U.S. Environmental Protection Agency
Information Collection Request

Title: Textile Mills Industry Data Collection

OMB Control Number: 2040-NEW

EPA ICR Number: 2798.01

Abstract: As announced in the Effluent Guidelines Program Plan 15, published in January 2023, the EPA plans to continue its detailed study investigating PFAS discharges from facilities in the Textile Mills point source category. Based on information and data collected during the Multi-Industry PFAS Study and the Textile Mills Detailed Study to date, the EPA determined PFAS are used by some textile manufacturing facilities to impart water, grease, and stain resistance to finished textiles, including consumer apparel, carpets, and technical textiles.

The EPA, through this Information Collection Request (ICR) package, requests that the Office of Management and Budget (OMB) review and approve the ICR for the Textile Mills Detailed Study. Through this collection, the EPA will obtain data essential to determine if updated regulations are required to address PFAS in wastewater discharges from textile manufacturing facilities, including facilities regulated under the Textile Mills point source category as specified by the Effluent Limitations Guidelines and Standards (ELGs) codified in Title 40 of the Code of Federal Regulations (CFR) Part 410. This collection effort is necessary because national data on PFAS use, treatment, and discharge at textile manufacturing facilities is not currently available and the EPA requires detailed information on industry practices to determine whether technology based ELGs are appropriate for the textile industry.

The Textile Mills industry will devote time and resources to respond to this ICR. The EPA estimates that the total burden to the approximately 2,200 textile manufacturing facilities for responding to the questionnaire and the approximately 20 facilities participating in the wastewater sampling program will be approximately 22,863 hours, or $1.62 million, including labor and other direct costs. The EPA estimates that the total burden to the Agency for the questionnaire will be approximately 5,011 hours, or $641,524, including labor costs and other direct costs. The collection design represents the EPA's efforts to gather sufficient data to perform the analyses required to accurately review the ELGs for textile manufacturing operations, yet at the same time, administer an ICR that limits the burden placed on respondents.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

For many decades, industrial facilities have used and discharged per- and polyfluoroalkyl substances (PFAS) to the nation's waters. PFAS are a class of synthetic chemicals of concern to the United States Environmental Protection Agency (EPA) because of their widespread use, potential to accumulate in the environment, and adverse human health effects. The EPA has not established national technology-based numeric standards for PFAS in wastewater discharges for any industrial point source category and few states have developed water quality standards for PFAS. Therefore, few industrial facilities have PFAS monitoring requirements, effluent limitations, or pretreatment standards for wastewater discharges.

The EPA initially promulgated the Textile Mills ELGs in 1974 and last amended the regulations in 1982. The current regulation covers wastewater discharges from direct discharger facilities performing various textile manufacturing operations.

Textile manufacturing facilities (i.e., textile mills) receive and prepare fibers; transform fibers into yarn, thread, and webbing; convert yarn and webbing into fabric or related products; and finish textile materials using various chemical and physical applications. Within the textile mill industry, there are nine subcategories to which the regulation applies, listed in Table 1-1. Since the Textile Mills ELG promulgation in 1974, synthetic textiles and fiber production has increased. Facilities that manufacture synthetic textile materials may additionally be subject to other ELGs, including the Plastics Molding and Forming (40 CFR Part 463), Organic Chemicals, Synthetic Fibers, and Plastics (40 CFR Part 414) ELGs. The EPA is considering all facilities manufacturing natural and synthetic textile products as part of the Textile Mills Detailed Study.

TABLE 1-1. 40 CFR PART 410 SUBPARTS

40 CFR § 410 Subpart	Description
Subpart A - Wool Scouring	The provisions of this subpart are applicable to process wastewater discharges resulting from the following types of textile mills: wool scouring, topmaking, and general cleaning of raw wool.
Subpart B - Wool Finishing	The provisions of this subpart are applicable to process wastewater discharges resulting from the following types of textile mills: wool finishers, including carbonizing, fulling, dyeing, bleaching, rinsing, fireproofing, and other such similar processes.
Subpart C - Low Water Use Processing	The provisions of this subpart are applicable to process wastewater discharges resulting from the following types of textile mills: yarn manufacture, yarn texturizing, unfinished fabric manufacture, fabric coating, fabric laminating, tire cord and fabric dipping, and carpet tufting and carpet backing. Rubberized or rubber coated fabrics regulated by 40 CFR part 428 are specifically excluded.

Subpart D - Woven Fabric Finishing	The provisions of this subpart are applicable to process wastewater discharges resulting from the following types of textile mills: woven fabric finishers, which may include desizing, bleaching, mercerizing, dyeing, printing, resin treatment, water proofing, flame proofing, soil repellency application and a special finish application.
Subpart E - Knit Fabric Finishing	The provisions of this subpart are applicable to process wastewater discharges resulting from the following types of textile mills: knit fabric finishers, which may include bleaching, mercerizing, dyeing, printing, resin treatment, water proofing, flame proofing, soil repellency application and a special finish application.
Subpart F - Carpet Finishing	The provisions of this subpart are applicable to process wastewater discharges resulting from the following types of textile mills: carpet mills, which may bleaching, scouring, carbonizing, fulling, dyeing, printing, resin treatment, waterproofing, flameproofing, soil repellency, looping, and backing with foamed and unfoamed latex and jute. Carpet backing without other carpet manufacturing operations is included in subpart C.
Subpart G - Stock and Yarn Finishing	The provisions of this subpart are applicable to process wastewater discharges resulting from the following types of textile mills: stock or yarn dyeing or finishing, which may include cleaning, scouring, bleaching, mercerizing, dyeing and special finishing.
Subpart H - Nonwoven Manufacturing	The provisions of this subpart are applicable to process wastewater discharges resulting from facilities that primarily manufacture nonwoven textile products of wool, cotton, or synthetics, singly or as blends, by mechanical, thermal, and/or adhesive bonding procedures. Nonwoven products produced by fulling and felting processes are covered in subpart I - Felted Fabric Processing.
Subpart I - Felted Fabric Processing	The provisions of this subpart are applicable to process wastewater discharges resulting from facilities that primarily manufacture nonwoven products by employing fulling and felting operations as a means of achieving fiber bonding.

Through the Multi-Industry PFAS Study and Textile Mills Detailed Study, the EPA determined that PFAS may enter textile manufacturing wastewater streams as part of fabric finishing processes including fabric coating, laminating, waterproofing, soil repellency, and flameproofing. In November 2021, the EPA administered a data collection request under CWA Section 308 authority to nine entities that the EPA identified as textile manufacturing companies likely to have used PFAS. As stated in ELG Program Plan 15, published January 2023, the EPA concluded that the data received from this request were insufficient to determine whether revisions to the Textile Mills ELGs are needed to address nationwide PFAS discharges from the textile manufacturing industry. The data collection activities described in this ICR will provide a robust data set that characterizes PFAS use and wastewater generation, treatment, and discharge from textile manufacturing facilities in the United States.

Based on current information and data available for textile manufacturing facilities, the EPA believes approximately 50% are direct dischargers to surface waters and the remaining are either indirect

dischargers (discharge to a POTW or third-party treatment facility) or do not discharge process wastewaters. Direct dischargers report monitoring data as part of their wastewater permit requirements and the data are publicly available through EPA systems, such as Integrated Compliance Information System – National Pollutant Discharge Elimination System (ICIS-NPDES). Data from indirect dischargers are not publicly available in a national, centralized system but instead are maintained at the state or pretreatment authority. Further, most textile manufacturing facilities are not required to sample or report for PFAS in their wastewater regardless of whether they are direct or indirect dischargers. The EPA will use data collected through the questionnaire and wastewater sampling program to characterize operations, wastewater generation, wastewater characteristics, wastewater management, and wastewater discharges across all textile manufacturing facilities in the United States regardless of size, geography, production, type of discharge, and current management practices.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The EPA's Office of Water plans to administer the data collection, including a one-time questionnaire and wastewater sampling program, under the authority of Section 308 of the Federal Water Pollution Control Act, 33 USC., Section 1318 (Clean Water Act). The EPA first plans to administer a questionnaire as a census to all facilities that currently or historically conducted textile mill operations in the United States. Based on the data sources discussed in section 4, the EPA has identified and compiled mailing addresses for approximately 2,200 textile manufacturing facilities in the United States. All active textile manufacturing facilities that conduct or have conducted one or more of the specified operations will be required to complete the questionnaire regardless of size, geography, production, and whether the facility discharges wastewater directly to surface waters, indirectly to surface waters through POTWs, or does not discharge wastewater. No single existing data source includes information for all facilities engaging in one or more of the specified operations. The EPA will continue to refine the list of facilities by identifying additional or duplicate facilities and collaborating with state regulatory authorities and textile industry trade associations, including the Carpet and Rug Institute (CRI), the National Carpet and Textile Organization (NCTO), and the American Association of Textile Chemists and Colorists (AATCC) before administering the questionnaire. For the purposes of this ICR, the EPA estimates the population of textile manufacturing facilities that will receive and be required to complete the questionnaire as 2,200 facilities.

