

**INFORMATION COLLECTION REQUEST**  
**FOR THE REVISIONS TO 40 CFR PARTS 72 & 75**  
**SUPPORTING STATEMENT**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1.1 Title of the Information Collection**

Revisions to the Emissions Monitoring Rule under the Acid Rain Program, NO<sub>x</sub> Budget Trading Program, Clean Air Interstate Programs (Final Rule), EPA ICR Number 2203.02, OMB Control Number 2060-NEW.

**1.2 Background**

Title IV of the Clean Air Act Amendments of 1990 (the acid rain title) established goals to reduce annual emissions of sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) and place a national cap on sulfur dioxide emissions beginning in the year 2000. To ensure compliance with the emissions reduction requirements and to provide the national consistency needed to foster the allowance market, sections 408 and 412 of Title IV require the designated representative of the owners and operators of each affected acid rain source to obtain an operating permit for the affected source and to certify that an approved emissions monitoring system has been installed and is properly operated at each affected unit's source of emissions. In addition, under a Federal NO<sub>x</sub> Budget Trading Program developed in conjunction with ozone attainment efforts in the eastern United States, many additional sources also must meet similar requirements as part of an emissions trading program. In May 2005, EPA promulgated the Clean Air Interstate Rule (CAIR), which may broaden the trading program concept to additional sources.

Emissions monitoring and reporting is the foundation upon which these allowance trading systems are based. Without accurate monitoring and reporting of emissions, the integrity of the allowance system would be undermined, and there would be no assurance that emissions had been reduced.

The legislative requirements in Title IV require all affected Phase I and Phase II sources to install SO<sub>2</sub> and NO<sub>x</sub> CEM systems, opacity monitors (COMS), and flow monitors (or approved alternatives). Affected gas- and oil-fired units may elect to use approved alternative monitoring methods that involve fuel flowmeters and fuel sulfur sampling and analysis. In addition, peaking units that burn natural gas and/or fuel oil may use an excepted method for calculating NO<sub>x</sub> emission rates. Finally, EPA allows certain low mass emissions (LME) units to use assumed emission factors together with operational data to calculate emissions. EPA has followed similar requirements for new emissions trading programs.

Data handling or reporting is required by the law, but not specified. Under the promulgated regulations, however, EPA imposes data handling, reporting, and recordkeeping requirements. The EPA requires that all affected units required to monitor and report emissions under these trading programs use a data acquisition and handling system (DAHS)

to record and submit hourly data in an electronic data report (EDR) format.

The Clean Air Markets Division (CAMD) has undertaken the re-engineering of the process and data systems associated with emissions, monitoring plan, and certification data into the new Emissions Collection and Monitoring Plan System (ECMPS). As part of the ECMPS project, CAMD reviewed how monitoring plan information, certification/recertification applications, on-going quality assurance data, and emissions data are maintained, quality assured, and submitted. CAMD also reviewed the tools available for checking and submitting data on a quarterly and ozone season basis.

Based upon this review, CAMD developed goals for the ECMPS project. They include:

- Creating a single client tool for all users to check and submit data
- Providing users with the ability to quality assure data prior to submission
- Providing users with one set of feedback
- Allowing for seamless updates to the client tool
- Providing direct access to EPA's database through the client tool
- Maintaining select data outside of the electronic data report
- Creating new XML file format
- Developing new security requirements

Adding flexibility to the process is one of the main reasons for changing how monitoring and emissions data are quality assured and submitted. Several of the changes add flexibility to the process. First, monitoring plans will no longer be required as part of the quarterly file. Second, sources will be able to submit on-going quality assurance test data after the tests are performed, and will not have to wait to submit the data as part of a quarterly report. Lastly, the new XML file format will allow the data to be organized based on dates and hours instead of pollutant type. To accomplish these objectives, EPA is making certain modifications to 40 CFR parts 72 and 75. In addition, EPA also is making some additional changes to clarify certain provisions, implement approaches approved through existing guidance, or make similar types of minor rule improvements.

