SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

Proficiency Testing Studies for Drinking Water Laboratories

1. Identification of the Information Collection

1(a) Title and Number of the Information Collection

Proficiency Testing Studies for Drinking Water Laboratories

1(b) Short Characterization

This is a request for a new Information Collection Request (ICR) to support the collection of proficiency testing (PT) data to test the performance of laboratories that conduct drinking water analyses. Under 40 CFR 141.23(k)(3), 141.131(b)(2), 141.28, and 141.24(f)(17), laboratories must successfully participate in these PT studies each year to be certified to conduct analysis of compliance monitoring samples. The Primacy Agencies and other certification authorities generally require annual or more frequent participation in PT studies for other classes of analytes.

Another expiring ICR (Performance Evaluation Studies of Water and Wastewater Laboratories (OMB Control No. 2080-0021, EPA ICR No. 0234.08)) currently supports not only drinking water PT studies but also similar studies conducted for wastewater under the Discharge Monitoring Report – Quality Assurance Study Program (DMRQA). The United States Environmental Protection Agency (USEPA or EPA) Office of Ground Water and Drinking Water (OGWDW) has decided to initiate this new ICR in order to specifically address the drinking water PT studies. The ICR for the DMRQA is being addressed separately. The ICR period is August 2007 – September 2008. This ICR period was selected to address these PT – ICR needs requirements until ICR 2040-0090 is renewed (it expires 9/30/08), at which point these activities will be incorporated into that renewed ICR.

The enforcement of drinking water regulations is conducted by Primacy Agencies. These Primacy Agencies are generally the States, but in the cases where the drinking water utilities are located either in a State that has not accepted primacy or in a U.S. territory, the EPA Regional Office for the area serves as the Primacy Agency.

Chemical monitoring data for drinking water are submitted by 2,363 laboratories to PT Vendors (9 total) in order to receive certification. PT Vendors must certify to the drinking water Primacy Agency that the laboratories have successfully completed their PT studies. The analytical results are stored by the PT providers but are not forwarded to EPA. This certification of PT study completion is then used by the Primacy Agencies to support the certification the laboratories to conduct drinking water compliance analyses.

EPA initiated this program and originally administered it as part of the Agency's mandate to assure the quality of environmental monitoring data. This program has since been privatized.

Private sector companies (i.e., PT vendors) manufacture and distribute samples to the participating laboratories, who then submit their analytical results to these PT vendors for evaluation. The PT vendors send evaluations of the submitted data to the laboratory and the States or other designated certifying/accrediting authorities. These data include the names and addresses of the laboratories, the analytes that were tested, the concentration of the analyte, and the acceptance criteria and evaluations.

EPA is required to conduct this ICR analysis because more than nine non-Federal entities (i.e., laboratories that conduct drinking water analyses) will be asked to respond to these data requests. Because Primacy Agencies use the resulting data for their own laboratory certification/ accreditation programs, and are not reporting any information from the PT studies to EPA, they do not incur any burden under this ICR. In addition, cost and burden to PT vendors 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., they are being paid for their incurred costs via the prices that laboratories pay for the PT standards).

The total annual burden and labor costs incurred by the 2,363 potential laboratory respondents associated with this ICR are estimated to be 17,291 hours and $1.80 million per year over the 1.17-year ICR period of August 2007 – September 2008, or 7.32 hours and $783 per year per respondent. Respondent labor costs are associated with the time it takes to read and understand directions sent by the PT vendors, plan activities, analyze PT standards, report information to the PT vendors, and maintain records. Respondent operating and maintenance (O&M) costs are associated with purchasing the PT standards. These non-labor costs for the PT standards represent the O&M costs of $0.91 million per year reported in the official Office of Management and Budget (OMB) inventory. No costs or burdens to PT vendors or Primacy Agencies are associated with this ICR.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

Laboratory PT studies are designed to fulfill the need to document and improve the quality of drinking water analytical data. Results from the PT studies over time have generally shown an improvement in average performance by the laboratories producing these monitoring data. By helping laboratories identify and correct analytical problems, the PT studies are partially responsible for the documented improvement in these data.

