

OMB-83I FORM SUPPORTING STATEMENT

FOR OMB REVIEW OF ICR NO. 2269.01

**INFORMATION COLLECTION REQUEST FOR PERFORMANCE
SPECIFICATION 17 (PS-17) AND PROCEDURE 4 FOR CONTINUOUS PARAMETER
MONITORING SYSTEMS.**

U.S. ENVIRONMENTAL PROTECTION AGENCY

SECTOR POLICIES AND PROGRAMS DIVISION

RESEARCH TRIANGLE PARK, NORTH CAROLINA 27711

JULY 08

PART A OF THE SUPPORTING STATEMENT

1.0 Identification of the Information Collection

(a) *Title and Number of the Information Collection.*

"Reporting and Recordkeeping Requirements for Performance Specification 17 (PS-17) and Procedure 4 for Continuous Parameter Monitoring Systems." This is a new information collection request (ICR). The EPA tracking number is 2269.01.

(b) *Short Characterization.*

Potential respondents are owners or operators of existing and new sources that are subject to certain emission standards promulgated under parts 60, 61, or 63 of title 40 of the Code of Federal Regulations (40 CFR) and are required to install and operate one or more continuous parameter monitoring systems (CPMS) for temperature, pressure, flow rate, pH, or conductivity. Respondents are required to conduct accuracy audits and perform other checks and inspections of CPMS to ensure that affected CPMS are operating properly and providing good quality data. Certain respondents also are required to develop quality control (QC) programs for affected CPMS. General requirements applicable to all part 60, 61, and 63 standards require records of monitoring system evaluations and operation. Records and reports must be retained for a total of 5 years (2 years at the site; the remaining 3 years of records may be retained off-site). The files may be maintained in electronic form such as microfilm, computer disks, or magnetic tape.

The PS-17 would require owners and operators of affected CPMS to record and maintain information that identifies the CPMS, including the location of the CPMS, identification number assigned by the owner or operator, the manufacturer's name and model number, and the typical operating range for each parameter that is monitored. In addition, owners and operators of affected CPMS would be required to document performance demonstrations. The proposed Procedure 4 would require owners and operators of affected CPMS to maintain records of all accuracy audits and corrective actions taken to return the CPMS to normal operation. These proposed requirements are described in Attachment 1.

2. Need For and Use of the Collection

(a) *Need/Authority for the Collection.*

The U.S. Environmental Protection Agency (EPA) is charged under Section 111 of the Clean Air Act (CAA) to establish standards of performance for new stationary sources and, under

Section 112 of the CAA to establish NESHAP for new or existing major sources or area sources of hazardous air pollutants. Certain records and reports are necessary for the Administrator to confirm the compliance status of affected sources. Specific information needed by EPA for the proposed PS-17 and Procedure 4 includes verification that the required CPMS are properly installed, operated, and maintained by affected sources that are required to install and operate CPMS. As proposed, PS-17 and Procedure 4 would not require reporting but would require recordkeeping. These recordkeeping requirements are specifically authorized by section 114 of the Act (42 U.S.C. 7414) and set out in the General Provisions to parts 60, 61, and 63.

(b) Practical Utility/Users of the Data.

The information will be used by Agency enforcement personnel to ensure that CPMS are being properly operated and maintained on a continuous basis. Based on compliance reports and other reports that are required under part 60, 61, and 63 rules that specify the use of CPMS, EPA can decide which plants, records, or processes should be inspected. The records that plants maintain will indicate to EPA whether plant personnel are operating and maintaining CPMS properly.

3. Nonduplication, Consultation, and Other Collection Criteria

(a) Nonduplication.

A search of existing standards and outgoing ICRs revealed no duplication of information-gathering efforts, and the proposed rule does not require reporting.

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

This section is not applicable because this is a rule-related ICR.

(c) Consultations.

Participants in the development process for this proposed rulemaking included representatives from several States, manufacturers and suppliers of CPMS, the American Chemistry Council (ACC), and other representatives from industry. Information surveys were sent to nine CPMS manufacturers and suppliers; eight industrial companies; one Department of Defense facility, and nine State agencies. The States contacted were Alabama, Arizona, Florida, Georgia, Minnesota, New York, Pennsylvania, Texas, and Virginia. In addition, meetings were held with the ACC to discuss specific requirements of the proposed rulemaking. Consultations

with these organizations and others will continue following proposal. A 60-day public comment period will be provided after proposal, during which the public will be given the opportunity to comment on the proposed PS-17 and Procedure 4. All comments received will be considered, and some may be reflected in the development of the final PS-17 and Procedure 4.

