

**INFORMATION COLLECTION REQUEST REVISION  
FOR  
AMBIENT AIR QUALITY SURVEILLANCE 40 CFR PART 58**

**OMB #2060-0084, EPA ICR #940.21**

**SUPPORTING STATEMENT**

**May 19, 2008**

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**PART B OF SUPPORTING STATEMENT**

## **PART A OF SUPPORTING STATEMENT**

### **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

#### **1(a) Title of the Information Collection**

“Revisions to Ambient Air Monitoring Regulations”

#### **1(b) Short Characterization/Abstract**

This Information Collection Request (ICR) includes ambient air monitoring data reporting and recordkeeping activities associated with the 40 CFR part 58 Ambient Air Quality Surveillance regulations. These data and information are collected by State, local, and Tribal air quality management agencies and reported to the U.S. Environmental Protection Agency (EPA).

This ICR revises the most recent ICR for 40 CFR part 58 approved by OMB (OMB #2060-0084, EPA ICR #940.20) to present an estimate of the change to the total annual reporting and recordkeeping hour and cost burden that would result if this proposed rule revising the lead (Pb) National Ambient Air Quality Standard (NAAQS) and the Pb ambient air monitoring requirements were to be finalized. This rule proposes revisions to the network design requirements, QA requirements, and the minimum sampling frequency. These changes are being proposed to ensure adequate Pb monitoring will be performed to determine compliance with the proposed Pb NAAQS. A number of options are being proposed as part of the Pb NAAQS revision including the level of the standard and the averaging time for the standard which directly affect the associated monitoring burden. The final decisions on these options will not be made until promulgation of the final rule. For the purpose of this ICR, we have estimated the maximum potential burden for all the options being considered. The ICR estimates for the final rule will present the burden estimate based on the requirements contained in the final rule. The burden estimates are for the 3-year period from 2009 through 2011.

This ICR also encompasses information collection associated with EPA grants to state, local, and tribal agencies for ambient monitoring of hazardous air pollutants. Such monitoring is not required by 40 CFR part 58 or any other rule. Agreement to submit data from monitoring conducted under such grants is a condition for receiving a grant. This grant program has two components, the National Air Toxics Trends Stations (NATTS) and the Community Scale Air Toxics Monitoring Program (CSATMP). The NATTS program consists of 22 grantees operating 23 sites over multiple years. The SCATMP consists of 1-year grants to about 15 grantees each fiscal year.

This ICR revision reflect burden estimates associated with the Pb monitoring requirements for the 3-year period from 2009 through 2011. The remainder of the burden estimate remains based on the 3-year period from 2007 through 2009 as estimated for ICR #940.20.

The data collected through this information collection consist of ambient air concentration measurements for the criteria air pollutants with NAAQS, ozone precursors, hazardous air pollutants, and meteorological variables at a select number of monitoring sites throughout the United States. Accompanying the pollutant concentration data are quality assurance/quality control data and air monitoring network design information.

The EPA and others (e.g., State, local, and Tribal air quality management agencies, environmental groups, academic institutions, industrial groups) use the ambient air quality data for many purposes. Some of the more prominent uses include informing the public and other interested parties of an area's air quality, judging an area's (e.g., county, city, neighborhood) air quality in comparison with the established health or welfare standards (including both national and local standards), evaluating an air quality management agency's progress in achieving or maintaining air pollutant levels below the national and local standards, developing and revising State Implementation Plans (SIPs) in accordance with 40 CFR part 51, evaluating air pollutant control strategies, developing or revising national control policies, providing data for air quality model development and validation, supporting enforcement actions, documenting episodes and initiating episode controls, air quality trends assessment, and air pollution research.

The State, local, and tribal air quality management agencies with responsibility for reporting ambient air quality data and information as requested in this ICR submit these data electronically to the EPA's Air Quality System (AQS) and AIRNow databases. Quality assurance/quality control records and monitoring network documentation are also maintained by each State, local, and Tribal agency, in AQS electronic format where possible.

