

Filter Adoption Survey
(EPA ICR No. 2615.01, OMB Control No. 2008-New)

Short Characterization/Abstract

Under Section 1415(a)(3) of the Safe Drinking Water Act, on December 16, 2019, the U.S. EPA granted Denver Water, a public water system, a variance (Variance) from the definition of “optimal corrosion control treatment” in 40 C.F.R. 141.2. Per the Variance, to determine the efficacy of the filter program, Denver Water will annually conduct the “Filter Adoption Survey” to determine the consumer filter adoption rate and assess whether consumers are properly using and maintaining the filters.

1. NEED FOR AND USE OF THE COLLECTION

1(a) Need and Authority for the Collection

The Variance is the agency decision requiring this information. The EPA issued the Variance under Safe Drinking Water Act (SDWA) Section 1415(a)(3) which gives the EPA the authority to issue a variance from a treatment technique requirement upon showing that an alternative is “at least as efficient” in lowering the level of the contaminant with respect to which such requirement was prescribed [in this case, optimal corrosion control treatment, OCCT].” EPA believes this is the first information collection request of its kind to have a survey component that measures pitcher filter use by its customers as a required reporting component. EPA is not aware of any other utilities conducting such surveys.

1(b) Practical Utility/Users of the Data

EPA will use the survey results that Denver Water annually distributes to determine the consumer filter adoption rate, and to confirm whether customers are using and maintaining the filters correctly (and per manufacturer’s instructions). Denver Water must annually submit a Program Year report to CDPHE and the EPA, containing a summary and analysis of the survey results. The filter adoption rate is one of the components that are assessed in the Program Year Report for the EPA to evaluate Denver Water’s performance of the Variance requirements.

2. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

2(a) Non-Duplication

The information to be obtained under this ICR has not been collected by the EPA, any other federal agency, or Denver Water.

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

The EPA publicly noticed this ICR in the Federal Register which was published on March 12, 2020 at 85 FR 14477. The EPA has not received any comments.

3(c) Consultations

Denver Water's public affairs office and other staff have conducted preliminary consultations of respondents to the survey. The Variance requires Denver Water to obtain the EPA and Colorado Department of Public Health and Environment (CDPHE)'s approval of the survey. Accordingly, in developing this survey, Denver Water, the EPA, and CDPHE had several conference calls and email exchanges. The EPA and CDPHE ultimately approved the survey.

3(d) Effects of Less Frequent Collection

The Variance requires that Denver Water conduct the surveys annually and that the EPA reviews those results annually. Less frequent collection would not suffice because the filter adoption survey is related to other components of the Variance such as lead service line removal and education, communication, and outreach efforts, among other components.

3(e) General Guidelines

All of the collection activities described within this ICR fall within OMB's General Guidelines and regulations under 5 CFR 1320.5(d)(2).

3(f) Confidentiality

The information the EPA will receive from the surveys will be summaries and be provided in annual reports. Denver Water will submit reports to the EPA through encrypted emails that are opened by a secured network, and that the EPA will store on restricted drives.

3(g) Sensitive Questions

The survey results may contain sensitive information in the form of customer IDs that are used to identify specific households in the event that Denver Water provides specific communication, outreach, and education to the households upon the filter adoption survey results. Additionally, the survey includes optional sensitive questions related to race, gender, age, education, income, and primary languages spoken in the household. This information will inform Denver Water, CDPHE, and the EPA of the filter adoption rate by neighborhood or demographic group so Denver Water's health equity and environmental justice principles set forth in their variance request can be evaluated. Denver Water will utilize this information to help inform future decisions pertaining to lead service line removal schedules, and to focus its communication, education, and outreach efforts aimed at reaching vulnerable populations at greatest risk from

lead exposure. For example, as Denver Water’s variance submittal notes, if certain geographic areas or demographic groups are not responding to the survey, then Denver Water would carry out additional communication, outreach, and education activities to understand the issue and improve survey responses. In doing so, the survey results will also inform how Denver Water will follow-up with linguistically and culturally appropriate outreach and actions to reach the communities most at risk from lead exposure.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

Eligible respondents for the survey are individuals 18 years of age or older and who are customers to the water system that Denver Water owns and operates, as well as integrated systems (as referenced in the Variance). Respondents will be those homeowners with either known, suspected, and possible LSLs. No businesses are targeted for this survey so Standard Industrial Classification (SIC) codes are not required. Each year 20,000 of these customers will be selected to receive the survey from Denver Water and its integrated systems. It is expected that 10% of respondents will return the survey to meet the required number of surveys per the variance. It is expected that those who did not receive a survey will be targeted to receive them the following year.