(d) Effects of Less Frequent Collection.

If the relevant information were collected less frequently, EPA could not be reasonably assured that a plant is in compliance with the standards. In addition, our authority to take administrative action would be significantly reduced. Section 113(d) of the CAA limits the assessment of administrative penalties to violations which occur no more than 12 months before initiation of the administrative proceeding. Since administrative proceedings are less costly and require use of fewer resources than judicial proceedings, both we and the regulated community benefit from preservation of our administrative powers.

(e) General Guidelines.

The proposed PS-17 and Procedure 4 for CPMS require that facilities retain records for a period of 5 years, which exceeds the 3-year retention period specified in the general information collection guidelines in 5 CFR 1320.6(f) of the Office of Management and Budget (OMB) regulations implementing the Paperwork Reduction Act. However, the 5-year retention period is consistent with the retention requirements in the General Provisions to part 63 and the retention requirement in the operating permit program under 40 CFR part 70. With certain exceptions, all facilities subject to this rule are required to obtain operating permits either through the State-approved permitting program or, if one does not exist, in accordance with the provisions of 40 CFR part 71. Thus, the 5-year record retention requirement of the rule adds no additional burden. Some area source facilities that are subject to this proposed rule are exempt from title V permitting. However, the applicable subparts that apply to those facilities require the same recordkeeping requirements for area source facilities as are required for major sources. Therefore, the 5-year record retention requirement specified in this proposed rule adds no additional burden for those area sources. At a minimum, respondents will be required to retain onsite the most recent 2 years of data. The remaining 3 years of data could be retained at a readily accessible onsite or offsite storage facility. None of the other guidelines in 5 CFR 1320.6

are being exceeded.

(f) Confidentiality

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) Sensitive Questions.

The proposed rule would not require reporting. Therefore, this section is not applicable because this ICR would not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/SIC Codes.

Respondents are owners or operators of sources that are subject to part 60, 61, or 63 emission standards and are required to operate a CPMS for monitoring temperature, pressure, flow rate, pH, or conductivity. A total of 36,110 existing and new facilities with affected CPMS are estimated to be required to comply with the requirements of the proposed PS-17 and Procedure 4 by the third year of the rule. The respondents are classified under the Standard Industrial Classification (SIC) codes and North American Industrial Classification System (NAICS) codes summarized in Table 1. Only certain processes classified in the SIC or NAICS codes listed in Table 1 would be regulated by PS-17 and Procedure 4.

(b) Information Requested.

(i) Data items, Including Recordkeeping Requirements. Attachment 1, Source Data and Information Requirements, summarizes the recordkeeping requirements including the required retention time for all records.

(ii) Respondent activities. The respondent activities required by the standards are identified in Tables 2A to 2C and introduced in Section 6(a). To the extent practicable, the activities required by respondents were designed to make use of or to be consistent with existing reporting and recordkeeping practices.

5. The Information Collected--Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

A list of Agency activities is provided in Tables 3A to 3C and introduced in Section 6(c).

(b) Collection Methodology and Management.

There would be no reporting requirements for the proposed rulemaking. Data obtained during periodic visits by our personnel from records maintained by the respondents will be tabulated and published for internal use in compliance and enforcement programs.

(c) Small Entity Flexibility.

Less than 5,000 of the estimated 36,110 plants that would be subject to the proposed PS-17 and Procedure 4 by the third year of the rule are owned by small businesses based on the definition used by the Small Business Administration (500 or 750 or fewer company employees depending on the companies SIC/NAICS codes). The EPA does not expect a significant economic impact on a substantial number of small entities.

The reason for the finding of no expectation of a significant economic impact on a substantial number of small entities is that, in case studies of the industries most likely to be adversely affected, none of the average per facility costs is as high as 3 percent of the compliance costs of the original rule. For these costs to be over 1 percent of sales (the Sales Test) the original compliance costs would have to be over 30 percent of sales.

