

**INFORMATION COLLECTION REQUEST SUPPORTING STATEMENT  
PART A**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA)**

**PUBLICLY OWNED TREATMENT WORKS (POTW) INFLUENT  
PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS) STUDY**

**MARCH 2024**

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## **PART A OF THE SUPPORTING STATEMENT**

*United States Environmental Protection Agency (EPA)  
Publicly Owned Treatment Works (POTW) Influent Per- and Polyfluoroalkyl Substances (PFAS) Study  
EPA ICR No. 2799.01  
OMB Control No. 2040-NEW  
Office: EPA Office of Water  
Contact: Sean Dempsey*

### **1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY AND LEGAL REQUIREMENTS THAT NECESSITATE THE COLLECTION**

The Clean Water Act directs the EPA to develop national regulations known as Effluent Limitations Guidelines and Standards (ELGs) to place limits on the pollutants that are discharged by categories of industry to surface waters and POTWs.<sup>1</sup> For many decades, industrial facilities have used and discharged PFAS to POTWs. 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. Most POTWs do not operate processes and technologies that effectively reduce or destroy PFAS; therefore, PFAS are subsequently discharged into surface waters. Additionally, some PFAS will accumulate in sewage sludge/biosolids generated by the POTW which poses a potential risk for further PFAS release depending on sewage sludge/biosolids management practices.

The EPA has not established national technology-based numeric standards for PFAS in wastewater discharges for POTWs or any industrial point source category 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. Additionally, data on the wastewater discharged from industrial facilities to POTWs are typically not publicly accessible and are limited to certain geographic regions and industrial categories.

As announced in the EPA's [Effluent Guidelines Program Plan 15](#), published in January 2023, the EPA plans to conduct the POTW Influent PFAS Study to collect and review nationwide data on industrial and domestic discharges of PFAS to POTWs. The EPA will require POTWs across the United States to complete a questionnaire and conduct sampling to obtain information on sources of PFAS discharged to POTWs and the presence of PFAS and other pollutants in POTW influent, effluent, and sewage sludge/biosolids. This includes information on wastewater discharges from industrial categories that the EPA has determined historically or currently use PFAS but for which insufficient PFAS monitoring data has been identified.

As part of the POTW Influent PFAS Study, the EPA estimates that approximately 400 POTWs with the highest daily flow rates in the United States would be required to complete an electronic questionnaire. The EPA would use the information and data collected in the questionnaire to select a subset of 200 to 300 POTWs to collect and analyze samples of industrial user effluent; domestic wastewater; and POTW influent, effluent, and sewage sludge/biosolids for PFAS and other pollutants. No individual POTW would be required to collect and analyze

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<sup>1</sup> A POTW is an individual wastewater treatment plant as defined by Section 212 of the Clean Water Act, which is owned by a state or municipality (as defined by Section 502(4) of the Clean Water Act. To simplify and provide clarity throughout this supporting statement, the population of interest includes POTWs and tribally owned facilities, but 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).

wastewater samples for more than 10 industrial users. The total number of industrial users sampled as part of the sampling program will not exceed 2,000 facilities.

The EPA, through this Information Collection Request (ICR) package, requests that the Office of Management and Budget (OMB) review and approve the ICR for the POTW Influent PFAS Study. Through this collection, the EPA will obtain data essential to identify and quantify sources of PFAS to POTWs and prioritize industrial categories for potential regulation. The data collection will also create a national data set on PFAS concentrations found in sewage sludge and biosolids which will fulfill the EPA's data needs for the National Sewage Sludge Survey (NSSS).

The data collection activities described in this ICR will provide a robust data set that will characterize the type and quantity of PFAS and other pollutants in POTW influent, effluent, and sewage sludge/biosolids to inform future Agency actions to control PFAS. This collection effort is necessary because there is limited publicly accessible data on PFAS discharges from many industrial categories to POTWs; the relative PFAS contributions from residential, commercial, and industrial sources to POTWs; and the fate and transport of PFAS in POTW influent and sewage sludge/biosolids. The collection effort is also consistent with the Agency'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.

The POTW industry will devote time and resources to respond to this ICR. The EPA estimates that the total burden to the approximately 400 POTWs for responding to the questionnaire and conducting 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 the ELGs for specific industries are warranted, and administer an ICR that limits the burden placed on respondents.

