

## **Clarification on Change in Burden**

ICR 2040-0204 (EPA 1896.08)

12/04/2008

### OMB Question:

Exhibit 12 shows 228,529 hours being added because the Stage 2 DBP ICR is being consolidated into this one. Then in Exhibit 13, there are 174,800 hours being added to PWS burden apparently for the same reason, and 49,710 hours being subtracted from the primacy agency burden, also with the same explanation. I believe the latter two changes may be adjustments to the current Stage 2 DBP ICR but this is not clear and there is no explanation given for the changes. Please clarify.

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### EPA Reponse:

The changes in Stage 2 burden that you asked about (174k increase for PWSs and a decrease of 49k for primacy agencies) are primarily due to the phased implementation schedule of the rule which causes the burden to change over time.

In the stand-alone Stage 2 ICR, which was developed for the first 3 years following Stage 2 promulgation, the states were conducting initial rule implementation, which included primacy application and technical assistance to PWSs. This initial implementation period is now complete. The states are now involved in overseeing PWSs' initial distribution system evaluations (IDSEs) and reviewing PWS compliance monitoring plans.

For PWSs, initial rule implementation burden is spread out over 6 years--half incurred during the stand-alone ICR and half incurred in the DBP/Chems/Rads ICR. However, the other rule requirements are being implemented in phases, with different deadlines for SW and GW systems and different deadlines based on system size. In the standalone ICR, only the largest GW systems incurred a burden for conducting an IDSE and preparing a compliance monitoring plan. The ICR we submitted to you includes IDSE and compliance monitoring burden for all the other GW systems. This results in an increase in burden.

A detailed explanation of the compliance deadlines for Stage 2 (given in # of months or years after promulgation) can be found beginning on p. 56 of the DBP/Chem/Rads ICR text. Also, Exhibits 2 and 3 of Appendix C (particularly the footnotes) show how the burden and number of respondents for each activity change during the 3 years of the current ICR period.

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