SUPPORTING STATEMENT
Information Collection Request (ICR) for the Lead and Copper Rule Revisions (LCRR)

1 IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

TITLE: Information Collection Request for Lead and Copper Rule Revisions (LCRR)

EPA ICR Number: 2606.03

OMB Control Number: 2040-0297

1(b) Short Characterization/Abstract

On January 15, 2021, the U.S. Environmental Protection Agency (EPA) published in the Federal Register (FR) the "National Primary Drinking Water Regulations: Lead and Copper Rule Revisions" (LCRR) (86 FR 4198). In a subsequent action on June 16, 2021, EPA published the "National Primary Drinking Water Regulations: Lead and Copper Rule Revisions; Delay of Effective and Compliance Dates" (86 FR 31939), which set the new effective date for the LCRR as December 16, 2021, and the compliance date as October 16, 2024. Office of Management and Budget (OMB) approved the initial "Information Collection Request for Lead and Copper Rule Revisions (LCRR)" on July 25, 2022, and set the renewal date as December 31, 2023. This ICR renewal characterizes the incremental impacts of the LCRR in terms of the burden and costs for the three-year period of January 1, 2024, through December 31, 2026. Also, this ICR modifies the extension to the ICR titled, "Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules" (80 FR 78224, December 16, 2015, OMB control number 2040-0204), which estimates the burden and costs associated with the previous Lead and Copper Rule (LCR) as well as other rules.

In addition to the renewal of the LCRR ICR, this request includes information on the potential burden that may result if respondents (public water systems, primacy agencies, and EPA) choose to follow the recommendations included in EPA's SL Inventory Guidance when seeking to comply with the inventory requirements of the LCRR over the same three-year period.

EPA intends to revise the LCRR prior to its compliance date. The proposed Lead and Copper Rule Improvements (LCRI) was published on December 6, 2023 (88 FR 84878). EPA intends to promulgate the final LCRI by October 16, 2024, revising many rule areas of the LCRR. As described in the preamble to the proposal, if the LCRI is promulgated as planned, there would not be a need for water systems to implement the LCRR except for the initial inventory requirements, public education requirements for consumers served by a lead, galvanized requiring replacement, or unknown service line, and the 24-hour public notice requirement. Similarly, states are not expected to apply for or obtain primacy for the LCRR. At this time, most states have sought, or intend to seek, an extension until December 18, 2025, to obtain primacy for the LCRR. If the LCRI is promulgated as planned in 2024, that primacy deadline would no longer be applicable. For the purposes of this ICR, however, this supporting statement includes a summary of the LCRR and the estimated burden and costs associated with

this ICR renewal for the LCRR and describes what would happen without promulgation of the LCRI. The LCRR description is provided for the reader to understand the information that would be collected if the LCRI is not promulgated. When EPA promulgates the LCRI, the Agency intends to issue a new ICR that would describe and assess the revised burden and costs to reflect the changed regulatory requirements of the LCRI.

The Safe Drinking Water Act (SDWA) is the core statute addressing drinking water at the federal level. Under SDWA, EPA sets public health goals and enforceable standards for drinking water quality. In 1991, EPA promulgated the LCR, which requires public water systems (PWSs) to minimize lead and copper in drinking water by reducing water corrosivity and preventing lead and copper from leaching from premise plumbing and drinking water distribution system components. The LCR established a National Primary Drinking Water Regulation (NPDWR) for lead and copper that consists of a treatment technique requirement, including but not limited to corrosion control treatment (CCT), lead service line replacement (LSLR), and public education, as well as established action levels (ALs) for the 90th percentile values of lead and copper and routine monitoring and sampling. Between 2000 and 2007, EPA revised the LCR on three different occasions to streamline rule requirements, promote and strengthen national implementation, and reduce burden for water systems.

The LCRR revised the previous version of this NPDWR and requires community and non-transient non-community water systems to optimize corrosion control and, under specified conditions, install source water treatment, conduct public education, and/or replace lead service lines (LSLs) in the distribution system. The LCRR also expands public education requirements for lead, requires greater public access to information on lead, and further targets sensitive subpopulations by requiring additional lead in drinking water testing at schools and child care facilities. The LCRR is designed to identify and reduce lead exposure at systems with elevated lead concentrations in their drinking water by establishing a lead trigger level (TL) of 0.010 milligrams per liter (mg/L) in addition to the lead AL of 0.015 mg/L that was established under the previous rule (a system's lead concentration is measured as the 90th percentile water lead level derived from a set of samples collected at consumers taps during each monitoring period). The LCRR retains both the lead and copper ALs, revises requirements for systems with a lead action level exceedance (ALE) and sets additional requirements for systems with a lead trigger level exceedance (TLE). Note, the maximum contaminant level goals (MCLGs) for both lead and copper have not been modified by the LCRR. See the LCRR final rule Federal Register for detailed information on the specific regulatory requirements (86 FR 4198).

Water systems required to comply with the regulation include Federal, State, Tribal, and local governmental entities as well as private entities. States (and Tribes) that have been granted primary enforcement authority (*i.e.*, primacy) for the LCR are responsible for overseeing rule implementation by systems within their jurisdiction. In instances where a State or Tribe does not have primacy, the EPA Region is the primacy agency. Systems demonstrate compliance through reporting the analytical results of collected samples, LSL statistics (both the number of LSLs present in a system and the number of LSLs replaced following a TL or AL exceedance), and other information to the primacy agency. Systems use this data to demonstrate compliance, assess treatment options, operate and maintain installed treatment, and communicate water quality information to consumers served by the system. Primacy agencies use the data to determine compliance, designate treatment to be installed, and set enforceable operating

parameters. Primacy agencies are also required to report a subset of the data to EPA, which uses this information to protect public health by ensuring compliance with the LCRR, measuring progress toward meeting the LCRR's goals, and evaluating the appropriateness of state and tribal implementation activities. The information reported by primacy agencies to EPA can be found in the Safe Drinking Water Information System (SDWIS).

In 2024, the first year of the LCRR ICR renewal period, which includes the October 16, 2024 LCRR compliance date, public water systems (PWS) should still be engaged in the regulatory startup activities identified in the original "Information Collection Request for Lead and Copper Rule Revisions (LCRR)." These activities include: reading and understanding the LCRR, assigning personnel and resources for rule implementation, attending training and receiving technical assistance from the state, developing initial LSL inventories and submitting demonstrations for systems that do not have lead, galvanized requiring replacement (GRR), and unknown service lines, and conferring with primacy agencies on initial planning for LSLR and preparation of an LSLR plan when lead, GRR, and unknown service lines are present. During this same period, primacy agencies may be conducting startup activities that include: adopting the rule and developing a program to implement it, modifying their data systems, providing system staff with training and technical assistance, providing internal staff with training for implementation, assisting with initial LSL inventories and reviewing initial inventories, reviewing demonstrations of no LSLs, GRRs, and unknown lines from systems, and conferring with systems on initial planning for LSLR and reviewing the LSLR plan.

Following the LCRR compliance date, if the LCRI is not promulgated, both systems and primacy agencies would work to implement several ongoing and additional regulatory requirements. The resultant ICR related burden and costs associated with these implementation activities are estimated in years 2025 and 2026 of this ICR renewal. The LCRR ICR water system activities occuring in years 2025 and 2026 include: ongoing rule implementation and administration, lead and copper tap monitoring, CCT, find-and-fix, water quality parameter monitoring, source water monitoring, LSL inventory updates, LSLR, small system point-of-use (POU) treatment as a compliance alternative,[1] lead public education and outreach, public notification, and lead in drinking water testing programs at schools and child care facilities.[2] During this same period, the burden and cost to primacy agencies stems from their review and oversight of the activities associated with each of the PWS requirements outlined above as well as training staff and managing data systems. See the LCRR final rule Federal Register notice for detailed information on the specific regulatory requirements to occur in the years 2024, 2025, and 2026 (86 FR 4198). However, note that EPA intends to revise many of the parts of the

[1] Note that for systems serving fewer than 10,000 people the LCRR allows for compliance choice in response to lead action level exceedance. Small systems may choose between installing or reoptimizing CCT, Lead service line replacement, installation and operation of POU devices, or the removal of all lead bearing plumbing material. The replacement of lead bearing plumbing compliance option for small system flexibility is not costed out in this ICR or the *Economic Analysis for the Final Lead and Copper Rule Revisions*. EPA lacks the system characteristic data that would allow the Agency to determine a small system's cost for replacement of lead-bearing plumbing materials because of the significant variability among systems and the plumbing materials in the buildings they serve. EPA assumes a system would only select the replacement of lead-bearing plumbing materials compliance option if it cost less than the three other alternative compliance options (LSLR, CCT, and POU).

[2] Note the degree of burden and cost associated with the majority of these activities is dependent on sampled water lead levels at individual systems.

LCRR through the LCRI prior to the October 16, 2024, compliance date, and therefore, EPA would submit a new ICR to OMB for review and approval for the LCRI.

In this ICR, EPA is also assessing the potential burden and cost to public water systems, primacy agencies, and EPA that choose to follow the non-binding recommendations made by EPA in its "Guidance for Developing and Maintaining a Service Line Inventory" (August 2022, EPA 816-B-22-001), or SL Inventory Guidance, when seeking to comply with the inventory requirements of the LCRR over the same three-year period (January 1, 2024 through December 31, 2026).[3]

The purpose of the Service Line (SL) Inventory Guidance is to assist water systems as they develop and maintain their SL inventories and to provide primacy agencies with needed information for oversight and reporting to EPA. The guidance covers the lifecycle of the inventory, including inventory creation, material investigations, system reporting, primacy agency review, public accessibility of service line information, and SL consumer notification. In addition, the guidance provides best practices, case studies, and templates related to topics, such as the classification of SL materials; best practices for SL material investigations; inventory form and format; inventory accessibility; tools to support inventory development and data tracking; and ways to prioritize SL investigations.

More specifically, in this ICR, EPA assessed the potential incremental burden and cost associated with the general recommendations for PWSs to: create an initial inventory that is as thorough as possible; provide, in the publicly accessible inventory, location identifiers for all SLs that are sufficiently detailed to allow the identification of a specific SL; expand inventories to include SL subclassifications, other plumbing components such as lead connectors, and other details such as source of information, pipe diameter, and installation date; conduct interviews with experienced staff and plumbers to help focus the inventory effort and locate system records; interview neighboring water systems about regional construction practices; consider inventory practices as something that can be worked into the day-to-day activities of the system rather than treated as an independent effort; consider developing or modifying standard operating procedures (SOPs) to document how they will collect SL information during normal operations and update their inventories; partner with plumbers and other third parties to obtain information on SL materials; document the records they reviewed (including information from past reviews) as a best practice and include the source of the material classification in their inventory; and continue to gather information on SL materials after the lines have been classified and assess the accuracy of historical records.

The ICR also assesses the potential burden and cost impacts of the SL Inventory Guidance recommendations associated with the LCRR requirement to update the inventory.[4] The guidance recommends that PWSs begin engaging customers and conducting proactive, on-site service line material investigations as soon as possible to improve their inventory, verify existing records, and reduce the number of unknowns. The SL investigative techniques discussed in the

[3] The SL Inventory Guidance document is not a regulation itself nor does it change or substitute for the relevant provisions and requirements in the Safe Drinking Water Act and LCRR. Thus, it does not impose legally binding requirements on EPA, primacy agencies, or the regulated community. The document does not confer legal rights or impose legal obligations on EPA, primacy agencies, and the regulated community, or any member of the public.
[4] The LCRR requires submission of the updated version of the inventory on the same schedule as a system's tap sampling monitoring, but no more frequently than annually (40 CFR 141.90(e)(3)).

SL Inventory Guidance include visual observation, water quality sampling, predictive modeling, and excavation.

A third category of potential burden and costs that could result from PWSs choosing to implement the guidance recommendations are those associated with public accessibility of the inventory. In the guidance, EPA recommends that systems select the best method for sharing the inventory data with the public given their data sharing infrastructure, technological capabilities, and staff limitations. Online systems could share data in the form of interactive maps or downloadable spreadsheets on the system's website or through other cloud-based sharing apps or FTP/SFTP servers. For PWSs that do not have an online system to disseminate inventory data, EPA recommends that these PWSs consider developing such a system[5]. Alternatively, in the guidance, EPA suggests that information can be shared in a tabular data format in preexisting utility mailings or newsletters.

Appendix A of the SL Inventory Guidance also provides templates to assist primacy agencies and PWSs to standardize and potentially simplify the inventory development and update process.[6] For detailed information on the SL Inventory Guidance recommendations and templates, see https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf.

EPA solicited public comment on the proposed renewal of the LCRR ICR on July 24, 2023, and received three comments during the 60-day comment period that ended on September 22, 2023. One commenting water system provided estimated costs for the system's future inventory development. The average cost values provided by the water system were lower than those estimated by EPA. The water system stated it planned to use predictive modeling to estimate the type of service line material present for about 25 percent of their existing unknown service lines. The remainder of the lines would be identified through some combination of other investigation techniques with unit costs similar to those previously employed by the system, including LCRR inventory development requirements (historical records review), visual field inspections, and customer outreach that utilized a door-to-door campaign. Information was not provided on the remaining percent of unknown lines to be investigated with each alternative identification method or the relative unit or total costs for each method. With the information provided, EPA was unable to compare the commenter's total cost numbers with the Agency's methodology and, therefore, could not update its ICR analysis based on the information provided in the comment. The commenter also provided unit cost information from another publication that EPA had already considered as part of the ICR analysis. A second commenter suggested that EPA require lead connectors and abandoned lead pipes to be included in the LCRR service line inventories. Since this suggestion would require changes to the LCRR rule itself and not the proposed information collection, EPA did not address the comment in this ICR. A third commenter raised concerns about the financial burden placed on homeowners. This comment did not identify which part of the LCRR the commenter was concerned with, and the comment did

[5] Note that the LCRR requires that systems serving 50,000 or more people provide online access to SL information. Systems have leeway as to the content of the online material and if other information sharing methods should be used in addition to the online material.

[6] See EPA's website at https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule for a downloadable, spreadsheet version of the template that contains forms and additional sheets for inventory tracking.

not specifically raise concerns with the reporting requirements of the rule; therefore, this comment was not addressed as a part of the ICR comment responses.

For the three years (2024 to 2026) covered by this ICR renewal, the total net respondent burden associated with this ICR is estimated to be 28,980,857 hours, or an average net burden of 9,660,286 hours per year. The corresponding total net costs are estimated to be $1,923,487,269, or an average of $641,162,423 per year. EPA estimates the average net per-respondent burden for PWSs to be 372 total hours, or 124 hours per year. Average net per -respondent costs for PWSs are estimated to be $24,935, or $8,312 per year. The Agency estimates that the average burden per primacy agency is 67,558 hours, or 22,519 hours per year. The corresponding respondent net costs per primacy agency are estimated to be an average of $4,222,388, or $1,407,463 per year.

The total number of respondents for this ICR is 67,712. Fifty-six of these respondents are primacy agencies and the remaining 67,656 respondents are water systems. The total number of responses for these respondents is 168,167,669 with 166,068,857 responses for water systems and 2,098,812 responses for primacy agencies. The average burden per response is 0.17 hours. The average cost per response is $11.44.

2 NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

EPA needs comprehensive and current information on lead and copper occurrence and associated enforcement activities to implement its program oversight and enforcement responsibilities mandated by SDWA. EPA identified rule changes in the LCRR rulemaking that clarify the intent of the LCR as well as ensure and enhance protection of public health through reduction in lead exposure. EPA will use the information collected to support the responsibilities outlined in SDWA. EPA will be able to strengthen rule implementation through the LCRR in the areas of monitoring, customer awareness, CCT, and LSLR. The LCRR does not alter the current MCLGs or treatment technique approach to controlling lead and copper in drinking water.

The authority for this collection is derived from different parts of SDWA, including the definition for a “primary drinking water regulation” under Section 1401(1)(D) of SDWA, which requires that a “primary drinking water regulation means a regulation” that “contains criteria and procedures to assure a supply of drinking water which dependably complies with such maximum contaminant levels; including accepted methods for quality control and testing procedures to [e]nsure compliance with such levels and to [e]nsure proper operation and maintenance of the system...” Furthermore, Section 1445(a)(1)(A) of SDWA requires that “[e]very person who is subject to any requirement of this subchapter or who is a grantee, shall establish and maintain such records, make such reports, conduct such monitoring, and provide such information as the Administrator may reasonably require by regulation to assist the Administrator in establishing regulations under this subchapter, in determining whether such person has acted or is acting in compliance with this subchapter...” In addition, Section 1413(a)(3) of SDWA requires primacy agencies to “keep such records and make such reports...as the Administrator may require by regulation.”

The sections from the SDWA 1996 Amendments, discussed above, are included as Appendix A to this document.

2(b) Uses/Users of the Data

2(b)(i) Uses of the Data

Primary users of the data collected under this ICR are EPA, water system managers, consumers, and primacy agencies (*i.e.*, state, territorial, and tribal regulators and, in some instances, EPA Regional Administrators). This section contains more information about how the lead and copper data generated by the LCRR regulatory changes will be used. The section also indicates how the non-binding recommendations from the SL Inventory Guidance may be used to improve PWS and primacy agency LCRR regulatory compliance.

The LCRR makes several changes to the lead and copper tap sampling. It requires all systems to 1) re-evaluate their tap sampling location based on their LSL inventory to ensure they are collecting tap samples from sites with LSLs (*i.e.*, highest risk sites) and 2) update LSL inventories according to the tap sampling schedule but no more frequent than annually. The LCRR codifies the tap sampling protocol guidance issued by the EPA in February 2016. In addition, the LCRR modifies how systems calculate the 90th percentile lead level. For example, when a water system with LSLs has an insufficient number of sites to meet the minimum number of tap samples, the system must use all of the samples from LSL sites and the samples from non-LSL sites with the highest lead results to meet the minimum number of tap samples, even when more than the necessary number of tap samples are collected from these non-LSL sites. A system's lead 90th percentile will be used as a criterion to determine additional requirements. EPA did not revise the minimum number of required samples or the requirements to analyze a tap sample for both lead and copper. The burden for these revisions begins to accrue after the compliance date of October 16, 2024. Tap monitoring will be used to:

- Evaluate the quality of water delivered to customers;
- Evaluate system-specific needs, including examining treatment effectiveness;
- Inform educational material provided to the public, including tap sample results;
- Assess compliance and determine when it is necessary to alert the public of possible health risks resulting from non-compliance with Federal or State regulations; and
- Modify monitoring frequencies to address potential health risks.

The LCRR includes revisions to CCT and water quality parameter (WQP) monitoring including the removal of calcium carbonate stabilization as a treatment technique and calcium as a regulated WQP. For water systems with CCT, exceedance of the lead TL or AL requires re-optimization. A water system without CCT would conduct a CCT study if it exceeds the lead TL and would implement CCT if it subsequently exceeded the lead AL. Another CCT-related change includes the revision of sanitary survey requirements to include CCT review and WQP assessment and consideration of potential CCT changes based on updated guidance that has been issued by EPA. The LCRR adds a new find-and-fix provision, requiring water systems to collect a follow-up sample for each lead tap sample that exceeds 0.015 mg/L. Systems with CCT are also required to collect a WQP sample and evaluate if localized or systemwide CCT adjustment is needed. As with tap sampling, WQP monitoring will be used to:

- Evaluate the quality of water delivered to customers;
- Evaluate system-specific needs, including examining treatment effectiveness;
- Assess compliance and determine when it is necessary to alert the public of possible health risks resulting from non-compliance with Federal or State regulations; and
- Modify monitoring frequencies to address potential health risks.