The objectives of the questionnaire will be to confirm the population of facilities that engage or have engaged in textile manufacturing operations, identify facilities that discharge wastewater either directly to surface waters or indirectly to surface waters through POTWs, and gather facility-specific information and data relevant to generation and discharge of PFAS-containing wastewater by the industry. The EPA will request the following types of information:

- General facility identification, industrial classification, ELG applicability, and wastewater permitting information.
- Type and size (both production and employees) of each facility.
- Details on textile mill operations, including the type(s) of products manufactured and types of processes performed.
- Use of PFAS in textile mill operations, including type and quantity of PFAS used, rationale for use, and whether these operations generate PFAS-containing wastewater.
- Wastewater generation, characteristics (including PFAS and other pollutant concentrations and flow rate), and management data.

The EPA will use the questionnaire data to refine the national profile of textile manufacturing facilities from which additional data collection, including site visits or wastewater sampling, may be based. The EPA will also use the questionnaire data to evaluate the current technology-based ELGs and determine if revised requirements are warranted to address PFAS and other pollutants (as the EPA Administrator deems appropriate) in wastewater discharges, as directed under section 306 of the Clean Water Act. The EPA will collect and analyze information pertaining to wastewater characteristics (e.g., pollutants discharged, wastewater flows), and pollution control practices and technologies (e.g., pollution prevention techniques, wastewater treatment units). Specifically, the EPA will use responses to characterize the type and quantity of PFAS discharged from textile manufacturing facilities, identify alternatives to using PFAS in textile finishing operations, and to determine if PFAS discharges can be controlled using demonstrated pollution control practices and technologies.

Following receipt of the completed questionnaires, the EPA will request approximately 20 textile manufacturing facilities to collect wastewater samples. The EPA will provide sampling supplies to each facility selected for the wastewater sampling program and contract laboratories to analyze samples collected. The wastewater sampling program will generate information and data critical to characterizing wastewaters generated and discharged by textile manufacturing facilities and assess capability of existing wastewater treatment units to reduce or eliminate PFAS. The EPA will use information and data collected via the questionnaire to identify participants in the wastewater sampling program. In selecting facilities to participate in the wastewater sampling program, the EPA will target a mix of facility types, sizes, and current technologies and practices such that the data generated reflect wastewater from all types of textile manufacturing operations. The wastewater sampling data collected will be used to characterize wastewater discharges from the industry, including PFAS discharges and facility treatment system capabilities.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for

adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The EPA plans to develop the questionnaire in Qualtrics, which allows respondents to fill out and submit the questionnaire online. The Qualtrics questionnaire will be developed to meet the 1998 Government Paperwork Elimination Act (GPEA). The EPA anticipates that most respondents will be familiar and comfortable with online submission forms. Additionally, the Qualtrics questionnaire will include automatic validation checks to minimize data entry errors and allow for automatic export of a response data set, reducing the potential for errors introduced by key-entry of data. The EPA's email and phone helpline will also be available during the response period to assist facilities with submitting responses.

The EPA designed the questionnaire to include burden-reducing features. For example, the questionnaire contains "screening" questions that direct respondents that do not qualify as the population of interest for a particular subset of questions to indicate their status and then bypass this subset of questions. The questionnaire is also designed with drop down menus to simplify and standardize responses, minimizing the number of narrative text responses.

The EPA will provide a mechanism for facilities to respond with a hardcopy mailed response if the facility cannot access the internet. The EPA anticipates this situation to affect less than 2 percent of the total population that receives the questionnaire.

Each textile manufacturing facility will receive a questionnaire notification letter which provides instructions, a URL to an EPA webpage, and a facility-specific log in and access code. Facilities will access the URL, be directed via a button link on the EPA webpage to the login webpage, and log in using the access code in the notification letter. The web-based survey will allow for electronic review and completion of the questionnaire. The questionnaire notification letter will also include instructions for respondents unable to access the online version. This letter will be sent via the United States Postal Service or other delivery service to each facility and will ensure that a facility point of contact receives and signs for it. Each facility selected for the questionnaire will be allowed 60 calendar days from the time of receipt to submit the completed questionnaire.

The EPA will include a helpline email address and phone number in the instructions that respondents can use to request assistance in completing the questionnaire. Using these assistance methods enables respondents to receive a timely response to any inquiries they may have. Email and phone communication will also reduce any misinterpretations of the questionnaire and the burden of follow-up phone calls and letters to respondents.

The questionnaire will include information relevant to the purpose and authority under which the EPA is conducting the survey; instructions for accessing, completing, and submitting the questionnaire; information on confidential business information (CBI) claims; and a glossary with all pertinent definitions, references, and acronyms to understand and complete the questionnaire. On the EPA

website, downloadable PDF copies of the questionnaire will be available for respondents to print out and use as a working copy, helping them gather and organize response data before beginning data entry.

Facilities that are unable to access the online version will be directed to contact the EPA. Upon contacting the EPA, staff will mail a package via the United States Postal Service or other trackable delivery service, containing a hardcopy questionnaire. Respondents may also request a PDF version of the questionnaire be delivered via email that they can print on site. Hardcopy questionnaires can be filled out by hand and returned to the EPA by mail. The EPA and its contractors will enter the hardcopy questionnaire responses into Qualtrics so all responses can be reviewed and analyzed in a consistent format.

Once the questionnaire response period is complete, the EPA and its contractors will export all responses from Qualtrics and review the questionnaire responses for completeness and CBI claims. Responses will also be reviewed for consistency and reasonableness and follow-up calls will be conducted as needed to clarify inconsistencies found in the responses. Questionnaire responses will be imported into a questionnaire database which will be used by the EPA to perform data analysis for the purpose of determining whether revisions to the ELGs are warranted.

In addition to technical data provided by facilities in the questionnaire, the EPA intends to collect and analyze wastewater samples from a subset of respondents to characterize types and quantities of PFAS in textile manufacturing wastewater and evaluate the performance of available pollution control practices and technologies. In this case, each textile manufacturing facility selected to conduct sampling and analysis of analytical data will be contacted by the EPA directly with instructions on how to participate in wastewater sampling activities. The EPA will coordinate with each facility to develop detailed facility-specific sampling plans and determine when sampling should occur. Facilities will submit sampling data to the EPA electronically.

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The EPA identified the 2022 Davison's Textile Blue Book as the primary source for identifying the population of textile manufacturing facilities in the United States. The EPA used this self-reported directory, as well as other data sources listed in Table 4-1, to establish a list of recipients for the questionnaire and to evaluate existing facility and/or wastewater characteristics.

TABLE 4-1. EXISTING DATA SOURCES

Data Source Name	Date of Data Collection	Population Included	Data Available	Considerations
Davison's 2022 Textile Blue Book – Mills, Dyers, and Finishers	2022	The Blue Book consists of two lists: Textile Mills, Dyers, and Finishers; and Textile Suppliers. Self-reported U.S. facilities in the Textiles Mills, Dyers, and Finishers list were included. 2,145 records.	•Facility Name and Address •Process Description/Type •Textile/Fiber Type •Contact Information •Number of Employees	List includes facilities outside of the U.S. Information is self-reported and may reflect corporate or facility-level details. Thus, if corporate details are provided, the blue book may not capture every facility under one parent company. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge.
2021 Textiles Mills 308 Data Request	2021	Facilities associated with one of the nine parent companies that were issued the data request. 92 records.	•Facility Name and Address •NAICS/SIC Code •Process Description •Contact Information •FRS ID •PFAS Use •Closure Information	Responses to the PFAS data requests capture a complete set of information for facilities operated by the nine recipients, which may not be representative of the entire PFAS manufacturing industry.
Region and State Permitting Authorities	2021-2022	Facilities on lists provided by states. AL: 29 records. GA: 19 records. NC: 14 records. NJ: 16 records. MI, NH, WI: 1 record each.	•Facility Name and Address •Latitude/Longitude •NAICS/SIC Code •Process Description •Contact Information •PFAS Use •Discharge Information •NPDES and Pretreatment IDs •Treatment Information	The lists obtained do not cover every state with textile manufacturing as only states that were contacted for EPA outreach provided lists. Not all state data provides the same facility-level details, including information on processes, PFAS use/discharge, or wastewater generation or management.
Discharge Monitoring Reports (DMRs)	2022	Facilities with discharge monitoring requirements in a NPDES permit that submit DMRs to the EPA.	•Facility Name and Address •Latitude/Longitude •NAICS/SIC Code •NPDES Permit ID •Discharge information for limited pollutants.	Most facilities with DMR requirements are direct dischargers. Additionally, few if any permits for textile mills include PFAS effluent limitations.

As demonstrated in Table 4-1, none of the existing data sources provide a complete listing of all textile manufacturing facilities in the United States nor do they all include information on PFAS use, wastewater generation or management, and PFAS discharge. The EPA extracted and aggregated information from these data sources to develop a best available listing of textile manufacturing facilities. However, facility names and addresses are often inconsistent and may change over time as ownership changes or addresses of record change. Based on the data evaluated to date, the EPA estimates the population of textile manufacturing facilities is approximately 2,200 facilities. While the EPA has attempted to identify duplicate records based on similar facility name, city/state address, and other unique identifiers, some duplicate records may still exist. The EPA will continue to coordinate with industry trade associations to identify additional duplicate records and facilities included on the facility list that may not perform textile mill operations or may no longer be operating.