## **2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED**

### **2(a) What Information Will Be Collected, Reported, or Recorded?**

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 Federal Water Pollution Control Act, 33 USC Section 1318 (Clean Water Act). The EPA first plans to administer a questionnaire to approximately 400 (2.7 percent) of the approximately 14,700 POTWs 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/biosolids management practices. The EPA will select which POTWs are required to complete the questionnaire based on geographic location and daily flow rate, as reported in the 2012 Clean Watersheds Needs Survey (CWNS). See Section 2(b) and Part B Section 2 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 discharging to the POTW, known or suspected sources of PFAS discharges to the POTW, and wastewater and sewage sludge/biosolids management practices of the POTW, including:

- Facility name, location, municipal authority, and contact information.
- Applicable wastewater discharge and biosolids permit information and requirements.
- Quantities of wastewater transferred to the POTW and relative contribution of each type of influent (e.g., industrial, commercial, septage, residential, stormwater).

- Information on significant industrial users (SIUs) and known/suspected sources of PFAS discharges to the POTW.
- Wastewater treatment and management practices, including existing wastewater treatment technologies in place and the quantity and final destination of treated wastewater.
- Sewage sludge/biosolids treatment and management practices, including the annual quantity of solids generated and how these solids were handled.
- Current PFAS monitoring requirements and laboratory capabilities.

The questionnaire consists of 21 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 2-1.

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 EPA plans to administer the questionnaire as a web-based, electronic questionnaire using Qualtrics Survey Software (Qualtrics). 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.

**Table 2-1. 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. Determine the number of in-scope 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.	Use contact information reported for the facility to conduct follow up, as necessary.
	3	Provide information relevant to existing water discharge and biosolids requirements (e.g., NPDES permits, state permits for biosolids 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 biosolids management requirements. Determine facilities that are already required to conduct PFAS monitoring of water discharges or sewage sludge/biosolids.
	4	Identify if facility has completed a NPDES Permitting Program Application Form 2S (New and Existing Treatment Works Treating Domestic Sewage) within the last 10 years. If so, requests the regulatory agency receiving the most recent Form 2S and submission date.	Identify which POTWs have completed Form 2S and the regulatory agency which received it. The EPA may request these Form 2S from regulatory agencies to collect relevant sewage sludge/biosolids data.
2 – Wastewater Influent and Industrial Sources	5	Report the facility’s design maximum daily influent flow rate, annual average influent daily flow rate, and seasonal average influent daily flow rates for 2023.	Understand the size of the facility and seasonal variations in flow rate, which will be used to determine when sampling should be conducted and augment sampling data.
	6	Report the total influent flow rate to the facility for 2023.	Understand the total volume of wastewater managed by the facility.
	7	Estimate the contribution of industrial wastewater and nonindustrial wastewater (e.g., commercial wastewater, residential wastewater, stormwater) discharged 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 percent of industrial wastewater influent.
	8	Identify whether the facility administers the local pretreatment program regulated under 40 CFR §403.8(a).	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	Identify the number of industrial users in specified industrial categories.	Determine the relative contribution from each industrial category to the POTW. Use to determine which industrial users to collect samples from during the sampling program and identify trends between POTW PFAS influent concentrations and presence of certain types of industrial facilities.
	10	Report for all SIUs permitted to discharge to the POTW and any additional facilities that are known or suspected to discharge	Identify industrial categories and specific upstream sources of PFAS to POTW influent. Develop a list of 2,000 industrial users