(d) Collection Schedule.

The proposed rule would not require any additional reporting.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden.

The annual burden estimates for reporting and recordkeeping are presented in Tables 2A, 2B, and 2C for the first, second, and third year of the rule, respectively. These numbers were derived from estimates based on EPA's experience with other standards.

(b) Estimating Respondent Costs.

The information collection activities for sources subject to the proposed rule are presented in Tables 2A to 2C. Because much of the data are already collected by respondents or required

by existing law, minimal respondent development costs are associated with the information collection activities for the proposed rule. Labor costs for all relevant activities were estimated based on the most recently available labor rate data from the U.S. Bureau of Labor Statistics (BLS) (<http://www.bls.gov/news.release/pdf/ecec.pdf>). Labor costs are divided into the following three categories: (1) technical, (2) management, and (3) clerical. The labor rates, including fringe benefits, reported by BLS for March 2008 (the most recent rates available) are \$44.92 per hour (\$44.92/hr) for technical personnel, \$53.04/hr for managerial personnel, and \$22.41/hr for clerical personnel. The base labor rates were adjusted by an overhead and profit rate of 167 percent. The final total labor rates are \$75.02 for technical personnel, \$88.58 for management, and \$37.42 for clerical. In addition to labor costs, capital costs include the costs of new sensors and instruments for checking CPMS accuracy. The capital/startup costs were estimated and annualized as described in the footnotes to Tables 2A, 2B, and 2C.

(c) Estimating Agency Burden and Cost.

No costs can be attributed to the development of the information collection requirements because the information collection requirements were developed as an incidental part of standards development. The recordkeeping requirements on the part of the respondents are required under the General Provisions to parts 60, 61, and 63. Because the respondent burden has already been applied under the General Provisions, no additional operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents would occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, would not be attributable to the ICR. The only costs that the Federal government would incur are user costs associated with the analysis of the recorded information, as presented in Table 3. Labor rates for Federal employees are based on the January 2007, Office of Personnel Management labor rates for General Schedule employees (http://www.opm.gov/oca/08tables/pdf/g_s_h.pdf). The base labor rates are \$31.34/hr for technical personnel (GS-12, step 5), \$51.80 for management personnel (GS-15, step 5), and \$17.67/hr for clerical personnel (GS-7, step 5). The base labor rates were multiplied by the

standard government benefits multiplication factor of 1.6. The resulting average hourly labor costs are \$50.14 for technical personnel, \$82.88 for management, and \$28.27 for clerical.

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

The EPA has identified 12,040 existing and new facilities that would be subject to the proposed rule in the first year, 24,070 existing and new facilities that would be subject in the second year, and 36,110 existing and new facilities that would be subject in the third year of the proposed rule. Details on the number of respondents affected by each individual burden item are provided in the footnotes to Tables 2A, 2B, and 2C.

(e) Bottom Line Burden Hours and Costs/Master Tables.

(i) Respondent tally. The bottom line respondent burden hours and costs, presented in Tables 2A to 2C, are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. The total annual number of responses is zero because there would be no reporting requirements. The estimated total annual recordkeeping hours for the first year of the proposed rule would be 223,604 at an annual labor cost of \$16,175,498. The estimated total annual hours for the second year of the proposed rule would be 311,529 at an annual labor cost of \$23,309,955. The estimated total annual hours for the third year of the proposed rule would be 420,852 at an annual labor cost of \$30,444,412. The estimated total capital/startup costs that would be incurred during the first year of the proposed rule would be \$6,071,246, and the annualized capital/startup costs would be \$1,539,861. The estimated total capital/startup costs that would be incurred during the second year of the proposed rule would be \$6,071,246, and the annualized capital/startup costs would be \$3,054,723. The estimated total capital/startup costs that would be incurred during the third year of the proposed rule would be \$6,071,246, and the annualized capital/startup costs would be \$4,573,656. The total annualized cost requested (including labor and the annualized capital/startup) for the proposed rule would be \$17,715,359 for the first year, \$26,364,678 for the second year, and \$35,018,069 for the third year.

(ii) The Agency tally. The bottom line Agency burden hours and costs, presented in Tables 3A to 3C, are calculated as in the respondent table, by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. In

this case, total cost is the sum of this total salary cost and total travel expenses for tests attended.

