

**SUPPORTING STATEMENT PART A:
INFORMATION COLLECTION REQUEST
FOR THE
MANDATORY REPORTING OF GREENHOUSE GASES –
PROPOSED RULE**

**OMB Control No. 2060-NEW
EPA ICR No. 2300.01**

March 16, 2009

Final

**SUPPORTING STATEMENT
FOR MANDATORY REPORTING OF GREENHOUSE GASES, PROPOSED RULE
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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

TITLE: “Mandatory Reporting of Greenhouse Gases (GHG Reporting Rule) – Proposed Rule.”

OMB Control Number: 2060-NEW

1(b) Short Characterization/Abstract

The United States (U.S.) Environmental Protection Agency (EPA) has proposed the GHG Reporting Rule, which requires reporting of GHG emissions from all sectors of the economy.

The proposed rule would establish mandatory reporting requirements for some direct greenhouse gas emitters as well as some fossil fuel suppliers, industrial GHG suppliers, and vehicle and engine manufacturers. The proposed rule does not require control of greenhouse gases. Instead, it requires that sources emitting above certain threshold levels of carbon dioxide (CO₂) equivalent (CO₂e) monitor and report emissions. Additionally, all facilities in certain industry sectors, such as petroleum refineries, would report emissions to EPA.

Under the proposed rule, respondents would collect and report data on anthropogenic greenhouse gas emissions including CO₂, methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and other fluorinated compounds (e.g., hydrofluorinated ethers, HFEs) used in boutique applications such as electronics and anesthetics. Those that determine they are under their sector-specific reporting threshold would not be required to report and have no further obligation under the rule; those that exceed this threshold or that belong to a sector in which all must report would be required to implement the reporting requirements of the proposed rule.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Signed into law on December 26, 2007, the FY2008 Consolidated Appropriations Act (henceforth referred to as the “Appropriations Act”) directed EPA to “develop and publish a draft rule not later than 9 months after the date of enactment of this Act, and a final rule not later than 18 months after the date of enactment of this Act, to require mandatory reporting of greenhouse gas emissions above appropriate thresholds in all sectors of the economy of the United States.”

The accompanying explanatory statement further directed EPA to “use its existing authority under the Clean Air Act” (CAA) to develop a mandatory GHG reporting rule. “The Agency is further directed to include in its rule reporting of emissions resulting from upstream production and downstream sources, to the extent that the Administrator deems it appropriate. The Administrator shall determine appropriate thresholds of emissions above which reporting is required, and how frequently reports shall be submitted to EPA. The Administrator shall have discretion to use existing reporting requirements for electric generating units” under §821 of the 1990 CAA amendments.

In accordance with this directive, EPA is establishing a mandatory reporting program using its authority under §114 and §208 of the CAA.

- CAA §114(a) provides EPA broad authority to collect data for the purpose of, among other things, “carrying out any provision” of the Act. Under §114(a)(1), EPA may require any person who owns or operates any emission source or may have information necessary to carry out the provisions of the Act to measure emissions (including installing monitoring equipment), maintain records, submit reports, and provide other information the Administrator may reasonably require.
- CAA §208, in Title II of the Act, provides EPA with similar authority regarding the manufacturers of new motor vehicles or new motor vehicle engines.

Further information on the authority provided under §114 and §208 of the CAA is contained in section I.C. of the proposal preamble.

The Agency believes that establishing a mandatory reporting program for facilities that emit greenhouse gases or supply fuel or chemicals that would eventually be emitted as greenhouse gases would inform any future climate change policy decisions.

Because EPA does not yet know the specific policies that will be adopted, the data reported through the mandatory reporting system should be of sufficient quality to support a range of approaches. Also, consistent with the Appropriations Act, the reporting rule proposes to cover a broad range of sectors of the economy.

EPA has identified the following goals of the mandatory reporting system, including:

- Obtain data that is of sufficient quality that it can be used to analyze and inform the development of a range of future climate change policies and potential regulations.
- Balance the rule’s coverage to maximize the amount of emissions reported while excluding small emitters.
- Create reporting requirements that are, to the extent possible and appropriate, consistent with existing GHG reporting programs in order to reduce reporting burden for all parties involved.