The EPA last collected industry wide data for textiles mills under the ELG planning program in 1996 through a previous study. The EPA is aware of a general decreasing trend in the size of the Textile Mills industry since the 1990's, as reported by several state regulating agencies in meetings held in 2021 and 2022. Although the consulted sources have provided valuable industry information, and the EPA has and will continue to use this information to understand current industry practices, these sources do not provide the Agency with complete and up-to-date site-specific technical and economic data that covers the entire textile mill industry and are crucial to the review of the Textile Mills ELGs.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

In accordance with requirements of the Regulatory Flexibility Act (RFA), the EPA must assess whether actions would have "a significant impact on a substantial number of small entities" (SISNOSE). Small entities include small businesses, small organizations, and small governmental jurisdictions.

The EPA has taken steps to ensure that the respondent burden is minimized for small entities, while collecting sufficient data to evaluate regulatory flexibility for small entities. To minimize the burden of responding to the questionnaire, the EPA has written a series of questions that will preclude facilities from completing the entire questionnaire if they are identified as not textile mill operations or if the facility has never used PFAS as part of textile manufacturing. Additionally, the questions are phrased with commonly used terminology and the tables are organized in formats familiar to the respondent industry. Based on consultations with industry representatives, the EPA expects that the majority of small entities will not meet the criteria to complete the full questionnaire.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The questionnaire and wastewater sampling program are to be administered one time only. If the data collection is not conducted, the EPA will not be able to fulfill its statutory requirement to consider revising the Textile Mills ELGs. The currently available data do not include wastewater quantity and quality characteristics information, particularly for PFAS. Information on pollution control practices and technologies is available in some permits and/or permit applications, but this information requires manual review of permit and permit application documents, permit applications may not be publicly available, and information would not be available for all textile manufacturing facilities. In addition, if the national population of all textile manufacturing facilities is not identified, it will not be possible to confirm whether population estimates are accurate. Without the data sought in the questionnaire, the EPA will be required to rely on the publicly available data listed in section 4. In general, these data sets are incomplete, inconsistent, and difficult to combine. The publicly available data are not sufficient to assess the current industry population, evaluate subcategories in the current ELG or future ELGs, assess use and discharge of PFAS, determine characteristics of wastewater and wastewater treatment currently occurring at textile manufacturing facilities, or evaluate new pollution control practices and technologies that are being used, especially for indirect discharging facilities which comprise a significant portion of the sector.

The questionnaire will collect data from all textile manufacturing facilities on production processes, PFAS use and discharge, wastewater and solid waste generated, and wastewater management and treatment, (see Section 12 for more specific detail). Production data from all facilities will help the EPA assess extent of PFAS use by textile manufacturing facilities and relationships to production type and size, type of wastewater discharge, and other aspects of facility operation including shifts in processing and seasonality. Data on wastewater generation and management will allow the EPA to establish an accurate characterization of type and quantity of PFAS in wastewater and develop a current profile of the textile mill industry to estimate the pollutant mass loads discharged. Pollution prevention and wastewater treatment details will provide insight into the type and design of current treatment technologies employed and treatment system capabilities to reduce or eliminate PFAS discharge. Overall, information on PFAS use and discharge, wastewater generation, and wastewater management are limited and only available publicly for a small subset of the industry.

If this questionnaire is not conducted, the EPA would need to estimate or interpolate PFAS use, control, and discharge data for the majority of facilities where data are not available. The EPA will also not be able to evaluate current operations or wastewater treatment capabilities or identify the extent to which PFAS and other pollutant discharges could be reduced or eliminated within the industry. Without these

analyses, determining whether it is necessary for the EPA to develop new or revise existing ELGs would not be possible.

Wastewater sampling data collected through this ICR are critical for characterizing the wastewater generated by textile manufacturing facilities and the wastewater discharged by textile manufacturing facilities, as well as evaluating the effectiveness of pollution control practices and technologies to reduce or eliminate PFAS in discharges. These characterization data will be used to estimate current pollutant mass loads and achievable load reductions for available technologies for the industry and to determine if the ELGs warrant revision. The EPA has previously used publicly available data sets, such as effluent discharge characterization data reported in discharge monitoring reports (DMRs), to characterize industry pollutant discharges. Textile manufacturing facilities are not currently required to sample for and report PFAS in DMRs, and data on the wastewater generated or discharged from indirect facilities are typically not publicly available through national data sets. Publicly available PFAS concentration data is available from a handful of state studies on a small subset of the textile mills industry. The EPA additionally collected information from 92 textile facilities through the 2021 Textile Mills 308 Request. These facilities were not required to conduct PFAS sampling through the 308 Request; rather, they submitted PFAS characterization data that had been collected through any previous sampling efforts. This data set represents an additional subset of facilities within the industry and does not necessarily include PFAS characterization data for process wastewaters. A wastewater sampling effort is necessary for the EPA to accurately characterize PFAS discharges across the textiles manufacturing industry and determine if the ELGs warrant revisions.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

The EPA published a notice in the Federal Register on November 28, 2023 (88 FR 83125), announcing the Agency’s intent to submit a request for a new ICR and to collect comments on the draft initial

questionnaire and the draft list of textile manufacturing facilities in the United States. The notice included a description of the entities to be affected by the proposed questionnaire, a brief explanation of the need for the questionnaire, identification of the authority under which the questionnaire will be issued, and an estimate of burden to be incurred by questionnaire respondents. The Agency requested comments and suggestions regarding the questionnaire and draft facility list and the reduction of data collection burden.

Pursuant to section 3506(c)(2)(A) of the Paperwork Reduction Act (PRA), the EPA solicited comments and information to enable it to:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility.
- Evaluate the accuracy of the Agency's estimate of burden of the proposed collection of information, including the validity of the methodology and assumptions used.
- Enhance the quality, unity, and clarity of the information to be collected.
- Minimize the burden of the collection of information on those who are to respond.

The EPA received two comment letters in response to the Federal Register notice. The comments were submitted by Mount Vernon Mills, Inc., a textile manufacturing facility, and the National Council of Textile Organizations (NCTO), an industry trade association. Overall, the comments requested the EPA to clarify the relevance of the data requests to the EPA's ELG planning process and to streamline or remove questions from the questionnaire to minimize burden on respondents. Specific comment excerpts and the EPA's responses are summarized below.

- NCTO and Mount Vernon Mills stated that PFAS use in the textiles industry is a decreasing over time and represents a small portion of the national textiles industry. Further they state that revisions to the ELGs would increase the regulatory burden and provide an advantage to offshore competitors. The purpose of the detailed study is to determine whether revisions to the existing ELGs are warranted. The EPA will use data collected through the questionnaire and sampling program to evaluate the current population of textile mills in the U.S., the applicability of the existing ELGs, and the extent of PFAS use and discharges from the textiles industry to inform this decision. The EPA increased the expected percentage of respondents who have never used PFAS to 50 percent to address this comment.
- NCTO and Mount Vernon Mills recommend moving Question 17 to Section 1 of the Questionnaire to allow facilities that have never used PFAS to more quickly complete and exit the survey. The EPA is collecting information about the entire textiles industry in the United States, including those that do not use PFAS. The questionnaire is designed to minimize burden to facilities that have never used PFAS while also providing the EPA with a complete picture of the industry and its wastewater discharges.

- NCTO recommends incorporating a consolidation feature in the survey for companies with multiple manufacturing plants. The EPA identified individual facilities to include in the survey population, which should all complete the questionnaire in order to capture the industry level data needed to evaluate the ELGs.

The data collected through this ICR will allow the EPA to profile the textile manufacturing industry, assess current wastewater discharges from the industry, identify PFAS use in the industry, and assess whether technology-based requirements are warranted to address PFAS discharges. The EPA is continuing to evaluate the Textile Mills ELGs and pursue the industry data collection.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Engineering and Analysis Division (EAD) of EPA's Office of Water has consulted with individuals in EPA Offices, Regions, and States. EAD has also engaged with local permitting authorities and industry trade associations.

Consultations with the seven state environmental agencies, listed in Table 8-1, provided information on the number, location, operations, and wastewater characteristics of textile manufacturing facilities in these states. Additionally, state agencies provided important perspectives on PFAS use and trends in textile manufacturing facilities. However, the EPA was not able to conduct outreach to every state agency, nor did every state have the same types of data or level of detail available for textile manufacturing facilities.

TABLE 8-1. STATE AGENCY CONSULTATIONS

State Environmental Agency
Alabama Department of Environmental Management
Georgia Department of Natural Resources
Maine Department of Environmental Protection
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
North Carolina Department of Environmental Quality
New Hampshire Department of Environmental Services
New Jersey Department of Environmental Protection
Rhode Island Department of Environmental Management
Wisconsin Department of Natural Resources

The EPA intends to additionally request input from textile industry trade groups, including the National Council of Textile Organization (NCTO), the Carpet and Rug Institute (CRI), and the American Association of Textile Chemists and Colorists (AATCC), on the questionnaire and facility list before administering the ICR.

9. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

10. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

In accordance with 40 CFR, Part 2, Subpart B, the questionnaire informs respondents of their right to claim information as CBI. The questionnaire provides instructions for asserting CBI claims and informs respondents of the terms and rules governing the protection of CBI under the Clean Water Act and 40 CFR §2.203(b). For each question which requests information that may potentially be claimed as CBI, responses will have a corresponding CBI checkbox. Respondents will be requested to check all CBI boxes which correspond to responses they claim as CBI.

If no business confidentiality claim accompanies the information when it is received by EPA, EPA may make the information available to the public without further notice. 40 CFR §2.203.

The EPA and its contractors will follow EAD's existing procedures to protect information claimed as CBI. These procedures include the following:

- Ensure secure handling of submitted and exported questionnaire data to preclude access by unauthorized personnel.
- Store exported questionnaire data and databases in secured areas of offices and system networks and restrict access to authorized EPA and contractor personnel only.
- Restrict any publication or dissemination of confidential results or findings to aggregate statistics and coded listings. Individual respondents will not be identified in summary reports.

The EPA has ensured that Qualtrics meets the EPA's regulations and policies for handling information claimed as CBI. EPA will design the Qualtrics questionnaire to require authentication and verification of the respondents to allow access to the questionnaire, allow users to mark information claimed as CBI,

provide secure storage and limit access to the EPA and the EPA's contractors, and require users to certify the completed questionnaire.

Each EPA contractor that collects, processes, or stores information claimed as CBI is responsible for the proper handling of that information. Each contractor shall safeguard such information as described in 40 CFR §2.211(d) and is obligated to use or disclose information only as permitted by the contract under which the information is furnished.

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No sensitive questions pertaining to private or personal information, such as sexual behavior or religious beliefs, will be asked in the questionnaire or as part of the wastewater sampling.

12. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

12a. Respondents/NAICS Codes

The questionnaire will collect information from an estimated 2,200 textile manufacturing facilities located in the United States. The subsequent wastewater sampling program will require a subset of approximately 20 textile manufacturing facilities that completed the questionnaire to also collect wastewater samples and submit them to an EPA-contracted laboratory. The respondents affected by this ICR are primarily classified under the following NAICS codes:

- 3131 – Fiber, Yarn, and Thread Mills.

- 3132 – Fabric Mills.
- 3133 – Textile and Fabric Finishing and Fabric Coating Mills
- 3252 – Resin, Synthetic Rubber, and Artificial and Synthetic Fibers and Filaments Manufacturing

As previously stated, not all facilities reporting the above NAICS codes will receive or complete the questionnaire. The EPA used the 2022 Davison's Textile Blue Book, a self-reported directory of textile manufacturing facilities that is updated annually, as the primary list of recipients for the questionnaire. See section 4 for more information on the EPA's efforts to refine this list.

12b. Information Requested

The EPA believes that all the information and data requested in the questionnaire is readily available to facilities; the EPA does not anticipate facilities will need to generate new information or data to complete the questionnaire. The information requested by the questionnaire and the purpose for requesting the information are listed in Table 12-1.

The questionnaire will be administered online using the Qualtrics Survey Software (Qualtrics) and will be programmed such that the facility's answers to certain questions will allow them to skip inapplicable questions or entire sections. Facilities that receive the questionnaire but have never conducted textile mill operations or will permanently cease all textile mill operations by 2023 will not be required to complete the full questionnaire. Most facilities will not be required to complete every question as not all questions will be applicable to every facility (e.g., facilities that have never used PFAS in the manufacture of textiles will not need to complete most questions).

The questionnaire will primarily collect data for calendar year 2023, which represents the most recent year for which complete technical data will be available as the EPA expects the survey will be administered in 2024. The questionnaire will also collect limited data for time periods prior to 2023. These data will be used by the EPA to determine if facilities that historically used PFAS are potential sources of PFAS discharges and changes in industry operation and economics.

The questionnaire will cover the following topics:

- General Facility Information
- Textile Production
- Facility Operations and PFAS Use
- Wastewater Generation
- Wastewater Management and Treatment
- PFAS Studies and Monitoring Data

TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE

Topic	Question Description	Purpose
General Facility Information	Provide the facility name, physical address, and contact information (i.e., name, phone number, email, mailing address) for technical information reported in the questionnaire.	Confirm and correct errors in the facility list including facility name and address. The EPA will use contact information reported for the facility to conduct follow up, as necessary.
	Identify whether the facility has engaged in manufacture of one or more textile products operations at any time since the facility began operation. If so, requests an overview of the types of textile products manufactured at the facility.	Identify facilities that should complete the questionnaire. Facilities that respond "no" to this question will not be required to complete the remainder of the questionnaire.
	Identify the ultimate parent company and, if applicable, provide the name, title, phone number, email, and mailing address for a primary point of contact for the ultimate parent company.	Ownership information for ultimate parent companies will be used to evaluate the financial structure of the industry.
	Provide all six-digit NAICS code(s) applicable to the facility.	Identify small businesses per the Small Business Association (SBA) definitions, confirm the facility information in the facility list, and confirm the NAICS codes impacted by the Textile Mills ELGs.
	Provide the 12-digit Facility Registry Service (FRS) identification number (also known as EPA Registry ID) associated with the facility.	Confirm the facility information in the facility list, identify any duplicate entries in the industry profile, and pull additional information for these facilities from existing EPA data sets (e.g., EPA ECHO).
Textile Production	Specify the year the facility began manufacturing operations of one or more textile products.	Determine the approximate age of facility, duration of operations of facilities, and if textile manufacture occurred during the time period when legacy PFAS were more likely to be used.
	Identify whether the facility permanently closed or permanently discontinued all textile manufacturing operations as of January 1, 2024.	Determine whether the facility currently conducts textile manufacturing operations that may result in the discharge of PFAS in wastewaters. Facilities that respond "yes" to this question will skip to the wastewater generation and management sections of the questionnaire.
	Identify whether the facility will permanently close or permanently discontinue all textile manufacturing operations by December 31, 2028.	Determine whether the facility would be included in the population evaluated and expected to incur compliance costs under a potential rulemaking. Facilities that will permanently close or cease all textile manufacturing operations would likely not be subject to 40 CFR Parts 410 by the time a potential final rulemaking would be fully implemented.

TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE

Topic	Question Description	Purpose
	Identify the intended use of textile products manufactured at the facility.	Determine the types of textiles the facility produces. Information will be used to determine which textile products may be manufactured with PFAS.
	Provide the total annual production volume of textile products manufactured in 2023.	Estimate the total production at facilities to establish the size of the facility relative to the industry.
	Collects information relevant to existing water discharge requirements (NPDES permits, pretreatment agreements, stormwater permits, underground injection control permits) and local ordinances such as permit/ordinance number, type of requirement, regulatory authority, and type of wastewater covered by requirement. Requests facilities to submit relevant wastewater permit documents.	Identify duplicate information in the facility list where permit IDs may be linked with variations of a facility's name, understand how facilities are managing wastewater, and how regulatory authorities are permitting water discharge requirements. Collects permit materials that may be used for future permit review.
	Identify the Subparts of 40 CFR Part 410 that apply to the operations conducted at the facility in 2023.	Identify how textile manufacturing facilities are being permitted for the ELGs and understand potential overlap between subparts. Information collected may be used to identify inconsistencies or improper permitting of facilities.
	Identify ELGs other than 40 CFR Part 410 that apply to facility operations.	Identify how textile manufacturing facilities are being permitted for the ELGs and understand potential overlap between textile related ELGs. Information collected may be used to identify inconsistencies or improper permitting of facilities.
Facility Operations and PFAS Use	Identify if the facility intentionally has ever used, blended, integrated, or applied one or more PFAS in the textile manufacturing process since operations began.	Identify textile manufacturing facilities that have historically used PFAS in the textile products manufactured at the facility to assess whether they may discharge PFAS wastewater from current or legacy use.
	Identify if the facility manufactures or produces textiles with oil repellent properties. If yes, provide details on the product used to impart oil repellent properties or the source of the oil repellent textiles.	The EPA will use this data to identify potential alternatives to PFAS and capture information where the respondent may not know they use PFAS. Facilities that indicate they manufacture or produce oil repellent textiles and that the facility has never used PFAS will skip the remaining production related questions.

TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE

Topic	Question Description	Purpose
	Identify if the facility intentionally has ever used, blended, integrated, or applied one or more PFAS in the textile manufacturing process since the year 2000.	Identify facilities that have more recently used PFAS in textile products to identify facilities with recent production information. Facilities that select no will not be required to complete the remainder of the questionnaire.
	Identify if the facility intentionally used, blended, integrated, or applied one or more PFAS in the textile manufacturing process during calendar year 2023. If not, identifies steps taken to eliminate PFAS use.	Identify textile manufacturing facilities that currently use PFAS in the manufacture of textile products to assess whether they may currently discharge PFAS in process wastewater. Additionally identifies available alternatives to PFAS-based products in textile manufacturing and process modifications that have been put in place to eliminate PFAS use. Facilities that did not use PFAS in 2023 will skip the remaining production related questions.
	Provide the total annual production volume of textile products manufactured in 2023 using PFAS in 2023.	Estimate the PFAS-related production at facilities.
	Identify textile manufacturing processes involved in the intentional use, blending, integration, or application of PFAS during the manufacture of textile products in 2023 and whether the process line generates wastewater.	Assess which textile manufacturing operations currently use PFAS to aid in subcategorization and determine if process wastewater subject to ELGs may contain PFAS.
	Report whether the facility manufactures products that must meet certain military or original equipment manufacturer specifications and provide the specific standards.	Identifies military or other product specifications that might affect the facility's ability to implement process changes while manufacturing the same products.
	Identify all PFAS or PFAS-containing products that are currently or have historically been used as part of textile manufacturing at the facility. Identifies most recent two years of use for each product.	Identifies PFAS products and suppliers used by the textile manufacturing industry. Also establishes trends for legacy PFAS use transitioning either away from PFAS or to alternative PFAS chemistries.
	Identify if the facility planning to add, remove, or modify operations in a manner which will change the quantity or type of PFAS intentionally used, blended, integrated, or applied to textile products at the facility by December 31, 2028.	Determine whether planned changes at the facility will impact PFAS use and evaluate industry trends.

TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE

Topic	Question Description	Purpose
Wastewater Generation Details	Report whether the facility generated wastewater from any processes associated with textile manufacturing operations or receive any wastewater from offsite in 2023.	Identifies facilities that generate wastewater specifically from textile manufacturing operations and would therefore be potentially subject to ELGs. Facilities that respond "no" to this question will skip the remaining wastewater generation or treatment related questions.
	Identify and describe wastewater streams generated on site or transferred to the facility during the 2023 calendar year.	Identifies process wastewater streams to determine which manufacturing processes generate wastewater and assess industry trends in relative wastewater generation.
	Provide the total annual wastewater flow to surface waters, publicly owned treatment works (POTWs), centralized waste treatment facilities (CWTs), land application, reuse, underground injection, septic tanks, or any other final destination.	Estimate the total wastewater flow from the textile manufacturing industry. This information will help update the EPA's understanding of the whole industry and will provide context for information regarding PFAS in wastewater discharges.
	Report whether the facility added, removed, or modified operations in a manner which reduced the quantity of wastewater generated or discharged at the facility since January 1, 2000. Identify the impacted streams and modifications made.	Determine whether changes at the facility impacted the quantity or quality of wastewater potentially discharged and evaluate industry trends in wastewater generation.
	Report whether the facility is planning to modify operations in a manner that will affect process wastewater generated on site or transferred to the facility by December 31, 2028.	Determine whether planned changes at the facility will impact the quantity or quality of wastewater potentially discharged and evaluate industry trends in wastewater generation.
Wastewater Management and Treatment	Provide one or more wastewater flow diagrams depicting the current treatment and management practices for each wastewater generated on site or transferred to the facility. Include each wastewater stream, wastewater treatment unit, and wastewater destination. The diagram should also identify any solid waste residuals generated on site or transferred to the facility, including process waste, wastewater treatment sludge, and spent water treatment residuals (e.g., spent activated carbon or resin), and identify the ultimate destination of the solid waste (e.g., centralized waste treatment facility, landfill).	Identify operations that generate wastewater or solid waste residuals, the relative amount of wastewater or waste, and how wastewater is handled at the facility. Inform selection of facilities for site visits or future sampling, assess whether the facility's system has pollutant removal treatment-in-place, and identify treatment system configuration and treatment unit redundancy.

TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE

Topic	Question Description	Purpose
	Asks if the facility operated one or more wastewater treatment units on site in 2023.	Identify facilities that treat wastewater on site; facilities that do not treat wastewater on site will skip the remaining wastewater management and treatment questions.
	Collects the following information for each onsite wastewater treatment unit used to treat any wastewater generated on site or transferred to the facility during 2023: treatment unit name and type, annual average flow rate, number of days operated, date added to treatment system, and cost information.	Determine current treatment-in-place and identify new treatment technologies and best management practices to help identify treatment trends in the industry. Select facilities for site visits or future sampling. Cost data for treatment unit installation will be used to validate cost data for similar treatments across the industry and from other sources (e.g., vendors).
	Provide the total annual average flow rate for influent to and effluent from the wastewater treatment system in 2023.	Assess the total capacity of the wastewater treatment system and inform costing of wastewater treatment system modifications.
	Collects information on the number of final outfalls and details on each destination, such as the flow rate at each final outfall, type of surface water or destination, and the name and physical address of any facilities that received wastewater from the facility in 2023.	Profile the industry by type of discharge location and characterize the types of surface waters and facilities which receive discharges from textile manufacturing facilities.
	Determines if the facility generates one or more solid wastes from textile manufacture or wastewater treatment. If so, collects information on the solid waste generated in 2023, such as waste name, waste source/description, annual generation rate, and destination facility.	Determine the final destinations of textile wastes or wastewater treatment solids that may contain PFAS from textile operations.
	Identify whether there has been any sludge removal or transfer efforts onsite since 2000.	Assess whether PFAS contaminants collected in wastewater sludge may be present from legacy use.
	Report planned changes to management or treatment of wastewaters or wastewater solids by December 31, 2028.	Determine whether planned changes at the facility will impact the quantity or quality of wastewater potentially discharged.
PFAS Studies and Monitoring Data	Collect information on facility conducted, funded, or sponsored studies assessing the feasibility, cost, or performance of any technologies or methods for disposal, treatment, or destruction of PFAS, PFAS-containing water, or PFAS containing waste. If so, provide study name, author, and submission details.	Assess the availability of PFAS data for textile manufacturing wastewaters and if treatments are currently being studied to address PFAS discharges.

TABLE 12-1. QUESTIONNAIRE QUESTIONS AND THEIR PURPOSE

Topic	Question Description	Purpose
	Collect information on PFAS monitoring requirements, PFAS effluent limitations, and PFAS pretreatment standards for the facility, including those in current wastewater discharge permits, consent decrees, set by regulatory authorities, required for process control, or other monitoring required to be conducted by the facility.	Assess the availability of PFAS data for textile manufacturing wastewaters. Also indicates if PFAS has previously been identified as a potential issue in facility wastewaters.
	Collect information on individual wastewater sampling results for PFAS that were collected at any location within the facility prior to discharge (including untreated wastewater; in-plant sampling points; wastewater treatment influent, intermediate points, or effluent) since January 1, 2018, including all individual wastewater sampling results analyzed for PFAS using any analytical method and required monitoring and voluntary monitoring sampling results.	Assess the availability of PFAS data for textile manufacturing wastewaters to characterize PFAS discharges from the industry.
	Collects information on individual wastewater sampling results for PFAS that were collected for final effluent or facility discharge since January 1, 2018.	Assess the availability of PFAS data for textile manufacturing wastewaters, specifically for final discharge to assist with pollutant loadings estimates.
Comments		Allow respondents to provide additional context and information for any question within the survey.

12c. Respondent Activities

The Textile Mills industry data collection effort will require recipient facilities to devote time and resources to produce acceptable responses to a questionnaire and, for a subset of facilities, also collect samples to characterize the types and quantity of pollutants in textile manufacturing wastewater. The EPA expects that wastewater treatment plant operators, engineers, operations managers, and technical staff at the facilities will devote time toward gathering requested information and data, preparing and submitting the final responses to the questionnaire, coordinating and planning sampling with EPA staff, and collecting wastewater samples. The costs to the respondents' facilities associated with these time commitments can be estimated by multiplying the time spent in each labor category by an appropriately loaded hourly labor rate.

To develop the burden estimates, the EPA estimated the number of hours required to complete all parts of the questionnaire, including reviewing instructions, gathering data, entering the information requested, reviewing responses, and submitting the questionnaire. Table 12-2 breaks down the burden (in hours) per anticipated respondent activity and per labor category presumed necessary to complete the questionnaire. The EPA expects that wastewater treatment plant operators (operators), engineers, and operations managers will all be involved in responding to the questionnaire. The EPA has differentiated the hours that will be spent by five different types of responses for the questionnaire:

1) **Full Response**. Recipients that complete the full questionnaire. This includes facilities that currently use PFAS in textile manufacture and facilities that have historically used PFAS in textile manufacture.
2) **Not Applicable**. The EPA expects that approximately 5 percent of the respondent population have never manufactured textiles, and therefore do not fall within the population of interest for the detailed study. These respondents will complete a portion of the General Facility Information questions and will be directed to the end of the questionnaire via specific screening questions, resulting in less burden.
3) **Partial Response**. Textile facilities that have never intentionally used PFAS to manufacture textile products. The EPA expects that 50 percent of the respondent population have never intentionally used PFAS, and therefore do not fall within population of interest for the detailed study. These respondents will complete only the General Facility Information questions, the Textile Production questions, and a portion of the Wastewater Generation and Management questions to develop an updated national population of textile manufacturing facilities (see Table 12-1). As a result, these facilities will not be required to complete large portions of the questionnaire, resulting in less burden.
4) **No-Response**. Recipients that do not submit response to the questionnaire. Although this ICR will be mandatory, the typical no response rate for effluent guidelines questionnaires is 10 percent.

