient water quality. EPA uses this data as the basis for many important decisions, which include policy and regulation development, compliance and enforcement determinations, and program development. The data quality depends heavily upon the availability of capable laboratory analyses at all levels and reliability must be ensured.

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.

States and laboratory personnel will use the results of these studies to identify problems associated with laboratory analysis and substandard facility discharges. This will improve the quality of water data in critical monitoring areas and the quality of facility discharges returned to the environment. These studies have demonstrated that problems exist and arise periodically with dischargers and water testing laboratories. Without future studies, many such problems will go unrecognized and unresolved. Results from the DMR-QA studies are used to highlight NPDES facilities and laboratories with apparent analytical problems that should be inspected on-site by state regulatory personnel. Results from the PE studies are used by state personnel as a major part of the basis for certifying laboratories to produce required regulatory data and as a basis for potential regulatory enforcement.

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.

EPA notifies the permittee of their requirement to participate in the relevant PE program annually. The permittee's in-house or contract laboratory will then select an accredited PT Provider to send them the appropriate PE samples. After following the PT Provider's instructions to complete the PE study, the laboratory then submits the analytical data of these samples back to the selected PT Provider by the instructed deadline. The permittee will use the form approved by OMB to report DMR-QA results. This form will be available in two formats: a hard copy that will be part of the announcement that is mailed annually, and an online PDF form that is available on the EPA website. This PDF form can be filled out and then printed for submission. The PT Provider will grade and send evaluations of the submitted data back to the permittee and the designated certifying/enforcement authority. PT Providers may also send summary data in electronic form to EPA for archiving.

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.

Data and results from other federally sponsored water quality programs, such as the Water Pollution (WP) program, can be used to fulfill obligations under the DMR-QA study program only if the laboratories meet the condition that they perform the PE sample analyses between January 1st of the DMR-QA study year and the last day of the DMR-QA study. The DMR-QA study commences on or around the 2nd quarter of the calendar year and concludes on or around the 3rd quarter of each year.

As of July 1, 2026, EPA has granted full or partial waivers to 17 states to use their state laboratory certification program in lieu of their permittees participating in DMR-QA. No new waivers have been granted since the last ICR was renewed in August 2023.

5. *MINIMIZING BURDEN ON SMALL ENTITIES:*

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

The information collected under this ICR does not significantly impact small businesses, because the information being reported would be considered as "customary and usual business activities." Even though the record-keeping and reporting requirements are the same for small and large businesses, the Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small businesses.

6. *EFFECTS 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 current frequency for the DMR-QA is judged to be the minimum needed to assess the accuracy of data production required by discharge permits. Under DMR-QA, laboratories producing data are expected to demonstrate adequate analytical proficiency once per year for each analyte they test routinely for their NPDES permittee clients. Collecting water quality data less than once per year to measure the accuracy of laboratory work would potentially delay corrective actions required by the permittee and therefore compromise discharge water quality.

7. *GENERAL GUIDELINES:*

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

The proposed collection does not create special circumstances requiring justification under 5 CFR 1320.5.

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.

Pursuant to 5 CFR 1320.8(d), EPA requested comments from the public on this ICR through a *Federal Register* notice published on May 21, 2026 (91 FR 29954). The notice sought comments regarding the necessity for EPA to collect information, the accuracy of the burden estimates for respondents, and whether the burdens may be reduced, among other aspects of the Paperwork Reduction Act. EPA received ten public comments during the 60-day public comment period (see docket items EPA-HQ-OECA-2013-0547-0018 through -0027). Comments supportive of the program pointed out that the DMR-QA Study Program is EPA's only formal mechanisms for tracking a laboratory's operational competency, helps to uncover quality control problems that might otherwise go unnoticed, and is justified because the added cost is minimal relative to overall laboratory operations.

One commenter supportive of the program raised concerns about the study's burden on small publicly owned treatment works (POTWs). This commenter suggested that EPA adjust participation requirements based on facility size, compliance history, and laboratory certification. EPA requires major NPDES permittees to annually participate in the study while the selection of minor NPDES permittees, representing smaller facilities, is generally made by our state partners. EPA will continue to work with our state partners to ensure that appropriate minor NPDES permittees are selected for DMR-QA participation. EPA believes the burden on minor POTWs is minimal as the 400 minor POTWs that participated in DMR-QA in 2025 represented seven percent of the DMR-QA participant universe (or one percent of all minor permits nationwide).