**Table 2-1. Questionnaire Questions and Their Purpose**

Section	Question Number	Question Description	Purpose
		PFAS to the POTW. For each facility, report the facility name, address, city, state, whether the POTW is a SIU, industrial category, average daily discharge flow rate, whether the facility monitors for PFAS, and whether the facility is a known or suspected source of PFAS discharges. Complete response using an EPA-provided Excel template workbook.	to select for wastewater sampling as part of the sampling program.
3 – Wastewater Management Practices	11	Provide one or more wastewater treatment diagrams depicting the sources and treatment/management practices of each wastewater transferred to the wastewater treatment system in 2023. The diagram should include the types of wastewater 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/biosolids if the POTW is selected for the sampling program.
	12	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 identify whether PFAS has already been identified as a pollutant of concern by the facility.
	13	Report the total flow rate of treated wastewater to surface water, land application, underground injection, recycle/reuse, evaporation, offsite treatment, or any other final destination during 2023.	Determine how treated wastewater is managed by the facility.
4– Sewage Sludge and Biosolids Management	14	Identify if the facility produced sewage sludge at any time during 2023. If so, report the total weigh of sewage sludge generated during 2023.	Identify which facilities produce sewage sludge to inform selection of which POTWs to participate in the 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.
	15	Identify whether the facility submitted a Sewage Sludge (Biosolids) Annual Report for 2023 and, if so, provide the Biosolids NPDES ID and a copy of the report.	Identify sources of information for biosolids production and collect annual report information for future review.
	16	Report the total weight of sewage sludge sent to each final destination during 2023.	Determine sewage sludge management practices and determine potential risks associated with improper management of PFAS-containing sewage sludge.
	17	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.

**Table 2-1. Questionnaire Questions and Their Purpose**

Section	Question Number	Question Description	Purpose
	18	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.
	19	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.
5 – Monitoring and Sample Analysis	20	Identify whether the POTW has conducted any PFAS or AOF sampling or collected PFAS monitoring data for the influent, effluent, domestic wastewater, biosolids, 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.
	21	Identify whether the facility or municipality will operate an onsite laboratory for analysis of aqueous wastewater and/or sewage sludge/biosolids 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 and biosolids 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.

Following receipt of the completed questionnaires and review of the questionnaire responses, the EPA will conduct a two-phase sampling program which will consist of 200 to 300 POTWs. Phase 1 will require each selected POTW to collect and analyze one-time grab samples of industrial user effluent, domestic wastewater, POTW influent, and POTW effluent for PFAS. For each POTW selected, the EPA anticipates specifying approximately 10 or fewer 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 are not expected to 2,000 facilities. Phase 2 will require selected POTWs to collect and analyze one-time grab samples of sewage sludge/biosolids for PFAS and ancillary parameters.

The EPA will select which POTWs will collect and analyze samples based on location, flow rate, types of influent wastewater and industrial users, treatment and waste management practices, and other information collected from the questionnaire. POTWs selected by the EPA to conduct wastewater and sewage sludge/biosolids sampling will be responsible for obtaining sampling bottles and supplies, collecting the required samples at the specified sampling points, contracting and coordinating with laboratories to conduct sample analysis, shipping samples to the laboratories, and submitting sample results to the EPA in the specified format. 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 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.

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.

All sewage sludge and biosolids samples collected from the POTW 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.

POTWs will be required to collect QA/QC samples as specified by the listed methods above. Additionally, POTWs will be required to collect up to three sewage sludge and/or biosolids samples which will be shipped to the EPA for long-term storage. POTWs will not be required to analyze these long-term storage samples – only collect and ship the sample volumes to the specified EPA storage facility.

The sampling program will generate information and data critical to characterizing wastewaters discharged by industrial facilities for which sufficient PFAS monitoring data does not currently exist, determining presence and fate of PFAS in POTW influent, establishing a current national data set of sewage sludge/biosolids characteristics, and assessing current capabilities of POTWs to reduce or eliminate PFAS.

## **2(b) From Whom Will the Information Be Collected?**

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 identifying indirect industrial dischargers across industrial categories.

The EPA will select which POTWs are required to complete the questionnaire based on geographic location and daily flow rate, as reported in the Existing Total Flow field of the 2012 Clean Watersheds Needs Survey (CWNS). The EPA intends to select at least one POTW from each state and several POTWs from each EPA Region to ensure information collected reflects all regions of the United States. The EPA will prioritize POTWs with the largest daily flow rates because these facilities will collectively capture the largest number and diversity in types of industrial users and wastewater influents and will likely have sufficient resources to complete the data collection. In developing the list of POTWs selected to complete the questionnaire, the EPA will use information and data available in sources described in Section 4 and solicit input from states, EPA Regions, POTW trade associations, and other stakeholders. 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 POTWs that completed the questionnaire to also collect and analyze samples from no more than 10 industrial users (effluent only); domestic wastewater; and POTW influent, effluent, and sewage sludge/biosolids. The total number of industrial users sampled as part of the sampling program will not exceed 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/biosolids 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).