### **1.3 Information to Be Collected**

The existing requirements in 40 CFR Part 75 are mandatory for all sources subject to the Acid Rain Program under Title IV of the Clean Air Act, as well as certain other emissions trading programs administered by EPA. These requirements are covered by existing ICRs for the Acid Rain Program (ICR No. 1633.14, OMB Control Number 2060-0258), the NO<sub>x</sub> SIP Call (ICR 1857.04, OMB Control Number 2060-0445), and the Clean Air Interstate Rule (ICR 2152.02, OMB Control Number 2060-0570). The information requirements in this ICR are based on revisions to the monitoring, recordkeeping, and reporting requirements, and reflect the one time costs necessary for sources to review the rule revisions and to adapt their recordkeeping and reporting systems to the revised requirements. These revisions do not impose new requirements upon sources with regard to monitoring or quality assurance activities. Thus, this ICR only covers specific monitoring, recordkeeping, and reporting elements that will be necessitated by the revisions: (1) reviewing the new requirements; (2) making changes to data acquisition and handling systems (DAHs); and (3) debugging software changes.

All burdens associated with other elements of Parts 72 and 75 will remain covered by the underlying ICRs of the existing programs. When changes covered by this rule are final, the burden estimates under the existing program ICRs will be adjusted accordingly.

The total respondent reporting burden for this collection of information is estimated to be 124,976 labor hours.

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

This section describes EPA's need for the information collection described above and the legal authority for conducting collections. The users of collected information are also described.

### **2.1 Need/Authority for the Collection**

Section 412(a) of Title IV requires the use of CEM systems (or alternative monitoring systems demonstrated to be equivalent) at each affected unit's source of emissions. Section 504(a) of Title V requires that the results of any required monitoring be submitted to the permitting authority no less often than every six months. The information collection is consistent with satisfying these minimum statutory requirements. EPA's model rules for implementation of the NO<sub>x</sub> Budget Trading Program (40 CFR part 96, subparts A-I) and CAIR (40 CFR part 96, subparts AA-end) impose comparable requirements.

Results of continuous emission monitoring system performance tests allow EPA to certify that monitors perform well enough to produce accurate emissions data. Emissions data is used to monitor compliance with emissions requirements under Title IV and other EPA trading programs, and to provide a basis for analyzing progress in meeting air quality objectives.

### **2.2 Practical Utility/Users of the Data**

Data from emissions monitoring is indispensable to successful implementation of EPA trading programs. EPA can only monitor compliance with and enforce these trading programs by having accurate emissions data for each affected unit.

Electric utilities, energy consultants, and power marketing companies can use the emissions data to project future allowance costs and availability. Academic institutions can perform data modeling to evaluate environmental benefits and estimate health effects of emissions reductions. EPA and other agencies use the data to try to correlate the reduction of SO<sub>2</sub> and NO<sub>x</sub> emissions with a decrease in acid precipitation and ambient air quality pollutant levels, and also to measure the impacts of other existing emissions trading programs. The emissions data provide the accountability to allow these trading programs to function without more stringent command and control approaches.

## **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

This section describes (1) efforts by EPA to learn whether the information requested is available from other sources, (2) consultations with respondents and data users to plan collections, monitor their usefulness, and minimize the collection burden, (3) effects of less frequent collections, and (4) justification for deviations from OMB's general guidelines.

### **3.1 Nonduplication**

All information requested from respondents under this ICR is required by statute and/or regulation, and the burden and costs of complying are covered by existing ICRs. This ICR covers only the need for respondents to review the revisions to Part 75 necessitated by changes in EPA's data systems and to adapt their recordkeeping and reporting systems to the revised requirements. As a result of changes to EPA's data systems, respondents will continue to provide the data they currently provide but in a different manner and format.

### **3.2 Consultations**

As part of the ECMPS project, EPA has met with many stakeholders and received input on the changes under consideration and the timetable for action. The rule revisions, including the burdens associated with DAHS changes, reflects that stakeholder input.

### **3.3 Effects of Less Frequent Collection**

The general schedule for submissions is established in the underlying emissions trading programs. As part of the rule revisions, EPA would reduce the frequency of monitoring plan submittals. This should reduce burdens on sources and allow EPA to focus on monitoring plan data only as the plans change over time.