Although the State, local, and Tribal air quality management agencies are responsible for the operation of the air monitoring networks, the EPA funds a portion of the total costs through federal grants. Some of these grants require an appropriate level of contribution, or Amatch@, from the State/local air quality management agencies. The costs shown in this ICR are the total costs incurred for the monitoring program regardless of the source of the funding. This practice of using the total cost is consistent with the prior ICR submittals for 40 CFR part 58.

This Information Collection is estimated to involve 168 respondents for a total cost of approximately \$178,960,195 (total capital, and labor and non-labor operation and maintenance) plus a total burden of 2,170,916 hours. The labor costs associated with the 2,170,916 hours is \$109,376,280. Included in the \$178,960,195 total are other costs of non-labor operations and maintenance of \$19,445,508 and equipment and contract costs of \$50,138,407. In addition to the costs at the State, local, and Tribal air quality management agencies, there is a burden to EPA of total of 192,769 hours and \$11,695,453.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need/Authority for the Collection**

The information requirements included within this ICR are necessary to provide the EPA with ambient air quality surveillance data to determine the United States' air quality status, to make attainment decisions with respect to the NAAQS, to assist in developing necessary control

strategies to ensure attainment of the NAAQS, to assess national trends in air pollution, to inform the public of air quality, and to determine the population's exposure to various ambient air pollutants. The EPA's goal of attaining the NAAQS in all areas of the United States is directly dependent upon the availability of ambient air quality data requested in this information collection. Additionally, the EPA, State, local, and Tribal air quality management agencies, environmental groups, industrial groups, and academic organizations use these data to study atmospheric chemistry, e.g., the formation of ozone, to determine the most appropriate and effective control strategies necessary to reduce air pollution.

The principal legal authority for this information collection is the Clean Air Act 42 U.S.C.A. " 7403, 7410, and 7511a, from which the 40 CFR part 58 regulations were promulgated.

Under ' 7403 (c), the Administrator is required to conduct a program of research, testing, and development of methods for sampling, measurement, monitoring, analysis, and modeling of air pollutants, specifically including a requirement to establish a national network to monitor, collect, and compile data with quantification of certainty in the status and trends of air emissions and air quality. This program will also include the development of improved methods and technologies to increase understanding of the sources of ozone precursors, ozone formation, ozone transport, regional influences on urban ozone, regional ozone trends, and interactions of ozone with other pollutants.

Section 7410 (a) contains the SIP requirements, which include a requirement that each State submit a SIP that provides for the establishment and operation of appropriate devices, methods, systems, and procedures necessary to monitor, compile, analyze, and make available to the Administrator data on ambient air quality.

Section 7511a (c)(1) states that the Administrator will promulgate rules requiring that State, local, and Tribal air quality management agencies conduct enhanced monitoring of ozone and its precursors (oxides of nitrogen and volatile organic compounds) in serious, severe, or extreme ozone nonattainment areas.

## **2(b) Practical Utility/Users of the Data**

The EPA Office of Air Quality Planning and Standards (OAQPS) uses the ambient air quality data included within this collection to make attainment decisions with respect to each air pollutant subject to NAAQS. For those areas that do not attain the NAAQS for one or more pollutants, the OAQPS, the affected EPA Regional Office, and the affected State or local air quality management agency will work to develop an appropriate SIP to address how the area's air quality can be improved to meet the applicable NAAQS.

To identify how the nation is progressing in improving air quality, the OAQPS prepares annually the National Air Quality and Emissions Trends report (<http://www.epa.gov/airtrends>) using the ambient air quality data collected through this ICR. The State, local, and Tribal air quality management agencies use these data for multiple purposes including tracking their progress toward achieving and maintaining air quality within the established NAAQS and any

statewide standards they have established. For example, the State of California has established a separate statewide ozone air quality standard that is more stringent than the NAAQS for ozone; therefore, they use ambient air data to determine compliance with both standards.