Title XIV of the Public Health Service Act of SDWA requires EPA to specify contaminants that may adversely affect public health when present in public water systems (PWSs), specify maximum contaminant levels for these contaminants, and publish "criteria and procedures to assure a supply of drinking water which dependably complies with such maximum contaminant levels." Section 1413(a) of the SDWA specifies that the States have the primary enforcement responsibility for PWSs as long as they have adopted drinking water regulations that are no less stringent than the National Primary Drinking Water Regulations (NPDWRs). Participation in the PT studies that relate to drinking water analyses is mandated in 40 CFR 141.23(k)(3), 141.24(f)(17), 141.28 and 141.131(b)(2) for those laboratories that report data to

support PWS compliance with the NPDWRs. Under 40 CFR 142.10(b)(3), authority for certifying drinking water laboratories is provided to drinking water Primacy Agencies.

2(b) Practical Utility/Users of the Data

EPA, States and laboratory personnel will use the results of these studies to identify laboratory problems for resolution, and thereby improve the quality of water data in critical monitoring areas. These studies have demonstrated that problems exist and arise periodically in drinking water laboratories; without future studies, many such problems will go unrecognized and unresolved. Results from the PT studies are used by State personnel as a major part of the basis for certifying laboratories to produce required regulatory data.

3. Nonduplication, Consultations, and Other Collection Criteria

3(a) Nonduplication

Since there are no other public or private PT programs designed to evaluate chemical analyses in drinking water there are no other sources for comparable data.

3(b) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act, a notice of this Information Collection Request ICR was published in the Federal Register on May 3. 2007. The notice included a request for comments on the content and impact of these information collection requirements on the regulated community. EPA received no comments on this ICR.

3(c) Consultations

EPA, originally the Office of Research and Development, and now OGWDW, has over 25 years experience in the overall oversight of these PT studies. OGWDW will consider any comments received and make adjustments that are appropriate. All nine PT providers are accredited by the American Association for Laboratory Accreditation (A2LA). A2LA is a nonprofit, non-governmental, public service, membership society. The mission of A2LA is to provide comprehensive services in laboratory accreditation and laboratory-related training.

EPA contacted all nine of the PT providers concerning the cost per analyte for laboratories participating in their PT studies. Of the three vendors that responded, the costs ranged from $10.00 to $22.38, with an average of $15.46. EPA used an estimate of $15.00 for the burden estimates. While EPA did not specifically request information from laboratories concerning the costs per analysis used in this burden effort, EPA is involved in a sufficient number of contracts and other interactions with laboratories to have reliable estimates for these routine analysis costs.

3(d) Effects of Less Frequent Collection

Laboratories producing drinking water compliance monitoring data are expected to demonstrate adequate analytical proficiency once each year for each analyte they test. Several

studies are offered each year for the convenience of the laboratories. This allows the laboratories to choose the most convenient study in which to participate, or have other opportunities in the same year to perform successfully in case of any test failures occurred in the first study they participate in annually. Any decrease in frequency would not adequately support the State's laboratory certification/evaluation programs.

3(e) General Guidelines

This ICR was prepared in accordance with the October 2001 version of the ICR Handbook developed by EPA's Office of Environmental Information, Office of Information Collection, Collection Strategies Division. The ICR Handbook provides the most current instructions for ICR preparation to ensure compliance with the 1995 Paperwork Reduction Act (PRA) Amendments and OMB's implementing guidelines. These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

3(f) Confidentiality

This information collection does not require respondents to disclose confidential information. If a respondent does consider any information to be of a confidential nature, the respondent may request that such information be treated as such. All confidential data will be handled in accordance with 40 CFR § 122.7, 40 CFR Part 2, and EPA's Security Manual Part III, Chapter 9, dated August 9, 1976.