The LCRR requires that systems complete and update an LSL inventory according to the tap sampling schedule, which is a comprehensive service line materials inventory that identifies LSLs and galvanized pipes that are currently or have ever been downstream of an LSL, and unknown service lines. The inventory will be used to inform LSLR efforts, lead and copper tap sampling sites, and public education efforts. In addition to the specific requirements of the LCRR, the SL Inventory Guidance (August 2022, EPA 816-B-22-001) provides water systems with additional information and recommendations that will assist the systems in developing a comprehensive and accurate service line inventory that will facilitate LCRR compliance, improve LSLR program efficiency, provide greater public health protection, potentially assist in obtaining external funds for inventory development and LSLR, and provide potential cost savings in complying with regulatory sampling, public education, and LSLR requirements. The SL Inventory Guidance recommendations, when implemented by systems, will also provide primacy agencies with robust inventory information for oversight and reporting. The public will also benefit from improved information on exposure to lead that will improve averting behaviors.

The revisions to the LCR requirements for LSL testing and replacement include requiring full LSLR at a mandatory minimum rate of three percent per year in response to a lead ALE and full LSLR based on a goal rate negotiated by the system and the primacy agency in response to a lead TLE. The LCRR prohibits systems from counting partial LSLRs toward their mandatory replacement rate or goal rate and eliminates the "test out" provision[7]. Systems are required to replace the system-owned portion of the LSL if they are made aware that the customer is replacing their portion.

The revisions also require systems to 1) provide a pitcher filter certified to remove lead and replacement cartridges to last a minimum of six months and 2) collect one follow-up lead tap sample between three to six months for each affected residence after any LSLR. Systems must also develop standard operating procedures that help define operations that disturb LSLs and practices to minimize disturbance and consumer exposure to lead. Also, systems must conduct targeted public education (PE) to customers with LSLs, GRRs, and unknown service lines to encourage them to participate in the LSLR program. The data collected as the result of this revision will primarily be used to demonstrate compliance and determine when it is necessary to alert the public of possible health risks.

The LCRR provides four compliance alternatives for a lead ALE to allow increased flexibility for small community water systems (CWSs) that serve 10,000 or fewer people and all non-transient and non-community water systems (NTNCWSs). The rule allows these water systems to choose among the options, which would allow them to select the most financially and technologically viable strategy that is effective in reducing lead in drinking water. The LCRR outlines the following compliance alternatives for small CWSs and NTNCWSs: 1) full LSLR in 15 years, 2) installation and maintenance of optimized corrosion control treatment (OCCT), 3)

[7] Systems will no longer be allowed to count an LSL as replaced through testing.

installation and maintenance of POU devices, and 4) replacement of all lead-bearing plumbing fixtures at every tap where water could be used for human consumption. The CWSs and NTNCWSs must have control of all plumbing materials to select option four. The data collected as a result of this revision will primarily be used to determine compliance and determine when it is necessary to alert the public of possible health risks resulting from non-compliance with federal or State regulations.

The LCRR adds additional lead PE and outreach requirements for systems responding to a lead ALE. The LCRR also codifies the Water Infrastructure Improvements for the Nation Act (WIIN Act), which requires water systems to provide public notice of a lead ALE within 24 hours. Most of the new PE requirements apply to systems regardless of their lead 90th percentile levels. The revisions include additional outreach to those potentially impacted by water-related work, new customers, and individual households with high lead results. Revisions would also increase information available to health care providers and the public and require updated lead language in the Consumer Confidence Report. CWSs that are conducting voluntary or mandatory LSLR would also be required to perform targeted outreach to customers with LSLs, GRRs, and unknown service lines, and CWSs that are providing and maintaining POU devices would be required to provide educational materials to customers. The data collection required for these programs will be used to inform the public of possible health risks and assess compliance.

Under the revisions for a change in source or treatment, all CWSs and NTNCWSs, regardless of lead 90th percentile levels, are required to obtain primacy agency approval prior to making any long-term treatment changes or adding a new source as well as sampling source water in response to a significant change in source. The data collected under this revision will be used to:

- Evaluate the quality of water delivered to customers;
- Evaluate system-specific needs, including examining treatment effectiveness; and
- Modify monitoring frequencies to address potential health risks.

Source water monitoring and treatment has one revision under the LCRR. The source water monitoring requirements would only apply to the first time in which a water system exceeds the lead or copper AL. The source water monitoring and treatment requirements are independent of lead 90th percentile levels. This is a reduction in burden.

The LCRR creates a new requirement for CWSs to conduct lead in drinking water testing and public education at schools and child care facilities. Systems would be required to provide PE to each sampled school or child care facility and provide testing results to the facility, primacy agency, and State and local health departments. The data collected as the result of this revision will primarily be used to evaluate the quality of water delivered to consumers at sampled school or child care facilities.

2(b)(ii) Users of the Data

Primary users of the data collected under this ICR are water systems and their customers, primacy agencies, and EPA. The information collected by EPA is available to the public, via EPA's website (https://www3.epa.gov/enviro/facts/sdwis/search.html) or by requesting the data

under the Freedom of Information Act (FOIA; 40 CFR, Chapter 1, Part 2). Other organizations and individuals that may utilize the data include but are not limited to the following:

- Individual consumers, realtors, potential homebuyers, homeowners, households, and other members of the public;
- News organizations;
- Staff from other EPA programs (such as Superfund, the Resource Conservation and Recovery Act, and the Office of Enforcement and Compliance Assurance);
- The Federal Emergency Management Administration;
- Centers for Disease Control and Prevention;
- Military bases;
- Farmers Home Administration;
- Department of Interior;
- Department of Housing and Urban Development;
- U.S. Army Corps of Engineers;
- White House Task Forces;
- American Water Works Association;
- Association of Metropolitan Water Agencies;
- National Rural Water Association;
- Rural Community Assistance Partnership;
- National Association of Water Companies;
- Association of State Drinking Water Administrators;
- Natural Resources Defense Council; and
- Consumers Federation of America.

3 NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

EPA has consulted with other federal agencies, state agencies, industry organizations, water systems, and tribal organizations to ensure non-duplication of this information collection. To the best of the Agency's knowledge, the data required by the LCRR and the data potentially collected based on the recommendations in the SL Inventory Guidance are not available from any other source.

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

EPA solicited public comment on the proposed renewal of the LCRR ICR on July 24, 2023, and received three comments. One commenting water system provided estimated costs for the system's future inventory development. The average cost values provided by the water system were lower than those estimated by EPA. With the information provided, EPA was unable to compare the commenter's total cost numbers with EPA's methodology and, therefore, could not update its ICR analysis based on the information provided. The commenter also provided unit cost information from another publication which EPA already considered as part of the ICR analysis. A second commenter suggested EPA require lead connectors and abandoned lead pipes be included in the LCRR service line inventories, and a third raised concerns about the LCRR placing financial burden on homeowners, however, specific concerns with the rule's reporting requirements were not raised. EPA did not address these comments in this ICR. 3(c) Consultations

EPA conducted three sets of consultations that inform the Agency's estimated burden and size of the potentially affected universe. The first set was conducted during the development of the LCRR regulatory requirements. EPA engaged with multiple stakeholders representing a wide range of expertise. The first sub-section below describes these rule development consultation activities that informed the initial characterization of the affected universe and the ICR burdens associated with the LCRR regulatory requirements. Summaries from this initial set of meetings and consultations are available in the docket for the rule under EPA-HQ-OW-2017-0300 at https://www.regulations.gov.

Post promulgation of the LCRR, EPA as part of compliance with the requirements of Executive Order (EO) 13990[8] conducted an extensive engagement process with Lead and Copper Rule stakeholders. This virtual engagement process represents an extensive set of consultations which have been used to inform the burden estimates in this LCRR ICR renewal. This effort is summarized in the second sub-section below. Summaries from this initial set of meetings and consultations are available in the docket for the virtual engagements under EPA-HQ-OW-2021-0255 at https://www.regulations.gov.

The third set of consultations was conducted as part of the SL Inventory Guidance development process. These consultations inform the ICR burden costs associated with the SL Inventory Guidance. The draft guidance was provided to eighteen different external stakeholder groups including regulated systems, primacy agencies, and non-governmental organizations. As part of this process to obtain input, EPA received approximately 1,500 specific comments on the draft guidance document. Sub-section three below summarizes this consultation effort.

[8] On January 20, 2021, President Biden issued the "Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis." (86 FR 7037, January 25, 2021) (Executive Order 13990). Section 1 of Executive Order 13990 states that it is "the policy of the Administration to listen to the science, to improve public health and protect our environment, to ensure access to clean air and water…, and to prioritize both environmental justice and the creation of the well-paying union jobs necessary to deliver on these goals." Executive Order 13990 directs the heads of all Federal agencies to immediately review regulations that may be inconsistent with, or present obstacles to, the policy it establishes. For the full text of the EO see: https://www.federalregister.gov/documents/2021/01/25/2021-01765/protecting-public-health-and-the-environment-and-restoring-science-to-tackle-the-climate-crisis.

3(c)(i) Consultations Conducted During the Development of the LCRR

Consultations with State and Local Government and Stakeholder Organizations

In October 2008, EPA held a two-day stakeholder meeting at the Carnegie Institution for Science. The purpose of this meeting was to gather stakeholder input on actions that could be taken in the revisions to the LCR. Discussion topics included changes to the tiering criteria for lead and copper, LSLR requirements, particulate lead in tap water samples, optimal water quality parameters, tap sampling issues, and CCT technologies. EPA presented summaries of the scientific data that the Agency had compiled on these issues. EPA also requested stakeholder input and feedback on other issues EPA could consider for potential future action on the LCR. EPA held a public meeting on November 4, 2010, to discuss potential Long-Term Revisions to the LCR. The meeting was held to obtain stakeholder feedback about key issues and options to address the issues.

EPA held a Federalism consultation on November 15, 2011, with representatives from State and local government organizations to solicit feedback on potential regulatory revisions to the LCR. In its capacity as an advisory committee to EPA, the Local Government Advisory Committee (LGAC) periodically makes recommendations and comments to the Agency on issues impacting local governments. EPA received comments that addressed sample site collection criteria and lead sampling protocol at LSL sites.

In May and June of 2016, the Administrator and other high-ranking EPA officials conducted meetings with state officials, water system officials, and non-government organizations (NGOs). Sixteen state officials and 16 PWS officials met with EPA on May 26 and June 1, 2016, respectively. EPA met with 15 NGOs on June 2, 2016. During each meeting, EPA and stakeholder officials discussed critical needs and key opportunities for addressing drinking water challenges and four priority issues including the LCR with the goal of strengthening implementation of the previous LCR and improving public health protection through updates to the rule.

In 2017, EPA sent a questionnaire to nine states regarding the burden and cost associated with the National Drinking Water Advisory Council's (NDWAC) recommendation to require all systems to develop a comprehensive LSL inventory and to expand the definition of an LSL to include lead connectors even if the service line is not made of lead. The questionnaire asked states how they would manage the LSL inventory requirement and their estimates for costs associated with reviewing PWS inventory documentation. The nine states were selected based on geographic diversity, high incidence of LSLs, and knowledge of existing LSLR programs. Seven states (Illinois, Michigan, Washington, Wisconsin, New Jersey, Rhode Island, and Ohio) out of the nine states responded to the questionnaire.

EPA held another Federalism meeting on January 8, 2018, in Washington DC, with 17 intergovernmental associations and several associations representing state and local governments.[9] EPA also held five follow-up briefings between January 8 and March 8, 2018. A

[9] Participants included: the National Governors' Association, the National Conference of State Legislatures, the Council of State Governments, the National League of Cities, the U.S. Conference of Mayors, the National Association of Counties, the International City/County Management Association, the National Association of Towns

total of 82 state and local governments and related associations provided input during the meetings and within 60 days after the initial meeting. Common issues discussed included LSLR, CCT, transparency and PE, tap sampling, and copper. EPA considered Federalism comments received in 2011 and 2018 when developing the LCRR. The Association of State Drinking Water Administrators (ASDWA) provided Federalism input on March 8, 2018, that informed the framework of the LCRR. To address ASDWA's concerns, EPA proposed 1) a new TL of 0.010 mg/L in addition to retaining the current AL of 0.015 mg/L, 2) a new set of requirements for systems with a TLE, and 3) a revised set of requirements for systems with an ALE. Summaries from meetings and consultations are available in the docket for the rule under EPA-HQ-OW-2017-0300 at https://www.regulations.gov.

National Drinking Water Advisory Council (NDWAC) and the Lead and Copper Rule Working Group

EPA consulted with NDWAC on July 21-22, 2011, to provide updates on the proposed LCR revisions and solicit feedback on potential regulatory options under consideration. In November 2011, NDWAC held deliberations on LSLR requirements after they received the Science Advisory Board's (SAB) final report on the effectiveness of partial LSLR. In December 2011, a public meeting was held where NDWAC provided EPA with major recommendations on the potential LCR regulatory revisions, which are outlined in a letter dated December 23, 2011.

In 2014, the NDWAC formed the Lead and Copper Rule Working Group (LCRWG) to provide additional advice to EPA on potential options for long-term regulatory revisions. EPA held seven in-person meetings with the LCRWG from March 2014 through June 2015, participated in multiple conference calls, and spent time outside these meetings to provide input to the LCRWG on key issues. The LCRWG focused their time to provide advice to EPA in addressing the following issues: sample site collection criteria, lead sampling protocols, public education for copper, and measures to ensure optimal CCT and LSLR. The NDWAC provided the Agency with their final recommendations and findings in a report submitted to the EPA Administrator in December 2015. In the report, the NDWAC acknowledged that reducing lead exposure is a shared responsibility between consumers, the government, PWSs, building owners, and public health officials. In addition, they recognized that creative financing is necessary to reach the LSL removal goals, especially for disparate and vulnerable communities. The NDWAC advised EPA to maintain the LCR as a treatment technique rule but with enhanced improvements. The NDWAC qualitatively considered costs before finalizing its recommendations, emphasizing that PWSs and states should focus efforts where the greatest public health protection can be achieved, incorporating their anticipated costs in their capital improvement program or the requests for Drinking Water State Revolving Funds. The LCRWG outlined an extensive list of recommendations for the LCRR, including establishing a goal-based LSLR program, strengthening CCT requirements, and tailoring water quality parameters to the specific CCT plan for each water system. A detailed description of the provisions for NDWAC's

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and Townships, the County Executives of America, and the Environmental Council of States. Additionally, the Agency invited the Association of State Drinking Water Administrators, the Association of Metropolitan Water Agencies, the National Rural Water Association, the American Water Works Association, the American Public Works Association, the National School Board Association, the American Association of School Administrators, and the Western Governors' Association. For more information regarding the LCR Federalism Consultation, refer to: https://www.epa.gov/dwstandardsregulations/lcr-federalism-consultation.

recommendations for the long-term revisions to the LCR can be found in the "Report of the Lead and Copper Rule Working Group to the National Drinking Water Advisory Council".[10]

On December 4 and 5, 2019, EPA held a NDWAC meeting in Washington, DC, where EPA presented the proposed LCRR. In the presentation, the major LCRR revisions were highlighted, such as the LSL inventory, the new TL of 0.010 mg/L, and new sampling protocols. The presentation focused on six key areas: identifying areas most impacted, strengthening treatment requirements, replacing LSLs, increasing sampling reliability, improving risk communication, and protecting children in schools. EPA reiterated that the LCRR was developed with extensive consultation from state, local, and tribal partners to identify avenues that would reduce elevated levels of lead in drinking water. EPA reaffirmed its commitment to transparency and improved communication to the public.

The NDWAC recommendations and meeting summaries are available in the docket for the rule under EPA-HQ-OW-2017-0300 at https://www.regulations.gov.[11]

Science Advisory Board (SAB)

Science Advisory Board Evaluation of the Effectiveness of Partial Lead Service Line Replacements

In 2011, EPA's Office of Water requested the Science Advisory Board (SAB) to evaluate the current scientific data to determine the effectiveness of partial LSLRs in reducing drinking water lead levels. The SAB convened the Drinking Water Committee Augmented for the Review of the Effectiveness of Partial Lead Service Line Replacements to study the issue. EPA asked the SAB to evaluate the current scientific data on the following five partial LSLR issues: 1) associations between partial LSLR and blood lead levels in children; 2) lead tap water sampling data before and after partial LSLR; 3) comparisons between partial and full LSLR; 4) partial LSLR techniques; and 5) the impact of galvanic corrosion. The SAB deliberated and sought input from public meetings held on March 30 and 31, 2011, and during a public conference call on May 16, 2011. The SAB's final report, titled "SAB Evaluation of the Effectiveness of Partial Lead Service Line Replacements" was approved by the SAB on July 19, 2011, and transmitted to the EPA Administrator on September 28, 2011.

The SAB's September 2011 report and recommendations are available in the docket for the rule under EPA-HQ-OW-2017-0300 at https://www.regulations.gov.

Science Advisory Board Consideration of the Scientific and Technical Basis of EPA's Proposed Rule Titled NPDWR: Proposed LCRR

On March 30, 2020, the SAB and SAB Drinking Water Committee met by teleconference and elected to review the scientific and technical basis of the proposed LCRR. The SAB drinking water committee deliberated on this topic at a public teleconference held on

[10] https://www.epa.gov/sites/production/files/2016-01/documents/ndwaclcrwgfinalreportaug2015.pdf.

[11] For more information regarding the NDWAC consultation, visit: https://www.epa.gov/dwstandardsregulations/ndwac-recommendations-administrator-long-term-revisions-lead-and-copper-rule.

May 11, 2020. The SAB provided advice and comments in its June 12, 2020, report (USEPA, 2020). The SAB reviewed the following LCRR topic areas and provided comment: lead tap sampling, water treatment including CCT and POU treatment devices, the addition of a TL, and the effectiveness of PE requirements including PE and sampling in schools and child care facilities. They also reviewed EPA's benefit-cost analysis, including the quantitative analysis of children's blood lead levels and IQ. In addition, the SAB provided feedback to EPA's specific questions that focused on: the identification of LSL inventory methods that would provide accuracy, cost efficiency, and minimize exposure risk (including the use of statistical methods); the identification of galvanized pipes formerly downstream of a lead source; and how to improve the efficacy of a number of PE outreach activities. The SAB's June 2020 report and recommendations are available in the docket for the rule under EPA-HQ-OW-2017-0300 at https://www.regulations.gov.