### **2(c) What Will the Information Be Used For?**

The EPA will use information and data generated by the questionnaire to determine which POTWs and industrial users will be selected for sampling. The EPA will use data collected via the questionnaire to develop a sampling program population that captures a range of facility characteristics, such as location, flow rate, types of influent wastewater and industrial users, and wastewater and sewage sludge/biosolids management practices. Additionally, through the questionnaire, the EPA will identify POTWs that have existing PFAS monitoring requirements and data similar to what will be generated by the sampling program. To avoid duplicative efforts and reduce total burden to industry, the EPA may request 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.

The EPA will use POTW and industrial user 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 sources of PFAS to POTWs, 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, and POTW influent sampling data will be used to determine the relative PFAS contributions from residential, commercial, and industrial sources to POTWs, allowing the EPA to identify best mechanisms to control PFAS discharges.
- POTW influent, effluent, and sewage sludge/biosolids data will be used to understand PFAS fate and transport in POTWs and efficacy of existing treatment processes.
- POTW sewage sludge and biosolids monitoring data will be used to inform upcoming risk assessments and risk management options, as well as potential future regulations and guidance for management of sewage sludges/biosolids 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.

**2(d) How Will the Information Be Collected? Does the Respondent have Multiple Options for Providing the Information? What Are They?**

Each of the approximately 400 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 EPA Questionnaire ID and entry code. The selected POTWs will access the EPA webpage, be directed via a button link to the questionnaire 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 at least 60 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 questionnaire response period.

The questionnaire will include information relevant to the purpose and authority under which the EPA is conducting the questionnaire; instructions for accessing, completing, and submitting the questionnaire; and a glossary with all pertinent definitions, references, and acronyms to understand and complete the questionnaire. A downloadable, watermarked PDF copy of the questionnaire will be available for respondents to print out on the EPA website 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 responses from Qualtrics and review the questionnaire 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. Questionnaire responses 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; and POTW influent, effluent, and sewage sludge/biosolids. Each POTW selected to conduct sampling and analysis of analytical data will be contacted, in writing, by the EPA directly. 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.

The EPA has conducted, is conducting, or will conduct the following activities to administer the questionnaire:

- Develop the technical questions for the questionnaire and the ICR Supporting Statement (Part A and Part B).
- Identify the population of approximately 400 POTWs with the largest daily flow rates in the United States by evaluating data sources listed in Section 4.

- Conduct stakeholder meetings with trade associations, industry representatives, state regulating agencies, EPA workgroup members, OMB, and other stakeholders to refine questionnaire content (e.g., technical questions, instructions, glossary) and the population of questionnaire respondents.
- Revise the questionnaire, list of POTWs, and POTW Influent PFAS Study design based on comments received.
- Develop the web-based questionnaire platform in Qualtrics.
- Test the final questionnaire in Qualtrics prior to launch.
- Develop mailing labels and facility-specific questionnaire notification letters.
- Prepare and distribute the notification letters, instructions, and questionnaire packages to the POTWs selected to complete the questionnaire.
- Develop a tracking system for questionnaire distribution and receipt.
- Develop a questionnaire database to house and analyze responses.
- Develop and maintain helplines (phone and email) for respondents who require assistance in completing their questionnaire.
- Follow up with POTWs on responses as needed.
- Summarize and analyze responses.
- Conduct technical analyses, summarize results, and select POTWs to participate in the sampling program.

**2(e) How Frequently Will the Information Be Collected?**

The data collection activities included in this ICR are a one-time information collection.

**2(f) Will the Information Be Shared with Any Other Organizations Inside or Outside the EPA or the Government?**

The EPA may share all information not claimed as CBI and collected through this ICR within the EPA and with other government agencies, the industry, trade associations, and the public, as necessary. The EPA intends to prepare publicly available summary versions of information and data collected via the questionnaire and sampling program. The EPA intends to prepare a Data Management and Release Plan which outlines an approach for publishing information in a format that is transparent, useful to the public, and supports the POTW Influent PFAS Study conclusions. Further, the EPA may share information claimed as CBI in accordance with its regulations under 40 CFR Part 2 Subpart B.

**2(g) If This Is an Ongoing Collection, How Have the Collection Requirements Changed Over Time?**

This ICR request is not an ongoing data collection.