3(g) Sensitive Questions

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

4. The Respondents and the Information Requested

4(a) Respondents and NAICS/SIC Codes

Data associated with this ICR are collected and maintained by laboratories seeking Primacy Agency certification for the analysis of drinking water samples. The North American Industry Classification System (NAICS) designation for laboratories that include environmental testing is 541380 (Testing Laboratories). Because Primacy Agencies use the resulting data for their own laboratory certification programs, and are not reporting any information from the PT studies to EPA, they do not incur any burden under this ICR. In addition, cost and burden to PT vendors 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., they are being paid for their incurred costs via the prices that laboratories pay for the PT standards). Therefore, there is no cost or burden included for PT vendors or Primacy Agencies because they are not subject to this ICR.

4(b) Information Requested

4(b)(i) Data Items

In all laboratory PT studies, the data results from the analyses of synthetic samples that contain known amounts of specific compounds, usually dissolved in reagent water. The compounds are those that are subject to required drinking water monitoring under the NPDWRs. 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 it wishes to be certified.

The enforcement of drinking water regulations is conducted by Primacy Agencies. These Primacy Agencies are generally the States, but in the cases where the drinking water utilities are located either in a State that has not accepted primacy or in a U.S. territory, the EPA Regional Office for the area serves as the Primacy Agency. Chemical monitoring data for drinking water are submitted by 2,363 laboratories to PT Vendors (9 total) in order to receive certification. PT Vendors must certify to the drinking water Primacy Agency that the laboratories have successfully completed their PT studies. This certification of PT study completion is then used by the Primacy Agencies to certify the laboratories to conduct drinking water compliance analyses.

4(b)(ii) Respondent Activities

The primary burden involves analyzing and reporting results for relevant study samples according to instructions. Based on information provided by the Registry of Laboratories Certified for Testing Drinking Water Parameters, February 1995, the following numbers of laboratories participated in certification studies:

- 1,082 for inorganics;
- 871 for disinfectant by-products (DBPs); and
- 410 for organic chemicals.

Since the PT program has been privatized and since no revisions have been made to this registry, EPA does not have access to, nor a mechanism to obtain, more recent data. EPA did however, contact all nine PT providers to verify these estimates. The three PT providers (one third of the nine providers) that responded to this request for information, stated that they had a total of 1,090 laboratories participating in PT studies in 2005. This information does confirm that EPA's estimate of 2,363 laboratories, is reasonable.

EPA also does not have data on how many of these laboratories participated in one or more studies. To provide an estimate of respondent burden, EPA assumes that a total of 2,363 laboratories will participate in the PT studies each year during the ICR period of 2007 – 2008. Some laboratories are assumed to participate in two or three of these studies (they analyze more than one of the three groups of analysis; inorganics, DBPs or organics). This is a conservative assumption, since it assumes that each group of analytes is tested by an individual participant, thereby assuming that each participant must conduct overhead activities (i.e. reading instructions, maintaining reports, etc.).

Respondents will participate in the following activities:

Read Instructions: Each of the 2,363 respondents will read the instructions provided by the vendor.

Plan Activities: Each of the 2,363 respondents will incur burden to plan activities associated with the PT studies.

Analyze Inorganic Chemicals: EPA assumes that 1,082 laboratories will participate in the PT studies for inorganic chemicals.

Analyze DBPs: EPA assumes that 871 laboratories will participate in the PT studies for DBPs.

Analyze Organic Chemicals: EPA assumes that 410 laboratories will participate in the PT studies for organic chemicals.

Report Results: Each of the 2,363 respondents will incur burden to report its study results to the PT vendor.

Maintain Records: Each of the 2,363 respondents will incur burden to maintain records associated with the PT study.

5. The Information Collected – Agency Activities, Collection Methodology and Information Management

5(a) Agency Activities

OGWDW has reduced its activity related to this information collection to that of providing general guidance and oversight for the Primacy Agencies, PT vendors and the participating laboratories on an as needed basis. Three EPA Regional Offices serve as Primacy Agencies for the certification of drinking water laboratories. These three EPA Regional Offices receive the certifications from the PT vendors that laboratories have or have not passed the vendor supplied PT study which they then use to determine if these laboratories should be certified to perform drinking water compliance monitoring.