Using the Air Quality Index (AQI) reporting system outlined within the 40 CFR part 58 regulations (on which this ICR is based), State, local, and Tribal air quality management agencies report air quality to the public in all metropolitan areas with a population greater than 200,000. Details on the AQI system can be found at <http://www.epa.gov/airnow>. The AQI reporting mediums can vary depending upon the location; however, it is generally reported in newspapers, on local television news stations, through a central telephone number, and/or by radio.

The EPA, State, local, and Tribal air quality management agencies, the regulated community (e.g., industrial groups), environmental groups, and air pollution researchers (such as those at the Georgia Institute of Technology and the Harvard School of Public Health) use ambient air pollutant and meteorological data to study the emission of air pollutants, the formation of secondary air pollutants (e.g., ozone, fine particles), the transport of these pollutants over large distances, and the effects of various pollutants on the public's health and welfare. The PAMS monitoring program, which is included as part of this ICR burden estimate, is designed specifically to assist the EPA and these same groups with the study of ozone formation and accumulation in areas with significant ambient ozone pollution problems. These areas are defined within the Clean Air Act Amendments of 1990 as serious, severe, and extreme ozone NAAQS nonattainment areas.

Given the significant impact of ambient air data upon the implementation of national and State air quality management programs, it is essential that the EPA provide the means for ensuring that the ambient air quality data measured, recorded, and reported to the Agency are of a high quality. The means for accomplishing this need encompasses a variety of factors, such as the requirements that State, local, and Tribal air quality management agencies report precision and accuracy testing results, incorporate quality assurance/quality control procedures in their daily monitoring site operation, conduct equipment and procedure audits through the National Performance Audit Program, and work with the EPA to conduct systems audits periodically. Records detailing the operation and maintenance practices for each ambient air monitoring site are necessary in order to meet the quality assurance/quality control requirements and recommendations.

### **3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a) Non-duplication**

This collection is not unnecessarily duplicative of information otherwise reasonably accessible to the agency. The AQS and AIRNOW systems, which contain information based solely on this collection, are the only national air quality data repositories available to the EPA. The ambient air quality surveillance data and related information collected through this information collection are not otherwise reasonably accessible to the EPA.

A few State and local air quality management agencies have their own data storage systems (e.g., the California Air Resources Board); however, most State, local, and Tribal air quality management agencies use the AQS and AIRNow as their primary repositories for all air quality data.

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

The 1995 Paperwork Reduction Act requires that any agency developing a non-rule related ICR must solicit public comments for a 60-day period prior to submitting the ICR to OMB. This section is not applicable to this ICR because this is a rule-related ICR.

### **3(c) Consultations**

Through the course of planning, monitoring, and improving upon this collection and its associated regulation, the EPA regularly consults with affected State, local, and Tribal air quality management agencies through various methods including the regulatory process, regular meetings, and training courses. The EPA conducts annual work shops and training on the AQS reporting system, e.g., the annual AQS Conference. The EPA Regional Offices conduct annual ambient air monitoring meetings with their affected State, local, and Tribal air quality management agencies to assist these affected agencies with this collection and its associated regulation. The EPA's OAQPS also meets regularly with leading State and local air monitoring managers to discuss the Nation's ambient air monitoring program and this collection, via large monthly phone calls and smaller in person meeting two or three times per year. Starting in 1999, the Clean Air Scientific Advisory Committee (CASAC) established the subcommittee on fine particle monitoring to provide advice to EPA on various implementation aspects of the PM monitoring networks. In addition, CASAC also has established a monitoring strategy subcommittee to extend consultation to the entire network.