**3. TO WHAT EXTENT DOES THE COLLECTION OF INFORMATION INVOLVE THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGY COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY**

The EPA plans to develop the questionnaire in Qualtrics, which allows respondents to fill out and submit the questionnaire online. The Qualtrics questionnaire 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 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.

#### **4. EFFORTS TO IDENTIFY DUPLICATION AND WHY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSES DESCRIBED IN ITEM 2**

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 2012 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 Existing Total Flow field of 2012 CWNS) for each POTW. The 2012 CWNS includes facility-specific information on POTWs such as facility name, location, design and actual flow rate, service population, NPDES permit number, municipal authority name, and watershed; however, the 2012 CWNS does not include information on sources of wastewater or PFAS to POTWs, or PFAS monitoring data for industrial user effluent; domestic wastewater; or POTW influent, effluent, and sewage sludge/biosolids.

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/biosolids, thus, little PFAS monitoring data exists. 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; and POTW influent, effluent, and sewage sludge/biosolids. 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 due to the following reasons:

- 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 data do not reflect a full range of industrial discharges to POTWs.
- 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/biosolids 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.

As part of the questionnaire, the EPA will collect information and data on existing PFAS monitoring requirements and data for POTWs and industrial users. In some instances, the EPA will allow POTWs to submit existing PFAS monitoring data of acceptable quality for use in the POTW Influent PFAS Study instead of performing additional wastewater and sewage sludge/biosolids sampling and analysis. The EPA will also develop a public-facing, web-based data submission portal which will allow states, municipal authorities, and POTWs (including those not selected to complete the questionnaire or sampling program) to voluntarily submit existing data characterizing PFAS in industrial user effluent; domestic wastewater; and POTW influent, effluent, and sewage sludge/biosolids. The EPA anticipates that this approach will increase the volume of PFAS monitoring data collected and decrease duplicative efforts of requiring POTWs currently monitoring PFAS to collect additional samples.

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.

## **5. COLLECTION OF INFORMATION IMPACTS TO SMALL BUSINESSES OR OTHER SMALL ENTITIES AND METHODS TO MINIMIZE THE 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 2012 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 dropdown 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. CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY AND 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 4, 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 listed in Section 4 which is not sufficient to assess the characterization of POTW influent, effluent, and sewage sludge/biosolids 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 National Sewage Sludge Surveys (NSSS), performed in 1988-1989, 2001, and 2006-2007, to collect national concentration data on contaminants found in sewage sludge/biosolids. With this upcoming fourth NSSS, the objective is to provide a national data set on PFAS concentrations found in sewage sludge and biosolids. Conducting this study is critical to obtain national PFAS occurrence data to help inform upcoming risk assessments and risk management options for PFAS in biosolids. This data is necessary for the scientific and economic analysis to inform the need for potential future rulemaking. This study will provide the first comprehensive national data set on PFAS industrial and domestic sources, pretreatment options to reduce PFAS sources, and PFAS transformation and fate throughout the wastewater and biosolids treatment process.

**7. SPECIAL CIRCUMSTANCES**

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. PUBLICATION OF THE *FEDERAL REGISTER* NOTICE AND PUBLIC RESPONSE**

**8(a) *Federal Register* Notice Publication**

The EPA plans to publish a notice in the *Federal Register* announcing the EPA's intent to submit a request for a new ICR and to collect comments on the draft initial questionnaire and POTW Influent PFAS Study data collection effort. The notice will include 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. By means of this notice, the Agency will request comments and suggestions regarding the questionnaire and proposed POTW Influent PFAS Study data collection and the reduction of data collection burden. The notice will ask that the public submit all comments and suggestions within 60 days of the *Federal Register* notice publication.

Pursuant to the Paperwork Reduction Act (PRA) §3506(c)(2)(A), the EPA will solicit 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 public comment period will be announced at the time of the publication of this request in the *Federal Register*.

### **8(b) Consultations**

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 January 2024, the EPA discussed the design and objectives of the POTW Influent PFAS Study 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 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).
- 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. PAYMENT OR GIFT TO RESPONDENTS**

No payments or gifts are provided to respondents.