5(b) Collection Methodology and Management

The Primacy Agency will notify a laboratory of its requirement to participate in the relevant PT program annually. The laboratory will then select an accredited private PT vendor to provide them with the appropriate samples. The laboratory will then send the data obtained from the analyses of these samples to the vendor, who will then send evaluations of the submitted data back to the laboratory and to the Primacy Agency or other designated certifying/accrediting authority.

5(c) Small Entity Flexibility

The major requirement under Small Business Regulatory Enforcement Fairness Act (SBREFA) is a regulatory flexibility analysis of all rules that have a "significant economic impact on a substantial number of small entities." Since this data request is not part of a rule, this ICR is not subject to SBREFA.

5(d) Collection Schedule

Under 40 CFR 141.23(k)(3), 141.131(b)(2), 141.28, and 141.24(f)(17), laboratories must successfully participate in these PT studies each year to be certified to conduct analysis of compliance monitoring samples. The Primacy Agencies and other certification authorities generally require annual or more frequent participation in PT studies for other classes of analytes. The participating laboratories demonstrate their proficiency by passing a PT study conducted by an accredited PT vendor for a fee. In order to have sufficient PT studies available, some PT vendors offer studies quarterly, some less frequently. The PT vendor must submit the results of each study, which may be four times per year, to the Primacy Agency.

In summary, each participating laboratory must report the results to the PT vendor once each year during the ICR period of 2007 through 2009. The PT vendor must submit the results to the Primacy Agency. There are no set calendar dates except that participating laboratories must successfully participate in an annual PT study for each analyte they report.

6. Estimating the Burden and Cost of the Collection

This section describes the estimated average annual burden and costs for the information collection activities for PT studies that will be conducted by drinking water laboratories. For this data submission, vendors and Primacy Agencies have no burden and costs; this is discussed further in Section 6(a). The burden and cost estimates for drinking water Primacy Agencies are discussed in detail in Section 6(b). The Agency's burden and cost estimates are outlined in Section 6(c).

To estimate the costs, EPA made assumptions about the burden associated with activities that would likely be needed to fulfill the request. To the extent possible, assumptions were based on activities from similar data collections. EPA emphasizes that the per-respondent estimates represent the average burden and cost over the 1.17-year period covered by this ICR (August 2007-September 2008). Some respondents may incur higher costs and some will fall below the average. Summary burden and cost estimates for laboratories and EPA are provided in Exhibits 6-1 and 6-2. Tables that detail the burden estimates to conduct each analysis are provided in Appendix A.

6(a) Estimating Respondent Burden

The average annual respondent burden (in labor hours) for laboratories is shown in Exhibit 6-1. There is no burden for PT vendors or Primacy Agencies, as discussed in Section 4(a) of this ICR. Over the ICR years of August 2007 – September 2008, EPA estimates an

average annual respondent burden (for all respondents in total) of 17,291 hours for activities associated with this reporting effort; or an average of 7.32 hours per respondent (17,291 hours divided by 2,363 laboratories). This estimate includes burden for participating laboratories to read instructions, plan activities, analyze samples, submit data to the PT vendors, 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.

Read Instructions: EPA assumes that each of the 2,363 respondents will require 1.0 hour to read the instructions provided by the vendor. The burden will be evenly divided between a manager and chemist.

Plan Activities: EPA assumes that the manager of each laboratory will require 0.2 hours to plan activities associated with the PT studies.

Analyze Inorganic Chemicals: A total of 2,363 laboratories are assumed to require approximately 3.3 hours to analyze PT standards for 29 inorganic chemicals. All hours will be incurred by a chemist.

Analyze DBPs: Chemists in 871 laboratories are assumed to require 2.0 hours to analyze PT standards for 9 DBPs.