Three commenters raised concerns that the DMR-QA may be duplicative of existing lab accreditation programs. However, EPA grants waivers from DMR-QA participation in states that operate their own wastewater lab accreditation program, but to be considered for a waiver, a state wastewater laboratory accreditation program must submit a request package in accordance with EPA policies and procedures. In states with wastewater laboratory accreditation programs that have not sought the EPA waiver, the permittees may use their laboratory certification results as a substitute for DMR-QA, provided those laboratory certification tests follow the procedures outlined in the DMR-QA study's NPDES Permittee Instructions and Frequently Asked Questions.

A comment that described DMR-QA as not beneficial suggested improving the study by tailoring it to individual laboratories, which would increase the cost burden on permittees. One additional comment expressing concerns about the DMR-QA Study Program as being both "burdensome and expensive" on top of their own state's NPDES permit requirements and suggested

discontinuing the program. EPA and state NPDES permitting authorities rely on the results of monitoring data submitted by permittees in accordance with their NPDES permits when carrying out permitting, compliance, and enforcement activities. The DMR-QA Study (or a program that meets the waiver requirements) is needed in order to provide an objective demonstration that these laboratories are submitting reliable information.

The remaining comments received raised concerns that were outside the scope of this ICR.

EPA appreciates the comments received as part of the 60-day open period. After careful review, the Agency believes the comments do not warrant any adjustments to the ICR.

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.

EPA consulted the PT Providers listed in Table 8.1, below, for their assessment of the burden and cost estimates expressed by the Agency in this ICR. The PT Providers that responded indicated that it costs $460 to $1,065 per laboratory for chemical/microbiological samples. EPA chose to use the conservative high-end estimate of $1,065 per laboratory for the purpose of estimating ICR costs to respondents. For Whole Effluent Toxicity (WET) tests, the range was $1,575 to $3,084 per laboratory, and the high-end estimate of $3,084 was used. It should be noted that this is the cost that both in-house and contract laboratories pay, and this is passed on to the permittee. Therefore, if a lab is contracted by several permittees, then EPA considers that the cost will be distributed evenly among the permittees. However, if a permittee employs an in-house laboratory, the permittee bears the entire cost of obtaining samples as well as the labor costs of the laboratory. Since the ratio of in-house and contract laboratories is unknown, an average was obtained for all laboratories and a ratio of 0.633 laboratories per permittee was used. This ratio is the same as used in the previous renewal of this ICR. Using this ratio, the cost of obtaining samples is estimated to be $674.15 per permittee for chemical/microbiological tests and $1,952.17 for WET tests.

TABLE 8.1: LIST OF ACCREDITED PROFICIENCY TEST (PT) PROVIDERS

Absolute Standards, Inc., Hamden, CT (203) 281-2917 or (800) 368-1131 www.absolutestandards.com
Advanced Analytical Solutions, LLC, Parkersburg, WV (304) 485-6325 www.advancedga.com

Environmental Resource Associates (ERA), Golden, CO (800) 372-0122 www.eragc.com
NSI Lab Solutions, Raleigh, NC (800) 234-7837 www.nsilabsolutions.com
Phenova Inc., Golden, CO (866) 942-2978 www.phenova.com

9. PAYMENTS OR GIFTS TO RESPONDENTS:

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

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

10. PROVISIONS FOR PROTECTION OF INFORMATION:

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.

This information collection does not require respondents to disclose confidential information.

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 questions of a sensitive nature are included in any of the information collection requirements outlined in this ICR.

12. RESPONDENT BURDEN HOURS AND 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.*
- *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

Respondents in DMR-QA studies are NPDES permittees designated by the EPA Region or state with permitting responsibility and the laboratories doing chemical/microbiological analyses and WET analyses for these permittees. These respondents are most likely from the following SIC and NAICS codes:

CATEGORY	SIC NUMBERS	NAICS NUMBERS
Manufacturers	2011 through 3999	311611
Water Supply Systems	4941	22131
Sewerage Systems	4952	22132
Water Testing Laboratories	8734	54194

The respondents for this ICR are major and select minor NPDES permittees. Some or all permittees in states that have received EPA waivers from the DMR-QA program may not be required to participate.

12b. INFORMATION REQUESTED

In all laboratory PE studies, the data result from analyses of synthetic samples that contain known amounts of specific compounds, usually dissolved in reagent water. In DMR-QA studies, the compounds are those of primary interest with regard to the monitoring requirements found in NPDES permits. All studies also collect sufficient data to properly identify and characterize the respondents. Each respondent reports only data for that portion of the study analytes for which they wish to be certified or as directed by the responsible regulatory official.