Input from Small Business Stakeholders

On August 14, 2012, EPA convened a Small Business Advocacy Review (SBAR) Panel. The SBAR Panel submitted its report to EPA in October 2012, which provided recommendations regarding the sample site selection criteria, PE for copper, the process for re-evaluating and revising CCT, copper monitoring waivers for systems that can demonstrate their water is non-aggressive toward copper; POU treatment units in lieu of CCT for NTNCWSs serving 10,000 people or fewer; the sampling protocol at sites served by LSLs; and mandatory LSLR requirements. To minimize impacts from the rule, systems with LSLs that serve 10,000 people or fewer would not be required to have a LSLR plan unless LSLR was the selected compliance option. See Section 8 of the SBREFA Panel Report available in the docket for the rule under EPA-HQ-OW-2017-0300 at https://www.regulations.gov.

Tribal Consultations

EPA consulted with tribal officials in developing the LCRR through the EPA American Indian Environmental Office. EPA held consultations with federally recognized Indian tribes in 2011 and 2018. The 2018 consultations with federally recognized Indian tribes began on January 16, 2018 and ended March 16, 2018. The first national webinar was held January 31, 2018, while the second national webinar was held February 15, 2018. A total of 48 tribal representatives participated in the two webinars. Updates on the consultation process were provided to the National Tribal Water Council upon request at regularly scheduled monthly meetings during the consultation process. Also, upon request, informational webinars were provided to the National Tribal Toxics Council's Lead Subcommittee on January 30, 2018, and the EPA Region 9's Regional Tribal Operations Committee on February 8, 2018. Additionally, EPA received written comments from the following tribes and tribal organizations: Navajo Tribal Utility Authority, National Tribal Water Council, United South and Eastern Tribes Sovereignty Protection Fund, and Yukon River Inter-Tribal Watershed Council. A summary report of the views expressed during tribal consultations is available in the docket under EPA-HQ-OW-2017-0300 at https://www.regulations.gov.[12]

[12] For more information regarding the tribal consultation, refer to the EPA Tribal Portal site at: http://www.epa.gov/tribal/consultation/index.htm.

Environmental Justice

Because the LCRR may have environmental justice impacts, in March 2011, EPA held a public meeting to discuss environmental justice considerations. EPA published a public notice of the meeting in the *Federal Register* on February 15, 2011 (76 FR 8674).

3(c)(ii) Lead and Copper Rule Revisions Virtual Engagements Consultations

Between April and August 2021, EPA conducted a series of virtual engagements to obtain public input on the EO 13990 review of the LCRR. The virtual engagements[13] included two public listening sessions, ten community roundtables (Pittsburgh, PA; Newark, NJ; Malden, MA; Washington, DC; Newburgh, NY; Benton Harbor and Highland Park, MI; Flint and Detroit, MI; Memphis, TN; Chicago, IL; and Milwaukee, WI), a tribal roundtable, a national stakeholder association roundtable, a national co-regulator meeting, and a meeting with organizations representing elected officials. EPA specifically sought engagement with communities that have been disproportionately impacted by lead in drinking water, especially low-income people and communities of color that have been underrepresented in past rulemaking efforts. A diverse group of individuals and associations provided feedback through these meetings and the docket, including people from communities impacted by lead in drinking water, local governments, water utilities, tribal communities, public health organizations, environmental groups, environmental justice organizations, and co-regulators. Summaries from these virtual engagement consultations are available in the docket for the rule under EPA-HQ-OW-2021-0255 at https://www.regulations.gov.

3(c)(iii) Service Line Inventory Guidance Consultations

EPA distributed the draft inventory guidance in March 2022 to five external stakeholders who are active in the creation or development of service line inventories. These groups were ASDWA, the American Water Works Association, and three NGOs (the Natural Resources Defense Council, Environmental Defense Fund, and Clean Water Action). Some of the external groups shared the draft with eight additional state regulators, the Association of Metropolitan Water Agencies, Blue Conduit, the Campaign for Lead Free Water, and two ASDWA contractors to supplement their comments. EPA accepted comments from these organizations. EPA asked that commenters provide feedback on: the degree to which the guidance would support water system and state efforts to develop and update LSL inventories; additional topics related to inventories that the guidance should cover; the technical accuracy of provided information, particularly the data associated with the inventory technologies and best practices; and the clarity of the technical information. Regarding the inventory template spreadsheet, EPA also asked for feedback on whether the document is useful and intuitive to fill out as well as what changes or additions would improve the template. EPA considered the approximately 1,500 comments received from these external stakeholders to prepare the final August 2022 service line guidance.

[13] More information on virtual engagements can be found on EPA's LCRR Review Virtual Engagements website: https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-revisions-virtual-engagements.

3(d) Effects of Less Frequent Collection

EPA considered a wide range of alternatives for the frequency of data collection under the LCRR regulatory development process and in the original OMB-approved ICR. EPA chose to require the least frequent collection that remains consistent with the overall goal of protecting public health. If data are collected less frequently, primacy agencies may not identify significant contaminant concentrations in a timely fashion that might threaten the health and safety of drinking water consumers. Monitoring frequencies have been carefully devised based on the following factors:

- data quality needed for a representative sample;
- precision and accuracy needed from the representative sample;
- number of people served by the system;
- source of the supply (*e.g.*, surface water or ground water);
- likelihood of finding contaminants; and
- temporal variability in occurrence.

The LCRR puts in place a framework with a new TL in addition to an AL. Systems are required to perform more frequent monitoring and reporting if they exceed the TL. Under the LCRR, a system may be on a different monitoring schedule for lead and copper. For lead, the frequency of tap sampling and number of required samples depend solely on a system's 90th percentile lead level as follows:

- Systems with an ALE would monitor every six months at the standard number of sampling locations in the previous rule. These systems are not eligible for reduced monitoring.
- Systems with a TLE would monitor annually at the standard number of sampling locations in the previous rule and would not be eligible to collect samples at the reduced number of sites or to qualify for triennial or nine-year monitoring.
- Systems without a TLE or ALE would conduct monitoring annually, triennially, or every nine years at the reduced number of sites.

The LCRR copper monitoring requirements are similar to those under the LCR, which are based on the system's 90th percentile copper level and compliance with a system's optimal WQP specifications. One difference is that a system's 90th percentile lead level is not a factor in determining the system's copper monitoring requirements.

3(e) General Guidelines

Apart from the two instances noted below, this ICR will not violate the guidelines codified under 5 CFR 1320.5(d)(2).

Records are required to be retained for a period greater than three years. In particular, the 1991 LCR requires all PWSs to retain on their premise original records of all sampling data and analyses, reports, surveys, letters, evaluations, schedules and any other information required by the state for no fewer than 12 years. Primacy agencies are subject to the same record retention period, except that primacy agencies are required to retain information relating to the decisions in §142.14(d)(8) until a new decision, determination, or designation has been issued, if no

change is made to the state decision during the 12-year retention period. The Agency justified these record retention periods and received approval for them under the original 1991 LCR ICR.

In addition, the LCRR codifies §2106 of the Water Infrastructure Improvements for the Nation Act (WIIN Act), which revised §1414 of SDWA to require PWSs to notify customers, the primacy agency, and EPA of a lead ALE within 24 hours of learning of the ALE.

3(f) Confidentiality

No confidential information will be collected as a result of this ICR.

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

The following sections contain information on the respondents and the information they are requested to provide.

4(a) Respondents/North American Industry Classification System Codes

Data associated with this ICR are collected and maintained at the PWS, state, tribal, and Federal levels. Respondents include:

- Owners/operators of PWSs, who must report to their primacy agency.
- Primacy agencies, and the EPA Regions that act as primacy agencies for states, territories, and tribal lands that do not have primacy.

The North American Industry Classification System (NAICS) code for privately owned PWSs is 22131. The NAICS codes for state agencies that include drinking water programs are 92411 (Administration of Air and Water Resources and Solid Waste Management Programs) or 92312 (Administration of Public Health Programs). Ancillary systems (systems where providing water is ancillary to a primary business, *e.g.*, mobile home parks) cannot be categorized in a single NAICS code. For ancillary systems, the NAICS code is that of the primary establishment or industry.

4(b) Information Requested

4(b)(i) Data items

The data items requested under this ICR differ across the three years covered by this ICR renewal (January 1, 2024 through December 31, 2026). In 2024, the first year of the ICR renewal period, which includes the October 16, 2024 LCRR compliance date, public water systems and primacy agencies will still be engaged in the regulatory startup/implementation activities identified in the original "Information Collection Request for Lead and Copper Rule Revisions (LCRR)." For PWSs these startup activities include the following:

- Reading and understanding the LCRR;
- Assigning personnel and resources for rule implementation;
- Attending training and receiving technical assistance from the state;
- Developing LSL inventories;
- Demonstrating that the system only has non-lead service lines and submitting materials for review to the primacy (if applicable);
- Developing LSL general outreach material if LSLs are present; and
- Conferring with states on initial planning for LSLR and preparing an LSLR plan when LSLs are present.

During the same period, primacy agencies will conduct startup activities that include the following:

- Adopting the rule and developing a program for implementation;
- Modifying their data system;
- Providing internal staff with training for implementation;
- Providing system staff with training and technical assistance;
- Assisting with LSL inventories and reviewing inventories;
- Reviewing general LSL outreach materials for LSL systems;
- Reviewing demonstrations of no LSLs, GRRs, and unknown service lines from systems; and
- Conferring with systems on initial planning for LSLR and reviewing plan.

Following the LCRR compliance date in year 2024, both water systems and primacy agencies must work to implement a number of additional regulatory requirements. The resultant ICR related data items associated with these implementation activities are estimated in years 2025 and 2026 of this ICR renewal. **Exhibit 1** lists the data items associated with PWS and primacy agency LCRR activities occuring in years 2025 and 2026.

Note that this ICR includes SL Inventory Guidance recommended activities that, while not adding new categories of requested data items, could potentially alter the burden and cost associated with LCRR regulatory data items, such as the initial inventory and LSL public education requirements in year 2024 and the requirements to provide LSL inventory updates in years 2025 and 2026.

Exhibit 1. Years 2025 and 2026 PWS and Primacy Agency Reporting Data Items Required by LCRR Post Compliance Date

Regulatory Change	PWS Costs				Primacy Agency Costs
	System Reporting	Lead in Water Monitoring	Water Quality Parameter Monitoring	Public Education	Primacy Agency Review
Ongoing Rule Implementation and Administration	x				x
Lead and Copper Tap Monitoring	x	x		x	x
Corrosion Control Treatment	x	x	x		x
Find-and-fix	x	x	x		x
Water Quality Parameter Monitoring	x		x	x	x
Source Water Monitoring	x	x			x
Lead Service Line Inventory Updates	x				x
Lead Service Line Replacement	x	x		x	x
Small System POU Compliance Alternative	x	x		x	x
Lead Public Education and Outreach	x			x	x
Lead in Drinking Water Testing Program at Schools and Child Care Facilities	x	x		x	x

4(b)(ii) Respondent Activities

Regulatory Startup, Implementation, and LSL Inventory and Replacement Plan Activities Conducted in Year 2024

This sub-section discusses the startup activities associated with the promulgation of the LCRR. The burden and cost impacts of these activities are estimated for year 2024 of this ICR. The initial LSL inventory and LSLR plan are also required in year 2024.

Adopting and Startup Implementation of the LCRR

Activities for Systems

Systems must conduct planning and startup activities for the implementation of the LCRR, including 1) reading and understanding the rule, 2) assigning personnel and resources, and 3) dedicating staff to attend training and receive technical assistance from the primacy agency.

Activities for Primacy Agencies

Primacy agencies must 1) adopt the rule into state regulations and develop an implementation program, 2) train primacy agency staff and provide training and technical

assistance to drinking water system staff, and 3) modify data management systems to collect and track the new data fields required by the LCRR.

Initial Lead Service Line Inventory

Activities for Systems

All systems must prepare and submit to their primacy agency a comprehensive initial service line material inventory that identifies LSLs, GRRs, unknown service lines, and non-lead service lines by the compliance date of October 16, 2024. The inventory does not need to be re-developed if the system has an existing inventory that meets the requirements of the LCRR. The public-facing (publicly accessible) inventory may be replaced by a written statement if the system can demonstrate that they have no LSLs, GRRs, and unknown service lines. As an assumption, PWSs without LSLs, GRRs, and unknown lines will incur burden to develop and submit documentation to the primacy agency that all of their service lines are non-lead. Systems with LSLs, GRRs, and unknown lines that developed inventories will incur the additional burden of submitting the inventory for primacy agency review. Systems with LSLs, GRRs, or unknown lines are also required to develop general LSL outreach materials for customers with LSLs, GRRs, or unknown service lines with information on the health effects and sources of lead in drinking water, how to have water tested for lead, actions customers can take to reduce exposure to lead, and information about the opportunities for LSLR. These materials are submitted to the primacy agency for review. Following the review process, systems would then distribute the approved outreach materials to households served by an LSL, GRR, or unknown service line annually.

The SL Inventory Guidance makes a number of non-binding recommendations designed to improve the LSL data generated during the information collection process and the effectiveness of the LCRR requirements to reduce lead exposure from LSLs. Some of these recommendations could potentially result in increased burden and cost if followed during system compliance with the regulatory requirement to develop the initial inventory. The guidance recommends the following:

- *Records Review*. The LCRR requires systems to review several categories of records and information. The guidance expands on how specific examples within these categories can be used to determine the service line material. PWSs should take a number of steps to improve their understanding and verify existing data available to conduct a review of system records when developing the initial inventory, such as investigating local building codes to determine lead ban dates, utilizing construction records to determine age of buildings relative to lead bans and diameter of service line pipe (most LSLs are less than 2 inches), incorporate information from previous distribution system and LSL material reviews, interviewing experienced staff and plumbers, interviewing neighboring water systems about regional construction practices, digitizing tap cards are all recommended activities. EPA also encourages systems to not submit initial inventories with all service lines classified as unknown. However, in cases of high uncertainty, where historical records are found to be unreliable, or where records conflict, it is recommended that a system categorize the service lines as unknown.

- *Investigation Methods*. When developing the initial inventory and subsequent inventory updates, PWSs should prioritize field investigations by employing one or more on-site service line material investigation techniques as soon as possible to improve their

inventory, verify existing records, and reduce the number of unknowns. The service line investigation methods discussed in the SL Inventory Guidance include visual observation by customers, plumbers (or other third parties), and system staff or contractors; water quality sampling; excavation (mechanical and vacuum); predictive modeling; and emerging methods. To reduce costs, it is recommended that systems work inventory activities into day-to-day activities rather than treat them as an independent effort. Water systems should consider developing or modifying SOPs to document how they will collect service line information during normal operations and update their inventories. Additionally, the guidance recommends that systems consider including the sources of the materials classification in their inventory as well as document where there was an LSL.

- *Additional Inventory Elements and Data Formats*. The SL Inventory Guidance makes a number of additional recommendations that will improve LCRR compliance and the LSLR program's efficiency as well as provide greater public health protection through the collection and dissemination of additional inventory information. The SL Inventory Guidance encourages PWSs to expand their inventories to include service line subclassifications (*e.g.*, assigning an LSL likelihood to unknown material categorizations), additional plumbing components such as lead connectors and solder, and other details, such as source of information, pipe diameter, and installation date. Systems are recommended to track and use the actual material when classifying non-lead service line materials, such as using "copper" or "plastic." Systems are encouraged consider the use of electronic formats for their internal and public-facing inventories. PWSs should also consider including street addresses, when available, as their location identifier for all service lines in the public-facing inventory.

- *Templates*. The SL Inventory Guidance also provides template for PWSs to use in the development of their inventories, which helps improve the consistency of the service line information collected and reduces the uncertainty and burden associated with the reporting the inventory data for the primacy agency to review.

Activities for Primacy Agencies

Primacy agencies must provide assistance to systems with the creation of LSL inventories. Primacy agencies must also review the submissions from systems for completeness of an LSL inventory as well as whether the system made a publicly accessible inventory or provided a written statement that demonstrates the system only has non-lead service lines. EPA assumed that primacy agencies would incur burden and cost for providing LSL systems with templates for LSL outreach. They would also have burden associated with the review of general LSL outreach materials provided by the LSL systems.

Note that the SL Inventory Guidance makes recommendations to improve the quality and format of LSL system data. The guidance also provides templates for primacy agencies to streamline their oversite reviews associated with the LCRR inventory requirements. Although these recommendations will likely result in burden savings to primacy agencies, EPA was conservative in this ICR analysis and did not estimate these savings.

Lead Service Line Replacement Plan

Activities for Systems

Systems with LSLs must create a lead service line replacement plan. The plan would include: a strategy for determining the composition of lead status unknown service lines in its inventory, a strategy for informing customers before a full or partial LSLR, procedures for coordinating the full LSLR, a funding strategy for conducting LSLR that includes ways to accommodate customers that are unable to pay to replace the portion they own, and a procedure for customers to flush service lines and premise plumbing of particulate lead post-replacement. In addition, for CWSs serving more than 10,000 people, a proposed replacement goal must be included in the event that the system should experience a TLE and be required to implement the required goal-based replacement program. PWSs must submit these LSLR plans to the primacy agency for review.

Activities for Primacy Agencies

Primacy agencies will incur burden to review the lead service line replacement plans submitted by systems.

Regulatory Activities Required by LCRR in Years 2025 and 2026

A number of additional regulatory activities with associated ICR burden and costs occur in years 2025 and 2026. The activities can be grouped into the larger categories including: ongoing rule implementation and administration, lead and copper tap monitoring, corrosion control treatment, find-and-fix, water quality parameter monitoring, source water monitoring, lead service line inventory updates, lead service replacement, small system POU compliance alternative, lead public education and outreach, and lead in drinking water testing program at schools and child care facilities.

Ongoing Rule Implementation and Administration

Activities for Systems

CWSs serving 10,000 or fewer people and NTNCWSs with a 90th percentile lead level above the TL must evaluate and recommend to their primacy agency which compliance alternative they would implement if they have a future lead ALE from among: 1) LSLR, 2) CCT installation/re-optimization, 3) POU device installation and maintenance, or 4) replacement of lead-bearing materials. -

Activities for Primacy Agencies

For primacy agencies, a number of implementation and rule administration task that were costed for year 2024 also continue in years 2025 and 2026 (based on input from ASDWA these startup administrative tasks would occur over the first five years after rule promulgation affecting all 3 years of this ICR). These follow-on tasks include 1) develop an implementation program, 2) train primacy agency staff, and provide training and technical assistance to drinking water system staff, and 3) modify data management systems to collect and track the new data fields required by the LCRR.

In addition to the tasks continuing from 2024, primacy agencies will have new burdens and costs associated with: ongoing coordination activities with EPA, training for both agency staff and systems, providing technical assistance to systems, and data reporting to SDWIS.

Primacy agencies will also incur burden to review and approve the small system compliance options recommended by CWSs serving 10,000 or fewer and all NTNCWSs that exceed the TL.

Lead and Copper Tap Water Monitoring

Activities for Systems

All CWSs and NTNCWSs are subject to lead tap sampling requirements. The frequency and required number of samples depend on the system's 90th percentile lead level and system size, but all systems are assumed to conduct one year of semi-annual monitoring at the start of rule compliance (year 2025). In year 2026 and thereafter, only systems with a 90th percentile level at or below the TL of 0.010 mg/L can qualify to conduct lead tap sampling at the reduced number of sites annually, triennially, or every nine years. Those with a lead ALE must conduct lead tap sampling every six months at the standard number of sample sites; those with a TLE must sample annually at the standard number of sites. Systems without a lead ALE or TLE can qualify for reduced triennial or 9-year monitoring, at a reduced number of sites, based on past tap sampling results, water quality parameter monitoring results as applicable, system size, and the presence of lead or copper in the distribution system. In addition, systems must sample for a minimum of two, six-month tap sampling monitoring periods following a change in source water or significant long-term change in treatment. For additional information on the LCRR required lead and copper sampling schedule and required number of samples see the "National Primary Drinking Water Regulation: Lead and Copper Rule Revisions" (86 FR 4198) published in the Federal Register.