The EPA expects that questionnaire response will be led by the operator as most questions are specific to wastewater generation and treatment. The EPA has included hours for engineering staff to support collecting data and entering details related to production as well as the operations manager to review the questionnaire response and coordinate submission.

TABLE 12-2. ESTIMATED QUESTIONNAIRE RESPONSE BURDEN BY ACTIVITY, LABOR CATEGORY, AND TYPE OF RESPONSE

Activity	Labor Category and Burden (hours)			
	Operator	Engineer	Operations Manager	Total Burden per Activity
Not Applicable (non-textile manufacturing facilities that complete Section 1 only)				
Review Instructions & Access Qualtrics Questionnaire	0.50	0.50	0.50	1.50
Complete General Facility Information Questions	0.50	--	--	0.50
Review & Submission	--	--	0.50	0.50
Total	**1.00**	**0.50**	**1.00**	**2.50**
Partial Response (Non-PFAS textile manufacturing facilities that complete Sections 1 & 2 only)				
Review Instructions & Access Qualtrics Questionnaire	0.50	0.50	0.50	1.50
Complete General Facility Information Questions	0.50	--	--	0.50
Complete Textile Production and Wastewater Questions	1.50	0.50	--	1.50
Review & Submission	--	--	1.00	1.00
Total	**2.50**	**1.00**	**1.50**	**5.00**
Full Response (textile manufacturing facilities completing Section 1 through 7)				
Review Instructions & Access Qualtrics Questionnaire	0.50	0.50	0.50	1.50
Complete General Facility Information Questions	0.50	--	--	0.50
Complete Textile Production and Wastewater Questions	1.50	0.50	--	1.50
Complete All Remaining Questions	8.00	3.00	--	11.00
Review & Submission	--	--	6.00	6.00
Total	**10.50**	**4.00**	**6.50**	**21.00**
Contact Helpline (10% of respondents expected to contact)	1.00	--	--	1.00

Note: EPA assumes that questionnaire recipients that do not respond to the questionnaire will incur zero burden.

In addition to completing the questionnaire, the EPA will require a subset of textile manufacturing facilities (approximately 20) to collect wastewater samples and submit them to an EPA-contracted laboratory. These facilities will collect one-time (one-day) grab samples inform EPA analyses of the types and quantities of pollutants in textile manufacturing wastewater. The EPA will develop a site -specific sampling plan for the 20 facilities selected for sampling. The facilities will be asked to review and provide input on the sampling plan developed by the EPA. The EPA will provide each facility with a sampling kit,

with all sampling supplies included. Facilities will be responsible for executing the sampling plan by collecting samples, preserving samples, and shipping wastewater samples to specific laboratories identified by the EPA. The EPA will contract with accredited analytical laboratories for each method included in the sampling plan; facilities will ship wastewater samples according to instructions provided by the EPA. By the EPA contracting directly with laboratories, this ensures that all wastewater samples will be analyzed to the same precision and using the same method for each analyte.

The EPA estimates that each facility will collect grab samples during one day from up to two locations, such as the influent and effluent for the facility wastewater treatment system. The exact sample locations may vary by facility based on the treatment system configuration and/or type of operations. For the purposes of the ICR estimate, the EPA estimates that all facilities will collect samples from two locations during the one-day sampling episode for a total of two wastewater samples per facility. In addition, the EPA expects the facility will also collect one quality assurance sample during the one-day sampling episode. These quality assurance samples could include laboratory required quality assurance volumes or field quality assurance samples. Table 12-3 presents estimated burden (in hours) for the one-day sampling episode on a per facility basis by labor category. The EPA expects that operators and operations managers will be involved in planning and implementing the wastewater treatment protocols.

TABLE 12-3. ESTIMATED BURDEN FOR SAMPLING PROGRAM BY ACTIVITY AND LABOR CATEGORY

Activity	Labor Category and Burden (hours)		
	Operator	**Operations Manager**	**Total Burden per Activity**
Pre-Sampling Episode Planning (e.g., pre-sampling coordination with EPA, input on site-specific sampling plan)	8.00	4.00	12.00
Sampling Preparation (e.g., reviewing site-specific sampling and analysis plan)	4.00	2.00	6.00
Sample Collection (e.g., Assumes 2 staff will spend a half day collecting 2 grab samples and 1 QA sample)	8.00	2.00	10.00
Sample Preservation/Shipment (e.g., preserving and cooling samples, packing and preparing coolers for shipment)	4.00	--	4.00
Sampling Oversight	--	4.00	4.00
Total	**24.00**	**12.00**	**36.00**

12d. Respondent Burden Hours and Labor Costs

The EPA obtained mean labor rates from the May 2022, United States Department of Labor, Bureau of Labor Statistics website for NAICS code 313000 (Textile Mills).

Table 12-4 presents the labor data for 2021 (the latest year for which data are available) for the labor categories representing an operator, engineer, and operations manager. To account for additional costs to overhead and benefits, the EPA calculated an 80 percent increase in the mean hourly earnings rate for each labor category. The EPA used these calculated labor rates for the burden estimates.

TABLE 12-4. 2021 MEAN HOURLY RATES BY LABOR CATEGORY

Labor Category	Operator [a]	Engineer [b]	Operations Manager [c]
Mean Hourly Rates ($/hour)	43.87	76.88	109.89

Source: 2022 National Occupational Employment and Wage Estimates for NAICS Code 313000 Plant and System Operator (occupation code 51-8000), Engineers (occupation code 17-2000), General and Operations Managers (occupation code 11-1021). https://www.bls.gov/oes/current/naics3_313000.htm#17-0000

a – Operator unloaded mean hourly wage of $24.37/hour times 1.8 loading (overhead/benefits) = $43.87/hour.

b – Engineer unloaded labor rate of $42.71/hour times 1.8 loading (overhead/benefits) = $76.88/hour.

c – Operations manager unloaded labor rates of $61.05/hour times 1.8 loading (overhead/benefits) = $109.89/hour.

The direct labor cost to respondents to complete the questionnaire equals the time required to read and understand all of the instructions, gather relevant information and data, transfer it to the questionnaire response, review responses, and certify and submit the completed questionnaire. The EPA calculated the estimated respondent burden for completion of the questionnaire using the estimated total response time per activity shown in Table 12-2 as well as the labor rates shown in

Table 12-4 to calculate a total labor cost shown in Table 12-5. Table 12-5 includes estimates for the following types of respondents: non-textile manufacturing facilities that complete Section 1 only (i.e., Not Applicable), textile manufacturing facilities that have never used PFAS that complete Sections 1 and 2 only (i.e., Partial Response), and textile manufacturing facilities that currently use or historically used PFAS that complete the full questionnaire (i.e., Full Response).

TABLE 12-5. TOTAL ESTIMATED RESPONDENT LABOR BURDEN FOR THE QUESTIONNAIRE PER RESPONDENT

Response Category	Operator Total Labor Costs	Engineer Total Labor Costs	Operations Manager Total Labor Costs	Total Labor Burden Cost
Not Applicable	$43.87	$38.44	$109.89	**$192.20**
Partial Response	$109.67	$76.88	$164.84	**$351.38**
Full Response	$460.59	$307.51	$714.29	**$1,482.39**

Note: The EPA assumes that questionnaire recipients that do not respond to the questionnaire will incur zero burden.

The total burden for the questionnaire equals the estimated burden per facility for all facilities the EPA expects will respond. As noted previously in this supporting statement, for the purposes of estimating burden to the industry, the EPA estimates the population of textile manufacturing facilities at approximately 2,200. The EPA expects that some number of facilities will not respond to the questionnaire. Although this ICR will be mandatory, the typical no response rate for effluent guidelines questionnaires is 10 percent. The EPA also expects that approximately 55 percent of the questionnaire population will not be required to complete the full questionnaire because the facility does not perform textile manufacturing operations or has never used PFAS as part of the textile manufacturing process. Table 12-6 includes the number of respondents in each category (not applicable, full response, and no response), total burden, and total cost for the industry to respond to the questionnaire. The values presented in Table 12-6 also include hours for a portion of the respondents to consult with the EPA's helpline. The EPA estimates that 10 percent of the questionnaire respondents, both not applicable responses and full responses, will spend 1 hour coordinating with the helpline. All values presented in Table 12-6 are rounded to the nearest whole hour or dollar. The total labor cost associated with the questionnaire is $1.56 million.