12c. RESPONDENT ACTIVITIES AND FREQUENCY

The primary burden involves analyzing and reporting results for relevant study samples according to instructions. About 5,500 respondents participated in the 2022 DMR-QA study. EPA projects that this number of respondents will remain relatively static for the next ICR period.

The DMR-QA program requires major permittees to submit results annually, and minor permittees are selected for participation by the DMR-QA state coordinators. The fluctuation of major permittees and the selection process of minor permittees at the state level causes the exact number of permittees to vary each year. A percentage of these permittees do all the work on-site themselves using in-house laboratories. The remaining permittees contract at least some of the analyses to commercial laboratories. The commercial laboratory may do work for many permittees; the DMR-QA results would then be sent to these permittees. Therefore, there are fewer labs than permittees. However, EPA does not have data on how many in-house laboratories and contract laboratories are used, as permittees may choose to have commercial or in-house laboratories perform the analyses. In addition, EPA does not track how many laboratories participated in one or more studies. Furthermore, EPA does not track how many permittees participated in only chemistry and microbiology testing and those that participated in

WET testing. EPA is estimating the "maximum" impact of the DMR-QA program on the regulated community. EPA will assume that all 5,500 permittees will fulfill requirements for the top 10 chemistry and microbiology analytes and the top 10 WET test methods. EPA believes this ICR may overestimate the burden because not all permittees are required to perform WET testing. (See Appendix B for a list of the top 10 chemistry and microbiology analytes and the top 10 WET test methods).

To calculate the burden incurred on laboratories performing PE samples, EPA used a ratio of 0.633 laboratories per NPDES permittee. This ratio was calculated based on data procured by four PT Providers in 2006. EPA assumes that the ratio of laboratories per permittee has not changed significantly since the last ICR was approved. Based on this ratio (0.633 laboratories per NPDES permittee) and that there are 5,500 permittees participating in the DMR-QA, EPA estimates there are a total of 3,482 laboratories performing PE studies under DMR-QA. To provide an estimate of respondent burden for the WET testing portion of DMR-QA, EPA determined that an average of 4.77% of all laboratories participating in DMR-QA perform WET PE tests, or 166 laboratories. This percentage is also based on the information from the four providers received in 2006. EPA is not estimating the burden for the PT Providers because this burden is internalized in the cost of obtaining PE samples from the PT Providers.

Respondents (permittees) will participate in the following activities:

1. Read Instructions: Each of the 5,500 respondents will read the instructions provided by EPA.

2. Plan Activities: Each of the 5,500 respondents will incur burden to plan activities associated with the PE studies.

3. Analyze Chemistry and Microbiology Analytes: EPA assumes that all 5,500 respondents will participate in the PE studies for microbiology, trace metals, demands, minerals, nutrients, and miscellaneous chemical analytes as required by respondents' permits. EPA assumes that 3,482 in-house and contract laboratories will do the work for the 5,500 permittees.

4. Analyze WET: EPA assumes that all 5,500 permittees will participate in the PE studies for WET. It is assumed that 166 in-house and contract laboratories will do the work for the 5,500 permittees.

5. Report Results: Each of the 5,500 respondents will incur burden to report its study results to the PT Provider.

6. Maintain Records: Each of the 5,500 respondents will incur burden to maintain records associated with the PE study.

EPA determines the requirements for the frequency that a permittee must demonstrate proficiency by passing a PE study. The study typically starts on or around the 2nd quarter of the

calendar year and ends on or around the 3rd quarter of each year. The participating permittees' in-house/contract laboratories demonstrate their proficiency by passing a PE study conducted by an accredited PT Provider for a fee. The PT Provider must submit the results of each study to the participating laboratories. The permittees must then request the participating laboratories to forward the graded results that were transmitted by the PT Provider, and in turn, the permittee must submit the graded results to the appropriate EPA Regional or state DMR-QA coordinator.

In summary: each participating in-house or contract laboratory must report test results to the PT Provider once a year. The PT Provider must submit the results of all studies they conduct to the participating laboratories. The permittees must then require the laboratories to forward them the graded results the laboratories received from the PT Provider. The permittees then submit a copy of the graded results to the appropriate EPA Regional or state DMR-QA coordinator. Participating permittees must re-qualify for each analyte it reports one year from the last certification that it received.

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

This section describes the estimated average annual burden and costs for the information collection activities for PE studies that will be conducted by laboratories.

To estimate the costs, EPA made assumptions about the burden associated with activities that would likely be needed to fulfill the request. EPA emphasizes that the per-respondent estimates represent the average annual burden and cost over the 3-year period covered by this ICR (2026-2028). Some respondents may incur higher costs, and some will fall below the average. EPA assumed that all respondents perform all the tests included in this analysis. As a result, the burden is assumed to be a high estimate.