The ICR burden and costs for system activities associated with lead tap sampling are as follows:

- All PWSs will incur a one-time burden to update their sampling instructions to be consistent with the revised LCRR tap sampling procedures related to aerators, pre-stagnation flushing, and use of wide-mouth bottles for sample collection.

- Under the LCRR, CWSs with LSLs are required to contact additional residents to increase the size of the system's tap sampling pool. This will insure CWSs will have enough volunteers to collect all lead samples from sites served by LSLs meeting their minimum required number of tap samples.

- Systems must report to the primacy agency any changes in their tap sampling locations from the prior monitoring period and the reason for the change.

- EPA assumed systems will incur a one-time burden in 2025 to discuss their LCRR sampling requirements moving forward with the primacy agency based on their sampling results from the most recent two six-month monitoring periods.

- For each monitoring period, CWSs will contact customers from the tap sampling pool to obtain volunteers to participate in the lead tap sampling program. Note that EPA has estimated costs of some CWSs offering monetary incentives to their customers to encourage their participation in their lead tap sampling program.

- The rule allows customers to collect tap samples after receiving proper instructions from the water system. EPA assumes that CWSs will ship test kits including instructions to the volunteers that are conducting the tap sampling.

- CWS volunteers will collect the tap samples, and EPA assumes that system staff will obtain the samples from the residence. NTNCWS staff collect their own samples.

- CWSs will determine if samples collected by volunteer customers meet the required sampling protocol and if any should be rejected prior to analysis. EPA assumes all NTNCWSs collect their own samples and should be familiar with the sampling protocol and thus would not incur burden to determine if a sample should be rejected.

- Systems will analyze the lead tap samples.

- Some CWSs and NTNCWSs will request that the primacy agency invalidate a lead tap sample based on rule provided criteria.

- CWSs must report individual lead sample results to customers who participated in the sampling pool. NTNCWSs are also required to provide sampling results to the people they serve. For NTNCWSs, EPA assumed the systems will deliver materials via email to all customers and post in a public location.

- Systems must certify to the primacy agency that the lead tap sample results were reported to the customers.

- CWSs and NTNCWSs on nine-year monitoring waivers must submit documentation to the primacy agency every nine years that demonstrates their system and their customers' residences continue to have no lead- or copper-containing plumbing materials.

- CWSs and NTNCWSs submit their tap sampling results and 90th percentile calculations, after the conclusion of each monitoring period, to the primacy agency for review.

Activities for Primacy Agencies

EPA has identified eight primacy agency implementation assistance, oversight and review activities associated with lead tap sampling conducted by water systems. These include:

- The primacy agency providing revised tap sampling instructions templates to PWS and reviewing those PWS draft materials that are developed with the help of the templates.

- Primacy agencies will incur a one-time burden to review the revised sampling plans submitted by CWSs with LSLs that demonstrates they will meet their minimum sampling requirements using 100 percent LSLs sites for the collection of tap samples, if available.

- Primacy agencies incur a one-time upfront burden per system to review each system's latest two rounds of LCRR compliance monitoring data to determine their status under the rule and prepare them for any new requirements.

- For CWSs primacy agencies will review reported changes in tap sample locations between each monitoring period. EPA assumes this burden is negligible for NTNCWSs because they collect their own samples from sampling locations under their control and thus, are unlikely to change sampling sites and submit documentation to the primacy agency for review.

- Primacy agencies will incur burden associated with the review of system sample invalidation requests.

- The primacy agencies will review each system's certification that monitoring results were reported to the customers at the end of each monitoring period.

- Primacy agencies will also review the tap monitoring results and lead 90th percentile calculations at the completion of each monitoring period.

- Primacy agencies will review waiver requests from the subset of systems that submit nine-year monitoring waiver renewal documentation.

Corrosion Control Treatment

Activities for Systems

PWSs may be required to install CCT, re-optimize their existing CCT, or perform a "find-and-fix" adjustment to their CCT under the LCRR. CCT installation and re-optimization are triggered based on the system's lead 90th percentile range. The CCT activities associated with ICR burden and cost are discussed below. Note CCT activities that result from find-and-fix requirements are discussed in a separate section below.

- For systems required to install CCT, EPA assumes that primacy agencies will require these systems to conduct a CCT study prior to installation. EPA also assumed primacy agencies will require all systems to update their previous CCT study prior to CCT re-optimization.

- Systems with CCT will incur burden to gather and submit non-compliance data (*e.g.*, process control data, other WQP data) and meet with their primacy agency during the sanitary survey to determine if CCT is still optimized. In addition, EPA assumes that systems with CCT serving more than 50,000 people will review each update to EPA's CCT guidance themselves to determine if CCT adjustment may be needed prior to consultations with the primacy agency during the sanitary survey.

- Systems are required to seek prior approval before making any source water changes or long-term treatment changes and to consult with the primacy agency on needed responses including the possibility of CCT installation or re-optimization.

Activities for Primacy Agencies

The primacy agency oversite of CCT activities associated with ICR burden and cost are listed below. Note that a number of oversite activities like reviewing system's CCT studies and setting OWQPs occur outside the ICR analysis window ending in December of 2026.

- Primacy agencies will incur burden to review updated EPA CCT guidance, identify changes that could affect their systems, prepare a memo to communicate changes to state surveyors, and be available to answer PWS questions.
- Primacy agencies will also incur burden to review water quality data with water systems that have CCT during sanitary surveys.
- Primacy agencies must consult with systems seeking prior approval before making any source water changes.
- Primacy agencies must consult with systems seeking prior approval before making any long-term treatment changes.

Find-and-Fix

Activities for Systems

The LCRR requires all CWSs and NTNCWSs to conduct a site investigation where a lead tap sample exceeds the AL of 0.015 mg/L. Based on the results of the site evaluation and other site evaluations occuring within a system, corrective actions may be taken in consultation with the primacy agency. Actions taken can range from site specific suggestions to residents to reduce lead exposure to changes in system wide CCT. For additional information on find-and fix LCRR requirements see the "National Primary Drinking Water Regulation: Lead and Copper Rule Revisions" (86 FR 4198) published in the Federal Register. Below is a list of the ICR relevant activities associated with the LCRR find-and-fix requirements:

- CWSs will incur burden and costs to contact customers and collect a follow-up tap sample at each compliance tap sampling location that had a result above 0.015 mg/L. As part of the sample collection, water system staff will look for lead sources in premise plumbing and service lines. NTNCWSs must also collect follow-up samples, but their burden and costs are lower given previous knowledge of and access to the sampling locations.
- Systems must analyze the follow-up tap samples.
- Systems must collect one distribution system sample at or near the site where the high lead sample was collected within five days of learning of the lead results. This sample will be used to assess WQPs.
- Systems will analyze the distribution system WQP sample. Note the number of parameters analyzed is dependent on the presence and type of CCT in the individual system.
- The system must inform the customer of the follow-up sampling results.

- Systems must determine if a CCT "fix" is needed following lead tap sample result(s) above 0.015 mg/L. EPA assumes that systems will use the collected follow-up tap samples and WQP samples from all find-and-fix locations, and information on system-wide conditions to assess distribution system operations and determine if there could have been factors that contributed to deteriorating water quality and elevated lead levels.

- Systems with CCT that have at least one sample above 0.015 mg/L must consult with their primacy agency prior to making any CCT changes.

- Systems will incur burden to provide a copy of the notice delivered to customers when an initial sample exceeds 0.015 mg/L, the results of follow-up tap sample, the WQP monitoring results, and any distribution system management actions or CCT adjustments made to fix the cause of sample results above 0.015 mg/L to their primacy agency.

Activities for Primacy Agencies

Primacy agency burden and costs related to find-and-fix activities include:

- Consulting with CCT systems that have at least one sample above 0.015 mg/L prior to the system making any CCT changes.

- Primacy agencies will incur burden to review each system's find-and-fix report that provides the results of tap and WQP monitoring, a distribution system assessment, and recommended corrective actions if a system has one or more samples above 0.015 mg/L in a given year.

Water Quality Parameter Monitoring

Activities for Systems

Lead WQP monitoring is required for all systems serving more than 50,000 people with CCT (except at "b3" systems which do not have CCT) and those serving 50,000 or fewer people that exceed the lead AL of 0.015 mg/L. Systems serving 50,000 or fewer people must continue WQP monitoring until they no longer exceed the lead and/or copper AL for two consecutive 6-month monitoring periods. WQP samples are collected at representative sites throughout the distribution system and at each entry point to the distribution system. Systems must conduct WQP monitoring prior to the installation of CCT and after CCT installation. The primacy agency may designate optimal water quality parameters (OWQPs) after the installation of CCT. Systems with CCT must continue to maintain WQPs at or above minimum values or within OWQP ranges designated by the primacy agency.

The number of and specific parameters which are sampled vary for systems with and without CCT and by the type of CCT. The sample schedule and number of samples also vary based on system size, the number of entry points, tap sampling 90th percentile levels, and past WQP sampling results relative to the primacy agency set OWQPs.[14] To qualify for reduced WQP distribution system monitoring, a system's 90th percentile lead tap sample must be equal to, or

[14] The number of distribution WQP sampling sites is also dependent on the find-and-fix provisions of the LCRR which require that systems with an individual lead tap sample result above 0.015 mg/L must conduct WQP monitoring in the distribution system at or near the site with the high lead result. If an existing WQP site does not meet these criteria, the system must identify a new WQP monitoring site and those with CCT must use it for future sampling in addition to the existing number of WQP sites.

less than, 0.010 mg/L and the system must meet its OWQPs. There are no reduced monitoring provisions for WQPs collected at entry points. For additional information on the exact number of WPQ samples required under the LCRR see the "National Primary Drinking Water Regulation: Lead and Copper Rule Revisions" (86 FR 4198) published in the Federal Register.

The follow list of lead WQP system activities are associated with ICR burden and costs:

- Systems subject to lead WQP monitoring requirements must collect and analyze WQP samples in the distribution system.
- Systems will also collect and analyze lead WQP samples at each entry point to the distribution system.
- Systems are required to report their lead WQP sampling results and for those systems where OWQPs have been set by the primacy agency to demonstrate compliance with those OWQPs every six months.

Copper WQP Monitoring is required when a system exceeds the copper AL. The number of required samples and sample schedule is the same a lead WQP monitoring except that to qualify for reduced monitoring a system must return copper tap sample results below the copper AL of 1.3 mg/L. Also, the lead find-and-fix requirements do not apply to copper WQP sampling sites. The activity categories associated with copper WQP monitoring are identical to lead WQP monitoring:

- Systems will collect and analyze copper WQP samples in the distribution system.
- Systems collect and analyze copper WQP samples from entry points.
- Systems are required to report their copper WQP sampling results and for those systems where OWQPs have been set by the primacy agency to demonstrate compliance with those OWQPs.

Activities for Primacy Agencies

Primacy agencies must review a system's lead and/or copper WQP monitoring data collected from entry points and within the distribution system as well as assess the systems compliance with OWQPs (if those values have been determined for the system) at the end of each WQP monitoring period.

Source Water Monitoring

Activities for Systems

Under the LCRR, CWSs and NTNCWSs must sample at each entry point if the system experiences a significant source water change and/or has not already conducted source water monitoring for a previous lead or copper ALE. Burden and costs to systems to comply with this requirement can be divided into three categories:

- CWSs and NTNCWSs with a significant source change and/or in response to their first lead or copper ALE must collect and analyze a source water sample at each entry point.

- Water systems are required to report their source water monitoring results to the primacy agency.

Activities for Primacy Agencies

Primacy agencies will incur burden to review source water monitoring results submitted by water systems after a significant source change and/or in response to the systems first lead or copper ALE.

Lead Service Line Inventory Updates

Activities for Systems

The LCRR requires systems with lead, GRR, and unknown service lines to report updated inventory information within 30 days of the end of each tap sampling monitoring period, but no more frequent than annually for those on semi-annual monitoring. This means that system reporting will be driven by lead tap sampling results and a system's 90th percentile tap level. The inventory update should reflect any replaced or newly discovered lead and GRR service lines or service line material classification changes. For this ICR, EPA assumes that LSL system inventories are updated and submitted to the primacy agency for review annually. EPA also includes the potential burden and costs associated with following SL Inventory Guidance recommendations. The guidance recommendations to note for inventory updates include those on-site service line material investigation techniques which include visual observation by customers, plumbers (or other third parties), and/or system staff or contractors, water quality sampling, predictive modeling, and excavation (mechanical and vacuum). To reduce cost the guidance also recommends that inventory activities be worked into the day-to-day activities of the system rather than treated as an independent effort. EPA also provides inventory update templates that should allow better consistence of record keeping improving the efficiency of conducting future inventory updates and reporting to primacy agencies.

Activities for Primacy Agencies

Primacy agencies will incur burden to review updates to systems LSL inventory. Although recommendations from the SL Inventory Guidance will likely result in burden savings to primacy agencies, EPA was conservative in this ICR analysis and did not estimate these savings.

Lead Service Line Replacement

Activities for Systems

Physical replacement of LSLs is required by the LCRR for systems with lead 90th percentile tap samples that fall within two ranges. CWSs serving more than 10,000 people that have a TLE (a 90th percentile lead tap sample greater than 0.010 mg/L but not greater than 0.015 mg/L) must implement a goal-based LSLR program in which they replace LSLs at a rate approved by the primacy agency. Systems must continue replacing LSLs until they no longer exceed the TL for two consecutive annual periods of tap sampling. CWSs serving more than 10,000 that have a lead ALE (a 90th percentile lead tap sample greater than 0.015 mg/L) must fully replace LSLs on a rolling 2-year average of 3 percent per year using a baseline number of LSLs equal to the number of LSLs and GRR service lines at the time the system first exceeds the lead trigger or action level plus the number of unknowns at the beginning of each year of the system's LSLR program. The mandatory program also requires that a cumulative number of replacements be reached equal to 3 percent of the sum of known lead, galvanized requiring replacement, and lead

status unknown service lines in the initial inventory, times the number of years that elapsed between the system's first ALE and the date on which the system's 90th percentile lead levels are at or below the action level for two years (four consecutive 6-month monitoring periods). CWSs serving 10,000 or fewer people and NTNCWSs with LSLR as their approved compliance option must replace LSLs at a schedule set by the primacy agency not to exceed 15 years and must replace all LSLs regardless of their subsequent lead 90th percentile value. For more information on small system compliance options see the "Small System POU Compliance Alternative" section. All PWSs are required to replace the system-owned portion of an LSL if they become aware that a customer has replace their portion of the line. Also, under all LSLR programs, an LSL is only counted toward a system's replacement rate if the entire LSL is replaced. Listed below there are a number of LSLR activities that incur ICR burden and cost.

- Systems with LSLs are required to distribute the general LSL outreach materials annually to customers served by an LSL, GRR, or service line of unknown material.

- CWSs subject to the goal-based or mandatory LSLR program will incur one-time burden to conduct a study including developing an LSLR financing plan.

- CWSs serving more than 10,000 people with a TLE will incur burden to consult with their primacy agencies and develop outreach materials on their LSLR program that invite customers to participate in their goal-based LSLR program.

- CWSs with LSLs that serve more than 10,000 people and have a TLE will incur burden to distribute targeted LSLR program outreach materials to households with lead, GRR, and unknown service lines.

- EPA assumes that systems will inspect and test lines to confirm they are not lead prior to conducting an LSLR.

- Systems participating in the goal-based or mandatory LSLR program must collect one lead tap sample following replacement of each LSL.

- Systems will incur the burden and cost to analyze the post-LSLR lead tap samples.

- Systems must notify their customers of their lead analytical results from the post-LSLR lead tap sample.

- Systems that are subject to the goal-based or mandatory LSLR program must submit an annual report to their primacy agency which covers topic areas like their replacement schedule, location of LSLs replaced, customer outreach, and post-LSLR pitcher filter delivery and sampling.

Activities for Primacy Agencies

Primacy agencies will conduct the following ICR related LSLR tasks:

- CWSs serving more than 10,000 people with LSLs and a TLE must provide additional outreach to customers with LSLs regarding the system's LSLR program. EPA assumed

that the primacy agency will incur a one-time burden to provide a template for these outreach materials and consult with the system.

- Primacy agencies will incur a one-time burden to review the draft LSL program outreach materials.

- Primacy agencies will also incur burden to consult with systems and determine needed activities for CWSs serving more than 10,000 people with a TLE that fail to meet their goal-based replacement requirements.

- Primacy agencies will incur annual burden to review systems' reports on their LSL mandatory and goal-based program, their replacement schedule, location of LSLs replaced, customer outreach, and post-LSLR pitcher filter delivery and sampling.[15]

Small System POU Compliance Alternative

Activities for Systems

CWSs serving 10,000 or fewer people and NTNCWSs with a lead 90th percentile above the TL must evaluate and recommend to their primacy agency which compliance alternative they would implement if they have a future lead ALE from among: 1) LSLR, 2) CCT installation/re-optimization, 3) POU device installation and maintenance, or 4) replacement of lead-bearing materials. Those small systems approved, by the primacy agency, for the POU provision must develop a plan and implement the program if they have a future lead ALE. The POU program burden and costs relevant to the ICR are as follows:

- EPA assumed that small systems would 1) develop a POU plan that describes how the system will provide and maintain POU devices and 2) submit the plan to primacy agency for review.

- Systems taking part in a POU program will be required to develop public education materials that inform users on how to properly use POU devices to maximize the units' effectiveness in reducing lead levels in drinking water. These materials will be submitted to the primacy agency for review.

- Systems will deliver the public education materials along with the POU devices through an LCRR-approved method or another method approved by the primacy agency.

- Under the POU program, systems must sample one-third of locations with POU devices annually. For CWSs, customers can collect these samples, therefore, systems will experience burden to obtain the annual household POU sampling pool.

- CWSs are assumed to deliver POU sampling materials and instructions to participating POU households from the sampling pool.

[15] Note that the LCRR requires CWSs serving more than 10,000 people with a TLE that fail to meet their goal-based replacement requirements to consult with primacy agencies to determine additional needed outreach activities. Because of the timelines associated with sampling and goal based LSLR the burden and costs for this activity can not occur until after 2026 and are not included in this analysis.

- CWS volunteers will collect the POU monitoring samples and EPA assumes that system staff will collect the samples from the residence. NTNCWS staff collect their own samples.

- CWS staff will determine if POU customer samples were collected properly or should be rejected and not analyzed.

- Systems will analyze POU monitoring samples.

- Systems will prepare and submit a sample invalidation request to their primacy agency.

- CWSs must report individual POU lead sample results to customers who participated in the POU sampling pool. NTNCWSs are assumed to report the sampling results through an email to all customers and post of results in a public location.

- Systems must prepare and submit an annual certification to their primacy agencies that they informed customers of their POU monitoring results.