### **3.4 Confidentiality and Sensitive Questions**

Information collected through this activity is not confidential or of a sensitive nature.

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

This section lists the major categories of businesses that participate in EPA-administered emissions trading programs, the data items requested from program participants, and the activities in which the participants must engage to assemble or submit the required data items.

### **4.1 Respondents/NAICS Codes**

Entities regulated by this action primarily are fossil fuel-fired boilers, turbines, and combined cycle units that serve generators that produce electricity, generate steam, or cogenerate electricity and steam. Although for the Acid Rain Program, part 75 primarily regulates the electric utility industry, certain State and Federal NO<sub>x</sub> mass emission trading programs rely on subpart H of part 75, and those programs may include industrial boilers, turbines, and combined cycle units, and certain process units from other industries (such as refinery process heaters or cement kilns).

## **4.2 Information Requested**

This section lists the data items requested from affected sources for the collection described in this ICR. This section also defines the activities in which respondents must engage to assemble, submit, or store these data items.

### **4.2.1 Data Items, Including Recordkeeping Requirements**

There are only a few new or modified data items requested from respondents under the revisions and this ICR (See Appendix A). Because these few items will be incorporated into the electronic data reporting software (or software upgrades) that the sources will purchase, this ICR covers only the need for respondents to review the revisions to Part 75 necessitated by changes in EPA's data systems and to adapt their recordkeeping and reporting systems to the revised requirements. As a result of changes to EPA's data systems, respondents generally will continue to provide the same basic data they currently provide but in a different manner and format.

Emissions monitoring requirements specify that affected sources must (1) submit a monitoring plan for each affected unit at a source, (2) submit data for certification of each monitor, and (3) record hourly operational, pollutant monitor, and flow monitor data for each affected unit and submit quarterly reports of their emissions data to EPA. Respondents are required by 40 CFR 75.64 to submit the quarterly emissions data electronically, by direct electronic submission to EPA, and must also include a certification statement by the designated representative of the unit. Under the 2002 rule revisions, EPA requires the certification statement to be submitted electronically unless it approves a hardcopy submission. All records are to be kept for three years.

### **4.2.2 Respondent Activities**

The primary tasks that are performed by respondents to meet the emissions monitoring requirements are (1) completing and submitting appropriate monitoring plan forms for each affected source and each affected unit at a source; (2) conducting tests to certify the operation of monitors, and submitting test results to EPA; (3) recording hourly emissions data (this activity generally is performed electronically); (4) operation and maintenance activities associated with the monitoring, including quality assurance activities; (5) assuring data quality, preparing quarterly reports of emissions data and submitting these reports to EPA; and (6) responding to error messages generated by EPA as a part of automated data checks or electronic audits, or to field audits conducted by EPA. In addition, respondents must purchase the necessary monitoring hardware (or pay for fuel sampling and analysis in some cases) and purchase the electronic data reporting software (or software upgrades).

This ICR covers only the need for respondents to review the revisions to Part 75 necessitated by changes in EPA's data systems and to adapt their recordkeeping and reporting systems to the revised requirements

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

## **METHODOLOGY, AND INFORMATION MANAGEMENT**

The first part of this section describes Agency (EPA) activities related to the acquisition, analysis, storage, and distribution of the information collected from designated representatives of affected sources that are required to submit monitoring and emissions data. The second part describes the information management techniques employed to increase the efficiency of collections. The third part discusses the burden or benefits of the collection activities described in this ICR to small entities. The last part outlines the schedule for collecting information.

### **5.1 Agency Activities**

The major EPA activities related to emissions monitoring and reporting include (1) reviewing monitoring plans and certification applications, and (2) processing, reviewing and evaluating reports of quarterly emissions data from affected units. These activities are covered by existing ICRs.

### **5.2 Collection Methodology and Management**

To ensure consistency nationwide and to expedite (1) data entry, (2) the allocation of allowances, and (3) permit issuance, EPA requires that standard reporting forms or equivalent formats or standard electronic reporting formats be used to submit all information to be collected under this ICR.