The total annual hours would be 4,825 for the first year, 6,217 for the second year, and 7,597 for the third year. The total annual cost is \$266,655 for the first year, \$353,915 for the second year, and \$440,453 for the third year.

(iii) *Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

(f) *Reasons for Change in Burden.*

This section does not apply because this is a new collection.

(g) *Burden Statement*

The average annual respondent burden would be 18.6 hours for the 12,037 affected facilities in the first year of the proposed rule; 12.9 hours for the 24,073 facilities in the second year, and 11.7 hours for the 36,110 facilities in the third year of the rule. These estimates include time for gathering information (e.g., conducting performance audits) and maintaining records.

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 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.

Send comments on the EPA's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Office of Environmental Information, Collection Strategies Division (2822), U. S. Environmental Protection Agency, 1200 Pennsylvania Avenue NW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street NW, Washington, DC

20503, marked "Attention: Desk Officer for EPA." Include the EPA ICR tracking number and OMB control number in any correspondence.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

TABLE 1. SIC AND NAICS CODES

SIC
12, 42, 44, 47, 109, 279, 281, 282, 283, 284, 285, 286, 287, 289, 386, 1011, 1021, 1031, 1041, 1044, 1051, 1061, 1099, 1311, 1321, 1411, 1422, 1423, 1429, 1442, 1445, 1446, 1454, 1455, 1459, 1474, 1475, 1479, 1492, 1496, 1499, 2034, 2035, 2046, 2099, 2211, 2241, 2295, 2296, 2392, 2394, 2396, 2399, 2421, 2426, 2429, 2431, 2435, 2436, 2439, 2441, 2448, 2449, 2451, 2452, 2491, 2493, 2499, 2514, 2522, 2531, 2542, 2599, 2611, 2621, 2631, 2652, 2653, 2655, 2656, 2657, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2711, 2721, 2741, 2754, 2759, 2761, 2771, 2812, 2813, 2816, 2819, 2821, 2822, 2823, 2824, 2832, 2833, 2834, 2835, 2836, 2841, 2842, 2843, 2844, 2851, 2861, 2865, 2869, 2873, 2874, 2875, 2879, 2891, 2892, 2893, 2895, 2899, 2911, 2951, 2952, 2992, 2999, 3011, 3021, 3052, 3053, 3061, 3069, 3074, 3079, 3081, 3082, 3083, 3084, 3085, 3086, 3087, 3088, 3089, 3111, 3131, 3142, 3143, 3144, 3149, 3161, 3171, 3172, 3199, 3211, 3221, 3229, 3274, 3281, 3291, 3292, 3295, 3296, 3299, 3312, 3313, 3315, 3316, 3317, 3321, 3322, 3324, 3325, 3329, 3331, 3334, 3339, 3341, 3351, 3353, 3354, 3355, 3356, 3357, 3363, 3364, 3365, 3366, 3369, 3398, 3399, 3411, 3412, 3421, 3423, 3425, 3429, 3431, 3432, 3441, 3442, 3443, 3444, 3446, 3448, 3449, 3451, 3452, 3462, 3463, 3465, 3466, 3469, 3471, 3479, 3482, 3483, 3484, 3489, 3491, 3492, 3493, 3494, 3495, 3497, 3499, 3511, 3519, 3523, 3524, 3531, 3537, 3543, 3545, 3559, 3562, 3566, 3568, 3569, 3579, 3585, 3592, 3599, 3621, 3634, 3639, 3644, 3645, 3646, 3647, 3663, 3677, 3691, 3693, 3694, 3695, 3711, 3713, 3714, 3715, 3716, 3720, 3721, 3724, 3726, 3728, 3731, 