### **3(d) Effects of Less Frequent Collection**

State, local, and Tribal air quality management agencies would collect and report ambient air quality data without the 40 CFR 58 regulation associated with this collection. Sanctions do not automatically accrue to State or local air quality management agencies that fail to meet these requirements. The 40 CFR part 58 regulations and this associated collection do provide for a consistent system for reporting and record keeping that would not exist without these requirements. The effects of less frequent collection include:

- A national database that is not consistently updated and available for public consumption;
- Less timely attainment designations with respect to the NAAQS;
- More difficulty in identifying and repairing problems with an ambient air monitor-- i.e., data are used as to check a monitor's operating condition, and reporting data less frequently would delay a State or local agency's ability to recognize a problem with a monitor or a laboratory procedure; and

- The EPA would not be able to consistently answer questions from the public in a timely fashion regarding air quality in various areas of the country.

### **3(e) General Guidelines**

All of the OMB's general guidelines for information collections in 5 CFR 1320.6 are met by this ICR. None of the guidelines are exceeded.

- Data reporting on a quarterly basis is the requirement. Nearly all respondents voluntarily report on a monthly basis.
- Record retention is for no more than 3 years (most records are kept by the EPA data repository, not the affected State, local, and Tribal air quality management agencies)
- Information is maintained and reported in the standardized electronic AQS format.

### **3(f) Confidentiality**

Information that is considered personal, private, proprietary, or confidential is not required for this collection. One purpose of collecting ambient air data through AQS and AIRNow is to inform the public of general air quality in ambient air (air considered generally accessible to the public), and as such, does not present a need for maintaining a confidential nature. Security measures are taken to prevent tampering with the AQS electronic database by limiting the access to the AQS mainframe only to authorized users

### **3(g) Sensitive Questions**

This section is not applicable to this ICR because no information involving matters of a sensitive nature is collected.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents/SIC Codes**

This ICR affects State, local, and Tribal governments (SIC code 951, Administration of Environmental Quality Program) that are currently operating and maintaining established ambient air quality networks. The 40 CFR part 58 regulations associated with this request require that State, local, and Tribal air quality management agencies conduct the ambient air quality surveillance and report the data to the EPA's AQS. Although industrial, environmental, and research organizations may use the data available through the AQS, they are not required to report any information for this information collection. Data submittal to AIRNow is voluntary for all organizations, but most State and local agencies reporting to AQS also report to AIRNow.



#### **4(b) Information Requested**

##### *(i) Data items, including record keeping requirements*

These data items are submitted electronically to EPA's AQS as required by 40 CFR part 58. Those data marked with an asterisk are stored electronically within the EPA's AQS, and separate records kept by the State or local air quality management agency are not required.

- Hourly ambient air pollutant concentrations of O<sub>3</sub>, SO<sub>2</sub>, NO<sub>2</sub>, and CO collected at SLAMS sites and PAMS\*.
- Daily (24-hour) concentration values of PM and lead collected at SLAMS sites \*.
- Ozone precursor and meteorological data collected at PAMS\*.
- Precision and accuracy data for all SLAMS sites, PAMS, and Special Purpose Monitors (SPM)\*. (PSD air quality surveillance concentration data reporting is not required by the 40 CFR part 58 regulations addressed by this ICR--the submission of these data is required under 40 CFR part 51. However, the precision and accuracy information for PSD sites is reported under the authority of 40 CFR part 58.)
- O<sub>3</sub>, CO, SO<sub>2</sub>, NO<sub>2</sub>, PM, and lead data as collected by SPMs\*. This includes data collected by collocated samplers or concurrent monitors as appropriate.
- SLAMS monitoring network description information, including the site AQS identification number\*, site location\*, sampling and analysis method\*, operating schedule\*, monitoring objective\*, site's scale of representation\*, identity of the urban area represented\*, and quality assurance plan.
- PAMS network description which includes an implementation schedule, identification of the monitoring area represented\*, AQS site identification number\*, site location\*, site type\*, sampling and analysis method\*, operating schedule\*, and an ozone event forecasting scheme, if appropriate.
- Results of the annual ambient air monitoring network and quality assurance plan review.
- Annual SLAMS summary report which includes the location, date, pollution source, and duration of each incident of air pollution during which ambient levels of a pollutant reached or exceeded the significant harm levels as defined in 40 CFR 51.151\*, the certification of the report's accuracy by a designated State air pollution control officer, and various other summary statistics as provided by the AQS system\*.
- In metropolitan areas with a population greater than 200,000, the appropriate State or local air quality management agency must report to the public through prominent