2(b) Practical Utility/Users of the Data

The proposed rule would provide EPA, other government agencies, and outside stakeholders with GHG emissions data that cover a broad range of sectors in the economy. Accurate and timely information on GHG emissions is essential for informing future climate change policy decisions. Through this data collection, EPA would gain a better understanding of the relative emissions of specific industries, and the distribution of emissions from specific facilities within those industries. The facility-specific data would also improve the Agency's understanding of the factors that influence GHG emission rates and actions that facilities are already taking to reduce emissions. In addition, the data collected on some source categories, such as landfills and manure management, could also potentially help inform offset program design by providing fundamental data on current baseline emissions for these categories. Through this rulemaking, EPA would be able to track the trend of emissions from industries and facilities within industries over time, particularly in response to policies and potential regulations. The data collected by this rule would also improve the U.S. government's ability to formulate a set of climate change policy options and to assess which industries would be affected and how these industries would be affected by the options. Finally, EPA's experience with other reporting programs is that such programs raise awareness of emissions among reporters and other stakeholders, and thus contribute to efforts to identify and implement reduction opportunities.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

EPA evaluated existing GHG programs and the GHG data currently available to determine whether this request duplicates other information collections. While some programs collect similar information on GHG emissions, the Agency has determined that these programs' data do not fit the needs for the GHG reporting rule because either industry participation is voluntary, only a relatively small number of sources report, or the scope and level of detail in the collected data differ from the proposed collection requirements. Documentation of EPA's review of GHG monitoring protocols for each source category used by Federal, State, and international voluntary and mandatory GHG programs, and the review of State mandatory GHG rules, can be found in the docket at EPA-HQ-OAR-2008-0508-056. A few of these programs are described below:

- A number of EPA's voluntary partnership programs include a GHG emissions and/or reductions reporting component (e.g., Climate Leaders, the Natural Gas STAR program, etc.). However, EPA's proposed mandatory reporting program would have much broader coverage than the voluntary programs, and therefore would help EPA learn more about emissions from facilities not included in current programs and identify ways to broaden coverage of data related to emissions sources to provide economy-wide data on facility-level GHG emissions.

- The Agency also examined the voluntary GHG gas registry that the U.S. Department of Energy's (DOE's) Energy Information Administration (EIA) implements under §1605b of the Energy Policy Act. Under EIA's "1605b program," reporters can choose to prepare an entity-wide greenhouse gas inventory and identify specific greenhouse gas reductions made by the entity. EPA's proposed mandatory GHG reporting rule would include a much broader set of reporters, primarily at the facility- rather than entity-level, and would not include the reporting of emissions reductions. Furthermore, the Agency believes that methods under the proposed rule would satisfy voluntary GHG reporting requirements for facilities owned by companies reporting under the §1605b program.
- EPA also considered CO₂ data currently collected under §821 of the 1990 Clean Air Act Amendments. To avoid duplication, and because the Acid Rain program already requires reporting of high quality CO₂ data from electrical generating units (EGUs), the proposed rule allows for use of the same CO₂ data rather than requiring additional reporting of CO₂ from EGUs. Facility operators would, however, have to report the emissions of GHGs that are not included under §821, such as CH₄ and N₂O.
- In addition, EPA reviewed the *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, which is a comprehensive top-down assessment of national greenhouse gas emissions, compiled from national energy data and other national statistics (e.g., on agriculture). To achieve the goal of comprehensive national emissions coverage, most greenhouse gas emissions in the report are calculated via activity data from national-level surveys, which are not broken down at the geographic or facility level. In contrast, the proposed rule focuses on bottom-up data from individual facilities that exceed appropriate thresholds to provide specific data that would allow the Agency to analyze and inform future climate policy decisions.
- Other Federal agencies collect some of the same supporting data that EPA is requesting as inputs to GHG emissions calculations such as fuel production. For example, mine-specific coal production data is an input to the total emission calculation and is currently reported to the Mine Safety and Health Administration, and refinery and gas liquid production data are reported to the EIA. Importers of coal and refined products may report similar data to the Department of Homeland Security/Customs and Border Protection. Where such reporting requirements already exist, the proposed rule requires that facilities report the same data as they report to the other entities, i.e., it does not require them to alter that data for this collection. The Agency has determined that generally existing programs' data do not fit the needs for the GHG reporting rule because either industry participation is voluntary, only a relatively small number of sources report, or the scope and level of detail in the collected data differ from the proposed collection requirements.
- Finally, EPA has considered any potential or perceived overlap between the July 2008 "Advance Notice of Proposed Rulemaking (ANPR): Regulating Greenhouse Gas Emissions under the Clean Air Act" (73 FR 44354, July 30, 2008) and the