Burden and costs are not distinguished by categorized entities, public (federal, state, and local government dischargers) and private (commercial, industrial and others) sectors, because EPA does not currently track this information.

The average annual respondent burden (in labor hours) for permittees is shown in Table 12.1, below. PT Providers conduct the studies, removing this burden from EPA. Participating laboratories receive samples from the PT Provider and return test results to the PT Providers. The PT Providers evaluate the data and send reports to the laboratories. The total burden on the laboratories is 36,300 hours, with an average of 6.6 hours per respondent (36,300 total hours divided by 5,500 permittees). This estimate includes burden for participating laboratories to read instructions, plan activities, analyze samples, submit data to the PT Providers, and maintain records.

EPA assumes that the respondent burden will be divided among three labor categories: manager, chemist, and records clerk. The labor associated with each of the ICR activities are discussed in more detail below.

1. Read Instructions: EPA assumes that each of the 5,500 respondents will require 0.5 hours to read the instructions provided by EPA. The burden will be divided between a manager and chemist. Sample instructions and forms can be found in the DMR-QA study package included in the docket.
2. Plan Activities: EPA assumes that the manager of each laboratory will require 0.5 hours to plan activities associated with the PE studies. The burden will be divided between a manager and chemist.
3. Analyze Chemistry and Microbiology Analytes: A total of 5,500 permittees are expected to use a total of 3,482 laboratories (a ratio of 0.633 laboratories for every permittee). Analysis is assumed to require approximately 2.1 hours to analyze PT standards for the top 10 analytes. All hours will be incurred by a chemist. See Appendix B for these tests and the estimated time for an analysis. These estimates assume that the laboratory is adding a DMR-QA sample to the normal processing that occurs in the laboratory using an already calibrated instrument/process.
4. Analyze WET: A biologist or project manager constructs the test chambers and records organism mortality (morbidity) of test organisms while a chemist analyzes the water chemistry. Biologists and chemists are assumed to require 2.4 hours to analyze PT standards for WET. It is assumed that 166 laboratories do this work for all 5,500 permittees. These estimates assume that the laboratory is adding a DMR-QA sample to the normal processing that occurs in the laboratory using an already calibrated instrument/process.
5. Report Results: EPA assumes that each of the 5,500 respondents will require 1.0 hours to report the results of the study to the PT Provider. The burden will be divided between a manager and records clerk.
6. Maintain Records: EPA assumes that each of the 5,500 respondents will require 0.1 hours from a records clerk to maintain the files from the PE study.

Table 12.1: Estimated Annual Respondent Burden, Performance Evaluation Studies on Wastewater Laboratories (Renewal).

Collection Activities	Annual # Respondents[1]	Burden				
		Manager	Chemist[2]	Record Clerk	Total Burden (hours/year)	
		hours/ year	hours/ year	hours/ year	Per Respondent	All Respondents
Read Instructions	5,500	0.2	0.3	0	**0.5**	**2,750**
Plan activities	5,500	0.2	0.3	0	**0.5**	**2,750**
Analyze Chemistry/ Microbiology	5,500	0	2.1	0	**2.1**	**11,550**
Analyze WET	5,500	0	2.4	0	**2.4**	**13,200**
Report Results	5,500	0.3	0	0.7	**1**	**5,500**
Maintain Records	5,500	0	0	0.1	**0.1**	**550**
Total Annual Respondent Burden	**5,500**				**6.6**	**36,300**

[1] In 2026, it is estimated that 5,500 NPDES permittees participated in the DMR-QA program. Most of the permittees participate in the Chemistry/Microbiology component. A smaller number of permittees also participate in WET analysis; it is estimated that 4.77% of all labs participate in WET analyses.

[2] Refer to Appendix B for analysis times for Chemistry/Microbiology analytes and WET methods.

The labor cost was arrived at by estimating the amount of labor required to participate on an annual basis in the DMR-QA study. Labor costs are based on information provided by the U.S. Department of Labor Statistics, May 2025, National Industry Specific Occupational Employment and Wage Estimate. The labor categories include a manager at an hourly rate of $80.39, a skilled technician or chemist to conduct the measurements at an hourly rate of $43.87, and a data entry clerical person at an hourly rate of $23.80. Table 12.2 lists the estimated burden and costs for labor related to each activity. The annual respondent labor cost for all 5,500 respondents is estimated to be $2,412,685 for 36,300 hours. The labor costs consider benefits/compensation in addition to salary. EPA relies on the Bureau of Labor Statistics to estimate the benefits/compensation to be 32.3% of total compensation for management positions, 31.8% of total compensation for natural resource positions, and 30.7% of total compensation for office positions. See Table 12.2 for references.