notice (e.g., newspaper, radio, local weather forecast, at a publicly accessible area) the AQI value indicating the status of the area's air quality (i.e., good, moderate, unhealthy, very unhealthy, hazardous). This prominent notice must be made on at least 5 days per week. The AQI\* is calculated using information collected in this request.

In addition to those items recorded and stored in the EPA's AQS and AIRNow systems, State, local, and Tribal air quality management agencies maintain records on the following items:

- Approved PAMS network description for areas designated as serious, severe, or extreme ozone nonattainment areas.
- SLAMS site information that is not maintained on the AQS or AIRNow systems (e.g., site maps, pictures), and any siting waiver documentation provided by the Regional Administrator, the Administrator, or their designee.
- The network quality assurance plan for the measurement of the criteria pollutants. This includes operational procedures for the entire network, e.g., the selection of methods; training; equipment installation; selection and control of calibration standards; calibration; zero/span checks and adjustments of automated analyzers; control checks and their frequency; control limits for zero, span and other control checks, and respective corrective actions when such limits are surpassed; calibration and zero/span checks for multiple range analyzers; preventive and remedial maintenance; quality control procedures for air pollution episode monitoring; recording and validating data; data quality assessment (precision and accuracy); and quality control documentation.

*(ii) Respondent Activities*

A model respondent would engage in the following activities to comply with this information request:

- Read the 40 CFR part 58 regulatory provisions and other EPA guidance (for example, please reference our Internet site at [www.epa.gov/ttn/amtic](http://www.epa.gov/ttn/amtic).)
- Plan ambient air monitoring activities, such as developing a quality assurance plan for the network operation and maintenance, developing and reviewing the ambient air quality surveillance network design, planning where to locate sites, plan how to maintain and operate each site, develop a data reporting and validation plan.
- Write the quality assurance plan for network operation and maintenance, the ambient air quality surveillance network plan, and the data reporting and validation plan. Submit these plans to the EPA Regional or Headquarters office for review, and approval if appropriate.

- Obtain on-site leases or agreements to locate ambient air quality surveillance equipment.
- Investigate vendors, and procure equipment necessary to meet the ambient air quality network plan.
- Receive training for site operation and maintenance, quality assurance procedures, and data processing and reporting.
- Make arrangements for appropriate utility hookups for each ambient air quality surveillance site, i.e., electricity, telephones, data lines for electronic submission of concentrations from automated analyzers.
- Install ambient air quality surveillance equipment and equipment shelter. Ensure security of the site.
- Conduct ambient air quality monitoring, incorporating all appropriate quality assurance procedures such as calibrations, precision and accuracy checks, and, if necessary, concurrent monitoring.
- For particulate matter and lead, conduct necessary filter collection and analyses to obtain concentration data.
- Report ambient air pollutant concentration data electronically if from an automated analyzer (generally, this includes ozone, nitrogen dioxide, sulfur dioxide, and carbon monoxide measurements), and from a central location, such as a laboratory, if for particulate matter, ozone precursors, or lead samplers.
- Validate the ambient air data for quality assurance considerations.
- Electronically submit the complete and validated ambient air data to the AQS and/or AIRNow data repositories.
- Prepare and submit to EPA annually the SLAMS sites summary report.

Each of these activities are conducted using existing reporting and recordkeeping practices, including electronic submittal to the AQS and to AIRNow . If the 40 CFR part 58 regulations did not exist, and presumably the related AQS and AIRNow, the quality assurance procedures, and the siting guidance did not exist, the State, local, and Tribal air quality management agencies would in a majority of cases conduct monitoring; however, methods used by each agency would vary and data would not be readily available to EPA and the public. The influence of the 40 CFR part 58 regulations has been to provide a nationally consistent mechanism for collecting ambient air quality data including uniform quality assurance procedures, data collection and storage mediums (AQS), and uniform methodology. Without this regulations and associated ICR, managing and maintaining a national air quality program would be extremely difficult, if possible.