mandatory GHG reporting rule. The ANPR reviews the various CAA provisions that may be applicable to regulate GHGs, examines the issues that regulating GHGs under those provisions may raise, provides information regarding potential regulatory approaches and technologies for reducing GHG emissions, and raises issues relevant to possible new legislation and the potential for overlap between such new legislation and CAA regulation. The ANPR does not require any reporting and does not duplicate any requirements of the proposed rule.

EPA's goal is for the GHG reporting program to supplement and complement, rather than duplicate, other U.S. government GHG programs. EPA anticipates that the facility-level GHG emissions data described in this information collection would lead to improvements in the quality of the Inventory of U.S. Greenhouse Gas Emissions and Sinks, and thus provide a more accurate assessment of progress in meeting national goals.

A growing number of programs at the State, Tribal, Territorial, and local level require emission sources in their respective jurisdictions to monitor and report GHG emissions. To reduce burden on reporters and program agencies, the Agency would share emissions data with the exception of any confidential business information (CBI) data with relevant agencies or approved entities using, where practical, shared tools and infrastructure.

3(b) Public Notice Required Prior to Information Collection Request (ICR) Submissions to OMB

As part of the Federal Register notice on the proposed regulation, EPA is also soliciting comments on this information collection and the estimates in this ICR. EPA will solicit comments on specific aspects of the proposed information collection, as described below:

- 1) Whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information would have practical utility;
- 2) Whether the Agency's burden estimate is accurate, including the validity of the methodology and assumptions used;
- 3) How to enhance the quality, utility, and clarity of the information to be collected; and
- 4) How to minimize the burden on respondents, including use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology.

In compliance with the Paperwork Reduction Act (44 USC 3501 *et seq.*), EPA submitted this ICR for the proposed GHG Regulation to the Office of Management and Budget (OMB) for review and approval concurrent with the publication of the proposed rule.

3(c) Consultations

In developing the proposed rule, EPA established several Agency workgroups to develop the reporting requirements for the GHG emitting processes within each of seven categories of processes that emit greenhouse gases. These workgroups addressed: (1) Fossil Fuel Combustion: Stationary, (2) Fossil Fuel Combustion: Mobile, (3) Fuel Suppliers, (4) Industrial Processes, (5) Industrial GHG Suppliers, (6) Fossil Fuel Fugitive Emissions, and (7) Biological Processes. An eighth workgroup developed the electronic data reporting system. The Climate Change Division within the Office of Atmospheric Programs coordinated the eight workgroups.

Each of the workgroups performed a comprehensive review of existing voluntary and mandatory GHG reporting programs, as well as guidance documents for quantifying greenhouse gas emissions from specific sources. These reviews included the following:

- International programs, including the Intergovernmental Panel on Climate Change, the EU Emissions Trading System, the Australian GHG Reporting System, and the Canadian Mandatory Greenhouse Gas Reporting Program;
- United States national programs, such as the *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, the §1605b program, the Acid Rain Program, and voluntary GHG partnership programs;
- State and regional greenhouse gas reporting programs in place or under development, such as The Climate Registry, the Regional Greenhouse Gas Initiative, and programs in several States including California, New Mexico, Connecticut, and New Jersey;
- Reporting protocols developed by nongovernmental organizations, such as the World Resources Institute/World Business Council for Sustainable Development; and
- Programs from industrial trade organizations, such as the American Petroleum Institute's Compendium of Greenhouse Gas Estimation Methodologies for the Oil and Gas Industry and the Cement Sustainability Initiative's CO₂ Accounting and Reporting Standard for the Cement Industry, developed by the World Business Council for Sustainable Development.