TABLE 12-6. ESTIMATED QUESTIONNAIRE RESPONDENTS BY RESPONSE CATEGORY AND TOTAL ESTIMATED BURDEN

Response Category	Number of Responses	Number of Respondents Contacting Helpline	Total Operator Labor (hours)	Total Engineer Labor (hours)	Total Operations Manager Labor (hours)	Total Labor (hours)	Total Operator Labor Cost ($)	Total Engineer Labor Cost ($)	Total Operations Manager Labor Cost ($)	Total Labor Cost ($)
Not Applicable	110	11	121	55	110	286	$5,308	$4,228	$12,088	$21,624
Partial Response	1,100	110	2,860	1,100	1,650	5,610	$125,457	$84,566	$181,319	$391,341
Full Response	770	77	8,162	3,080	5,005	16,247	$358,034	$236,784	$549,999	$1,144,818
No Response	220	--	--	--	--	--	$-	$-	$-	$-
Total	**2,200**	**198**	**11,143**	**4,235**	**6,765**	**22,143**	**$488,799**	**$325,578**	**$743,406**	**$1,557,783**

For labor costs associated with sampling, the EPA assumed that all sampling activities described in Section 12(a) will be completed by a combination of operators and the operations manager as shown in Table 12-3. To estimate the labor cost, the EPA combined the hours presented in Table 12-3 with the labor rates shown in

Table 12-4. The total labor cost for sampling per facility is shown in Table 12-7, rounded to the nearest dollar.

TABLE 12-7. TOTAL ESTIMATED LABOR BURDEN FOR ONE-DAY SAMPLING EPISODE PER FACILITY

Operator Total Labor Cost ($)	Operations Manager Total Labor Cost ($)	Total Labor Burden ($)
$1053	$1319	**$2,371**

Using the total industry labor cost for the questionnaire shown in Table 12-6 and the total labor cost for sampling per facility shown in Table 12-7 combined with the number of facilities participating in sampling, the EPA estimates the total labor cost associated with activities described in this ICR. The total labor associated with the questionnaire and wastewater sampling program is $1.6 million, as shown in Table 12-8.

TABLE 12-8. TOTAL ESTIMATED RESPONDENT LABOR BURDEN FOR DATA COLLECTION ACTIVITIES

Activity	Number of Facilities Participating	Total Labor Burden (Dollars)
Questionnaire	2,200	$1,557,783
Wastewater Sampling	20	$47,429
	Total	**$1,605,212**

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

13a. Estimating Capital/Start-up Operating and Maintenance Costs

The EPA estimates there will be minimal other direct costs associated with responding to the questionnaire. All information requested in the questionnaire should be available from existing facility records and/or monitoring. Facilities are not required to collect and analyze additional samples to respond to the questionnaire.

Other costs for completing the questionnaire include printing/duplicating working copies and shipping for those respondents that are unable to respond to the online platform. The EPA has assumed that 2 percent of questionnaire submittals will be mailed hardcopies as opposed to online submittals. Most respondents will submit electronic questionnaire responses, which will reduce burden and ensure efficient transfer of data. The EPA assumes all respondents will incur a printing rate of $0.10 per page for a paper copy for use as a working copy or a hardcopy file. The EPA also assumes that any facility submitting a paper response will return the completed questionnaire via Federal Express or other trackable delivery service that requires a signature to acknowledge receipt. The EPA also included cost for long distance phone charges. Although, most facilities have access to cell phones or other internet-based phone mechanisms that do not charge for long distance calls, the EPA has included these costs at $0.05 per minute for calls into the helpline to cover facilities in rural areas.

Table 13-1 presents the estimated other direct costs for respondents related to the questionnaire.

TABLE 13-1. TOTAL OTHER DIRECT COSTS FOR RESPONDENTS TO THE QUESTIONNAIRE

Activity	Number of Respondents	Total Printer/ Photocopying Cost [a]	Total Shipping Cost [b]	Total Phone/ Calling Costs [c]	Total
Questionnaire	2,200	$8,910	$352	$594	**$9,856**

a – Assumes printing 45 pages for the questionnaire; $0.10/page print cost. Assumes all facilities will print the questionnaire once as a working copy.

b – Assumes 2 percent of facilities submitting questionnaires (40 facilities) will send in a paper questionnaire via Federal Express (or another shipper with tracking). Assumes $8.90 shipping fee/package.

c – Assumes 10 percent of facilities submitting questionnaires (198 facilities) will contact the helpline for 1 hour at a rate of $3 / hour.

A subset of textile manufacturing facilities (approximately 20 facilities) will be required to have facility staff collect wastewater samples and transfer them to an EPA-contracted laboratory for analysis. This burden estimate assumes that the EPA will contract directly with laboratories, provide each facility with a set of sampling supplies, and pre-pay the costs to ship coolers to the facility and to the laboratory. The only sampling supplies not provided by the EPA would be ice required to cool wastewater samples immediately after collection and/or during preservation. Sampled facilities will be responsible for any long-distance phone charges associated with planning. In addition to ice needed during sample collection, the EPA estimates that each sampled facility will need to provide ice for filling coolers and keeping samples at the proper temperature during shipping. The EPA estimates these other direct costs associated with wastewater sampling include those elements shown in Table 13-2.

TABLE 13-2. TOTAL OTHER DIRECT COSTS FOR FACILITIES SELECTED FOR WASTEWATER SAMPLING

Activity	Units Cost	Units	Number	Direct Cost ($)
Planning Calls (phone charges)	$3.00	$ per hour	2 hours	$6.00
Sample Supplies Not Provided by EPA (ice)	$10.00	$ per wastewater sample	3 wastewater samples per facility	$30.00
			Total Cost per Facility	$36.00
			Total Cost for Sampling at 20 Facilities	**$720.00**

13b. Annualizing Capital Costs

The EPA estimates that there will be no recuring capital costs associated with responding to the questionnaire or wastewater sampling. The one-time burden to respondents includes labor costs described in section 13a and other direct costs described in Section 13b. Table 13-3 presents the total burden to the industry for the questionnaire and wastewater sampling.

TABLE 13-3. TOTAL ESTIMATED RESPONDENT BURDEN AND COST SUMMARY

Information Collection Activity	Number of Participating Facilities	Total Burden (Hours)	Total Labor Cost ($)	Total Other Direct Cost ($)	Total Cost ($)
Questionnaire	2,200	22,143	$1,557,783	$9,856	$1,567,639
Wastewater Sampling	20	720	$47,429	$720	$48,149
Total		**22,863**	**$1,605,212**	**$10,576**	**$1,615,788**

The EPA estimates that the total burden to the industry for responding to the questionnaire and wastewater sampling will be approximately 22,863 hours, or $1.62 million, including labor and other direct costs.

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

Table 14-1 presents the collection administration tasks to be performed by EPA employees and contractors, with the associated hours required for each grouping of related tasks.

TABLE 14-1. ESTIMATED AGENCY BURDEN AND LABOR COSTS FOR THE QUESTIONNAIRE

Activity	Burden (hours)		
	Agency	Contractor	Total Hours
Develop questionnaire instrument	200	800	1,000
Meet with trade association representatives	100	200	300
Publish notice of anticipated ICR in Federal Register			
Respond to all comments received			
Revise questionnaire instrument based on reviewers' comments			
Design distribution approach	200	300	500
Develop a mailing list database			
Develop a system to track mailing and receipt activities to improve mailing list			
Develop notification letters			
Mail questionnaire notification letters			

TABLE 14-1. ESTIMATED AGENCY BURDEN AND LABOR COSTS FOR THE QUESTIONNAIRE

Activity	Burden (hours)		
	Agency	Contractor	Total Hours
Develop and maintain email and phone helplines	100	400	500
Maintain helpline database and develop documentation			
Track survey responses	100	200	300
Review responses and assess potential for bias due to missing data			
Engineering follow-up to clarify responses			
Develop questionnaire database	40	400	440
Upload and verify data			
Enter hardcopy survey responses	40	141	181
Total	**780**	**2,441**	**3,221**

Table 14-2 presents a list of the tasks the EPA and its contractors will perform associated with the wastewater sampling program with the associated hours required for each task.

TABLE 14-2. ESTIMATED AGENCY BURDEN FOR WASTEWATER SAMPLING

Activity	Burden (hours)		
	Agency	Contractor	Total Hours
Select facilities	40	40	80
Develop site-specific sampling plans (e.g., pre-sampling calls with facilities, developing site-specific sampling and analysis plans)	100	340	440
Prepare sample collection kits	--	150	150
Laboratory analysis and data review	80	500	580
Process sampling data results, enter data into database, analyze data, document results for the record in sampling episode reports	80	460	540
Total for All Facilities	**300**	**1,490**	**1,790**

14b. Agency Labor Cost

The EPA estimated the burden and labor costs that the EPA will incur to administer the questionnaire. The EPA determined Agency labor costs by multiplying Agency burden figures by an average hourly Agency labor rate ($48.41/hour) for technical and managerial support using the Salary Table 2023-GS from the United States Office of Personal Management. This table can be found at the website https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-

tables/23Tables/html/GS_h.aspx. The government employee labor rates are $40.51 per hour for technical (GS-13, Step1) and $56.31 per hour for managerial (GS-15, Step 1). The EPA determined contractor labor costs by multiplying contractor burden figures by an average contract labor rate of $130 per hour. This rate is consistent with current Agency contracts.

