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Comment submitted by Rocco Cusato

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Comment

August 20, 2026

Re: Docket ID No. EPA-HQ-OW-2011-0442
Microbial Rules (Renewal), EPA ICR No. 1895.12, OMB Control No. 2040-0205
91 FR 37109 (June 22, 2026)

To the Environmental Protection Agency:

I support renewal of the information collection requirements associated with EPA's microbial drinking water rules. Protecting drinking water must remain a core public-health priority. Regular testing, accurate recordkeeping, and timely reporting are essential to that responsibility.

This ICR covers recordkeeping and reporting that are mandatory under 40 CFR parts 141 and 142, including the Surface Water Treatment Rule, Total Coliform Rule, Revised Total Coliform Rule, Interim Enhanced Surface Water Treatment Rule, Filter Backwash Recycling Rule, Long Term 1 and Long Term 2 Enhanced Surface Water Treatment Rules, Ground Water Rule, and Aircraft Drinking Water Rule. Respondents include public water systems and primacy agencies. Microbial contamination can create immediate and serious health risks. EPA and states need reliable, consistent, current information to identify problems, confirm that treatment is working, recognize trends, and respond quickly when standards are exceeded.

I. Necessity and practical utility

Give Feedback

The collection is necessary for EPA and primacy agencies to carry out the Safe Drinking Water Act. Monitoring and reporting requirements should remain strong enough to provide early warning of contamination and meaningful confirmation that corrective actions have worked. This renewal should not be used to reduce essential monitoring or reporting solely to lower administrative burden. Substantive changes to sampling frequencies or public-notification duties belong in notice-and-comment rulemaking, not in an ICR.

II. Burden and cost estimates

EPA estimates 144,273 respondents, 15,020,711 burden hours per year, and $1.378 billion per year, including $174.8 million in annualized capital or operation and maintenance costs. I am not in a position to verify system-level hour estimates, but I urge EPA to check those figures with systems of different sizes and with primacy agencies, and to distinguish necessary public-health activities from avoidable paperwork. I also support correcting the 2022 ICR typographical error that stated estimated cost as $1.378 trillion rather than $1.378 billion. An error of that magnitude undermines confidence in the estimates submitted to OMB.

III. Quality, utility, and clarity

EPA should continue to emphasize:

• Sound, consistent procedures for collecting, handling, analyzing, and documenting samples.
• Prompt reporting of positive results, treatment failures, and other conditions that may present an immediate health risk, and timely public notification when required by the underlying rules.
• Data that are clear, complete, and consistent enough for EPA, states, water systems, researchers, and the public to identify risks and evaluate compliance.

IV. Minimizing burden without weakening protection

Efforts to reduce paperwork should focus on simplifying forms, coordinating overlapping requirements, improving digital systems, and offering compliance assistance—not on collecting less of the information needed to protect drinking water. In particular, EPA should complete and strengthen secure, standardized electronic reporting through SDWIS modernization and related tools, so systems and primacy agencies can reduce duplicate entry and errors without dropping data elements or limiting public access to water-quality information. Many small, rural, and resource-limited systems will need practical implementation support if electronic reporting is to reduce burden rather than shift it.

Give Feedback

Clean and safe drinking water depends on consistent testing and dependable data. I encourage EPA to renew this ICR and to keep water-quality monitoring, data quality, timely reporting, transparency, and public-health protection as the central purposes of this collection.

Thank you for considering this comment.

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