- Systems must prepare and submit a report of their POU program that includes monitoring results, any corrective actions if the TL was exceeded, and if requested by the primacy agency, any maintenance activities.

Activities for Primacy Agencies

Primacy agencies will conduct the follow POU implementation and oversight activities that produce ICR burden and costs:

- Primacy agencies would incur a one-time burden to review water systems' POU plans.

- EPA assumed that primacy agencies will provide templates to CWSs serving 10,000 or fewer people and NTNCWSs to develop POU outreach materials that describe the POU program and proper use of the POU devices.

- Primacy agencies will incur a one-time burden to review the POU outreach materials developed by the systems.

- Primacy agencies must review sample invalidation request for POU monitoring.

- Primacy agencies must review each system's annual certification that POU monitoring results were reported to customers.

- Primacy agencies will incur burden to review a system's annual report on its POU program that includes monitoring results and may include corrective actions and routine maintenance activities.

Lead Public Education and Outreach

Activities for Systems

Systems will incur burden and non-labor costs to provide a consumer notice in response to a single lead tap sample above 0.015 mg/L, to conduct additional education and outreach

regardless of a system's lead 90th percentile level, and to conduct PE requirements in response to a lead 90th percentile ALE. Note that public education requirements for systems with LSLs that pertain to general LSL outreach that is provided to customers with LSLs, GRRs, or that are served by lines of unknown material and targeted outreach that is required when the system exceeds the TL were previously discussed in the "Lead Service Line Replacement" section. The PE requirements for systems implementing a POU program were previously discussed in the "Small System POU Compliance Alternative" section.

Under the LCRR, systems must notify any customer with a tap sample result above 0.015 mg/L as soon as practicable but no later than 3 days after learning of the results. CWSs can notify customers by telephone within the three days but must follow-up with results by mail. Systems that choose only to mail the notification must have the letters postmarked within three days. NTNCWSs would use the same mechanism they currently use under the LCR to inform their customers of sample results via posting and electronic notification but would provide this information no later than three days after learning of the results. All systems must submit a copy of the three-calendar-day notification to their primacy agencies.

There are new PE requirements under the LCRR that are independent of a system's lead 90th percentile range. These requirements are as follows:

- CWSs must update information about lead in the annual consumer confidence report (CCR).
- CWSs with LSLs will develop a new customer outreach plan.
- CWSs will incur a one-time burden to develop improved public access to lead data that includes lead health-related data and tap monitoring results.
- Systems with LSLs must also establish a way for customers and the public to access information on LSLs. Note that the SL Inventory Guidance makes a number of recommendations associated with the dissemination of LSL data. PWSs that do not have an online system for dissemination of inventory data should consider developing such a system. The guidance also recommends that online systems could share data in the form of interactive maps or downloadable spreadsheets on the system website or through other cloud-based sharing apps or FTP/SFTP servers. In the non-online space, the Agency indicates that information can be shared in a tabular data format in preexisting utility mailings or newsletters. Burden and cost impacts for the initial development of public access to the inventory are captured in the costs reported under the initial inventory development. Addition impacts are captured in the estimated impacts of the LCRR requirements for this section.
- CWSs would also incur an annual burden to maintain a way for the public to access the lead health and LSL information.
- CWSs will incur a burden to respond to LSL information requests from homeowners and residents, and other parties (*e.g.*, realtors, home inspectors, and potential homebuyers).
- CWSs will also incur a burden to respond to LSL information requests from home other parties (*e.g.*, realtors, home inspectors, and potential homebuyers).

- Systems will incur a one-time upfront burden to develop an initial list of State and local health departments serving their service area.
- CWSs are required to develop lead outreach materials that will be distributed to State and local health agencies.
- CWSs would incur an annual burden to produce and distribute the annual outreach to State and local health agencies, which includes the results of any school testing and find-and-fix activities in response to a tap sample above 0.015 mg/L. Systems will also incur an annual burden to make any necessary updates to the list of State and local health agencies.
- CWSs must conduct annual outreach to State and local health agencies to discuss the sources of lead in drinking water, health effects of lead, steps to reduce exposure to lead in drinking water, and information on find-and-fix activities. EPA expects CWSs will work with their primacy agencies to conduct increased lead outreach to health care agencies.
- CWSs with LSLs must send PE to customers when there is scheduled water-related work that could result in disturbances of service lines. The PE materials discuss the potential for elevated lead levels in drinking water as a result of the disturbance to LSLs. These systems will incur a one-time burden to develop materials, and an annual burden to deliver the PE to impacted households.
- CWSs must annually certify, to the primacy agency, PE activities were completed.

For systems with a lead ALE, a number of actions must be taken:

- PWSs must update their mandatory health effects language, and those that also have LSLs must include information about their LSLR program and opportunities to replace LSLs.
- CWSs are required to distribute PE materials to all households they serve and NTNCWSs are required to deliver material to customers via email and public posting.
- CWSs must contact local health care agencies to obtain a list of additional organizations that serve at-risk populations. Organizations would include schools, child cares, and medical providers that offer services to pregnant women, children, and infants.
- CWSs must provide public education materials to facilities that include local health departments and additional organizations that serve at-risk populations.
- Each CWSs serving more than 100,000 people with a lead ALE must post PE materials on their website.

- CWSs will consult with their primacy agency on other required PE activities to be conducted in response to a lead ALE. These activities potentially include public service announcements, paid ads, public displays, email notifications, public meetings, and materials sent to multifamily homes and other institutions.

- CWSs will also incur burden to implement the primacy agency selected other required PE activities.

- CWSs with an ALE must certify, to the primacy agency, PE activities completed on a quarterly basis.

Activities for Primacy Agencies

Primacy agencies will incur burden to conduct oversight and review activities related to the PE requirements of the LCRR. These activities are broadly grouped into the following: activities related to a consumer notice in response to a single lead sample above 0.015 mg/L, activities that are independent of a system's lead 90th percentile level, and activities conducted in response to a lead ALE.

Primacy agencies will review a copy of the 3-calendar-day notice that systems must provide to consumers if their lead tap sample exceeds 0.015 mg/L.

Primacy agencies will also have burden and costs associated with the new PE requirements under the LCRR that are independent of a system's lead 90th percentile status. EPA assumed that primacy agencies will provide templates to CWSs to update their CCR language with the revised LCRR mandatory health effects language and for those systems with LSLs to further update their materials to include information about the system's LSLR program and opportunities to replace LSLs. Primacy agencies will also incur a one-time burden to provide templates to CWSs for the development of outreach materials that will be sent to State and local health departments. Primacy agencies will incur burden associated with the review of the CCR, LSL, and health department outreach PE material developed by the CWSs. Primacy agencies will incur annual burden to participate in joint communication efforts with CWSs to provide lead PE to health departments annually. The primacy agencies will also incur a burden to review PE material developed by CWSs, with LSLs, for delivery during scheduled water-related work that may result in the disturbance of LSLs, GRRs, or unknown service lines.

The LCRR requires systems with a lead ALE to update the mandatory health effects language and those with LSLs to further update their materials to include information about their LSLR program and opportunities for customers to replace LSLs. EPA assumes primacy agencies will incur a one-time burden to provide templates and review each system's revised PE mandatory language in materials that are delivered when a system has a lead ALE. In addition, primacy agencies will consult with CWSs on other ALE required PE activities to be conducted. These can include public service announcements, paid ads, public displays, email notifications, public meetings, and materials sent to multifamily homes and other institutions.

Primacy agencies will review each system's certification that they have met their PE and outreach requirements including any done in response to a lead ALE. For the majority of systems this certification occurs annually. Note, CWSs have quarterly, semi-annual, and annual PE

requirements in response to a lead ALE. Thus, CWSs with an ALE must report the certification on a quarterly basis.

Lead in Drinking Water Testing Program at Schools and Child Care Facilities

Activities for Systems

The LCRR requires CWSs to implement a lead in drinking water testing program at K-12 schools and licensed child care facilities. CWSs must collect five samples per tested school and two samples at each tested child care. The final rule splits this testing program into two phases. The "mandatory testing" phase occurs at elementary schools and child care facilities during the first five years of rule implementation. Under the mandatory testing program, systems must annually conduct testing at 20 percent of eligible schools and child care facilities such that each would be tested once in the 5-year period. During this mandatory program testing will be upon request at secondary schools. Starting in year six of the school testing program, CWSs are only required to test elementary schools, secondary schools, and child care facilities that request testing. For the ICR, this means that the burden estimates for years 2025 and 2026 will be based on the requirements for implementing the mandatory testing program only with an estimated 20 percent of eligible elementary schools and child care facilities being tested in each year as well as a smaller percent of secondary schools (5 percent) requesting sampling in each of the years.

The LCRR activities associated with ICR burden in the first two years of the mandatory program include:

- CWSs at the start of the program are required to create a contact list of schools and child cares facilities.
- CWSs will prepare outreach materials that describe the importance of lead testing and the systems lead in drinking water testing program at schools and child care facilities.
- CWSs would incur a one-time burden at the start of the program to prepare and distribute an initial letter explaining the sampling program.
- EPA assumed systems would coordinate with each school or child care facility at the start of the program to plan and finalize when each facility would be sampled.
- EPA assumes that systems would contact each school or child care facility to coordinate sample collection logistics.
- EPA assumes that CWSs will conduct a walkthrough to become familiar with the facility and to identify sampling sites prior to the sampling event.
- CWSs will incur burden to travel to and from sample sight.
- CWSs will collect lead samples.
- CWSs will analyze lead samples.

- CWSs must provide sampling results to each tested facility. As part of this requirement EPA assumed systems will incur additional burden, which increases when results show high lead levels, to discuss the sampling results with each school and child care facility.

- CWSs are required to prepare and provide an annual report to their primacy agency regarding their testing program at schools and child care facilities, and provide the sampling results to State and local health offices if different from the primacy agency.

Activities for Primacy Agencies

Primacy agency activities for implementation assistance and oversight of CWSs' lead in drinking water testing programs at schools and child care facilities include:

- Primacy agencies reviewing the initial list of schools and licensed child care facilities served by each CWS.

- EPA assumed primacy agencies would provide a template to assist CWSs in developing outreach materials that describe the importance of lead testing and the lead in drinking water testing program at schools and child care facilities.

- EPA estimated that primacy agencies will incur a one-time burden to review the school and child care facility testing program materials developed by the CWSs.

- The primacy agency will also review the annual reports generated by CWSs on school and child care facility lead in drinking water testing program implementation and results.

Exhibit 2 lists the PWS data collection and reporting activities. These include new activities required by the LCRR as well as activities already required by the LCR that experience incremental burden increases as a result of other LCRR changes. For example, lead tap sampling occurs under the LCR, but the TL requirements under the LCRR increase the number of tap samples required for some systems. provides the primacy agency data collection and reporting activities.

Exhibit 2. PWSs Data Collection and Reporting Activities

Activity	Burden Frequency 2024-2026 (Annual Activities Start Year in Parentheses)
Rule Startup Implementation Activities	
Systems read and understand the LCRR rule	Once (2024)
Systems assign personnel and resources for rule implementation	Once (2024)
Systems attend training and technical assistance from the primacy agencies during rule implementation	Once (2024)
Systems submit small system flexibility compliance option	Once (2025)
Lead Service Line Inventory Activities (Initial and Updates)	
Systems create initial inventory of lead service lines - **records review plus field investigations per SL Inventory Guidance**	Once (2024)
Systems submit initial demonstration documentation of only non-lead service lines	Once (2024)
Systems submit initial inventory	Once (2024)
Systems develop public education material for LSLs	Once (2024)
Systems distribute public education material for LSLs	Annual (2024)
Systems update inventory **including field investigations per SL Inventory Guidance**	Annual (2025)
Systems submit updated inventory report	Annual (2025)
Lead Service Line Replacement Plan Activities	
Systems create a lead service line replacement plan and submit for primacy agency review	Once (2024)
Lead and Copper Tap Water Monitoring Activities	
Systems update sampling instructions for tap sampling	Once (2025)
Systems contact homes to establish new 100 percent LSL tap sampling pool	Once (2025)
Systems report changes in tap locations	Annual (2025)
Systems confer with primacy agencies on tap sampling program	Once (2025)
Systems obtain volunteer customers to participate from sampling pool	Annual (2025)
Systems offer customer incentives for lead and copper tap samples	Annual (2025)
Systems deliver sample equipment/instructions for the 5th-liter option	Annual (2025)
Systems obtain lead and copper tap samples from households	Annual (2025)
Systems determine that a sample should be rejected and not analyzed	Annual (2025)
Systems analyze lead and copper tap samples	Annual (2025)
Systems submit lead and copper tap sample invalidation requests to primacy agency	Annual (2025)
Systems inform customers of results of lead and copper tap monitoring	Annual (2025)
Systems certify to primacy agencies that sampling results were reported to customer	Annual (2025)
Systems submit nine-year waiver request	Annual (2025)
Systems draft and submit report on lead and copper tap sampling	Annual (2025)
Corrosion Control Treatment Activities	
Systems conduct or revise CCT study	Once (2025)
Systems with LSLs gather non-water quality compliance data and review EPA CCT guidance prior to consultation with primacy agencies during the sanitary survey	Once (2025)

Systems notify and consult with primacy agencies on modification of CCT	Once (2025)
Find-and-Fix Activities	
Systems collect the follow-up tap sample and assess lead sources at location when a tap sample is > 0.015 mg/L	Annual (2025)
Systems analyze the follow up tap sample when a tap sample is > 0.015 mg/L	Annual (2025)
Systems collect WQP in distribution system near location of tap sample > 0.015 mg/L	Annual (2025)
Systems analyze WQP from distribution system when a tap sample is > 0.015 mg/L	Annual (2025)
Systems review incidents of system-wide events and other system conditions	Annual (2025)
Systems consult with primacy agencies prior to making find-and fix CCT changes	Annual (2025)
Systems provide a copy of the 3-day notice delivered to customers to primacy agencies when a sample exceeds 0.015 mg/L	Annual (2025)
Systems report all find and fix activities	Annual (2025)
Water Quality Parameter Monitoring Activities	
Lead WQP Activities	
Systems collect and analyze lead WQP at distribution system	Annual (2025)
Systems collect and analyze lead WQP at entry points	Annual (2025)
Systems report on lead WQP monitoring	Annual (2025)
Copper WQP Activities	
Systems collect and analyze copper WQP in distribution system	Annual (2025)
Systems collect and analyze copper WQP at entry points	Annual (2025)
Systems report on copper WQP monitoring	Annual (2025)
Source Water Monitoring Activities	
Systems collect and analyze source water samples	Annual (2025)
Systems report results of source water monitoring to primacy agencies	Annual (2025)
Systems report and consult on source water changes	Annual (2025)
Lead Service Line Replacement Activities	
Systems conduct planning and identify financial options for LSLR Program and submit to primacy agency	Once (2025)
Systems consult with primacy agency on targeted LSLR outreach materials	Once (2025)
Systems distribute targeted outreach material on LSLR Program	Annual (2025)
Systems contact customers to coordinate replacement	Annual (2025)
Systems collect and analyze a tap sample 3 months after LSLR	Annual (2025)
Systems inform customers of lead results after LSLR tap sample	Annual (2025)
Systems submit annual report on LSLR program	Annual (2025)
Small System POU Compliance Alternative Activities	
Systems conduct initial planning of POU Program	Once (2025)
Systems develop public education for POUs and submits to primacy agencies for review	Once (2025)
Systems provide POU educational materials to customers	Annual (2025)
Systems obtain volunteer customers to participate in annual sampling program	Annual (2025)
Systems deliver sampling equipment/instructions	Annual (2025)
Systems collect lead tap samples	Annual (2025)

Systems determines that a sample should be rejected and not analyzed	Annual (2025)
Systems analyze lead tap samples	Annual (2025)
Systems submit lead tap sample invalidation requests to primacy agency	Annual (2025)
Systems inform customers of results of lead tap monitoring	Annual (2025)
Systems certify to primacy agencies that sampling results were reported to customers	Annual (2025)
Systems prepare and submit annual report on POU	Annual (2025)
Public Education and Outreach Activities	
PE Activities Independent of Lead 90th Percentile Range	
Systems update CCR	Once (2025)
Systems with LSLs develop a new customer outreach plan	Once (2025)
Systems develop approach for improved public access to lead information	Once (2025)
Systems with LSLs establish a way for customers to access information on LSL locations	Once (2025)
Systems maintain a way for customers to access information on LSL locations	Annual (2025)
Systems with LSLs provide information about LSLs in response to request from homeowners and residents	Annual (2025)
Systems with LSLs provide information about LSLs in response request from realtors, home inspectors, and potential home buyers	Annual (2025)
Systems develop a list of health care providers	Once (2025)
Systems develop material for State and local health agencies	Once (2025)
System deliver PE to State and local health agencies, and participate in joint communication with the primacy agencies to provide increased information to health care providers on lead education	Annual (2025)
Systems develop PE material for delivery during water-related work and submit it to the state for review	Once (2025)
Systems deliver public education material during water-related work	Annual (2025)
Systems certify to primacy agencies that PE outreach occurred including ALE outreach if applicable	Annual (2025)
PE Activities for Action Level Exceedance	
Systems must update their mandatory health effects language, and LSLs systems must also include information about their LSLR program	Once (2025)
CWSs deliver materials to all households and NTNCWSs email and post lead information	Annual (2025)
Systems contact public health agencies to obtain additional organizations	Annual (2025)
Systems notify public health agencies and other organizations in response to lead ALE	Annual (2025)
Systems post lead notice on website	Annual (2025)
Systems consult with primacy agencies on additional PE activities for a lead ALE	Annual (2025)
Systems implement primacy agency directed additional PE in response to lead ALE	Annual (2025)
PE Activities for Customers when Individual Tap Samples > 0.015 mg/L	
Systems provide public education material for customer affected by tap sample > 0.015 mg/L	Annual (2025)
Lead in Drinking Water Testing Program at Schools and Child Care Facilities Activities	
Systems identify childcare facilities and schools served	Once (2025)
Systems develop outreach materials explaining the school sampling program	Once (2025)

Systems prepare and distribute outreach materials explaining the school sampling program	Once (2025)
Systems call school/facility to determine sampling schedule when mandatory	Once (2025)
Systems contact school/facility to offer sampling to secondary schools under opt-in	Annual (2025)
Systems contact school/facility before sampling and coordinate	Annual (2025)
Systems conduct walkthrough at school	Annual (2025)
Systems travel to and from sampling site	Annual (2025)
Systems collect lead samples	Annual (2025)
Systems analyze lead samples	Annual (2025)
Systems provide sampling results to school/facility and health agencies	Annual (2025)
Systems discuss sampling results with school/facility	Annual (2025)
Systems conduct additional detailed follow-up with school/facility when a lead sample is above 0.015 mg/L	Annual (2025)
Systems prepare and submit annual schools sampling report	Annual (2025)