The 2005 rule revisions change Part 75 monitoring, recordkeeping, and reporting requirements to accord with the fundamental changes in EPA's data systems, which are designed to unify and simplify data reporting, as well as to provide flexibility to respondents.

EPA also has established the Clean Air Markets Home Page on the Internet, which includes detailed information collected from emissions reports. Those without access to the Internet may use the Acid Rain Hotline to request information.

### **5.3 Small Entity Flexibility**

For the purposes of the programs covered by this ICR, EPA has adopted the Small Business Administration's definition of a "small" electric power utility as one that generates a total of less than 4 billion kilowatt-hours per year. Generally, although about two-thirds of the affected sources in Phase II generate a total of less than 4 billion kilowatt-hours per year and are required to participate in some collections under this ICR (e.g., submitting information for certification of monitors and submitting quarterly emissions monitoring reports), the costs to these sources for collections under this ICR are small relative to the revenues they generate.

All affected sources under the Clean Air Act Amendments of 1990 are required to submit permit applications and to respond to other collections under this ICR, according to the same parameters (with the exception of operators of new units of 25 MW or less, who may receive an exemption from the Acid Rain Program requirements if they qualify). Retired units may also be exempted from some reporting requirements.

In the January 11, 1993 final Acid Rain Core Rules, EPA provided for a conditional

exemption from the emissions reduction, permitting, and emissions monitoring requirements of the Acid Rain Program for new units having a nameplate capacity of 25 MWe or less that burn fuels with a sulfur content no greater than 0.05 percent by weight, because of the high cost of monitoring emissions from these sources and the *de minimis* nature of their emissions.

The 2002 Part 75 rule revisions also created an additional small unit exception. This exception incorporates optional reduced monitoring, quality assurance, and reporting requirements into Part 75 for units that combust gas and/or fuel oil and that have low levels of mass emissions (referred to as low mass emissions (LME) units). Originally, EPA required that LME units emit no more than 25 tons of SO<sub>2</sub> and no more than 50 tons of NO<sub>x</sub> annually, and that they calculate no more than 25 tons of SO<sub>2</sub> and no more than 50 tons of NO<sub>x</sub> annually based on required procedures for calculating and reporting emissions. As part of the 2002 Part 75 revisions, EPA increased the NO<sub>x</sub> threshold to <100 tons per year (and, for units that are subject to the NO<sub>x</sub> SIP Call, no more than 50 tons per ozone season). Qualifying LME units are no longer required to keep monitoring equipment installed on (or conduct sulfur-in-fuel sampling for) low mass emissions units, nor are they required to perform quality assurance or quality control tests. Moreover, emissions reporting requirements significantly simplified for these units.

Even if a gas- or oil-fired unit does not qualify for the LME provisions, Part 75 allows gas and oil-fired units to use methods other than continuous emission monitoring systems (CEMS). The 1999 Part 75 revisions significantly reduced the costs and burdens associated with fuel sampling and QA activities for these non-CEMS methods. As discussed in the Regulatory Impact Analysis (RIA) of the final Acid Rain Implementation Regulations (October 19, 1992), smaller utilities are more likely to be dependent on these oil- and gas-fired units, especially very small utilities (see p. 5-14 of that RIA document).

Further reductions in requirements aimed specifically at small entities are limited because of the statutory requirements that all affected units use CEMS (or an equivalent method) to record and report emissions data for Title IV purposes.

#### **5.4 Collection Schedule**

Monitoring plans must be submitted initially, and, under the rule revisions, only at subsequent intervals, if elements of the monitoring plan change over time. Quarterly reports are due for each quarter during the life of this information collection request. In addition, EPA has provided for notifications to the Agency for semi-annual or annual quality assurance testing and for situations where a unit will have a revised certification deadline (for example, notifications of unit start-up for new units). This collection schedule is provided for under existing ICRs.

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

This section estimates the annual paperwork burden and cost to sources for reviewing the rule revisions and adapting their recordkeeping and reporting systems to the revised requirements.