3732, 3743, 3751, 3760, 3761, 3764, 3765, 3769, 3792, 3795, 3799, 3821, 3829, 3841, 3842, 3843, 3851, 3861, 3911, 3914, 3915, 3931, 3942, 3944, 3949, 3951, 3952, 3953, 3955, 3961, 3965, 3991, 3993, 3995, 3996, 3999, 4225, 4226, 4512, 4581, 4612, 4911, 4922, 4923, 4924, 4925, 4931, 4932, 4939, 4941, 4952, 4953, 4961, 4971, 5086, 5122, 5149, 5169, 5171, 5172, 5541, 5995, 7218, 7231, 7241, 7391, 7397, 7399, 7534, 7538, 7539, 7641, 7699, 7911, 7999, 8062, 8063, 8069, 8071, 8072, 8091, 8211, 8221, 8222, 8231, 8243, 8244, 8249, 8299, 8411, 8711, 8731, 8734, 8741, 8748, 8922, 9511, 9661, 9711
NAICS
211, 221, 316, 321, 322, 324, 325, 326, 331, 332, 336, 339, 611, 622, 2123, 2211, 3231, 3241, 3251, 3252, 3253, 3254, 3255, 3256, 3259, 3271, 3273, 3274, 3279, 3327, 3328, 3329, 3332, 3335, 3339, 3341, 3342, 3343, 3344, 3361, 3362, 3363, 4227, 5622, 5629, 21221, 22121, 22132, 31332, 32211, 32222, 32411, 32613, 32614, 32615, 32791, 33422, 33634, 33992, 33995, 42269, 42271, 45431, 48611, 48621, 49311, 49319, 51113, 51114, 51223, 54171, 56220, 56221, 56292, 81142, 92711, 92811, 111998, 112519, 112910, 112990, 211111, 211112, 212111, 212112, 212113, 212210, 212221, 212222, 212231, 212234, 212299, 212319, 212322, 212324, 212325, 212393, 212399, 213113, 221112, 221320, 238910, 311211, 311212, 311221, 311225, 311340, 311421, 311423, 311823, 311830, 311911, 311920, 311941, 311942, 311991, 311999, 313210, 313320, 314911, 314992, 315299, 315999, 321211, 321212, 321213, 321214, 321219, 321911, 321918, 321999, 322110, 322121, 322122, 322130, 322211, 322212, 322213, 322215, 322221, 322222, 322223, 322224, 322225, 322226, 322231, 322291, 322299, 323111, 323112, 323116, 323119, 324121, 324199, 325131, 325181, 325182, 325188, 325192, 325199, 325211, 325221, 325222, 325311, 325312, 325320, 325411, 325412, 325991, 326111, 326113, 326121, 326122, 326191, 326192, 326150, 326199, 326211, 326212, 326299, 327211, 327212, 327213, 327410, 327991, 327992, 327993, 327999, 331111, 331112, 331210, 331221, 331222, 331312, 331315, 331316, 331319, 331419, 331492, 331511, 331512, 331513, 331521, 331524, 332115, 332116, 332212, 332431, 332612, 332618, 332812, 332912, 332951, 332999, 333111, 333112, 333120, 333313, 333319, 333611, 333612, 333613, 333618, 334613, 335121, 335122, 335312, 335911, 336111, 336112, 336120, 336211, 336213, 336214, 336312, 336350, 336399, 336411, 336412, 336413, 336414, 336415, 336419, 336612, 336992, 336999, 337124, 337127, 337214, 337215, 339111, 339112, 339114, 339911, 339912, 339914, 339999, 424690, 424720, 425110, 425120, 481111, 483111, 483112, 483113, 483114, 483211, 483212, 484110, 484121, 484122, 484210, 484220, 484230, 487210, 488111, 488119, 488190, 488310, 488320, 488330, 488390, 488490, 492110, 492210, 493110, 493120, 493130, 493190, 511199, 531130, 532411, 541380, 541710, 541990, 561720, 562111, 562112, 562119, 562213, 562219, 611310, 611692, 622110, 622310 811111, 811118, 811310, 811411, 811420, 924110, 928110

TABLE 2A. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE FIRST YEAR OF RULE