TABLE 14-2. ESTIMATED AGENCY LABOR COSTS FOR THE QUESTIONNAIRE

Activity	Labor Cost		
	Agency ($48.41/hour)	Contractor ($130/hour)	Total Cost
Develop questionnaire instrument	$9,682	$104,000	$113,682
Meet with trade association representatives	$4,841	$26,000	$30,841
Publish notice of anticipated ICR in Federal Register			
Respond to all comments received			
Revise questionnaire instrument based on reviewers' comments			
Design distribution approach	$9,682	$39,000	$48,682
Develop a mailing list database			
Develop a system to track mailing and receipt activities to improve mailing list			
Develop notification letters			
Mail questionnaire notification letters			
Develop and maintain email and phone helplines	$4,841	$52,000	$56,841
Maintain helpline database and develop documentation			
Track survey responses	$4,841	$26,000	$30,841
Review responses and assess potential for bias due to missing data			
Engineering follow-up to clarify responses			
Develop questionnaire database	$1,936	$52,000	$53,936
Upload and verify data			
Enter hardcopy survey responses	$1,936	$18,330	$20,266
Total	**$37,760**	**$317,330**	**$355,090**

Table 14-3 includes an estimate of the burden and labor costs for each task and the total labor cost.

TABLE 14-3. ESTIMATED AGENCY LABOR COSTS FOR THE WASTEWATER SAMPLING

Activity	Labor Cost		
	Agency ($48.41/hour)	Contractor ($130/hour)	Total Cost
Select facilities	$1,936	$5,200	$7,136
Develop site-specific sampling plans (e.g., pre-sampling calls with facilities, developing site-specific sampling and analysis plans)	$4,841	$44,200	$49,041
Prepare sample collection kits	$--	$19,500	$19,500
Laboratory analysis and data review	$3,873	$65,000	$68,873
Process sampling data results, enter data into database, analyze data, document results for the record in sampling episode reports	$3,873	$59,800	$63,673
Total for All Facilities	**$14,523**	**$193,700**	**$208,223**

14c. Agency Non-Labor Costs

Table 14-4 presents the other direct costs associated with administering the questionnaire that will be incurred by the EPA. For the EPA and contractor other direct costs, the EPA assumed mailing a cover letter announcing the questionnaire effort to all facilities and mailing hardcopy questionnaires to 2 percent of all respondents as described in Section 13b.

TABLE 14-4. ESTIMATED OTHER DIRECT COSTS TO THE AGENCY TO ADMINISTER THE QUESTIONNAIRE

Activity	Unit Costs [a]		Number of Units [b]		Total Cost ($)
Questionnaire Notification Mailout	$4.00	per package	2,220	letters	$8,800
Hardcopy Questionnaires	$8.90	per package	44	packages	$392
				Total	$9,192

a – Questionnaire notifications will be sent out via Federal Express at $4 shipping fee/package. Hardcopy questionnaires will be sent via Federal Express (or another shipper with tracking) at $8.90 shipping fee/package.

b – Assumes 2 percent of questionnaire respondents will not have access to the internet and request a hardcopy questionnaire.

Other direct costs associated with wastewater sampling include costs associated with planning calls, costs for sample collection supplies, shipping costs to get sampling kits to facilities, shipping costs to transfer collected samples to analytical laboratories, and sample analysis costs. Table 14-5 shows the other direct costs incurred by the EPA per sampled facility and the total cost for all 20 sampled facilities.

TABLE 14-5. ESTIMATED OTHER DIRECT COSTS TO THE AGENCY FOR WASTEWATER SAMPLING

Activity	Unit Costs		Number of Units		Total Cost ($)
Planning Calls (phone charges)	$3.00	per hour	2	hours per facility	$6.00
Sample Collection Supplies (bottles, labels, preservation supplies, sampling equipment)	$250	per set of supplies	1	set of supplies per facility	$250
Sample Analysis	$1,000	per sample	3	wastewater and QA samples per facility	$3,000
Shipping Costs (postage)	$65	per cooler	3	number of coolers per facility	$195
				Total Cost per Facility	$3,451
				Total Cost for 20 Facilities	$69,020

Table 14-6 summarize the total costs that the Agency will incur as a result of the ICR.

TABLE 14-6. TOTAL ESTIMATED AGENCY BURDEN AND COST SUMMARY

Total Burden (hours)	Total Labor Cost ($)	Total Other Direct Cost ($)	Total Cost ($)
5,011	$563,313	$78,212	**$641,524**

The EPA estimates that the total burden to the Agency for the questionnaire and wastewater sampling will be approximately 5,011 hours, or $641,524, including labor costs and other direct costs. The EPA estimates that there will be no start-up or capital costs associated with completing the questionnaire.

15. REASONS FOR CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

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

16. PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Current ELGs do not contain requirements for PFAS; however, PFAS has been found in wastewater discharges from facilities in the Textile Mills point source category, particularly in those that manufacture performance apparel, carpets, outdoor gear, or other textiles meant to provide water, oil, or stain resistance. The EPA will use the data collected through the questionnaire and wastewater sampling program to determine if revisions to the Textile Mills ELGs are warranted. If the EPA determines revisions are warranted, the EPA anticipates also using data in support of future rulemaking efforts. The EPA will use the data collected through the questionnaire to support the following types of analyses:

- **Subcategorization.** The EPA will survey all textile manufacturing facilities to fully capture the range of textile manufacture processes, PFAS use, wastewater types, and pollution control practices and technologies for the sector. Data from the respondents will help the EPA determine whether the existing subcategorization of the industry is appropriate or additional/revised subcategorization is necessary for the Textile Mills ELGs.
- **Evaluation of Textile Manufacture Processes and Wastewaters.** The EPA will use data collected to analyze textile manufacturing processes; PFAS use and potential transfer to wastewater; wastewater generation and characteristics (including PFAS concentrations and flow rates); and available and demonstrated pollution control technologies and practices. The EPA will also analyze facility-wide pollution prevention practices and wastewater treatment systems to determine the wastewaters that contain PFAS, the treatment technologies that are applicable to those wastewaters, the effectiveness of these treatment units, and the final discharge characteristics from chromium finishing facilities.
- **Technical Feasibility Analysis.** The EPA will evaluate technically feasible technology options, including control technologies and pollution prevention and recycle practices, for the spectrum of textile manufacturing operations and facility characteristics. The EPA will assess the technical feasibility of each technology option by determining its availability within the industry as well as the degree to which it effectively eliminates the generation of pollutants and/or removes or destroys PFAS.
- **Assessment of Technology Costs.** The EPA will use data collected to estimate the industry-specific direct capital costs, operating and maintenance costs, and recurring costs (e.g., waste disposal) of the pollution control technologies and practices, with a focus of identifying technologies that can effectively reduce or eliminate PFAS. The EPA will develop methodologies for estimating potential compliance costs associated with installing additional technologies.
- **Revision to Effluent Limitations and Pretreatment Standards.** The EPA may determine that revised ELGs are necessary for the Textile Mills point source category to address PFAS discharges. If so, the EPA will use data collected to support statistical analysis of wastewater discharge data from textile manufacturing facilities which have implemented PFAS pollution control technologies and management practices
- **Environmental Assessment and Environmental Justice.** The EPA may perform an environmental assessment to determine the potential impacts of textile manufacturing discharges on aquatic

life and human health, as well as on the proper operation of POTWs and other treatment works. The EPA will also evaluate the potential impact of textile manufacturing discharges of small, disadvantaged, or minority communities. These assessments will characterize the potential risk posed by the discharges and will assist the EPA in projecting the environmental and economic benefits of potential revisions to the regulation.

The specific dates for distribution, response receipt, and data collection activities for the questionnaire have not yet been established but will include the activities in Table 16-1.

TABLE 16-1. COLLECTION SCHEDULE

Activity	Estimate of Schedule
EPA notification to questionnaire recipients	15 days after OMB Approval
Facilities submit responses	60 days following receipt
EPA reviews responses and evaluates need for follow-up	3 months following questionnaire completion
EPA conducts follow-up to collect all missing or incomplete information	2 months following initial response review
EPA completes questionnaire database	4 weeks after receiving follow-up information
EPA selects and notifies facilities for wastewater sampling	3 months following questionnaire completion
Wastewater sampling data collection occurs	2 months following notification
Wastewater sampling data reviewed and analytical database populated	4 months following sampling analytical data receipt

All responses containing or consisting of information claimed as CBI will be so identified in the questionnaire database. The EPA regulations governing CBI appear at 40 CFR Part 2, Subpart B.

Information that has not been claimed as CBI may be shared with any interested parties. Nonexempt information is not protected from disclosure under the Freedom of Information Act (FOIA). Results of the EPA's analyses become publicly available most often in three ways: (1) within materials placed in the public docket supporting the rulemaking, (2) within development and supporting documents otherwise published in support of the rulemaking, and (3) within any proposed and final rules published in the *Federal Register* if the data is to be used in any rulemaking effort. These documents are available through the EPA's website and on regulations.gov.

17. DISPLAY OF EXPIRATION DATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

18. CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The EPA can comply with all provisions of the Certification for Paperwork Reduction Act Submissions.