Analyze Organic Chemicals: Chemists in 410 laboratories are assumed to require 16.0 hours to analyze PT standards for 52 organic chemicals.

Report Results: EPA assumes that each of the 2,363 respondents will require 1.0 hours to report the results of the study to the PT vendor. The burden will be divided between a manager and records clerk.

Maintain Records: EPA assumes that a records clerk in each of the 2,363 laboratories will require 0.1 hours to maintain the files from the PT study.

6(b) Estimating Respondent Costs

Exhibit 6-1 shows the estimated laboratory burden resulting from the requirement to participate in proficiency testing. Exhibit 6-2 shows the annual average costs for laboratories over the ICR period of August 2007 – September 2008. Average annual labor costs for all 2,363 laboratories are estimated to be $0.895 million. Average annual O&M costs are estimated to be $0.91 million. EPA estimates each laboratory will incur an annual average labor plus non-labor cost of $763 for this data collection effort. Respondent costs are not included for the Primacy Agencies as their participation in laboratory certification activities are voluntary.

6(b)(i) Respondent Labor

Labor costs are based on information provided by the U.S. Department of Labor Statistics, May 2005, National Industry Specific Occupational Employment and Wage Estimate. The labor categories include a manager at an hourly rate of $52.09, a data entry clerical person at an hourly rate of $12.71, and a skilled technician or chemist to conduct the measurements at an hourly rate of $23.65. The U.S Bureau of Labor Statistics employer cost for employee compensation (average for 2005) of $24.36 was added to each of the wage estimates. Exhibit 6-2 lists the estimated burden and costs for labor related to each activity. The annual respondent labor cost, for all 2,363 respondent/laboratories is estimated to be $895,288 for 17,291 hours.

6(b)(ii) Respondent Operating and Maintenance Costs

O&M costs for laboratories are 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 can be considered associated with this ICR. Only the cost associated with purchasing the PT standards is appropriate for consideration in this category.

Laboratories may participate in the PT studies for some or all of the regulated contaminants. Because EPA does not does not have sufficient information to estimate how many analytes are contained in the PT samples sent to each laboratory, EPA has estimated a "worst case" scenario by assuming that a single PT sample contains standards for each possible regulated analyte. Therefore, laboratories participating in the inorganic PT study are assumed to receive and run analyses for 29 analytes. Similarly, those participating in the PT study for DBPs and/or organic chemicals will receive samples for each of 9 analytes and/or each of 52 analytes, respectively. EPA estimates the costs of each PT standard to be $15 (i.e., $15 per analyte). Average annual O&M costs (fees for PT standards) for the respondent laboratories is estimated to be $908,055. Refer to Appendix A for a list of inorganic, DBP, and organic analytes.

Exhibit 6-. Estimated Laboratory Burden for Proficiency Testing.

Collection Activities	***Manager hours/year***	***Chemist hours/year***	***Records Clerk hours/year***	***Total hours per Lab***	***# of Labs*** [1]	***Total Average Annual Burden Hours*** *(all respondents)*
	(a)	(b)	(c)	(d) = (a) + (b) + (c)	(e)	(f) = (d)*(e)
Read Instructions	0.5	0.5	0	1.0	2,363	2,363
Plan Activities	0.2	0	0	0.2	2,363	473
Analyze Inorganics	0	3.285	0	3.285	1,082	3,554
Analyze DBPs	0	2.0	0	2.0	871	1,742
Analyze Organics	0	16.0	0	16.0	410	6,560
Report Results	0.5	0	0.5	1.0	2,363	2,363
Maintain Records	0	0	0.1	0.1	2,363	236
Annual Average Burden						**17,291**
Annual Average per Respondent Burden						**7.32**

[1] Data from Registry of Laboratories Certified for Testing Drinking Water Parameters, February 1995.

Exhibit 6-. Estimated Laboratory Cost for Proficiency Testing.