Table 12.2: Estimated Annual Respondent Labor Costs, Performance Evaluation Studies on Wastewater Laboratories (Renewal).

Collection Activities	Annual # Respondents[1]	Labor Cost[1]				
		Manager[2]	Chemist[3]	Record Clerk[4]	Labor Costs	
		at $118.74/hr.	at $64.33/hr.	at $34.34/hr.	Per Respondent	All Respondents
Read Instructions	5,500	$23.75	$19.30	$0	$43.05	$236,775
Plan activities	5,500	$23.75	$19.30	$0	$43.05	$236,775
Analyze Chemistry and Microbiology	5,500	$0	$135.09	$0	$135.09	$742,995
Analyze WET	5,500	$0	$154.39	$0	$154.39	$849,145
Report Results	5,500	$35.62	$0	$24.04	$59.66	$328,130
Maintain Records	5,500	$0	$0	$3.43	$3.43	$18,865
Total Annual Respondent Costs					**$438.67**	**$2,412,685**

[1] Median salaries from U.S. Bureau of Labor Statistics (BLS), May 2025, National Industry Specific Occupational Employment and Wage Estimates (https://www.bls.gov/oes/tables.htm). As a percentage of total compensation, BLS estimates benefits to be 32.3% for management positions, 31.8% for natural resource positions and 30.7% for office positions. (Employer Costs for Employee Compensation, March 2026, Table 5, https://www.bls.gov/news.release/archives/ecec_06122026.htm)

[2] BLS, Natural Science Manager 11-9121 ($80.39/hr., median salary only--see Footnote 1).

[3] BLS, Chemist 19-2031 ($43.87/hr., median salary only--see Footnote 1).

[4] BLS, Information and Record Clerk 43-4199 ($23.80/hr., median salary only--see Footnote 1).

Permittees who participate may use contract laboratories to perform the work, but the burden is considered to be upon the permittees, since they bear the costs of labor as well as operations & maintenance. As itemized in this section, the annual respondent burden and labor costs is 6.6 hours and $438.67 per participant, respectively. The total annual respondent burden and labor costs is 36,300 hours and $2,412,685, respectively, for 5,500 participants. Currently, there are 5 PT Providers. PT Providers' burdens are not assessed in this ICR because their cost burden for this ICR is part of the estimated PE sample cost burden for the laboratories.

The bottom-line burden hours and labor costs for this ICR are shown in Table 12.3, below.

Table 12.3: Bottom-Line Burden and Labor Costs, Performance Evaluation Studies on Wastewater Laboratories (Renewal)

Cost / Burden		Average per Year
(A)	**Number of Respondents (Permittees)**	5,500
(B)	**Number of Responses per Permittee**	1
(C)	**Burden Hours per Permittee**	6.6
(D)	**Total Burden Hours** [D = A × B × C]	36,300
(E)	**Per Permittee Labor Costs**	$438.67
(F)	**TOTAL LABOR COST** [F = (A × B) × E]	**$2,412,685**

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.

There are no Capital/Startup costs associated with this information collection.

Operation and Maintenance (O&M) costs for laboratories include all costs related to providing personnel with the space, equipment, and materials necessary to perform the tasks required by this ICR. Since laboratories are driven by their compliance monitoring requirements to purchase the analytical instrumentation and computers and not by this ICR, no capital costs are associated with this ICR. Only the costs associated with purchasing the PT standards is appropriate for consideration in this category.

Permittees may participate in the PE studies for some or all the chemistry and microbiology analytes and WET test methods (refer to Appendix A for a list of chemistry and microbiology analytes and WET test methods). The cost of the PE samples varies with the costs for the chemical, microbiological, and WET testing required for each calendar year. This is complicated by the fact that the participants in any given study need not analyze all the samples available for that study, only the ones that are required by their permits. EPA estimated a cost of $1,212.12 per laboratory based on 2026 feedback from PT Providers who analyzed the average cost of buying PE samples.

Because EPA does not have sufficient information to estimate how many analytes are contained in the PE samples sent to each laboratory, EPA assumes that a single PE sample contains standards for the top ten analytes for chemistry and microbiology and the top 10 WET test methods, based on information from the PT Providers. Therefore, laboratories participating in the chemistry and microbiology PE study are assumed to receive and run analyses for 10 analytes. Similarly, those participating in the PE study for WET would receive samples for each of 10 WET test methods. EPA estimates the costs of obtaining PE samples to be $1,212.12 per laboratory and $767.27 per permittee (respondent). Annual O&M costs (fees for PE samples) for all the respondents is estimated to be $4,219,985.