Exhibit 3. Primacy Agency Data Collection and Reporting Activities

Activity	Burden Frequency 2024-2026 (Annual Activities Start Year in Parentheses)
Rule Startup and Ongoing Implementation Activities	
Primacy agencies adopt rule and develop program	Annual (2024)
Primacy agencies provide primacy agencies staff with training for rule implementation	Annual (2024)
Primacy agencies provide system staff with training and technical assistance during rule implementation	Annual (2024)
Primacy agencies modify data system while implementing rule	Annual (2024)
Primacy agencies coordinate with the EPA during annual administration of the rule	Annual (2025)
Primacy agencies train staff for annual administration	Annual (2025)
Primacy agencies provide on-going technical assistance	Annual (2025)
Primacy agencies report to SDWIS	Annual (2025)
Primacy agencies review and approve small system compliance option	Once (2025)
Lead Service Line Inventory Activities (Initial and Updates)	
Primacy agencies assist with inventory development and review initial LSL inventory	Once (2024)
Primacy agencies review information from PWSs that only have non-lead service lines	Once (2024)
Primacy agencies provide template for public education material to LSLs	Once (2024)
Primacy agencies review public education material for LSLs	Once (2024)
Primacy agencies review updated LSL inventory	Annual (2025)
Lead Service Line Replacement Plan Activities	
Primacy agencies review lead service line replacement plan	Once (2024)
Lead and Copper Tap Water Monitoring Activities	
Primacy agencies provide templates for and review sampling instructions for tap sampling	Once (2025)
Primacy agencies review revised sampling plan from systems	Annual (2026)

Primacy agencies review latest two rounds of sampling to determine system sampling requirements under LCRR	Once (2025)
Primacy agencies review changes in tap locations	Annual (2025)
Primacy agencies review sample invalidations requests for lead and copper tap sampling	Annual (2025)
Primacy agencies review certification that sampling results were reported to customer	Annual (2025)
Primacy agencies review report of lead and copper tap sampling	Annual (2025)
Primacy agencies review nine-year waiver request	Annual (2025)
Corrosion Control Treatment Requirements	
Primacy agencies review CCT guidance and to which systems it applies	Once (2025)
Primacy agencies review water quality data with systems that have CCT during sanitary survey	Once (2025)
Primacy agencies consult with PWS on response to source change	Annual (2025)
Primacy agencies consult with PWS on response to treatment change	Annual (2025)
Find-and-Fix Requirements	
Primacy agencies consults with the system prior to making find and fix CCT changes	Annual (2025)
Primacy agencies reviews report regarding all find and fix activities	Annual (2025)
Water Quality Parameter Monitoring Activities	
Lead WQP Activities	
Primacy agencies review lead water quality parameter data	Annual (2025)
Copper WQP Activities	
Primacy agencies review copper water quality parameter data	Annual (2025)
Source Water Monitoring Activities	
Primacy agencies review source water quality data	Annual (2025)
Lead Service Line Replacement Activities	
Primacy agencies provide outreach templates and consult with systems for LSLR Program outreach	Once (2025)
Primacy agencies review targeted public education language for LSLR	Once (2025)
Primacy agencies review annual report on LSLR activities, which includes LSLs replaced under goal based, mandatory, or customer-initiated programs, and required outreach and other additional PE required by the primacy agency	Annual (2025)
Small System POU Compliance Alternative Activities	
Primacy agencies review POU plan	Once (2025)
Primacy agencies provide templates for POU outreach materials	Once (2025)
Primacy agencies review public education material for POUs	Once (2025)
Primacy agencies review certification that sampling results were reported to customer	Annual (2025)
Primacy agencies review annual report on POU	Annual (2025)
Primacy agencies review sample invalidations requests for lead tap sampling	Annual (2025)
Public Education and Outreach Activities	
PE Activities Independent of Lead 90th Percentile Range	
Primacy agencies provide templates to update CCR	Once (2025)
Primacy agencies provide lead outreach templates for State and local health providers	Once (2025)
Primacy agencies review lead outreach for State and local health providers	Once (2025)

Primacy agencies participate in joint communication efforts for sharing lead PE with health departments	Annual (2025)
Primacy agencies review PE material developed for delivery during water-related work	Once (2025)
Primacy agencies review certifications of lead public outreach per system (includes ALE activities if applicable)	Annual (2025)
PE Activities for Action Level Exceedance	
Primacy agencies provide templates and review lead health effects language (and for LSL systems LSLR information) for PE	Once (2025)
Primacy agencies consults with systems on additional PE activities in response to lead ALE	Annual (2025)
PE Activities for Customers when Individual Tap Samples > 0.015 mg/L	
Primacy agencies review copy of 3-day notice delivered to customers and provided to primacy agencies when a sample exceeds 0.015 mg/L	Annual (2025)
Lead in Drinking Water Testing Program at Schools and Child Care Facilities Activities	
Primacy agencies review initial list of schools and child care facilities and confer on program	Once (2025)
Primacy agencies provide templates on school and child care facility testing program	Once (2025)
Primacy agencies review school and child care facility outreach materials	Once (2025)
Primacy agencies review school sampling annual reporting	Annual (2025)

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

5(a) Agency Activities

The Agency is responsible for overseeing the implementation of the LCRR. The Agency is involved in the following activities that assist primacy agencies in implementing the modifications:

- Respond to questions on the revised regulations
- Collect data at the national level in SDWIS.

The Agency will also conduct primacy activities in states, tribes, and territories that do not have primacy. Burden and costs for these activities are accounted for under the primacy agency burden (see section 6).

5(b) Collection Methodology and Management

The data generated as a result of the regulatory changes will be integrated in the existing quarterly SDWIS reporting process. The collection methodology and management of SDWIS is described in the ICR entitled Public Water System Supervision Program (OMB control number 2040-0090).

5(c) Small Entity Flexibility

In developing the revisions to the LCR, the EPA considered the requirement of the Small Business Regulatory Enforcement Fairness Act (SBREFA) to minimize the burden of information collections on small entities. Small entities include "small businesses," "small organizations" and "small government jurisdictions," and are defined as follows:

- A small business is any business that is independently owned and operated and not dominant in its field, as defined by the Small Business Administration regulations under section 3 of the Small Business Act.
- A small organization is any non-profit enterprise that is independently owned and operated and not dominant in its field.
- A small governmental jurisdiction is the government of a city, county, town, township, village, school district, or special district that has a population of fewer than 50,000. This definition may also include tribal governments.

The major requirement under SBREFA is a regulatory flexibility analysis of all rules that have a "significant economic impact on a substantial number of small entities."

EPA considered the particular needs of small businesses, small governments, and small organizations when proposing rule changes in the LCRR. For example, EPA has prepared a Regulatory Flexibility Act analysis for the rule, which can be found in the *Economic Analysis for the Final Lead and Copper Rule Revisions*. EPA recognizes that many water systems are small entities; therefore, the LCRR reduces to the extent practicable and appropriate the burden on PWSs, especially small systems. The regulations include the following examples of reduced burden for small systems:

- Different monitoring, compliance, or reporting requirements or schedules that take into account the resources available to small water systems.
- Consolidated or simplified compliance and reporting requirements.
- No unnecessary or redundant requirements.

Specifically, the LCRR incorporates flexibility for small CWSs serving 10,000 or fewer people and all NTNCWSs by allowing these entities to select, in consultation with their primacy agency, the compliance option that best protects public health, recognizing the unique nature of these systems. This flexibility applies to CWSs serving 10,000 or fewer people and all NTNCWSs that exceed the lead TL of 0.010 mg/L or lead AL of 0.015 mg/L. The compliance options for these systems after a TLE or ALE include CCT; provision, monitoring, and maintenance of POU devices; LSLR; and replacement of lead-bearing materials. These small system flexibilities provide alternatives to chemical treatment because it can be difficult for many small systems to find operators that have the more advanced skills necessary to implement and maintain such treatment, particularly given the limited financial and programmatic capacity of many small utilities. These small systems can work with their primacy agency to identify an affordable and feasible treatment technique to reduce drinking water lead exposure.

5(d) Collection Schedule

For both the LCR and LCRR, the Agency considered a wide range of alternatives for frequency of data collection and chose the option that requires the least frequent collection possible while still protecting public health. When possible, primacy agency discretion in adjusting these frequencies has been allowed. Monitoring frequencies for PWSs have been carefully devised based on the following factors: system size, source water type, system type (*e.g.*, CWS and NTNCWS), and contaminant history. The collection schedule associated with the years covered by this ICR (2024, 2025, and 2026).

In year 2024, the first year of the ICR renewal period, which includes the October 16, 2024 LCRR compliance date, public water systems and primacy agencies will still be engaged in the regulatory startup/implementation activities identified in the original "Information Collection Request for Lead and Copper Rule Revisions (LCRR)". These activities include reading and understanding the LCRR, assigning personnel and resources for rule implementation, attending training and receiving technical assistance from the state, developing initial LSL inventories, submitting demonstrations that they only have non-lead service lines (when applicable), and conferring with primacy agencies on initial planning for LSLR and preparing an LSLR plan when LSLs are present. During this same period, primacy agencies will conduct startup activities that include: adopting the rule and developing a program to implement it, modifying their data systems, providing system staff with training and technical assistance, providing internal staff with training for implementation, assisting with initial LSL inventories and reviewing initial inventories, reviewing demonstrations of only non-lead service lines from systems, and conferring with systems on initial planning for LSLR and reviewing the LSLR plan.

In years 2025 and 2026 of the ICR, following the LCRR compliance date, both systems and primacy agencies must work to implement a number of ongoing and additional regulatory requirements including: ongoing rule implementation and administration, lead and copper tap monitoring, corrosion control treatment, find-and-fix, water quality parameter monitoring, source water monitoring, LSL inventory updates, LSL replacement, small system POU treatment as a compliance alternative, lead PE and outreach, and lead in drinking water testing programs at schools and child care facilities. During this same period, the burden and cost to primacy agencies stems from their review and oversite activities associated with each of the PWS requirements for 2025 and 2026.

See **Exhibits 2** and **3** at the end of Section 4(b)(ii) for additional information on the timing of specific sub-activities that occur within the three-year period covered in this ICR renewal.

6 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section describes the estimates of burden and direct costs to water systems and primacy agencies associated with the regulatory changes.[16] This ICR provides estimates of the

[16] There are two types of costs that may result from the LCRR–direct and indirect. Direct costs are from those activities that are specified by the rule change, such as costs for additional monitoring or distribution of consumer notices. A second type of cost may also result when systems and primacy agencies use the information generated by the directly related rule activities to modify or enhance practices to reduce lead levels.

burdens to comply with the LCR as amended by the LCRR. As noted below, the initial burden and cost estimates double-count burden estimates in the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (USEPA, 2022; OMB Control Number 2040-0204; EPA Tracking Number 1896.12). EPA provides an estimate of the double counting and subtracts that amount from the final net estimates.

The burden and cost estimates in this ICR are based on the calculations documented in the *Economic Analysis for the Final Lead and Copper Rule Revisions*. Major underlying burden assumptions, data sources, and calculations are detailed in Chapter 5 of that document. Since promulgating the LCRR, EPA has updated the national estimate of LSLs. This ICR reflects EPA's updated estimates of the number of systems responding to the regulatory provisions. Appendix B provides the revised respondent and response estimates as well as the updated burden and non-labor cost estimates for systems creating a lead service line inventory and updating it per EPA guidance.

6(a) Estimating Respondent Burden

The following sections discuss the burden faced by PWSs and primacy agencies[17], and associated labor costs and non-labor costs.

6(a)(i) Burden to Public Water Systems

During the first year covered in this ICR renewal (2024), which represents the last year of the three-year initial implementation period prior to the LCRR compliance date, EPA assumes that systems would face one-third of the burden and cost to complete regulatory startup activities, the initial inventory development for LSL containing systems or the demonstration that the system doesn't have LSLs, and for LSL systems the LSLR plan. During 2025 and 2026, all systems will perform multiple activities to comply with the LCRR. The number of systems performing each task, shown in **Exhibit 4**Error: Reference source not found, varies depending on estimated LSL presence and lead monitoring results.[18] See Chapter 5 of the *Economic Analysis for the Final Lead and Copper Rule Revisions* for a detailed presentation of the data and formulas used in generating the burden estimates. The lead service line inventory requirement category includes the supplemental burden associated with systems using EPA's *Guidance for Developing and Maintaining a Service Line Inventory* ("SL Inventory Guidance")[19]. This increased potential burden associated with the SL Inventory Guidance, affects the estimated

[17] EPA implementation costs that occur as a result of the Agency acting as the primacy agency in cases where a state or tribal government does not have LCR implementation oversite are included in the estimated primacy agency cost in this section.

[18] Throughout the period covered in this ICR renewal, system requirements vary by system type, size, LSL status, CCT status, source water type, lead monitoring results, and small system flexibility option. Consequently, the number of respondents for each requirement will vary based on these system characteristics. The full inventory of water system characteristics can be found in document EPA-HQ-OW-2017-0300-1909 in EPA Docket EPA-HQ-OW-2017-0300 at www.regulations.gov. This file also provides pivot tables that show how the system characteristics affect the number of systems incurring each type of burden.

[19] USEPA. 2022. *Guidance for Developing and Maintaining a Service Line Inventory.* Retrieved from https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf.

burden for the sub-activity line items “Systems create initial inventory of lead service lines” and “Systems update inventory.” These two line items account for 76 percent of the inventory activities burden.

Exhibit 4. Total PWS Respondents, Responses, and Burden for the LCRR ICR Renewal (Including Potentential SL Inventory Guidance Burden)

Activity	Respondents	Responses	Total Burden
Rule Startup Implementation Activities			
Systems read and understand the LCRR rule	22,552	22,552	90,208
Systems assign personnel and resources for rule implementation	22,552	22,552	180,416
Systems attend training and technical assistance from the primacy agencies during rule implementation	22,552	22,552	180,416
Systems submit small system flexibility compliance option	14,626	14,626	146,260
Subtotal Responses and Burden		***82,282***	**597,300**
Lead Service Line Inventory Activities (Initial and Updates)			
Systems create initial inventory of lead, GRR, and unknown service lines - **records review plus field investigations per SL Inventory Guidance**	29,601	54,358	2,337,555
Systems submit initial demonstration documentation of no LSLs[a]	30,442	30,442	361,069
Systems submit initial inventory	29,601	29,601	313,885
Systems develop PE material for LSLs	33,166	33,166	127,433
Systems distribute PE material for LSLs	33,166	48,359,701	581,210
Systems update inventory **including field investigations per SL Inventory Guidance**	24,757	49,514	2,297,475
Systems submit updated inventory report	33,166	66,332	66,332
Subtotal Responses and Burden		***48,623,114***	***6,084,959***
Lead Service Line Replacement Plan Activities			
Systems create a LSLR plan and submit for primacy agency review	33,166	33,166	534,720
Subtotal Responses and Burden		***33,166***	***534,720***
Lead and Copper Tap Water Monitoring Activities			
Systems update sampling instructions for tap sampling	67,656	67,656	135,312
Systems contact homes to establish new 100 percent LSL tap sampling pool	24,757	24,757	506,335
Systems reports change in tap locations	60,545	68,787	206,361
Systems confer with primacy agencies on tap sampling program	67,656	67,656	67,656
Systems obtain volunteer customers to participate from sampling pool	38,633	1,158,595	861,495
System offers customer incentive for lead and copper tap samples	27,855	35,075	0[b]
Systems deliver sample equipment/instructions for the 5th liter option	38,633	1,158,595	289,649

Systems collect lead and copper tap samples from households	51,253	1,449,997	607,515
Systems determine that a sample should be rejected and not analyzed	38,633	50,112	12,528
Systems analyze lead and copper tap samples	51,253	1,099,799	24,146
Systems submit lead and copper tap sample invalidation requests to primacy agency	51,253	6,959	13,770
Systems inform customers of results of lead and copper tap monitoring	51,253	1,025,196	65,532
Systems certify to primacy agencies that sampling results were reported to customer	51,253	64,834	43,214
Systems submit nine-year waiver request	479	479	479
Systems draft and submit report on lead and copper tap sampling	51,253	51,253	78,340
Subtotal Responses and Burden		***6,329,750***	***2,912,332***
Corrosion Control Treatment Activities			
Systems conduct or revise CCT study	3,849	3,849	0[b]
Systems with LSLs gather non-water quality compliance data and review EPA CCT guidance prior to consultation with primacy agencies during the sanitary survey	16,907	16,907	32,582
Systems notify and consult with primacy agencies on modification of CCT	2,276	4,552	51,418
Subtotal Responses and Burden		***25,308***	***84,000***
Find-and-Fix Activities			
Systems collect the follow-up tap sample and assess lead sources at location when a tap sample is > 0.015 mg/L	67,656	147,704	537,313
Systems analyze the follow up tap sample when a tap sample is > 0.015 mg/L	67,656	147,704	3,513
Systems collect WQP in distribution system near location of tap sample > 0.015 mg/L	24,539	28,917	14,458
Systems analyze WQP from distribution system when a tap sample is > 0.015 mg/L	24,539	28,917	1,621
Systems review incidents of system-wide events and other system conditions	63,784	127,568	518,023
Systems consult with primacy agencies prior to making find-and fix CCT changes	16,749	33,498	66,996
Systems provide a copy of the 3-day notice delivered to customers to primacy agencies when a sample exceeds 0.015 mg/L	63,305	575,440	46,035
Systems report all find and fix activities	63,784	127,568	259,056
Subtotal Responses and Burden		***1,217,316***	***1,447,015***
Water Quality Parameter Monitoring Activities			
Lead WQP Activities			
Systems collect and analyze lead WQP at distribution system	10,823	193,072	33,347
Systems collect and analyze lead WQP at entry points	10,823	571,684	260,321
Systems report on lead WQP monitoring	10,823	43,292	202,808
Copper WQP Activities			

Systems collect and analyze copper WQP in distribution system	221	2,592	0[b]
Systems collect and analyze copper WQP at entry points	221	586,976	1,136
Systems report on copper WQP monitoring	221	884	4,420
Subtotal Responses and Burden		***1,398,500***	***502,032***
Source Water Monitoring Activities			
Systems collect and analyze source water samples	10,295	33,876	17,437
Systems report results of source water monitoring to primacy agencies	10,295	20,532	15,360
Systems report and consult on source water changes	5,669	11,338	139,442
Subtotal Responses and Burden		***65,746***	***172,239***
Lead Service Line Replacement Activities			
Systems conduct planning and identify financial options for LSLR Program and submit to primacy agency	12,728	12,728	5,355,300
Systems consult with primacy agency on targeted LSLR outreach materials	1,674	1,674	16,401
Systems distribute targeted outreach material on LSLR Program	1,674	25,916,021	154,787
Systems contact customers to coordinate replacement	17,813	226,449	402,423
Systems collect and analyze a tap sample 3 months after LSLR	17,867	226,748	272,521
Systems inform customers of lead results after LSLR tap sample	17,867	226,748	11,622
Systems submit annual report on LSLR program	17,867	17,867	33,371
Subtotal Responses and Burden		***26,628,235***	***6,246,425***
Small System POU Compliance Alternative Activities			
Systems conduct initial planning of POU Program	3,872	3,872	671,406
Systems develop public education for POUs and submits to primacy agencies for review	3,872	3,872	13,569
Systems provide POU educational materials to customers	3,872	345,102	3,504
Systems obtain volunteer customers to participate in annual sampling program	2,548	131,959	65,979
Systems deliver sampling equipment/instructions	2,548	131,959	32,990
Systems collect lead tap samples	3,872	147,544	59,521
Systems determines that a sample should be rejected and not analyzed	2,548	5,708	1,427
Systems analyze lead tap samples	3,872	130,422	0[b]
Systems submit lead tap sample invalidation requests to primacy agency	3,872	778	1,556
Systems inform customers of results of lead tap monitoring	3,872	116,799	8,356
Systems certify to primacy agencies that sampling results were reported to customers	3,872	7,744	5,112
Systems prepare and submit annual report on POU	3,872	7,744	7,772
Subtotal Responses and Burden		***1,033,503***	***871,192***
Public Education and Outreach Activities			
PE Activities Independent of Lead 90th Percentile Range			
Systems update CCR	50,067	50,067	29,675