In reviewing these programs, the workgroups analyzed the sectors covered, reporting thresholds, monitoring or emissions estimating methods used, quality assurance measures, the point of monitoring, data input needs, and information required to be reported or retained.

EPA also conducted a proactive communications outreach program to inform the public about the rule development effort. Since January 2008, EPA staff held more than 100 meetings with stakeholders, including:

- Trade associations and firms in potentially affected industries/sectors;

- State, local, and Tribal environmental control agencies and regional air quality planning organizations;
- State and regional organizations already involved in GHG emissions reporting, such as The Climate Registry, California Air Resources Board, and the Western Climate Initiative; and
- Environmental groups and other nongovernmental organizations.

EPA also met with Federal agencies, including DOE and the U.S. Department of Agriculture, which have programs relevant to GHG emissions.

For a full list of organizations with whom EPA met when developing this proposal, please see the memorandum found at EPA-HQ-OAR-2008-0508-055.

3(d) Effects of Less Frequent Collection

The proposed reporting frequency for emissions data to EPA has been established to minimize the burden on owners and operators of affected facilities, while ensuring that the reporting rule collects facility-specific data of sufficient quality to achieve the Agency's objectives. For entities required to report, the rule would require annual reporting, except where existing programs must provide data on a more frequent basis. If the information collection were not carried out on this schedule, the Agency would not be able to develop an informed tracking system of trends in GHG emissions across the country. The year-by-year GHG emissions information from a broad range of industry sectors may eventually be used to inform future climate change policy decisions. The quarterly reporting required of electric generating units that are subject to the Acid Rain Program is consistent with the facilities' current reporting requirements.

3(e) General Guidelines

This collection of information is consistent with all OMB guidelines under 5 CFR 1320.6 except with respect to the maintenance of records by respondents for more than three years. EPA believes a 5-year recordkeeping requirement is needed so that a history of compliance can be demonstrated and questions about past emission estimates can be resolved, if needed. EPA's proposal to allow a variety of electronic and hard copy formats for records allows flexibility for facilities to use a system that meets their needs and is consistent with other facility records maintenance practices, thereby minimizing the recordkeeping burden.

3(f) Confidentiality

In general, emission data collected under §114 and §208 of the CAA cannot be declared confidential business information (CBI). However, if any CBI is reported under this GHG reporting rule, EPA would protect CBI in accordance with regulations in 40 CFR Chapter 1, Part 2, Subpart B. Although CBI determinations are usually made on a case-by-case basis, EPA has issued guidance on what constitutes emissions data that cannot be considered CBI (956 FR 7042–7043, February 21, 1991).

3(g) Sensitive Questions

This information collection does not ask any questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

The respondents in this proposed information collection include operators of facilities that would be required to report their GHG emissions to EPA to comply with the proposed rulemaking, as well as facilities that would be required to determine whether the rule's reporting requirements apply to them, but not required to report. To facilitate the analysis, EPA has divided respondents into groups that align with the source categories identified in the proposed rule.

This section lists the industry sectors (GHG source categories) that would be expected to participate in the GHG Reporting Rule program, the data items that would be requested from program participants, and the activities in which participants would be required to engage to collect, assess, and in some cases submit the required data items.

4(a) Respondents/North American Industrial Classification Systems (NAICS) Codes

Under the proposed rule, reporting facilities would include, but may not be limited to, those operating one or more units that exceed the CO₂e threshold for the industry sectors listed below or those in the categories in which all must report, such as petroleum refining facilities. Other facilities would calculate their emissions in order to determine whether they must report under the proposed rule. Additionally, EPA is proposing to amend other parts of the CFR to require reporting of certain emissions information associated with mobile sources (e.g., for permit applications or emissions control certification testing procedures).

Industry sectors are listed below by their corresponding subpart of the rule and their North American Industry Classification System (NAICS) code for reference.