Table 13.1: Estimated Annual Respondent Operation and Maintenance Costs, Performance Evaluation Studies on Wastewater Laboratories (Renewal)

Collection Activities	Cost of Standards per PE Study[1]	
	per Respondent	*All Respondents*
Read Instructions	$0	$0
Plan activities	$0	$0
Analyze Chemistry and Microbiology	$674.15	$3,707,825
Analyze WET	$93.12	$512,160
Report Results	$0	$0
Maintain Records	$0	$0
Total Annual Respondent Costs	**$767.27**	**$4,219,985**

[1] Based upon estimated cost of $1,065 per chemistry/microbiology laboratory and $3,084 per WET laboratory. Includes a factor of 0.633 labs per respondent. WET analysis is multiplied by 0.0477 since only 4.77% of all labs perform WET tests. Therefore, the average cost for each respondent is $3,084 × 0.633 × 0.0477 = $93.12.

Permittees who participate may use contract laboratories to perform the work, but the burden is considered to be upon the permittees, since they bear the costs of labor as well as O&M. As itemized in this section, the annual respondent O&M costs is $767.27 per participant. The total annual respondent O&M costs is $4,219,985 for 5,500 participants. Currently, there are 5 PT Providers. PT Providers' O&M costs are not assessed in this ICR because their cost burden for this ICR is part of the estimated PE sample cost burden for the laboratories.

The bottom-line O&M costs for this ICR are shown in Table 13.2, below.

Table 13.2: Bottom-Line Operation and Maintenance Costs, Performance Evaluation Studies on Wastewater Laboratories (Renewal)

Cost / Burden		Average per Year
(A)	**Number of Respondents (Permittees)**	5,500
(B)	**Number of Responses per Permittee**	1
(C)	**Per Permittee O&M Costs**	$767.27
(D)	**TOTAL O&M COST** [D = (A × B) × C]	**$4,219,985**

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 AND FREQUENCY

The cost to the Government for administering the annual DMR-QA study (EPA Form 6400-01) is based on one work-year to:

(a) put together the annual announcement, distribute the study packages to participants (permittees), provide support to participants who contact the program coordinator directly or from questions relayed by state and Regional DMR-QA coordinators, and
(b) maintaining records of active participants in the program.

See Table 14.1, below for Agency burden and cost estimates.

This ICR consolidates all government labor costs to that of a GS-13 step 1, as the bulk of the work is performed at this level. The minor shares of burden carried by management and clerical staff have been judged approximately equal and thus balance out if the entire burden is estimated at the GS-13/1 level.

14b. AGENCY BURDEN AND LABOR COST

The cost to the Government for administering this ICR is based on one work-year to put together the annual announcement, electronically distributing the study packages to participants (permittees), and providing support to participants who contact directly and also program

coordination with state and Regional DMR-QA coordinators. See Table 14.1, below, for annualized Agency burden and labor costs.

14c. AGENCY NON-LABOR COSTS

EPA has worked to maximize electronic distribution of this ICR (EPA Form 6400-01) by emailing PDF copies to participants who have a valid email on file with their state or Regional DMR-QA coordinator. Electronic distribution costs are considered *de minimis* as the program coordinator utilizes existing technologies that do not require additional software licenses beyond what are already provided to all agency personnel (Microsoft 365 / Microsoft Office).

When electronic distribution is not possible due to invalid email addresses identified, hard copies may be printed and mailed to participants. Thus, the non-labor costs to the Government for this ICR (EPA Form 6400-01) involves printing and mailing hardcopies to participants without a valid email identified. Printing costs vary by quantity, and based on recent print jobs for this ICR, costs can average as much as $3.50 per booklet (announcement), with print requests estimated to cost up to $2,049. Thus, it is assumed that up to 585 announcements (10.6 percent of the 5,500 permittees who participate annually on average) might be printed depending on the number of invalid email addresses identified upon email distribution of the DMR-QA announcement. This is a conservative estimate as pricing varies on quantity, which can average lower for print jobs exceeding 500 units. The other non-labor cost consists of postage, which averaged $1.36 per booklet. See Table 14.1, below, for annualized Agency non-labor costs.

14d. AGENCY TOTAL COSTS

The estimates for Agency costs for EPA Form 6400-01 are shown in Table 14.1, below.