4(b) Information Requested

4(b)(i) Data items, including recordkeeping requirements

The recordkeeping requirements that Denver Water must comply with under the Variance, including those related to the filter adoption survey, are consistent with recordkeeping requirements under the existing Lead and Copper Rule. Denver Water is required to submit a summary of the information collected from the survey, including the filter adoption rate and information about filter use and maintenance on an annual basis to the EPA and CDPHE.

4(b)(ii) Respondent Activities

To assemble this information collection, Denver Water composed the filter adoption survey. Denver Water will submit the survey analysis results to the EPA and CDPHE electronically. Denver Water will store the information on its own information platforms as described in Part B of the supporting statement. The respondents to the survey, the Denver Water and integrated systems customers, will have minimal assembly and submission burdens for the data, and will likely not be storing the information.

5. THE INFORMATION COLLECTED—AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The EPA will review a summary of results that Denver Water submits in an annual report. The EPA will store the annual reports in a restricted drive.

5(b) Collection Methodology and Management

Information about the survey, its processing, and the database that Denver Water will use is detailed in Part B. The survey information will be obtained online, through mail, and in-person. Denver Water anticipates sending as many as 20,000 surveys in waves (in English and Spanish), will send the surveys through direct mail with an online option (Denver Water will finalize QR code and how individual access codes will be automated), and direct mail pieces will have a unique code to track location where survey was sent. Denver Water's requirement to survey at least 50 homes in-person will ask the same exact questions as customers completing the mail and electronic versions of the filter adoption survey. The burden for these in-person customer respondents should be the same or less than the customers respondents who are responding to the survey by mail or electronically, because Denver Water will simultaneously conduct the in-person survey during its visit with the customer to collect compliance tap samples, and customers would be able to submit their surveys electronically or directly hand the survey responses back to the Denver Water staff person, rather than having to mail it in. The estimated burden for customer respondents, including those responding in-person, is further described in Section 6(e)(i), Table 1, below.

5(c) Small Entity Flexibility

This survey will be administered to individuals, not businesses. Thus, no small entities will be affected by this information collection.

5(d) Collection Schedule

The surveys are scheduled to send to respondents in the estimated timeframe of August 31 through September 4, 2020. Denver Water will have until the end of the calendar year to analyze and report the data to the EPA.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

The EPA and Denver Water estimate that on average it will take each respondent about 15 minutes to review the introductory materials, complete the survey, and mail the survey. Denver Water will mail or email 20,000 surveys each year. Denver Water estimates that 10% of respondents will complete the survey. These burden estimates reflect a one-time expenditure in a single year.

6(b) Estimating Respondent Costs

6(b)(i) Estimating Labor Costs

Estimated respondent costs was developed from Bureau of Labor (below) and is the mean average of all occupations in the Denver metro area and is an hourly wage of \$28.57. The website we used was https://www.bls.gov/oes/current/oes_19740.htm#00-0000 See the detailed data in the table in section 6(e).

6(b)(ii) Estimating Capital and Operations and Maintenance (O&M) Costs

Denver Water is encouraging participation by offering a drawing for a monetary reward in the form of gift cards. This annual \$1,000 expense is reflected as an operations and maintenance (O&M) costs. There are no capital or startup costs for respondents associated with this collection.

6(c) Estimating Agency Burden and Costs

Agency costs arise from staff reviewing and approving the survey and reviewing the summary data in the annual report. See the detailed data in the table in section 6(e).

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

The EPA expects Denver Water to send up to 20,000 surveys per year and receive approximately 2,000 responses in return. Denver Water is also considered a single respondent. The total annual burden and cost for survey respondents and Denver Water to be approximately \$100,262 and 1,270 hours. See section 6(e) for details.

6(e) Bottom Line Burden Hours and Costs Tables

Please see 6(e)(i) through 6(e)(iii).