Systems with LSLs develop a new customer outreach plan	24,757	24,757	101,776
Systems develop approach for improved public access to lead information	50,067	50,067	622,180
Systems with LSLs establish a way for customers to access information on LSL locations	24,757	24,757	149,980
Systems maintain a way for customers to access information on LSL locations	50,067	100,134	477,368
Systems with LSLs provide information about LSLs in response to request from homeowners and residents	24,757	548,474	27,424
Systems with LSLs provide information about LSLs in response request from realtors, home inspectors, and potential home buyers	24,757	834,050	41,702
Systems develop a list of health care providers	50,067	101,326	8,444
Systems develop material for State and local health agencies	50,067	50,067	191,372
System deliver PE to State and local health agencies, and participate in joint communication with the primacy agencies to provide increased information to health care providers on lead education	50,067	202,652	487,348
Systems develop PE material for delivery during water-related infrastructure work and submit it to the state for review	24,757	24,757	97,985
Systems deliver PE material during water-related infrastructure work	24,757	2,853,222	237,769
Systems certify to primacy agencies that PE outreach occurred including ALE outreach if applicable	67,656	135,312	225,444
PE Activities for Action Level Exceedance			
Systems must update their mandatory health effects language, and LSLs systems must also include information about their LSLR program	10,016	10,016	37,746
CWSs deliver materials to all households and NTNCWSs email and post lead information	10,016	37,459,304	98,807
Systems contact public health agencies to obtain additional organizations	7,430	15,272	11,550
Systems notify public health agencies and other organizations in response to lead ALE	7,430	317,378	793
Systems post lead notice on website	7,430	15,272	71
Systems consult with primacy agencies on additional PE activities for a lead ALE	7,430	15,272	29,720
Systems implement primacy agency directed additional PE in response to lead ALE	7,430	45,816	224,868
PE Activities for Customers when Individual Tap Samples > 0.015 mg/L			
Systems provide PE material for customer affected by tap sample > 0.015 mg/L	47,054	504,391	126,098
Subtotal Responses and Burden		***43,382,363***	***3,228,120***
Lead in Drinking Water Testing Program at Schools and Child Care Facilities Activities			
Systems identify child care facilities and schools served	41,033	630,715	52,560
Systems develop outreach materials explaining the school sampling program	27,321	27,321	103,346

Systems prepare and distribute outreach materials explaining the school sampling program	41,033	630,715	31,536
Systems call school/facility to determine sampling schedule when mandatory	35,565	608,464	566,266
Systems contact school/facility to offer sampling to secondary schools under opt-in	32,789	89,004	4,450
Systems contact school/facility before sampling and coordinate	41,033	10,327,944	140,575
Systems conduct walkthrough at school	41,033	10,327,944	828,779
Systems travel to and from sampling site	41,033	10,327,944	265,060
Systems collect lead samples	41,033	1,198,342	203,718
Systems analyze lead samples	41,033	1,198,342	230,094
Systems provide sampling results to school/facility and health agencies	41,033	1,124,596	56,230
Systems discuss sampling results with school/facility	41,033	562,298	562,298
Systems conduct additional detailed follow-up with school/facility when a lead sample is above 0.015 mg/L	41,033	220,609	1,103,047
Systems prepare and submit annual schools sampling report	50,067	200,268	202,484
Subtotal Responses and Burden		***37,474,506***	***4,350,443***
System Total – All Activities	**67,656**	**166,293,789**	**27,030,777**

Notes: Detail may not add exactly to total due to independent rounding. Chapter 5 of the LCRR *Economic Analysis for the Final Lead and Copper Rule Revisions* provides burden estimate details. Details for assumptions revised since final rule promulgation are in Appendix B.

a. This burden for systems with all non-lead service lines includes preparing the initial inventory, compiling and submitting demonstrations to primacy agencies, preparing the written statement, and describing the categorization methods used to the public.

b. No PWS labor burden for this activity. Non-labor costs are shown in section 6(b)(i).

6(a)(ii) Burden to Primacy Agencies

During the three-year period (2024 to 2026), primacy agencies will incur burden associated with completing one-time startup activities and administering the compliance activities listed in **Exhibit 5**. Note that EPA did not estimate the potential burden reduction associated with the PWSs providing more accurate and organized inventory data to primacy agencies as a result of the SL Inventory Guidance recommendations and templates.

Exhibit 5. Total Primacy Agency Respondents, Responses, and Burden for the LCRR ICR Renewal

Activity	Respondents	Responses	Total Burden
Rule Startup and Ongoing Implementation Activities			
Primacy agencies adopt rule and develop program	56	168	107,520
Primacy agencies provide primacy agencies staff with training for rule implementation	56	168	32,928
Primacy agencies provide system staff with training and technical assistance during rule implementation	56	168	134,400
Primacy agencies modify data system while implementing rule	56	168	124,320

Primacy agencies coordinate with the EPA during annual administration of the rule	56	112	116,480
Primacy agencies train staff for annual administration	56	112	11,648
Primacy agencies provide on-going technical assistance	56	112	253,680
Primacy agencies report to SDWIS	56	112	174,720
Primacy agencies review and approve small system compliance option	56	14,626	73,130
Subtotal Responses and Burden		***15,746***	***1,028,826***
Lead Service Line Inventory Activities (Initial and Updates)			
Primacy agencies assist with inventory development and review initial LSL inventory	56	29,601	136,468
Primacy agencies review information from PWSs that do not have LSLs	56	30,442	60,884
Primacy agencies provide template for PE material to LSLs	56	33,166	12,430
Primacy agencies review PE material for LSLs	56	33,166	17,615
Primacy agencies review updated LSL inventory	56	33,166	33,166
Subtotal Responses and Burden		***159,541***	***260,563***
Lead Service Line Replacement Plan Activities			
Primacy agencies review LSLR plan	56	33,166	267,360
Subtotal Responses and Burden		***33,166***	***267,360***
Lead and Copper Tap Water Monitoring Activities			
Primacy agencies provide templates for and review sampling instructions for tap sampling	56	67,656	25,353
Primacy agencies review revised sampling plan from systems	56	33,166	155,368
Primacy agencies review latest two rounds of sampling to determine system sampling requirements under LCRR	56	67,656	142,078
Primacy agencies review change in tap locations	56	68,787	68,787
Primacy agencies review sample invalidations requests for lead and copper tap sampling	56	6,959	13,770
Primacy agencies review certification that sampling results were reported to customer	56	64,834	26,923
Primacy agencies review report of lead and copper tap sampling	56	51,253	24,107
Primacy agencies review nine-year waiver request	52[a]	479	240
Subtotal Responses and Burden		***360,790***	***456,626***
Corrosion Control Treatment Requirements			
Primacy agencies review CCT guidance and to which systems it applies	56	16,907	270,512
Primacy agencies review water quality data with systems that have CCT during sanitary survey	56	16,907	46,317
Primacy agencies consult with PWS on response to source change	56	11,338	81,441
Primacy agencies consult with PWS on response to treatment change	56	4,552	51,418
Subtotal Responses and Burden		***49,704***	***449,688***

Find-and-Fix Requirements			
Primacy agencies consults with the system prior to making find-and-fix CCT changes	56	33,498	66,996
Primacy agencies reviews report regarding all find-and-fix activities	56	127,568	129,528
Subtotal Responses and Burden		***161,066***	***196,524***
Water Quality Parameter Monitoring Activities			
Lead WQP Activities			
Primacy agencies review lead water quality parameter data	56	43,292	264,242
Copper WQP Activities			
Primacy agencies review copper water quality parameter data	56	884	4,420
Subtotal Responses and Burden		***44,176***	***268,662***
Source Water Monitoring Activities			
Primacy agencies review source water quality data	56	20,532	7,680
Subtotal Responses and Burden		***20,532***	***7,680***
Lead Service Line Replacement Activities			
Primacy agencies provide outreach templates and consult with systems for LSLR Program outreach	56	1,674	3,975
Primacy agencies review targeted PE language for LSLR	56	1,674	1,491
Primacy agencies review annual report on LSLR activities, which includes LSLs replaced under goal based, mandatory, or customer-initiated programs, and required outreach and other additional PE required by the primacy agency	56	17,867	16,686
Subtotal Responses and Burden		***21,215***	***22,152***
Small System POU Compliance Alternative Activities			
Primacy agencies review POU plan	56	3,872	335,703
Primacy agencies provide templates for POU outreach materials	56	3,872	1,449
Primacy agencies review PE material for POUs	56	3,872	1,938
Primacy agencies review certification that sampling results were reported to customer	56	7,744	3,213
Primacy agencies review annual report on POU	56	7,744	3,886
Primacy agencies review sample invalidations requests for lead tap sampling	56	778	1,556
Subtotal Responses and Burden		***27,882***	***347,745***
Public Education and Outreach Activities			
PE Activities Independent of Lead 90th Percentile Range			
Primacy agencies provide templates to update CCR	56	50,067	18,779
Primacy agencies provide lead outreach templates for State and local health providers	56	50,067	18,769
Primacy agencies review lead outreach for State and local health providers	56	50,067	26,501
Primacy agencies participate in joint communication efforts for sharing lead PE with health departments	56	100,134	100,134

Primacy agencies review PE material developed for delivery during water-related infrastructure work	56	24,757	13,409
Primacy agencies review certifications of lead public outreach per system (includes ALE activities if applicable)	56	135,312	139,769
PE Activities for Action Level Exceedance			
Primacy agencies provide templates and review lead health effects language (and for LSL systems LSLR information) for PE	56	10,016	5,253
Primacy agencies consults with systems on additional PE activities in response to lead ALE	56	15,272	29,720
PE Activities for Customers when Individual Tap Samples > 0.015 mg/L			
Primacy agencies review copy of 3-day notice delivered to customers and provided to primacy agencies when a sample exceeds 0.015 mg/L	56	575,440	46,035
Subtotal Responses and Burden		***1,011,132***	***398,369***
Lead in Drinking Water Testing Program at Schools and Child Care Facilities Activities			
Primacy agencies review initial list of schools and child care facilities and confer on program	56	27,321	81,963
Primacy agencies provide templates on school and child care facility testing program	56	27,321	10,253
Primacy agencies review school and child care facility outreach materials	56	27,321	14,363
Primacy agencies review school sampling annual reporting	56	200,268	200,268
Subtotal Responses and Burden		***282,231***	***306,847***
System Total – All Activities	**56**	**2,187,181**	**4,011,042**

Notes: Detail may not add exactly to total due to independent rounding. Chapter 5 of the LCRR *Economic Analysis for the Final Lead and Copper Rule Revisions* provides burden estimate details. Details for assumptions revised since final rule promulgation are in Appendix B.
a. EPA tracked systems on 9-year waivers, and these systems only apply to 52 out of 56 primacy agencies.

6(b) Estimating Respondent Costs

The following sections provide the estimates of the costs to PWSs and primacy agencies.

6(b)(i) Cost to Public Water Systems

The labor rates associated with the system activities during the ICR period apply to all 67,656 CWSs and NTNCWSs that must comply with the LCRR. To estimate the cost of system labor burden, EPA used the fully loaded labor rate of $40.24 per hour, which is the same wage rate used in the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (USEPA, 2022; OMB Control Number 2040-0204; EPA Tracking Number 1896.12). EPA used this average wage rate to facilitate estimating net burden values.

Based on this labor rate, **Exhibit 6** presents the labor costs to systems for each of the activities conducted during the three years. It also provides the non-labor cost estimates for each activity category. These estimated values include costs for sample collection materials, laboratory analysis, and distribution of PE materials. The lead service line inventory line item

includes the potential cost of PWSs following the recommendation of the EPA SL Inventory Guidance.

Exhibit 6. Public Water System Total Burden and Costs for the LCRR ICR Renewal (Including Potentential SL Inventory Guidance Burden and Costs, 2021$)

Activity Category	Total Burden	Labor Costs	Non-labor Costs	Total Costs
		2021$	(2021$)[a]	2021$
Rule Startup Implementation	597,300	$24,035,352	$0	$24,035,352
Lead Service Line Inventory	6,084,959	$244,858,750	$463,471,507	$708,330,257
LSLR Plan	534,720	$21,517,133	$0	$21,517,133
Lead and Copper Tap Water Monitoring	2,912,332	$117,192,240	$55,513,422	$172,705,662
Corrosion Control Treatment	84,000	$3,380,160	$35,803,348	$39,183,508
Find-and-Fix Requirements	1,447,015	$58,227,884	$6,614,634	$64,842,518
Water Quality Parameter Monitoring	502,032	$20,201,768	$42,712,873	$62,914,641
Source Water Monitoring	172239	$6,930,897	$825,221	$7,756,118
LSLR	6,246,425	$251,356,142	$15,502,398	$266,858,540
Small System POU Compliance Alternative	871,192	$35,056,766	$5,210,703	$40,267,469
PE and Outreach	3,228,120	$129,899,549	$28,344,729	$158,244,278
Lead in Drinking Water Testing Program at Schools and Child Care Facilities	4,350,443	$175,061,826	$28,750,025	$203,811,851
Total – All Activities	**27,030,777**	**$1,087,718,466**	**$682,748,860**	**$1,770,467,326**

Notes: Detail may not add exactly to total due to independent rounding.
a. Non-labor cost estimates shown in 2021$. The LCRR Rule estimates were in 2016$. EPA used the Gross Domestic Product Implicit Price Deflator to update those estimates to 2021$. The multiplier based on fourth quarter values for both years was 1.16009 = 124.174 (January 1, 2022)/ 107.371 (January 1, 2022).

The total burden and cost estimates in **Exhibit 6** partially double count the approved burden and costs for the LCR in the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (OMB Control Number 2040-0204, EPA Tracking Number 1896.12). That request covered system and primacy agency burdens from April 1, 2023, through March 31, 2026, for the following groups of data collection and reporting activities under the LCR: tap water sampling, water quality parameter monitoring, source water monitoring, CCT reporting, source water treatment reporting, and PE for an ALE. The overlap period is 15 of the 36 months. Therefore, EPA applied a multiplicative factor of 15/30 to the approved ICR total burden and cost estimates to estimate the potential overlap. **Exhibit 7** shows the adjustments EPA used to estimate LCRR burden and costs net of the double counting.

Exhibit 7. Public Water System Net Total and Average Annual Burden and Costs for the LCRR ICR Renewal (Including Potentential SL Inventory Guidance Burden and Costs, 2021$)Public Water Systems

Item	Responses	Total Burden	Labor Costs (2021$)	Non-labor Costs (2021$)	Total Costs (2021$)
[a] Total for Approved ICR (USEPA, 2022)	539,838	4,399,597	$184,932,581	$15,308,454	$200,241,035
[b] Estimated Overlap with Approved ICR ([a] x 15/36)	224,932	1,833,165	$77,055,242	$6,378,523	$83,433,765
[c] Total for LCRR ICR Renewal – All Activities	166,293,789	27,030,777	$1,087,718,466	$682,748,860	$1,770,467,326
[d] Net Total for LCRR ICR Renewal – All Activities ([c] - [b])	**166,068,857**	**25,197,612**	**$1,010,663,224**	**$676,370,337**	**$1,687,033,561**
[e] Net Average Annual for LCRR ICR Renewal – All Activities ([d]/3)	**55,356,286**	**8,399,204**	**$336,887,741**	**$225,456,779**	**$562,344,520**

6(b)(ii) Cost to Primacy Agencies

Fifty-six primacy agencies will review and implement the final LCRR, which includes 49 states, five territories, one tribe, and EPA.[20] The fully loaded labor rate applied to primacy agency costs for the three years of the LCRR is $62.50 per hour, which is the same labor rate used in the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (USEPA, 2022; OMB Control Number 2040-0204; EPA Tracking Number 1896.12) approved ICR (USEPA, 2022). Based on this labor rate, **Exhibit 8** labor costs to primacy agencies for all activities conducted during the ICR period, 2024-2026. There are no non-labor costs associated with this period.

Exhibit 8. Primacy Agency Total Burden and Costs for the LCRR ICR Renewal (2021$)

Activity Category	Total Burden	Labor Costs 2021$	Non-labor Costs (2021$)[a]	Total Costs 2021$
Rule Startup Implementation	1,028,826	$64,301,625	$0	$64,301,625
Lead Service Line Inventory	260,563	$16,285,188	$0	$16,285,188

[20] EPA regions will also conduct primacy activities on behalf of Wyoming, Washington DC, tribes, and territories that do not have primacy. The burden and costs for these activities are included in the primacy agency burden.

LSLR Plan	267,360	$16,710,000	$0	$16,710,000
Lead and Copper Tap Water Monitoring	456,626	$28,539,125	$0	$28,539,125
Corrosion Control Treatment	449,688	$28,105,500	$0	$28,105,500
Find-and-Fix Requirements	196,524	$12,282,750	$0	$12,282,750
Water Quality Parameter Monitoring	268,662	$16,791,375	$0	$16,791,375
Source Water Monitoring	7,680	$480,000	$0	$480,000
LSLR	22,152	$1,384,500	$0	$1,384,500
Small System POU Compliance Alternative	347,745	$21,734,063	$0	$21,734,063
PE and Outreach	398,369	$24,898,063	$0	$24,898,063
Lead in Drinking Water Testing Program at Schools and Child Care Facilities	306,847	$19,177,938	$0	$19,177,938
Total – All Activities	**4,011,042**	**$250,690,125**	**$0**	**$250,690,125**

Note: Detail may not add exactly to total due to independent rounding.

The total primacy agency burden and costs shown above also double count approved burden and costs for the LCR in the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (OMB Control Number 2040-0204, EPA Tracking Number 1896.12). Therefore, EPA applied a multiplicative factor of 15/30 to the previously approved ICR's total burden and cost estimates to estimate the potential overlap with this new LCRR renewal. See the PWS net cost calculation description above for additional details. EPA subtracted the prorated values from the LCRR values to estimate the net total and annual average burden and costs (see **Exhibit 9**).