Collection Activities	Labor Costs						O&M Costs	Total Average Annual Costs (all respondents)
	Manager at $76.45/hr	Chemist at $48.01/hr	Records Clerk at $37.07/hr	Labor Costs per Respondent	# of Labs	Labor Costs/Year	Standards at $15/analyte	
	(a)	(b)	(c)	(d) = (a) + (b) + (c)	(e)	(f) = (d) * (e)	(g) = (e) * $15 * # of analytes	(h) = (f) + (g)
	*hourly rates * labor hours from Exhibit 6-1, columns (a)-(c)*							
Read Instructions	$38.23	$24.01	$0.00	$62.23	2,363	$147,050	$0	$147,049
Plan activities	$15.29	$0.00	$0.00	$15.29	2,363	$36,130	$0	$36,130
Analyze Inorganics	$0.00	$157.71	$0.00	$157.71	1,082	$170,645	$470,670	$641,315
Analyze Disinfection Byproducts	$0.00	$96.02	$0.00	$96.02	871	$83,633	$117,585	$201,218
Analyze Organic Chemicals	$0.00	$768.16	$0.00	$768.16	410	$314,946	$319,800	$634,746
Report Results	$38.23	$0.00	$18.54	$56.76	2,363	$134,124	$0	$134,124
Maintain Records	$0.00	$0.00	$3.71	$3.71	2,363	$8,760	$0	$8,760
Average Annual Costs for All Laboratory Respondents						$895,288	$908,055	$1,803,343
Average Annual Costs per Laboratory Respondent						$379	$384	$763

[1] Salaries from U.S. Department of Labor Statistics, May 2005, National Industry Specific Occupational Employment and Wage Estimates. plus U.S. Department of Labor average estimate of employee compensation for 2005 of $24.36.
[2] U.S. Department of Labor Statistics, Natural Science Manager 11-9121.
[3] U.S. Department of Labor Statistics, Chemist 19-2031.
[4] U.S. Department of Labor Statistics, Information and Record Clerk 43-4199.

6(c) Estimating Agency Burden and Costs

Since EPA's role has been reduced to an advisory level only, there is no longer any burden to the Agency.

6(d) Estimating the Respondent Universe and Total Burden and Costs

The only respondents for this ICR are laboratories. This ICR estimates the number of potential respondents at 2,363. The total and average annual burden for these respondents are summarized in Section 6(a) and Exhibit 6-1. The total and average annual costs are summarized in Section 6(b) and Exhibit 6-2. There are no Agency burden and costs associated with this ICR.

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and costs for this ICR are shown in Exhibit 6-3. This includes the burden and costs to the 2,363 laboratories that are affected by this ICR.

Exhibit 6-. Bottom Line Burden and Costs(for ICR period of 2007-2009).

Cost / Burden	***Total Across 1.17 ICR Years (August 2007-September 2008)***	***Average Per Year over ICR Years (August 2007-September 2008)***
Number of Respondents (Laboratories)	2,363	2,363
Total Responses	2,765	2,363
Number of Responses per Lab	1.17	1
Burden Hours per Lab	8.56	7.32
Total Burden Hours (all 2,363 labs)	23,668	17,291
Hours per Response (Total hours from above/Total responses from above)	8.56	7.32
Per Laboratory Labor Costs	$443	$379
Total Labor Costs (all 2,363 labs)	$1.05 million	$0.895 million
Laboratory O&M Costs	$450	$384
Total O&M Costs (all 2,363 labs)	$1.06 million	$0.908 million
Total Lab Costs (Labor plus O&M costs for all 2,363 labs)	$2.11 million	$1.80 million

6(f) Burden Statement

The reporting burden for data collections included in this ICR is detailed above. The total annual respondent burden (for August 2007 – September 2008) imposed by these collections is estimated to be 17,291 hours, or 7.32 hours per respondent per year. Estimates include time for reading instructions, planning activities, analyzing standards, reporting results, and maintaining records.