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year (b)	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (a)
1. Reviewing Instructions								
A. Read/understand rule	4.0	1.0	4.0	12,037	48,147	2,407	4,815	\$4,005,376
2. Developing, Acquiring, Installing, and Utilizing Technology and Systems								
A. Develop QC Plan (b)	40	1.0	40	1,495	59,782	2,989	5,978	\$4,973,335
B. Conduct accuracy audits	2.0	2.6	5.1	12,037	61,643	3,082	6,164	\$5,128,108
C. Perform visual inspections	0.25	0.039	0.010	12,037	118	5.9	12	\$9,800
D. Perform leak checks	1.0	2.0	2.0	12,037	24,000	1,200	2,400	\$1,996,549
E. Install new sensors (c)	2.0	0.035	0.069	10,796	749	37	75	\$62,329
3. Adjusting Existing Ways to Comply with Previously Applicable Requirements								
A. Adjust existing practices (d)	N/A							
4. Training Personnel								
A. Train personnel (d)	N/A							
5. Searching Data Sources								
A. Search data sources (e)	N/A							
6. Completing and Reviewing Information								
A. Review information (f)	N/A							
7. Transmitting or disclosing information								
A. Transmit/disclose information (g)	N/A							
Total Annual Burden and Cost (Salary)								\$16,175,498
Total Annual Number of Responses (g)				0				
Annual Capital Costs								
Total annual capital (h)								\$6,071,246
Annualized Capital Costs: (i)								\$1,539,861

- (a) Costs are based on the following hourly rates: technical at \$75.02, management at \$88.58, and clerical at \$37.42. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
 - (b) Applies to sources subject to 40 CFR part 60 standards.
 - (c) Applies only to rules with less stringent accuracy requirements; based on assumption that 10 percent of sensors would not meet accuracy requirement of proposed PS-17.
 - (d) Affected sources already must comply with basic requirements for operating and maintaining CPMS; no need to adjust existing practices or train personnel.
 - (e) No need to search data sources.
 - (f) Included in Item 2.
 - (g) No reporting requirements; no need to transmit/disclose information; no responses required.
 - (h) Includes costs of new sensors (see Item 2D) and costs of instruments, equipment, and materials for auditing CPMS.
 - (i) Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=i*(1+i)^t/((1+i)^t-1)$ where i = interest rate (%) and t = equipment life (years). Capital recovery factor (0.2439) based on 5 year equipment life and 7% interest rate.
- N/A = Not Applicable.

TABLE 2B. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE SECOND YEAR OF RULE

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year (b)	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (a)
1. Reviewing Instructions								
A. Read/understand rule	4.0	1.0	4.0	12,037	48,147	2,407	4,815	\$4,005,376
2. Developing, Acquiring, Installing, and Utilizing Technology and Systems								
A. Develop QC Plan (b)	40	1.0	40	1,495	59,782	2,989	5,978	\$4,973,335
B. Conduct accuracy audits	2.0	2.6	5.1	24,073	123,285	6,164	12,329	\$10,256,216
C. Perform visual inspections	0.25	0.039	0.010	24,073	236	12	24	\$19,600
D. Perform leak checks	1.0	2.0	2.0	24,073	47,999	2,400	4,800	\$3,993,099
E. Install new sensors (c)	2.0	0.035	0.069	10,976	749	37	75	\$62,329
3. Adjusting Existing Ways to Comply with Previously Applicable Requirements								
A. Adjust existing practices (d)	N/A							
4. Training Personnel								
A. Train personnel (d)	N/A							
5. Searching Data Sources								
A. Search data sources (e)	N/A							
6. Completing and Reviewing Information								
A. Review information (f)	N/A							
7. Transmitting or disclosing information								
A. Transmit/disclose information (g)	N/A							
Total Annual Burden and Cost (Salary)								\$23,309,955
Total Annual Number of Responses (g)				0				
Annual Capital Costs								
Total annual capital (h)								\$6,071,246
Annualized Capital Costs: (i)								\$3,054,723

(a) Costs are based on the following hourly rates: technical at \$75.02, management at \$88.58, and clerical at \$37.42. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) Applies to sources subject to 40 CFR part 60 standards.

(c) Applies only to rules with less stringent accuracy requirements; based on assumption that 10 percent of sensors would not meet accuracy requirement of proposed PS-17.

(d) Affected sources already must comply with basic requirements for operating and maintaining CPMS; no need to adjust existing practices or train personnel.

(e) No need to search data sources.

(f) Included in Item 2.

(g) No reporting requirements; no need to transmit/disclose information; no responses required.

(h) Includes costs of new sensors (see Item 2D) and costs of instruments, equipment, and materials for auditing CPMS.