Respondent	Hours	Cost
Denver Water customers	500	\$14,285
Denver Water	770	\$85,977
	1,270 hours	\$100,262/year

6(e)(i) Respondent Tally

Estimated time and burden for the customer respondents is

Table 1 Total Estimated Burden and Cost for Customers to Complete the Survey

2,000 surveys*	15 minutes to complete: 2,000 x 15 minutes= 30,000 minutes or 500 hours	\$28.57 per hour**	\$14,285 Total cost
<p>*Denver Water's response rate since 2013 for an end user survey yields a response rate between 9% and 13%. After discussions with our survey consultant a response rate of 10% can be expected. Approximately 3% of these surveys will constitute the in-person surveys.</p>			
<p>**This estimate is from Bureau of Labor (below) and is the mean average of all occupations in the Denver area. https://www.bls.gov/oes/current/oes_19740.htm#00-0000</p>			

Table 2 Total Estimated Burden and Cost for respondent Denver Water			
Description	Hours	Hourly Rate	Extended Cost
# of hours for staff, management, administrative to develop and approve survey	Staff: 10 Management: 2	Staff: \$110 Management: \$220	\$1,100 \$400
# of hours for Denver Water staff to identify the 54 participants and/conduct survey filter use survey in-person (including travel time to these customer premises).	Staff: 294	Staff: \$50	\$14,717
# of hours to develop the database for the subset of customers with known, and suspected LSLs for mailing the surveys to, time from printing to mailing, time to email and transmit, time for other activities (staff, management, administrative)	Database Development: Staff: 20 Database Development Staff: 20 Database Development Management: 8	Database Development: Staff: \$110 Database Development Staff: \$150 Database Development Management: \$220	\$2,200 \$3,000 \$1,760
# of hours for staff, management, administrative to mail surveys and cost of the mailings	Assume 20,000 surveys sent Staff: 8	Staff: \$50 Cost to print \$1,200 Cost to mail \$10,000	\$440 \$1,200 \$10,000
# of hours for staff, management, administrative to process survey responses and any associated additional costs	Assume 2,054 surveys returned (10% + in-person) Process Surveys Staff: 160 Process Surveys Management: 24	Process Surveys Staff: \$110 Process Surveys Management: \$220	\$17,600 \$5,280

Table 2 Total Estimated Burden and Cost for respondent Denver Water			
Description	Hours	Hourly Rate	Extended Cost
# of hours to collect and input data into a data base, time to organize and sort and analyze the data and time to develop a report per the LRPP, time for other activities (staff, management, administrative)	Assume 2,054 surveys returned (10% + in-person) Input Survey Data Staff: 160 Report Preparation Staff: 40 Process Surveys Management: 24	Input Survey Data	\$17,600
		Staff: \$110	\$4,400
		Report Preparation	\$5,280
		Staff: \$110	
		Process Surveys	
		Management: \$220	
Any additional training costs and hours associated with any of these activities (e.g. to complete and review survey results, and to analyze results to EPA and CDPHE)	Cost of Gift Cards – \$1,000		\$1,000
Total Budget		\$85,977	

6(e)(ii) The Agency Tally

Estimated time and burden for EPA Region 8 to approve the Survey

Table 3 Total Estimated Burden and Cost Summary for EPA			
Technical staff	3 hours	GS 13 step 5 55.92 per hour	\$167.76
Attorney	2 hours	GS 14 Step 5 66.07 per hour	\$132.14
Management	2 hours	GS 14 Step 5 66.07 per hour	\$132.14
Annual Cost			\$432.04

Estimated time and burden for EPA Region 8 to review the data related to the survey per the annual report

Table 4 Total Estimated Burden and Cost Summary for EPA			
Technical staff	3 hours	GS 13 step 5 55.92 per hour	\$167.76
Attorney	2 hours	GS 14 Step 5 66.07 per hour	\$132.14

Management	2 hours	GS 14 Step 5 66.07 per hour	\$132.14
Annual Cost			\$432.04

6(e)(iii) Variations in the Annual Bottom Line

We do not anticipate significant variation (>25%) in the annual respondent reporting/recordkeeping burden.

6(f) Reasons for Change in Burden

This is a new collection.

6(g) Burden Statement

For Filter Adoption Survey, the public reporting burden is estimated to average 0.385 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number R08-OW-2019-0404], which is available for online viewing at www.regulations.gov, or in person viewing at 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. 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 or R08-OW-2019-0404 and OMB Control Number 2008-NEW in any correspondence.