Table 14.1: Annual Agency Burden/Cost Estimates, Performance Evaluation on Wastewater Laboratories (Renewal)

[2026 GS-13/1 hourly rate is $58.36 × (1.6 benefits costs) = $93.38]

Activities	Annual Burden Hours and Labor Costs[1]	Annual Non-Labor Costs[1]	Total Annual Costs[1]
a. Prepare, notify, and provide program support	($93.38 × 480) = $44,822	----------	$44,822
b. Maintaining active participants in the program	($93.38 × 80) = $7,470	----------	$7,470
c. Printing costs	----------	($3.50 per unit × 585 units) = $2,048	$2,048
d. Mailing/postage costs	----------	($1.36 per unit × 585 units) = $796	$796
TOTAL	**560 hours; $52,292**	**$2,844**	**$55,136**

[1] Calculated costs are rounded to the nearest dollar

15. CHANGE IN BURDEN:

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

Participation in the DMR-QA PE study has remained static at an average of 5,500 permittees since the last renewal of this ICR. Total burden hours per respondent have also remained the same.

Labor costs increased modestly due to changes in employee benefit compensation costs and inflation.

O&M costs in this supporting statement reflect the 2026 costs of obtaining PE samples from the PT Providers. The Agency estimates an increase in O&M costs from $687.54 to $767.27 per respondent since the 2023 ICR renewal.

Agency costs have been revised to reflect efficiencies with electronically distributing DMR-QA study booklets to over 90 percent of the respondent universe.

16. PUBLICATION OF DATA:

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

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

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

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

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

18. CERTIFICATION STATEMENT:

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

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

BURDEN STATEMENT

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 6.6 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire,

install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0547, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket is (202) 566-1752. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0547 and OMB Control Number 2080-0021 in any correspondence.

ADDITIONAL TABLES AND APPENDICES

APPENDIX A. LIST OF CHEMISTRY & MICROBIOLOGY ANALYTES AND WET TEST METHODS

Chemistry and Microbiology Analytes	
Microbiology	**Trace Metals**
Escherichia coli (E. coli)	Aluminum
Fecal Coliform, MF or MPN	Antimony
Total Coliform, MF or MPN	Arsenic
Minerals	Barium
Alkalinity, total ($CaCO_3$)	Beryllium
Chloride	Cadmium
Fluoride	Chromium, total
Hardness, total ($CaCO_3$)	Chromium, hexavalent
Specific conductance (25°C)	Cobalt
Sulfate	Copper
Total Dissolved Solids (180°C)	Iron
Nutrients	Lead
Ammonia (as N)	Manganese
Nitrate (as N)	Mercury
Nitrite (as N)	Mercury (Low Level)
Orthophosphate (as P)	Molybdenum
Total Kjeldahl-Nitrogen (as N)	Nickel
Total Phosphorus (as P)	Selenium
Miscellaneous Analytes	Silver
Non-Filterable Residue (TSS)	Thallium
Oil and Grease	Vanadium
pH	Zinc
Total Cyanide	**Demands**
Total Phenolics (4-AAP)	5-day Biochemical Oxygen Demand (BOD_5)
Total Residual Chlorine	5-day Carbonaceous BOD ($CBOD_5$)
Total Residual Chlorine (Low Level)	Chemical Oxygen Demand (COD)
Settleable Solids	Total Organic Carbon (TOC)
Turbidity	