(i) Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF = i * (1+i)^t / ((1+i)^t - 1)$ where i = interest rate (%) and t = equipment life (years). Capital recovery factor (0.2439) based on 5-yr equipment life and 7% interest rate.

N/A = Not Applicable.

TABLE 2C. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE THIRD YEAR OF RULE

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year (b)	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (a)
1. Reviewing Instructions								
A. Read/understand rule	4.0	1.0	4.0	12,037	48,147	2,407	4,815	\$4,005,376
2. Developing, Acquiring, Installing, and Utilizing Technology and Systems								
A. Develop QC Plan (b)	40	1.0	40	1,495	59,782	2,989	5,978	\$4,973,335
B. Conduct accuracy audits	2.0	2.6	5.1	36,110	184,928	9,246	18,493	\$15,384,324
C. Perform visual inspections	0.25	0.039	0.010	36,110	353	18	35	\$29,400
D Perform leak checks	1.0	2.0	2.0	36,110	71,999	3,600	7,200	\$5,989,648
E. Install new sensors (c)	2.0	0.035	0.069	10,976	749	37	75	\$62,329
3. Adjusting Existing Ways to Comply with Previously Applicable Requirements								
A. Adjust existing practices (d)	N/A							
4. Training Personnel								
A. Train personnel (d)	N/A							
5. Searching Data Sources								
A. Search data sources (e)	N/A							
6. Completing and Reviewing Information								
A. Review information (f)	N/A							
7. Transmitting or disclosing information								
A. Transmit/disclose information (g)	N/A							
Total Annual Burden and Cost (Salary)								\$30,444,412
Total Annual Number of Responses (g)				0				
Annual Capital Costs								
Total annual capital (h)								\$6,071,246
Annualized Capital Costs: (i)								\$4,573,656

- (a) Costs are based on the following hourly rates: technical at \$75.02, management at \$88.58, and clerical at \$37.42. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) Applies to sources subject to 40 CFR part 60 standards.
- (c) Applies only to rules with less stringent accuracy requirements; based on assumption that 10 percent of sensors would not meet accuracy requirement of proposed PS -17.
- (d) Affected sources already must comply with basic requirements for operating and maintaining CPMS; no need to adjust existing practices or train personnel.
- (e) No need to search data sources.
- (f) Included in Item 2.
- (g) No reporting requirements; no need to transmit/disclose information; no responses required.
- (h) Includes costs of new sensors (see Item 2D) and costs of instruments, equipment, and materials for auditing CPMS.
- (i) Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF = (i) * (1+i)^t / ((1+i)^t - 1)$ where i = interest rate (%) and t = equipment life (years). Capital recovery factor (0.2439) based on 5 year equipment life and 7% interest rate.

N/A = Not Applicable.

TABLE 3A. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR THE FIRST YEAR OF THE RULE

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (a)
Attend initial validation check (b)	8	1	8	60	480	24	48	\$27,415
Approve request for alternative installation and/or validation check (c)	16	1	16	120	1,920	96	192	\$109,661
Review records of CPMS, installation, operation, and audits (d)	2	1	2	120	240	12	24	\$13,708
Attend accuracy audit (e)	8	1	8	120	960	48	96	\$54,831
Review QA/QC procedures (f)	4	1	4	149	596	29.8	59.6	\$34,041
Litigation (g)	-	-	-	-	-	-	-	-
Total Burden and Cost (Salary)								\$239,655
Travel Expenses for Tests Attended (h)								\$27,000
Total Annual Cost (Salary + Expenses)								\$266,655

- (a) Costs are based on the following hourly rates: technical at \$50.14, management at \$82.88, and clerical at \$28.27. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) Assumes Agency personnel will attend 0.5 percent of the 12,037 plants that will conduct initial validations.
- (c) Assumes 1.0 percent of 12,037 plants will submit request for alternative installation or validation check.
- (d) Assumes Agency personnel will review 1 percent of installation, operation, and audit records for 12,037 plants.
- (e) Assumes Agency personnel will attend an accuracy audit for 1.0 percent of the 12,037 plants that will conduct audits.
- (f) Assumes Agency personnel will review 10 percent of the 1,495 plants that must develop QA/QC procedures.
- (g) Assumes no plants will be involved in litigation.
- (h) Assumes Agency personnel (1 person) will spend 1 day per visit, at \$50 per diem per day, and \$100 transportation expense per round trip to attend validation check or audit.