The information requirements in this ICR are based on the revisions to the

monitoring, recordkeeping, and reporting requirements, and reflect the one time costs necessary for sources to review the rule revisions and adapt their recordkeeping and reporting systems to the revised requirements. EPA believes that the long term implications of the rule revisions will be to reduce the ongoing burdens and costs associated with Part 75 compliance, but those impacts will be addressed as EPA renews the individual program ICRs.

To calculate labor costs, EPA used the following amounts: \$79.29 per hour for managers and \$50.44 per hour for technicians. These rates were derived by using the rates from the previous ICR and updating them with the Employment Cost Index to June 2005.

### **6.1 Estimating Respondent Burden**

The primary tasks performed by owners and operators of affected units under the information collection are to (1) review the regulations, and (2) reprogram a DAHS and debug the software.

#### *(i) Regulatory Review.*

EPA estimates that the time to review instructions and requirements should be 24 manager hours and 24 technician hours per year, per source. This increase reflects the cost of familiarization with these rule revisions, and is consistent with the estimate used at the time EPA promulgated the 2002 revisions to Part 75 (a conservative approach given that the 2002 revisions were more extensive than these revisions).

After the first year, there are no additional labor costs associated with the rule revisions. Note that the underlying ICRs already account for ongoing rule review burdens. (4 manager hours and 4 technician hours). EPA is making available an easy-to-use unofficial redline/strikeout version of the regulations to simplify the process of reviewing the regulatory changes.

#### *(ii) DAHS Upgrade and Debugging.*

Each source must purchase (or create) and install computer software designed to implement the electronic data reporting (EDR) formats required under the Acid Rain Program. Because of the rule revisions, the existing software will have to be upgraded. The costs of the upgrade are discussed in Section 6.4.2, below. The Agency estimates that sources will incur 8 manager and 16 technical hours to coordinate the purchase and installation of the upgraded software. In addition, consistent with the prior ICR, EPA estimates that each source will have some burdens for debugging the software. Consistent with the previous ICR, EPA assumes a higher burden in the first year of implementing the new, upgraded software (see line 2 of Exhibit 1). The debugging costs in subsequent years is already accounted for in the underlying ICRs, so no additional, ongoing burdens are estimated for this activity in this ICR. Sources that have only low mass emissions units will not be impacted by these requirements and are excluded from the total number of respondents for these line items in Exhibit 1.

In addition, new units will not be required to upgrade the software since they will be purchasing the software for the first time with the upgrades already included. They will incur the overall capital expense of systems purchase, and an appropriate line item for this capital/startup cost is included. In addition, they will have debugging efforts, just as other units, but these burdens and costs also are accounted for in the underlying program ICRs.

## **6.2 Estimating Respondent Costs**

Exhibit 1 summarizes the annual respondent costs. The following discussion describes how those costs were derived.

### *(i) Estimating Total Capital and Annual Operations and Maintenance Costs*

Capital/start-up costs include the cost of purchasing an upgrade to the DAHS software for each source. The estimated cost is \$4,000 based on DAHS upgrade estimates used in the current Acid Rain Program ICR for a DAHS upgrade that is consistent with the overall level expected.

### *(ii) Capital/Start-up vs. Operating and Maintenance (O & M) Costs*

Capital costs reflect one-time costs for purchase of equipment which will be used over a period of years. Conversely, operating and maintenance costs are those costs which are incurred on an annual or other scheduled basis. For instance, costs associated with quality assurance activities, such as spare parts or contractor costs for work, will be incurred on an annual basis.

### *(iii) Annualizing Capital Costs*

The capital costs of equipment were annualized over a 10-year period at a discount rate of seven percent. Note that these estimates do not include ongoing capital costs that were capitalized over more than a 3 year period in the underlying program ICRs. Those costs are included in those separate ICRs. The annualized cost of the necessary DAHS upgrade purchase associated with the rule revisions is \$570 per source.

## **6.3 Estimating Agency Burden and Costs**

See section 5.1.