## **5. THE INFORMATION COLLECTED--AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

The EPA conducts the following activities to implement this ICR and associated regulation:

- Periodically review the 40 CFR part 58 regulations to update the information collection and monitoring requirements in light of new technological developments or new air pollutant standards. Develop revisions to the regulations in response to legislative action and program changes.
- Establish, maintain, and support the AQS and AIRNow as the national repositories for all State, local, and Tribal air quality management agency ambient air quality data and monitoring information. Periodically evaluate and improve upon this system as new technologies, and new regulatory requirements would dictate.
- Answer respondent (generally State, local, and Tribal air quality management agencies, but also industrial organizations, environmental groups, and others) questions about ambient air monitoring, the 40 CFR part 58 regulatory requirements, and the AQS and AIRNow. This includes the establishment of the Ambient Monitoring Technology Information Center bulletin board, the AQS toll-free hotline, and other written or verbal communication.
- Support the quality assurance program by working within the EPA and with the respondents to evaluate precision and accuracy data, oversee the National Performance Audit Program, participate in systems audits, and conduct weekly data validation checks on the AQS data submittal.
- Provide within the AQS mechanisms for statistical calculations, such as the number of times a particular ambient air quality monitoring site exceeds the NAAQS. Distribute the AQS data in various ways including upon written request, by Freedom of Information Act request, by press release, and in the annual National Air Quality and Emissions Trends Report.
- Provide adequate electronic storage space within the AQS for all ambient air quality surveillance data and information.
- Provide various reports and graphics for users of AIRNow.

### **5(b) Collection Methodology and Management**

All State, local, and Tribal ambient air monitoring networks have access to and use well-established quality assurance procedures as defined in the Quality Assurance Handbook for Air

Pollution Measurement Systems, Volumes I and II, EPA/600/R-94/038a & b. These documents ensure that all ambient air quality data are accurate and reliable.

The EPA has provided and will continue to provide resources for the maintenance and operation of the AQS and AIRNow national data repositories. All data required by this collection are submitted electronically to reduce the burden of the collection and to improve data quality, agency efficiency, and responsiveness to the public. Various statistical and graphical summaries are also provided by the AQS and AIRNow systems which enhance the utility of the information for consumption by the public and all affected State, local, and Tribal air quality management agencies. In submitting ambient air data into the AQS and AIRNow national repositories, we ensure that the data are publicly available, electronically stored, and electronically retrievable. State, local, and Tribal air quality management agencies and the EPA have been submitting data to the AQS since its inception in 1987.

### **5(c) Small Entity Flexibility**

This collection contains a minimum amount of information in order to manage the air quality program for the United States. The smallest entities affected by this collection are local air quality management agencies, typically consisting of the governing agencies for a county or group of counties, or a smaller metropolitan area (e.g., cities with a population of 100,000). This collection reduces to the extent practicable and appropriate the burden on entities that provide ambient air quality data and information to or for the EPA, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:

- Establishing differing compliance or reporting requirements or timetables that account for the resources available to those who are to respond (e.g., the monitoring and reporting requirements decrease as the population of an area decreases, and various timetables for deploying ambient air monitoring stations are negotiated between the affected State or local air quality management agency and the EPA with consideration of the respondent's resources);
- Clarification, consolidation, or simplification of compliance and reporting requirements (e.g., by establishing, maintaining, and improving as needed the AQS and AIRNow national repositories for ambient air quality data and information);
- Exemption from coverage of the collection of information, or any part thereof (e.g., the EPA negotiates with State, local, and Tribal air quality management agencies to determine the most effective and most efficient ambient air quality networks with respect to the monitoring needs, technical abilities, and resources available to each affected agency).