WET Organisms/Test Conditions/End Points		
Analyte Number	**Organisms/Conditions**	**End Points**
Test Code 13/EPA Method 2000		
754	Fathead minnow (*Pimephales promelas*) - MHSF 25°C	LC50
Test Code 14/EPA Method 2000		
755	Fathead minnow (*Pimephales promelas*) - 20% DMW	LC50
Test Code 15/EPA Method 1000		
756	Fathead minnow (*Pimephales promelas*) - MHSF	NOEC SURVIVAL
808	Fathead minnow (*Pimephales promelas*) - MHSF	IC25 (ON) GROWTH
810	Fathead minnow (*Pimephales promelas*) - MHSF	NOEC (ON) GROWTH
Test Code 16/EPA Method 1000		
759	Fathead minnow (*Pimephales promelas*) - 20% DMW	NOEC SURVIVAL
812	Fathead minnow (*Pimephales promelas*) - 20% DMW	IC25 (ON) GROWTH
814	Fathead minnow (*Pimephales promelas*) - 20% DMW	NOEC (ON) GROWTH
Test Code 19/EPA Method 2002		
764	*Ceriodaphnia dubia* - MHSF 25°C	LC50
Test Code 20/EPA Method 2002		
765	*Ceriodaphnia dubia* - 20% DMW 25°C	LC50
Test Code 21/EPA Method 1002		
766	*Ceriodaphnia dubia* - MHSF	NOEC SURVIVAL
767	*Ceriodaphnia dubia* - MHSF	IC25 REPRODUCTION
768	*Ceriodaphnia dubia* - MHSF	NOEC REPRODUCTION
Test Code 22/EPA Method 1002		
769	*Ceriodaphnia dubia* - 20% DMW	NOEC SURVIVAL
770	*Ceriodaphnia dubia* - 20% DMW	IC25 REPRODUCTION
771	*Ceriodaphnia dubia* - 20% DMW	NOEC REPRODUCTION
Test Code 32/EPA Method 2021		
788	*Daphnia magna* - MHSF 25°C	LC50
Test Code 38/EPA Method 2021		
794	*Daphnia pulex* - MHSF 25°C	LC50
Test Code 42/EPA Method 2007		
798	Mysid (*Mysidopsis bahia*) - 25°C	LC50
Test Code 43/EPA Method 1007		
799	Mysid (*Mysidopsis bahia*)	NOEC SURVIVAL
816	Mysid (*Mysidopsis bahia*)	IC25 (ON) GROWTH
818	Mysid (*Mysidopsis bahia*)	NOEC (ON) GROWTH
Test Code 44/EPA Method 2006		
803	Inland silverside (*Menidia beryllina*) - 25°C	LC50
Test Code 45/EPA Method 1006		
824	Inland silverside (*Menidia beryllina*)	NOEC SURVIVAL
825	Inland silverside (*Menidia beryllina*)	IC25 (ON) GROWTH
826	Inland silverside (*Menidia beryllina*)	NOEC (ON) GROWTH
Test Code 46/EPA Method 2004		
804	Sheepshead minnow (*Cyprinodon variegatus*) - 25°C	LC50
Test Code 47/EPA Method 1004		
805	Sheepshead minnow (*Cyprinodon variegatus*)	NOEC SURVIVAL
820	Sheepshead minnow (*Cyprinodon variegatus*)	IC25 GROWTH
822	Sheepshead minnow (*Cyprinodon variegatus*)	NOEC (ON) GROWTH

APPENDIX B. LIST OF TOP CHEMISTRY & MICROBIOLOGY ANALYTES AND WET TEST METHODS AND TIMES FOR ANALYZING

Chemistry/Microbiology Analyte Checklist

Rank	Analyte	Time (in minutes) for one analysis*
1	pH	10
2	Total Suspended Solids	30
3	Ammonia (as N)	5
4	Total Residual Chlorine	3
5	Biochemical Oxygen Demand (BOD)	45
6	Carbonaceous BOD	45
7	Total Phosphorus as P	10
8	Settleable Solids	10
9	Fecal Coliform (MF)**	30
10	Oil and Grease	15
	TOTAL (minutes)	**203**
	TOTAL (hours)	**3.38**

* These estimates assume the DMR-QA sample is being added as additional single analyses to an already calibrated instrument/process, and to the normal processing that occurs in the laboratory.

** 24 hours for incubation

2.1 hours per permittee for Chemistry/Microbiology **using ratio of 0.633 labs per permittee**

WET Organisms/Test Conditions/End Points Checklist

Rank	Analyte	Time (in hours) for one analysis***	type of test
1	Fathead minnow - MHSF - NOEC Survival	10	Chronic
2	Fathead minnow - MHSF - NOEC (ON) Growth	10	Chronic
3	Ceriodaphnia - MHSF - NOEC Survival	10	Chronic
4	Fathead minnow - MHSF 25°C - LC50	3	Acute
5	Fathead minnow - MHSF - IC25 (ON) Growth	10	Chronic
6	Ceriodaphnia - MHSF - NOEC Reproduction	10	Chronic
7	Ceriodaphnia - MHSF - IC25 Reproduction	10	Chronic
8	Ceriodaphnia - MHSF 25°C - LC50	3	Acute
9	Fathead minnow - MHSF 20°C - LC50	3	Acute
10	Mysid - 40 fathoms - NOEC Survival	10	Chronic
	TOTAL (hours)	**79**	

*** based on set-up, maintenance, data crunching at conclusion, 10 hr. (chronic) also includes daily weighting

50.0 hours for WET analysis per lab using ratio of 0.633 labs per permittee.

Because only 4.77% of labs do WET analyses, the following number will be used for time burden for WET tests:

2.4 hours for WET analysis