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-OW-2007-0266, which is available for online viewing at www.regulations.gov, or in person viewing at the Water 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 Water Docket is (202) 566-2426. 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-OW-2007-0266 and OMB Control Number 2040-NEW in any correspondence.

Exhibit A-. Analytical Burden – Inorganic Chemicals.

Method Type	Analytes	Burden *(in hours for 1 analysis)*
Metals (Inductively Coupled Plasma-Mass Spectrometry or Atomic Absorption)	Aluminum Antimony Arsenic Barium Beryllium Cadmium Chromium Copper Lead Manganese Mercury Nickel Selenium Silver Zinc	0.33 *(in total)*
Ion Chromatography	Fluoride Sulfate Nitrite-N Nitrate-N	0.5 *(in total)*
	pH Turbidity Alkalinity Residual Free Chlorine Total Filterable Residue Thallium Calcium Sodium Total Cyanide	0.083 0.083 0.083 0.05 0.33 0.33 0.083 0.083 0.33
Transmission Electron Microscopy	Asbestos	1.0
Total	**29 Analytes**	**3.29**
Note: Each PT standard is estimated to be $15.00. Therefore, the cost to purchase PT standards for all 29 inorganic chemicals would be $435 per laboratory.		

Exhibit A-. Analytical Burden – Disinfectant By-products.

Method Type	Analytes	Burden *(in hours for 1 analysis)*
Purge and Trap Mass Spectrometry	Total Trihalomethanes • Chloroform • Bromodichloromethane • Dibromochloromethane • Bromoform	1.0
Gas Chromatography/ Electron Capture Detector	Haloacetic Acids • Monochloroacetic acid • Dichloroacetic acid • Trichloroacetic acid • Monobromoacetic acid • Dibromoacetic acid.	1.0
Total	**9 Analytes**	**2.0**
Note: Each PT standard is estimated to be $15.00. Therefore, the cost to purchase PT standards for all nine disinfectant by-products would be $135 per laboratory.		

Exhibit A-. Analytical Burden – Organic Chemicals.

Method Type	**Analytes**		**Burden** ***(in hours for 1 analysis)***
Gas Chromatography/ Mass Spectrometry (GC/MS) *(for synthetic organic chemicals)*	Alachlor Atrazine Benzo(a)pyrene Chlordane Di(2-ethylhexyl)adipate Di(2-ethylhexal)phthalate Endrin Heptachlor Heptachlor epoxide	Hexachlorobenzene Hexachlorocyclobenzene Hexachlorocyclopentadiene Lindane Methoxychlor Pentachlorbiphenol Polychlorinated Biphenyls Simazine Toxaphene	5.0
High Performance Liquid Chromatography (HPLC) (1)	Carbofuran	Oxamyl	1.0
HPLC (2)	Endothall		1.0
Gas Chromatography/ Electron Capture Detector (GC/ECD) (1)	2,4-D 2,4,5-TP Dalapon	Dinoseb Picloram	5.0
GC/ECD (2)	1,2-dibromo-3-chloropropane	Ethylene dibromide	0.5
GC/MS *(for volatile organic compounds)*	Benzene Carbon tetrachloride Chlorobenzene 1,2-Dichlorobenzene 1,4-Dichlorobenzene 1,2-Dichloroethane 1,1-Dichloroethylene *cis*-Dichloroethylene *trans*-Dichloroethylene Dichloromethane	1,2-Dichloropropane Ethylbenzene Styrene Tetrachloroethylene Toluene 1,1,1-Trichloroethane 1,1,2-Trichloroethane Trichloroethylene 1,2,4-Trichlorobenzene Vinyl chloride Xylenes	0.5
High Resolution GC/MS	2,3,7,8-TCDD (Dioxin)		1.0
HPLC (3)	Diquat		1.0
HPLC (4)	Glyphosate		1.0
Total	**52 Analytes**		**16.0**
Note: Each PT standard is estimated to be $15.00. Therefore, the cost to purchase all 52 organic chemical PT standards would be $780 per laboratory.			