### **5(d) Collection Schedule**

Ambient air quality surveillance data and precision and accuracy data for criteria air pollutants are submitted according to the schedule defined in 40 CFR 58.16. These current

regulations require that State and local air quality management agencies report their data within 90 days after the end of the quarter during which the data were collected. Volatile organic compound (VOC), carbonyl, NH<sub>3</sub>, and NH<sub>3</sub> data measured by PAMS are reported within 6 months following the end of each quarterly reporting period as in 40 CFR 58.45.

The annual SLAMS report is submitted by July 1 of each year for data collected from January 1 through December 31 of the previous year in accordance with 40 CFR 58.15. This certification applies to all SLAMS and all SPM monitoring data that have been submitted by July 1.

The annual air quality surveillance network reviews are conducted and reports are submitted to the EPA on a schedule that is determined by the affected State or local air quality management agency and the EPA Regional Office.

Ambient air quality data and information are made available to the public **at any time** in various ways, including:

- Upon request to the appropriate EPA Regional office, or to the OAQPS;
- By Freedom of Information Act Request to the appropriate EPA Regional Office or the OAQPS;
- From the State or local air quality management agency responsible for collecting the ambient air quality data and information;
- By obtaining access, through appropriate EPA channels, to the AQS and AIRNow to obtain the data electronically;
- Through EPA public reports, such as the annual ANational Air Quality and Emissions Trends Report@; or
- Through the AIRNow data base and the AQI reporting mechanisms which include newspaper, television, Internet and other publicly available notices (see [www.epa.gov/airnow](http://www.epa.gov/airnow)).

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

### **6(a) Estimating Respondent Burden**

All activities listed with section 4 (b) (ii) of this ICR Supporting Statement are presented in the Table 1 of the Appendix. As discussed in Section 1, this ICR reflects revised burden and cost estimates updating the most recent OMB approved ICR (2002).

The detailed burden and cost estimates for the different types of monitors with the exception of PM<sub>10-2.5</sub> monitors are based on information provided in the updated version of *Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants*

*and Selected Air Toxic Pollutants* (prepared by Desert Research Institute for the EPA Office of Air Quality Planning and Standards, Air Quality Assessment Division, Ambient Air Monitoring Group, January 2005). The cost estimates presented in this guidance document are based on existing literature and direct monitoring experience. The costs for equipment and supplies were verified with vendors. The monitoring costs for PM<sub>10-2.5</sub> are based on vendor quotes for the monitor type that EPA expects respondents to use to comply with the requirements and assuming that the labor hour factors associated with installing, operating, and maintaining these monitors are same as those factors for PM<sub>2.5</sub> monitors that are presented in the guidance document. Costs for level of effort estimates are verified with selected State and local agencies. All cost values presented in the guidance document are adjusted to 2004 dollars, based on the average of the first two quarters.

For use in preparing the burden estimates for this ICR, costs for the Pb monitoring requirements were inflated to 2009, 2010, or 2011, while the remainder of the ICR remains based on the burden period for the previous ICR, i.e., 2007 through 2009. The cost escalation factors were estimated based on the appropriate Gross Domestic Product (GDP) price indices as reported in the report available at <http://www.jsc.nasa.gov/bu2/inflateGDP.html> . Note however, that the GDP price indices reported only include escalation factors up to the year 2009. As such, we used the escalation factor from 2008 to 2009 (2%) to estimate the inflation rate for the years 2010 and 2011 as well. Tables showing the detailed burden estimate calculations are presented in the Appendix. A summary of the average annual respondent burden costs follows.

**Worksheet 1: Annual Average Respondent Burden Estimates**

<b>Collection Activities</b>	<b>Total Labor Hours Per Respondent Per Year (168 respondents)</b>
1. Network design	287
2. Site installation	127
3. Sampling & analysis	4,283
4. Maintenance & repairs	1,667
5. Data management	3,524
6. Quality assurance	1,858
7. Supervision	1,177
<b>TOTAL</b>	<b>12,922</b>

### 6(b) Estimating Respondent Costs

All activities listed with section 4 (b) (ii) of this ICR Supporting Statement are included in the Table 1 of the Appendix. A summary of the average annual respondent burden costs follows.