TABLE 3B. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR THE SECOND YEAR OF THE RULE

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (a)
Attend initial validation check (b)	8	1	8	60	480	24	48	\$27,415
Approve request for alternative installation and/or validation check (c)	16	1	16	120	1,920	96	192	\$109,661
Review records of CPMS, installation, operation, and audits (d)	2	1	2	241	482	24	48	\$27,530
Attend accuracy audit (e)	8	1	8	241	1,928	96	193	\$110,118
Review QA/QC procedures (f)	4	1	4	149	596	30	60	\$34,041
Litigation (g)	-	-	-	-	-	-	-	-
Total Burden and Cost (Salary)								\$308,765
Travel Expenses for Tests Attended (h)								\$45,150
Total Annual Cost (Salary + Expenses)								\$353,915

- (a) Costs are based on the following hourly rates: technical at \$50.14 management at \$82.88 and clerical at \$28.27. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) Assumes Agency personnel will attend 0.5 percent of the 12,037 plants that will conduct initial validations.
- (c) Assumes 1.0 percent of 12,037 plants will submit request for alternative installation or validation check.
- (d) Assumes Agency personnel will review 1 percent of installation, operation, and audit records for 24,073 plants.
- (e) Assumes Agency personnel will attend an accuracy audit for 1.0 percent of the 24,073 plants that will conduct audits.
- (f) Assumes Agency personnel will review 10 percent of the 1,495 plants that must develop QA/QC procedures.
- (g) Assumes no plants will be involved in litigation.
- (h) Assumes Agency personnel (1 person) will spend 1 day per visit, at \$50 per diem per day, and \$100 transportation expense per round trip to attend validation check or audit.

TABLE 3C. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR THE THIRD YEAR OF THE RULE

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (a)
Attend initial validation check (b)	8	1	8	60	480	24	48	\$27,415
Approve request for alternative installation and/or validation check (c)	16	1	16	120	1,920	96	192	\$109,661
Review records of CPMS, installation, operation, and audits (d)	2	1	2	361	722	36	72	\$41,237
Attend accuracy audit (e)	8	1	8	361	2,888	144	289	\$164,949
Review QA/QC procedures (f)	4	1	4	149	596	30	60	\$34,041
Litigation (g)	-	-	-	-	-	-	-	-
Total Burden and Cost (Salary)								\$377,303
Travel Expenses for Tests Attended (h)								\$63,150
Total Annual Cost (Salary + Expenses)								\$440,453

- (a) Costs are based on the following hourly rates: technical at \$50.14, management at \$82.88 and clerical at \$28.27. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) Assumes Agency personnel will attend 0.5 percent of the 12,037 plants that will conduct initial validations.
- (c) Assumes 1.0 percent of 12,037 plants will submit request for alternative installation or validation check.
- (d) Assumes Agency personnel will review 1 percent of installation, operation, and audit records for 36,110 plants.
- (e) Assumes Agency personnel will attend an accuracy audit for 1.0 percent of the 36,110 plants that will conduct audits.
- (f) Assumes Agency personnel will review 10 percent of the 1,495 plants that must develop QA/QC procedures.
- (g) Assumes no plants will be involved in litigation.
- (h) Assumes Agency personnel (1 person) will spend 1 day per visit, at \$50 per diem per day, and \$100 transportation expense per round trip to attend validation check or audit.

ATTACHMENT 1

SUMMARY OF REPORTING AND RECORDKEEPING REQUIREMENTS

Summary of Recordkeeping and Reporting Requirements

Requirements	Regulation Reference
Notifications (none required)	
Records	
Record retention	' 60.7(f) ' 61.14(f) ' 63.10(b)(1) PS-17, Section 14.2 Procedure 4, Section 14.2
Records and documentation of installation and initial validation check	' 60.7(b) and (f) ' 61.14(f) ' 63.8(d)(3) PS-17, Section 14.1
Records and documentation of accuracy audits and corrective actions taken	' 60.7(b) and (f) ' 61.14(f) ' 63.8(d)(3) Procedure 4, Section 14.1
Reports (none required)	