**10. CONFIDENTIAL BUSINESS INFORMATION CLAIMS**

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;
- 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. QUESTIONS OF A SENSITIVE NATURE**

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. ESTIMATES OF RESPONDENT BURDEN FOR THE INFORMATION COLLECTION**

**12(a) Estimate of Respondent Hour Burden**

The POTW Influent PFAS Study 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; and POTW influent, effluent, and sewage sludge/biosolids. 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 12-1 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/biosolids 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 12-1. 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>

**Table 12-1. Estimated Questionnaire Response Burden by Activity and Labor Category**

Activity	Labor Category and Burden (hours)			Total Burden <sup>a</sup>
	Operator <sup>a</sup>	Engineer	Operations Manager	

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/biosolids samples and contract laboratories to analyze the samples using the specified analytical methods. 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, reviewing sample results, and providing sample data to the EPA in a standardized format as specified in the generic sampling and analysis plan.

The sampling program will be conducted in two phases. For Phase 1, the EPA estimates that each of the selected facilities will collect aqueous grab samples during one-day sampling episodes from up to 13 locations, including POTW influent and effluent samples, a domestic wastewater sample, and an effluent sample from up to 10 industrial users. For Phase 2, facilities will collect up to two sewage sludge/biosolids samples for immediate laboratory analysis and two additional sewage sludge/biosolids samples for long-term storage by the EPA. 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. The EPA also accounts for each facility to collect and submit three aqueous samples and one sewage sludge/biosolids sample for QA/QC purposes. 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 1 and 5 sewage sludge/biosolids samples (2 samples for immediate analysis, 2 samples for long-term storage, and 1 QC/QA sample) during Phase 2. Table 12-2 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/biosolids sampling.

**Table 12-2. 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 1 wastewater samples, one half day for two POTW operators to collect required Phase 2 sewage sludge/biosolids 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>

**12(b) Estimate of Respondent 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 12-3 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 12-3. 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 12-1 as well as the labor rates shown in Table 12-3 to calculate a total labor cost shown in Table 12-4.

**Table 12-4. Total Estimated Respondent Labor Burden for the Questionnaire per Respondent**

<b>Operator Total Labor Costs <sup>a</sup></b>	<b>Engineer Total Labor Costs</b>	<b>Operations Manager Total Labor Costs</b>	<b>Total Labor Burden Cost <sup>a</sup></b>
\$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 of the POTWs selected will respond to the questionnaire. Table 12-5 includes the number of respondents, total burden, and total cost for the industry to respond to the questionnaire. The values presented in Table 12-5 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 12-5 are rounded to the nearest whole hour or dollar.

**Table 12-5. Estimated Questionnaire Respondents by Response Category and Total Estimated Burden**

<b>Response Category</b>	<b>Number of Responses</b>	<b>Number of Respondents Contacting Helpline</b>	<b>Total Wastewater Plant Operator Labor (hours)</b>	<b>Total Engineer Labor (hours)</b>	<b>Total Operations Manager Labor (hours)</b>	<b>Total Labor (hours)</b>	<b>Total Operator Labor Cost (\$)</b>	<b>Total Engineer Labor Cost (\$)</b>	<b>Total Operations Manager Labor Cost (\$)</b>	<b>Total Labor Cost (\$)</b>
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 12-2 with the labor rates shown in Table 12-3. The total labor cost for sampling per facility is shown in Table 12-6. All values presented in Table 12-6 are rounded to the nearest dollar.

**Table 12-6. 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 12-5 and the total labor cost for sampling per facility shown in Table 12-6 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 12-7. All values presented in Table 12-7 are rounded to the nearest whole hour or dollar.

**Table 12-7. 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. TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION

#### 13(a) 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 13-1. 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 questionnaire respondents will contact the helpline for 60 minutes at a rate of \$0.05/minute. The EPA expects this to be an overestimate of the long-distance costs associated with the questionnaire.

As described in Section 12, a subset of POTWs will be required to have facility staff collect wastewater and sewage sludge/biosolids 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/biosolids samples for long-term storage, but the Agency will incur the cost for storage and analysis. The EPA estimates the direct costs associated with wastewater and sewage sludge/biosolids sampling in Table 13-2. All values presented in Table 13-2 are rounded to the nearest dollar.

**Table 13-2. 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/Biosolids 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.