#### Worksheet 2: Annual Average Respondent Cost Estimates

<b>Collection Activities</b>	<b>Total Labor Cost Per Respondent Per Year (168 respondents)</b>
1. Network design	\$15,273
2. Site installation	\$7,444
3. Sampling & analysis	\$226,012
4. Maintenance & repairs	\$81,546
5. Data management	\$163,092
6. Quality assurance	\$95,744
7. Supervision	\$61,937
TOTAL	\$651,049

### 6(c) Estimating Agency Burden and Cost

We estimated the Agency burden and cost by using current burden and cost of the ambient air monitoring program related to this collection. We included burden and cost for the OAQPS, the ten Regional Offices, and associated contract activities. The in-house activities for this collection are completed by a variety of individuals with a variety of salaries; therefore, we used the actual salary as an average for computing the program costs. Actual contractor expenses were used for those activities completed using extramural resources. We estimated a total of 192,769 hours and \$11,695,453 total agency burden.

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

Worksheet 3 shows the total respondent hourly burdens and costs which was taken from section 6(b) above for the estimated 168 respondents. The total labor burden for the respondents was estimated to be 2,170,916 hours at a total cost of \$178,960,195.



**Worksheet 3: Annual Total Respondent Labor Burden/Cost Estimates**

<b>Collection Activities</b>	<b>Total Labor Hours Per Year</b>	<b>Total Labor Cost Per Year</b>
1. Network design	48,149	\$2,565,822
2. Site installation	21,274	\$1,250,609
3. Sampling & analysis	719,492	\$37,970,037
4. Maintenance & repairs	280,062	\$13,699,783
5. Data management	592,113	\$27,399,513
6. Quality assurance	312,164	\$16,085,110
7. Supervision	197,662	\$10,405,405
TOTAL	2,170,916	\$109,376,280

**6(e) Bottom Line Burden Hours and Cost Tables**

*(i) Respondent Tally*

Respondent Total Annual Burden ' 2,170,916 hours

Respondent Total Annual Labor Cost for O & M ' \$109,376,280

Respondent Total Annual Cost for Non-labor O & M ' \$19,445,508

Respondent Total Equipment/Contract Dollars ' \$50,138,407

Total Respondent Tally ' \$178,960,195

*(ii) The Agency Tally*

Agency Total Annual Burden ' 192,769 hours

Agency Total Annual Cost ' \$11,695,453

*(iii) Variations In The Annual Bottom Line.*

We do not expect any significant variations in the annual bottom line for the ambient air monitoring networks for the clearance period requested.

**6(f) Reasons for Change in Burden**

The previously approved ICR estimate of burden hours is 2,057,168. The revised ICR burden hour estimate is 2,170,916 hours, which is 113,748 hours higher than the approved ICR

level. The reason for the increase in burden is due to the revised Pb monitoring requirements being proposed. The rule proposes revisions to the network design requirements, QA requirements, and the minimum sampling frequency for Pb monitoring. These changes are being proposed to ensure adequate Pb monitoring will be performed to determine compliance with the proposed Pb NAAQS. A number of options are being proposed as part of the Pb NAAQS revision including the level of the standard and the averaging time for the standard which directly affect the associated monitoring burden. The final decisions on these options will not be made until promulgation of the final rule.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 12,922 hours per respondent. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To allow comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2002-0091 which has been available for public viewing at the Air and Radiation Docket and Information Center Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2002-0091 and OMB Control Number 2060-0084 in any correspondence.

## **PART B OF SUPPORTING STATEMENT**

This section is not applicable to this ICR because statistical methods are not used in the data collection associated with the rule amendments.