Exhibit 9. Primacy Agency Net Total and Average Annual Burden and Costs for the LCRR ICR Renewal (2021$)

Item	Responses	Total Burden	Labor Costs (2021$)	Total Costs (2021$)
[a] Total for Approved ICR (USEPA, 2022)	212,085	546,713	$34,167,400	$34,167,400
[b] Estimated Overlap with Approved ICR ([a] x 15/36)	88,369	227,797	$14,236,417	$14,236,417
[c] Total for LCRR ICR Renewal – All Activities	2,187,181	4,011,042	$250,690,125	$250,690,125
[d] Net Total for LCRR ICR Renewal – All Activities ([c] - [b])	**2,098,812**	**3,783,245**	**$236,453,708**	**$236,453,708**
[e] Net Average Annual for LCRR ICR Renewal – All Activities ([d]/3)	**699,604**	**1,261,082**	**$78,817,903**	**$78,817,903**

6(c) Estimating Agency Burden and Cost

The Agency will conduct primacy activities in states, tribes, and territories that do not have primacy. However, burden and costs for these activities are accounted for under the primacy agency burden. Additional information-related activities that may be undertaken by both EPA headquarters and regional offices include reviewing, interpreting, and explaining the LCRR regulations and/or SL Inventory Guidance to primacy agencies that ask for guidance. For example, during the implementation process, EPA headquarters or regions might be asked for explanations or interpretations of the intent of the new regulations. Primacy agencies may also ask about how to best utilize the templates provided in the SL Inventory Guidance. EPA thinks that these regulatory changes and guidance recommendations are relatively straightforward and limited in scope and expects that the rule preamble language and inventory guidance document language will generally be sufficient for the purpose of explaining EPA's intent. Therefore, the additional burden incurred by headquarters and regional offices is expected to be minimal.

Further, the additional burden and costs incurred by EPA's drinking water program at headquarters and regional offices to assist primacy agencies in implementing drinking water regulations are already included in existing ICRs. The EPA burden and costs for ongoing regulatory development and support activities for all EPA drinking water regulations are accounted for under the Public Water System Supervision Program ICR.[21] This final rule and SL Inventory Guidance does not create any additional Agency burden beyond what is already described in the latest version of the PWS Supervision Program ICR (2040-0090, EPA ID 1895.10).

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

There is a total of 67,656 PWSs and 56 primacy agencies considered for this Information Collection Request.

6(e) Bottom Line Burden Hours and Costs Tables

This section provides a description of the bottom line estimates for implementation of the LCRR rule over the years 2024 to 2026 including the potential burden resulting from PWSs following EPA's SL Inventory Guidance. The bottom line burden hours and costs for systems and primacy agencies are the summaries of the hours and costs collectively incurred for all activities. The first part of this section describes the estimated costs and hourly burdens for respondents to the rule. The second part discusses the potential cost and burden to EPA. **Exhibit 10** presents a summary of the total respondent burden over the three years (2024, 2025, and 2026) for PWSs and primacy agencies.

[21] Information Collection Request for the Public Water System Supervision Program, OMB control number 2040-0090.

Exhibit 10**. Net Bottom Line Total Burden and Costs for the Three Years of the LCRR ICR Renewal (Including Potential SL Inventory Guidance Burden and Costs, 2021$)**

Number of Respondents	**67,712** = 67,656 +56	 Public water systems Primacy agencies
Number of Responses	**168,167,669** = 166,068,857 +2,098,812	 Public water systems Primacy agencies
Total Respondent Burden Hours	**28,980,857** = 25,197,612 +3,783,245	 Public water system hours Primacy agency hours
Hours per System for Public Water Systems	**372** = 25,197,612 /67,656	 Total PWS hours from above Total PWS from above
Hours per Primacy Agency for Primacy Agencies	**67,558** = 3,783,245 /56	 Total primacy agency hours from above Total primacy agencies from above
Total Respondent Cost	**$ 1,923,487,269** = $ 1,687,033,561 +$ 236,453,708	 Public water system costs Primacy agency costs
Average Cost per System for Public Water Systems	**$ 24,935** = $ 1,687,033,561 /67,656	 Total PWS costs from above Total PWS from above
Average Cost per Primacy Agency for Primacy Agencies	**$ 4,222,388** = $ 236,453,708 /56	 Total primacy agency costs from above Total primacy agencies from above

Note: Detail may not add exactly to total due to independent rounding.

6(e)(i) Respondent Tally

For the three years, 2024-2026, the net burden associated with this ICR renewal, including the potential burden associated with the SL Inventory Guidance, is estimated to be 28,980,857 burden hours, or an average of 9,660,286 hours per year. The corresponding net total respondent costs are estimated to be $1,923,487,269, or an average of $641,162,423 per year.

The EPA estimates the average net per-respondent burden for PWSs is 372 total hours or 124 hours per year. Average net per-respondent cost for PWSs is estimated to be $24,935 or $8,312 per year. The average net per-primacy agency burden estimate is 67,558 hours or 22,519 hours per year. The corresponding average net per-agency cost is $4,222,388 or $1,407,463 per year.

6(e)(ii) The Agency Tally

Any additional burden or cost that EPA may incur as a result of the LCRR implementation activities and the SL Inventory Guidance is expected to be minimal and is already accounted for in existing ICRs, as explained in 6(c).

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

With the exception of the rule startup implementation activities, the finalization and submission of the initial inventory and demonstration that a system only has non-lead service lines (where applicable), and the LSLR Plan activities, EPA assumes the LCRR required activities will primarily take place in years 2025 and 2026. Therefore, EPA estimates that the

2024 net total the rule startup implementation activities, initial lead service line inventory costs, and LSLR plan costs will be $327,146,732 for systems and $44,481,179 for primacy agencies[22]. The remaining required activities occur in 2025 and 2026 for an average annual net total of $679,816,921 for systems and $88,868,055 for primacy agencies per year[23].

6(f) Reasons for Change in Burden

There is an increase of 8,530,946 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This increase is primarily due to the differing ICR burden estimation windows. The previous ICR covered the first three years after the promulgation of the LCRR when PWSs and primacy agencies could have been engaged in the regulatory startup/implementation activities identified in the currently approved ICR. This ICR renewal covers these same activities from the current ICR for only the first year of the renewal period (2024). In the next two years covered by the ICR renewal (2025 and 2026), if the LCRI is not promulgated as planned in 2024, both systems and primacy agencies would work to implement several ongoing, additional LCRR requirements.

Furthermore, over the next three years represented in this ICR renewal, the LCRR would require respondents to undertake additional actions beyond those in the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (OMB Control Number 2040-0204, EPA Tracking Number 1896.12).

6(g) Burden Statement

Exhibit 10 presents the net or incremental public reporting burden associated with this ICR. For the three-year period of analysis of this ICR renewal, the average net annual burden associated with this ICR is estimated to be 9,660,286 burden hours. The corresponding total respondent net costs are estimated to be $641,162,423 per year. EPA estimates the per respondent net annual burden for PWSs to be 124 hours. Net per respondent costs for PWSs are estimated to be $8,312 per year. The Agency estimates that the per respondent burden for primacy agencies is 22,519 hours per year. The corresponding net per respondent costs for primacy agencies are estimated to be $1,407,463 per year. There is no EPA burden or cost except where the Agency acts as the primacy agency.

The total number of respondents for this ICR is 67,712. Fifty-six of these respondents are primacy agencies and the remaining 67,656 respondents are water systems.

The net total number of responses for these respondents is 168,167,669 with 166,068,857 responses for water systems and 2,098,812 responses for primacy agencies. The average burden per response is 0.17 hours. The average cost per response is $11.44.

[22] Note estimated values for 2024 represent net values having subtracted 12/15th of the total estimated overlapping cost for the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (OMB Control Number 2040-0204, EPA Tracking Number 1896.12).

[23] Note estimated average annual values for 2025/2026 represent net values having subtracted 3/15th of the total estimated overlapping cost for the *Information Collection Request for the Disinfectants/Disinfection Byproducts, Chemical, and Radionuclides Rules* (OMB Control Number 2040-0204, EPA Tracking Number 1896.12).

These incremental/net burden and cost estimates represent those activities associated with LCRR regulatory requirements and EPA's SL Inventory Guidance that EPA expects would occur in the three-year period associated with this ICR (2024, 2025, and 2026). During this period, systems and primacy agencies would finish performing the initial, one-time activities related to rule review and primacy requirements. They would also begin activities that are required during full rule implementation (*e.g.*, primacy agencies reporting data to SDWIS and water systems reporting tap sampling, other monitoring results and regulatory milestones). PWSs when developing their initial and updated LSL inventories would follow the non-binding recommendations made in the SL Inventory Guidance.

Burden means the total time, effort, or financial resources expended by people to generate, maintain, retain, 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 request for information collection 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-2017-0300, 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), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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, to 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. Comments can also be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number (EPA-HQ-OW-2017-0300) and the OMB Control Number 2040-0297 in any correspondence.

APPENDIX A: SDWA Sections that Provide Authority for the Collection

Section 1401. For purposes of this title:

(1) The term “primary drinking water regulation” means a regulation which-

(D) contains criteria and procedures to assure a supply of drinking water which dependably complies with such maximum contaminant levels; including accepted methods for quality control and testing procedures to insure compliance with such levels and to insure proper operation and maintenance of the system, and requirements as to (i) the minimum quality of water which may be taken into the system and (ii) siting for new facilities for public water systems. At any time after promulgation of a regulation referred to in this paragraph, the Administrator may add equally effective quality control and testing procedures by guidance published in the Federal Register. Such procedures shall be treated as an alternative for public water systems to the quality control and testing procedures listed in the regulation.

Section 1413(a) For purposes of this title, a state has primary enforcement responsibility for public water systems during any period for which the Administration determines (pursuant to regulations under subsection (b)) that such state-

(1) has adopted drinking water regulations that are no less stringent than the national primary drinking water regulations promulgated by the Administrator under subsections (a) and (b) of section 1412 not later than 2 years after the date on which the regulations are promulgated by the Administrator, except that the Administrator may provide for an extension of not more than 2 years if, after submission and review of appropriate, adequate documentation from the state, the Administrator determines that the extension is necessary and justified;

(2) has adopted and is implementing adequate procedures for the enforcement of such state regulations, including conducting such monitoring and making such inspections as the Administrator may require by regulation;

(3) will keep such records and make such reports with respect to its activities under paragraphs (1) and (2) as the Administrator may require by regulation.

Section 1445 (a)(1)(A) Every person who is subject to any requirement of this title or who is a grantee, shall establish and maintain such records, make such reports, conduct such monitoring, and provide such information as the Administrator may reasonably require by regulation to assist the Administrator in establishing regulations under this title, in determining whether such person has acted or is acting in compliance with this title, in administering any program of financial assistance under this title, in evaluating the health risks of unregulated contaminants, or in advising the public of such risks. In requiring a public water system to monitor under this subsection, the Administrator may take into consideration the system size and the contaminants likely to be found in the system's drinking water.

(B) Every person who is subject to a national primary drinking water regulation under section 1412 shall provide such information as the Administrator may reasonably require, after consultation with the state in which such person is located if such state has primary enforcement

responsibility for public water systems, on a case-by-case basis, to determine whether such person has acted or is acting in compliance with this title.

(C) Every person who is subject to a national primary drinking water regulation under SDWA Section 1412 shall provide such information as the Administrator may reasonably require to assist the Administrator in establishing regulations under SDWA Section 1412 of this title after consultation with primacy agencies and suppliers of water. The Administrator may not require, under this subparagraph, the installation of treatment equipment or process changes, the testing of treatment technology, or the analysis or processing of monitoring samples, except where the Administrator provides the funding for such activities. Before exercising this authority, the Administrator shall first seek to obtain the information by voluntary submission.

(D) The Administrator shall, no later than two years after the date of enactment of this subparagraph and after consultation with public health experts, representatives of the general public, and officials of state and local governments, review the monitoring requirements for no fewer than 12 contaminants identified by the Administrator and promulgate any necessary modifications.

APPENDIX B: Burden Assumptions[24]

While most of the burden and non-labor estimates used in this analysis come directly from the *Economic Analysis for the Final Lead and Copper Rule Revisions*, EPA used updated data for a subset of modeling inputs. The new data include as estimate of the number of LSL from the 7th Drinking Water Infrastructure Needs Survey and Assessment, estimated initial lead 90th percentile system categorization from updated SDWIS/Fed information, and estimated unit burden and non-labor cost estimates for the initial inventory and inventory updates. The updated inputs are presented below, and additional detail on these inputs can be found in Docket Number EPA-HQ-OW-2017-0300.

7th Drinking Water Infrastructure Needs Survey and Assessment (DWINSA)

EPA derived the estimated percent of systems with service lines of different material (**Exhibit 11**) and the percent of service lines of different materials within those systems (**Exhibit 12**) from responses to specific questions on service lines in the 7th Drinking Water Infrastructure Needs Survey and Assessment (DWINSA). All PWSs participating in DWINSA were asked to provide preliminary information on lead connectors, LSLs, galvanized service lines, and unknown service lines. For this analysis, EPA assumed lead content is any service line reported as having a lead pipe, lead connector, galvanized pipe previously downstream of an LSL, and galvanized pipe downstream of a lead connector or connector of unknown material. For additional information on the derivation of these lead service line values, see document EPA-HQ-OW-2017-0300-1906 in EPA Docket EPA-HQ-OW-2017-0300 at www.regulations.gov.

Exhibit 11. Percent of Systems with Service Lines (SL) of Lead and/or Unknown Content

Population Category	CCT Status	Percent of Systems with Lead Content (may also contain unknown SLs)	Percent of Systems with No SL Material Known	Percent of Systems with Non-Lead SLs and Unknown SLs
< 101	No	2%	40%	6%
< 101	Yes	9%	34%	6%
101-500	No	2%	40%	6%
101-500	Yes	9%	34%	6%
501-1,000	No	2%	40%	6%
501-1,000	Yes	9%	34%	6%
1,001-3,300	No	2%	40%	6%
1,001-3,300	Yes	9%	34%	6%
3,301-10,000	No	21%	14%	9%
3,301-10,000	Yes	22%	21%	13%
10,001-50,000	No	33%	9%	13%
10,001-50,000	Yes	36%	15%	13%
50,001-100,000	No	0%	20%	22%
50,001-100,000	Yes	40%	13%	15%
100,001-1,000,000	No	0%	0%	14%
100,001-1,000,000	Yes	42%	10%	17%
> 1,000,000	No	0%	0%	0%
> 1,000,000	Yes	59%	3%	18%

[24] Derivation of the burden and rate estimates are provided in the *Economic Analysis for the Final Lead and Copper Rule Revisions*, EPA-HQ-OW-2017-0300.

Exhibit 12. Percent of Service Lines per System by Content

Population Category	Percent of Service Lines in "Lead Content" Systems that are Known	Percent of Service Lines in systems designated as "Lead Content" and "Non-Lead SLs and Unknown" that are Unknown	Percent of Known Service Lines that are Lead
< 101	73%	27%	36%
101-500	73%	27%	36%
501-1000	73%	27%	36%
10001-3300	73%	27%	36%
3301-10000	70%	30%	44%
10001-50000	70%	30%	30%
50000-100000	72%	28%	24%
100000-1000000	72%	28%	22%
GT 1000000	76%	24%	17%

Initial Lead 90th Percentile Categorization

EPA estimated a system's initial lead 90th percentile (P90) for the LCRR. Since the publication of the Final Rule, EPA has updated these estimates based on the P90 values reported to SDWIS/Fed from 2012 to 2020 and adjusted to account for the required tap sampling protocols required by the LCRR. These values represent a high end estimate of P90 values given EPA use of higher annual reported P90 values from SDWIS/Fed and larger multipliers used in the LCRR tap sampling adjustment process. **Exhibit 13** presents the percentages applied to systems to assign them to P90 bins that either 1) have P90s less than or equal to the TL, 2) have P90 values exceeding the TL but are less than or equal to the AL, or 3) have P90s that exceed the AL. For additional information on the derivation of these values, see document EPA-HQ-OW-2017-0300-1907 in EPA Docket EPA-HQ-OW-2017-0300 at www.regulations.gov.

Exhibit 13. Percent of Systems in Different Lead 90th Percentile (P90) Binning Categorizations (Assuming LCRR Tap Sampling Protocols)

Category	No LSLs	Has LSLs
P90 ≤ 0.010 mg/L	91.0%	61.2%
0.010 mg/L < P90 ≤ 0.015 mg/L	4.0%	13.3%
P90 > 0.015 mg/L	5.0%	25.5%

Initial Inventory and Inventory Update Unit Burden and Non-labor Cost Estimates

EPA estimated updated unit burden and costs for CWSs and NTCWSs with lead content and/or unknown service lines to prepare their initial inventories. Note EPA also included some costs to make inventories publicly accessible in this burden and cost category. Additional detail on the derivation of these estimates can be found in document EPA-HQ-OW-2017-0300-1908 in EPA docket EPA-HQ-OW-2017-0300 at www.regulations.gov. The estimates for CWS are presented in **Exhibit 14**. The estimates for NTNCWS are presented in **Exhibit 15**.

Exhibit 14. Estimated Unit Burden and Costs for CWSs to Prepare the Initial Inventory or Certify no LSLs (2021$)

System Size (Population Served)	Hours per CWS with LSLs and/or unknown SLs to conduct initial inventory	Hours per CWS with LSLs and/or unknown SLs to compile information and submit to primacy agency	Non-labor cost per CWS with LSLs and/or unknown SLs to make publicly available initial inventory	Hours per CWS with no LSLs or unknown SLs to compile information, make publicly available, and submit to primacy agency
< 101	6	10	-	12
101-500	7	10	-	12
501-1,000	11	10	-	12
1,001-3,300	21	10	-	12
3,301-10,000	50	20	-	22
10,001-50,000	142	20	-	22
50,001-100,000	517	40	$25.00	42
100,001-1,000,000	1,228	40	$156.25	42
> 1,000,000	9,290	40	$156.25	42

Exhibit 15. Estimated Unit Burden for NTNCWSs to Prepare the Initial Inventory or Certify no LSLs

System Size (Population Served)	Hours per NTNCWS with LSLs and/or unknown lines to compile information, make publicly available, and submit to primacy agency	Hours per NTNCWS with no LSLs or unknown lines to compile information, make publicly available, and submit to primacy agency
< 101	10	7
101-500	10	7
501-1,000	10	7
1,001-3,300	10	7
3,301-10,000	20	12
10,001-50,000	20	12
50,001-100,000	40	22
100,001-1,000,000	40	22

EPA also estimated burden and costs for CWSs with lead content and/or unknown service lines to update their inventories based on EPA guidance. These potential unit burden and costs associated with PWSs following the recommendations of the SL Inventory Guidance are shown in **Exhibit 16**. Additional detail on the derivation of these estimates can be found in document EPA-HQ-OW-2017-0300-1908 in EPA docket EPA-HQ-OW-2017-0300 at www.regulations.gov. All other inventory unit burden and cost estimates for systems and primacy agencies remain the same as in the final LCRR. EPA determined that the estimated values from the final LCRR sufficiently captured the burden and cost associated with the SL Inventory Guidance recommendations.

Exhibit 16. Estimated Unit Burden and Costs for CWSs with LSLs and/or Unknowns to Update the Inventory (2021$)

System Size (Population Served)	Hours per CWS with LSLs and/or unknown lines to update inventory	Non-labor cost per CWS with LSLs and/or unknown lines to update inventory
< 101	1	$86
101-500	3	$340
501-1,000	9	$970
1,001-3,300	23	$2,098
3,301-10,000	67	$6,154
10,001-50,000	207	$16,119
50,001-100,000	516	$40,250
100,001-1,000,000	541	$126,576
> 1,000,000	4524	$1,057,604