## **6.4 Estimating the Respondent Universe and Total Burden and Costs**

EPA estimates that: (a) 1,542 sources will review instructions and requirements; (b) 870 sources (this latter number excludes sources with only low mass emissions units and/or new units) will reprogram and debug DAHS computer software. Low mass emissions units will not have to modify their DAHS, and sources with only new units already have their initial startup burdens and costs accounted for in the underlying program ICRs. Exhibit 1 shows the total burden and total cost based on this respondent universe.

It is important to note that this ICR does not include the more than 700 sources that will be affected by the Clean Air Interstate Rule (CAIR). The burden and costs to these sources has been accounted for in the CAIR collection request (ICR No. 2152.02, OMB Control Number 2060-0570), which includes the need to review Part 75 and install and debug a DAHS.

**EXHIBIT 1**  
**RESPONDENT BURDEN/COST ESTIMATES RELATED TO REVISIONS OF 40 CFR**  
**PARTS 72 & 75**

<b>INFORMATION COLLECTION ACTIVITY</b>	<b>Mgr. \$79.29/Hour</b>	<b>Tech. \$54.48/Hour</b>	<b>Respondent Hours</b>	<b>Labor Cost</b>	<b>Cont./ O&amp;M Cost</b>	<b>Capital/ Startup Cost</b>	<b>No. of Resp.</b>	<b>Total Hours</b>	<b>Total Cost</b>
1. Review rule revisions and requirements	24	24	48	\$3,210	\$0	\$0	1542	74,016	\$4,949,820
2a. DAHS Upgrade	8	16	24	\$1,506	\$0	\$570	870	20,880	\$1,806,120
2b. DAHS Debugging	8	24	32	\$1,942	\$0	\$0	940	30,080	\$1,825,480
<b>TOTAL:</b>								124,976	\$8,581,420

**6.4 Reasons for Change in Burden**

This is a one time information collection request. As noted above, this collection request reflects the one time costs necessary for sources to review the rule revisions and adapt their recordkeeping and reporting systems to the revised requirements. EPA believes that the long term implications of the rule revisions will be to reduce the ongoing burdens and costs associated with Part 75 compliance. The Agency will address these impacts as it renews the individual program ICRs.

**6.5 Burden Statement**

The respondent reporting burden for this collection of information is estimated to be 124,976 labor hours. The total cost is estimated to be \$8,581,420. This estimate includes burdens for rule review, recordkeeping and reporting software upgrades, and software debugging activities, as well as the capital costs of upgrading recordkeeping and reporting software.

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 81 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including

the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2005-0132, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center 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-2005-0132 and OMB Control Number 2060-NEW in any correspondence.

## **Appendix A**

### **Parts 72 & 75 Rule Revision Data Element Changes**

New monitoring plan data elements include:

- For dual range monitoring components, value at which component switches from normal to secondary scale;
- Indicator for non-load based units;
- Indicator of exemption from 3-load flow RATA requirement;
- For each monitoring location, stack/duct shape code, material code, and duct indicator;
- Identification of applicable bypass approach

Data requirements being removed:

- Fuel Classification for boiler
- Primary/Secondary control indicator;
- Type of fuel associated with each monitoring methodology;
- Primary/Secondary methodology indicator;
- Appendix E NO<sub>x</sub> Correlation Curve Segment Data

Revised monitoring plan format not to include:

- Facility Short Name;
- Unit Program Classification;
- Unit Boiler Type;
- Date of Commence Operation (SUB H);
- Date of First Commence Commercial Operation (ARP);
- Unit Retirement Date, Program Code;
- Reporting Frequency, Program Participation Date;
- State Regulation Code, State or Local Agency Code;
- All EIA Cross Reference information

Requirements being replaced:

- Component Status with Component Activation date/hour and Deactivation date/hour;
- Formula Status with Formula Activation date/hour and Deactivation date/hour;
- Submission Status of Fuel Flowmeter with Activation data/hour and Deactivation date/hour, as appropriate;
- Monitoring component type code simplified into:
  - Component type code (CO<sub>2</sub>, SO<sub>2</sub>, NO<sub>x</sub>, etc.)
  - Analyzer range code (H, L, A)
  - Moisture measurement basis code (wet or dry)