**13(b) 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 13-3. 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. ANNUALIZED COST TO THE FEDERAL GOVERNMENT**

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.<sup>2</sup> 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 14-1 identifies the collection administration tasks to be performed by the EPA employees and contractors, with the associated hours required. Table 14-2 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 14-3 presents a list of the tasks the EPA and its contractors will perform associated with the sampling program and an estimate of the burden and labor costs. Other direct costs associated with sampling include costs associated with planning calls and long-term storage for sewage sludge/biosolids samples. Table 14-4 shows the other direct costs incurred by the EPA per sampled facility and the total cost for a sampling program of 200 POTWs. Table 14-5 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.

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<sup>2</sup> This table can be found at the website [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB_h.aspx)

**Table 14-1. Estimated Agency Burden and Labor Costs for the Questionnaire**

Activity	Burden (hours)			Labor Cost		
	Agency	Contractor	Total Hours	Agency	Contractor	Total Cost
Develop questionnaire instrument (PDF and Qualtrics)	100	600	700	\$11,544	\$73,842	\$85,386
Meet with trade association representatives and stakeholders	100	370	470	\$11,544	\$45,536	\$57,080
Publish notice of anticipated ICR in the <i>Federal Register</i>						
Respond to comments received						
Revise questionnaire instrument based on comments						
Design distribution approach	60	410	470	\$6,927	\$50,459	\$57,385
Develop a mailing list database						
Develop a system to track mailing and receipt activities to improve mailing list						
Develop notification letters						
Mail questionnaire notification letters	50	160	210	\$5,772	\$19,691	\$25,463
Develop and maintain email and phone helplines						
Maintain helpline database and develop documentation	50	160	210	\$5,772	\$19,691	\$25,463
Track questionnaire responses						
Review responses						
Follow-up to clarify responses	20	100	120	\$2,309	\$12,307	\$14,616
Develop questionnaire database						
Upload and verify data						
<b>Total</b>	<b>380</b>	<b>1,800</b>	<b>2,180</b>	<b>\$43,868</b>	<b>\$221,526</b>	<b>\$265,394</b>

**Table 14-2. 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 14-3. Estimated Agency Burden and Labor Costs for the Sampling Program**

Activity	Burden (hours)			Labor Cost		
	Agency	Contractor	Total Hours	Agency	Contractor	Total Cost
Select POTWs and industrial users to sample	80	300	<b>380</b>	\$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)	200	1,000	<b>1,200</b>	\$23,089	\$123,070	<b>\$146,159</b>
Laboratory and analytical support	80	847	<b>927</b>	\$9,235	\$105,000	<b>\$114,235</b>
Review and analyze sampling results (process and compile sampling results into database, analyze data)	200	800	<b>1,000</b>	\$23,089	\$98,456	<b>\$121,545</b>
<b>Total for All Facilities</b>	<b>560</b>	<b>2,947</b>	<b>3,507</b>	<b>\$64,648</b>	<b>\$363,447</b>	<b>\$428,095</b>

**Table 14-4. 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/Biosolids 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 14-5. 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. REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS IN BURDEN ESTIMATES FROM THE PREVIOUS APPROVED ICR**

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

**16. COLLECTION OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED**

**16(a) Technical Analyses Supported by the Questionnaire and Sampling Program**

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/biosolids 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 sludges/biosolids 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. The EPA will request POTWs to identify suspected or known sources of PFAS to POTW influent. 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/Biosolids.** The ancillary parameters assessed for the POTW sewage sludge/biosolids 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/biosolids 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/biosolids sampling results to determine the extent that current management practices (e.g., land application of biosolids) may result in release of and exposure to PFAS.

**16(b) Collection Schedule**

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 16-1. The EPA’s intention is to ensure that facilities have at least 60 days to prepare and submit their response to the questionnaire.

**Table 16-1. Collection Schedule**

Activity	Estimate of Schedule
The EPA sends notification to questionnaire recipients	Within 30 days following OMB approval
Deadline for submission of complete questionnaires to the EPA	At least 60 days following notification
The EPA begins sending notification to facilities participating in Phase 1 of the sampling program	Within 120 days following questionnaire response period
Deadline for submission of compiled wastewater sampling results	Within 120 days following notification
The EPA begins sending notification to facilities participating in Phase 2 of the sampling program	Within 120 days following Phase I
Deadline for submission of compiled sewage sludge/biosolids sampling results	Within 120 days following notification

**16(c) Publication of Results**

The EPA intends to prepare publicly available summaries and/or sanitized versions 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 THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION**

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

**18. 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.