Part and Subpart	NAICS code(s)
Parts 86, 87, 89, 90, 94, 600, 1033, 1039, 1042, 1045, 1048, 1051, 1054, 1064, 1065	481 Air transportation; 482 Rail transportation; 483 Water transportation; 484 Truck transportation; 485 Transit and ground passenger transportation
Part 98	
C. General Stationary Fuel Combustion Sources	Facilities operating boilers, process heaters, incinerators, turbines, and internal combustion engines: 211 Extractors of crude petroleum and natural gas; 321 Manufacturers of lumber and wood products; 322 Pulp and paper mills; 325 Chemical manufacturers; 324 Petroleum refineries, and manufacturers of coal products; 316, 326, 339 Manufacturers of rubber and miscellaneous plastic products; 331 Steel works, blast furnaces; 332 Electroplating, plating, polishing, anodizing, and coloring; 336 Manufacturers of motor vehicle parts and accessories; 221 Electric, gas, and sanitary services; 622 Health services; 611 Educational services
D. Electricity Generation	221112 Fossil-fuel fired electric generating units
E. Adipic Acid Production	325199 Adipic acid manufacturing facilities
F. Aluminum Production	331312 Primary Aluminum production facilities
G. Ammonia Manufacturing	325311 Anhydrous and aqueous ammonia manufacturing facilities
H. Cement Production	327310 Owners and operators of Portland cement manufacturing plants
I. Electronics Manufacturing	334111 Microcomputers manufacturing facilities; 334413 Semiconductor, photovoltaic (solid-state) device manufacturing facilities; 334419 Liquid crystal display unit screens manufacturing facilities/Microelectromechanical systems manufacturing facilities
J. Ethanol Production	325193 Ethyl alcohol manufacturing facilities
K. Ferroalloy Production	331112 Ferroalloys manufacturing facilities
L. Fluorinated Greenhouse Gas Production	325120 Industrial gases manufacturing facilities
M. Food Processing	311611 Meat processing facilities; 311411 Frozen fruit, juice, and vegetable manufacturing facilities; 311421 Fruit and vegetable canning facilities
N. Glass Production	327211 Flat glass manufacturing facilities; 327213 Glass container manufacturing facilities; 327212 Other pressed and blown glass and glassware manufacturing facilities

Part and Subpart	NAICS code(s)
O. HCFC-22 Production and HFC-23 Destruction	325120 Chlorodifluoromethane manufacturing facilities
P. Hydrogen Production	325120 Hydrogen manufacturing facilities
Q. Iron and Steel Production	331111 Integrated iron and steel mills, steel companies, sinter plants, blast furnaces, basic oxygen process furnace (BOPF) shops
R. Lead Production	331419 Primary lead smelting and refining facilities; 331492 Secondary lead smelting and refining facilities
S. Lime Manufacturing	327410 Calcium oxide, calcium hydroxide, dolomitic hydrates manufacturing facilities
T. Magnesium Production	331419 Primary refiners of nonferrous metals by electrolytic methods; 331492 Secondary magnesium processing plants
U. Miscellaneous Uses of Carbonate	Facilities included elsewhere
V. Nitric Acid Production	325311 Nitric acid manufacturing facilities
W. Oil and Natural Gas Systems	486210 Pipeline transportation of natural gas; 221210 Natural gas distribution facilities; 325212 Synthetic rubber manufacturing facilities
X. Petrochemical Production	32511 Ethylene dichloride manufacturing facilities; 325199 Acrylonitrile, ethylene oxide, methanol manufacturing facilities; 325110 Ethylene manufacturing facilities; 325182 Carbon black manufacturing facilities
Y. Petroleum Refineries	324110 Petroleum refineries
Z. Phosphoric Acid Production	325312 Phosphoric acid manufacturing facilities
AA. Pulp and Paper Manufacturing	322110 Pulp mills; 322121 Paper mills; 322130 Paperboard mills
BB. Silicon Carbide Production	327910 Silicon carbide abrasives manufacturing facilities
CC. Soda Ash Manufacturing	325181 Alkalis and chlorine manufacturing facilities
DD. Sulfur Hexafluoride (SF ₆) from Electrical Equipment	221121 Electric bulk power transmission and control facilities
EE. Titanium Dioxide Production	325188 Titanium dioxide manufacturing facilities
FF. Underground Coal Mines	212113 Underground anthracite coal mining operations; 212112 Underground bituminous coal mining operations

Part and Subpart	NAICS code(s)
GG. Zinc Production	331419 Primary zinc refining facilities; 331492 Zinc dust reclaiming facilities, recovering from scrap and/or alloying purchased metals
HH. Landfills	562212 Solid waste landfills; 221320 Sewage treatment facilities; 322110 Pulp mills; 322121 Paper mills; 322122 Newsprint mills; 322130 Paperboard mills; 311611 Meat processing facilities; 311411 Frozen fruit, juice, and vegetable manufacturing facilities; 311421 Fruit and vegetable canning facilities
II. Wastewater Treatment	322110 Pulp mills; 322121 Paper mills; 322122 Newsprint mills; 322130 Paperboard mills; 311611 Meat processing facilities; 311411 Frozen fruit, juice, and vegetable manufacturing facilities; 311421 Fruit and vegetable canning facilities; 325193 Ethanol manufacturing facilities; 324110 Petroleum refineries
JJ. Manure Management	112111 Beef cattle feedlots; 112120 Dairy cattle and milk production facilities; 112210 Hog and pig farms; 112310 Chicken egg production facilities; 112330 Turkey production; 112320 Broilers and other meat type chicken production
KK. Suppliers of Coal	212111 Bituminous, and lignite coal surface mining facilities; 212113 Anthracite coal mining facilities; 212112 Underground bituminous coal mining facilities
LL. Suppliers of Coal-based Liquid Fuels	211111 Coal liquefaction at mine sites
MM. Suppliers of Petroleum Products	324110 Petroleum refineries
NN. Suppliers of Natural Gas and Natural Gas Liquids	221210 Natural gas distribution facilities; 211112 Natural gas liquid extraction facilities
OO. Suppliers of Industrial Greenhouse Gases	325120 Industrial greenhouse gas manufacturing facilities
PP. Suppliers of Carbon Dioxide	325120 Industrial greenhouse gas manufacturing facilities
Mobile Sources	336112 Light-duty vehicles and trucks manufacturing facilities; 333618 Heavy-duty, non-road, aircraft, locomotive, and marine diesel engine manufacturing; 336120 Heavy-duty vehicle manufacturing facilities; 336312 Small non-road, and marine spark-ignition engine manufacturing facilities; 336999 Personal watercraft manufacturing facilities; 336991 Motorcycle manufacturing facilities

4(b) Information Requested

(i) Data Items

Reporting Requirements

Under the proposed rule, the owner or operator of a facility that exceeds the threshold specific to its respective source category(ies) in 40 CFR Part 98 would report emissions annually from all source categories present at the facility for which methods are specified in proposed 40 CFR Part 98, Subparts D through PP. (Facilities that are already reporting quarterly for the Acid Rain Program would continue to report quarterly.) In addition, facilities that are not in the listed source categories but that emit 25,000 metric tons/yr CO₂e from stationary combustion would report stationary combustion emissions annually. Respondents would comply with the following categories of requirements (if applicable): the General Provisions applicable to all sources; stationary combustion; and requirements applicable to other specific source categories identified in subparts D through PP of the rule. In addition, vehicle and engine manufacturers subject to the requirements of CFR Parts 86, 87, 89, 90, 94, 600, 1033, 1039, 1042, 1045, 1048, 1051, 1054, 1064, and 1065 would report CO₂, N₂O, and CH₄ emissions associated with the mobile sources that they produce.

Following is a summary of the information requested by source category.

General requirements that apply to all sources. Under the proposed rule, all respondents that exceed the reporting threshold or that belong to a source category in which all respondents report would submit the following information electronically:

1. Facility or supplier name, street address, physical address, and Federal Registry System identification number;
2. Year covered by the report;
3. Date of submittal;
4. Annual emissions of CO₂, CH₄, N₂O, and each fluorinated GHG. Emissions would be calculated assuming no capture of CO₂ and reported at the levels specified below:
 - 4.1 Total facility emissions aggregated from all applicable source categories in subparts C through JJ of the proposed rule and expressed in metric tons of CO₂e calculated using equation A-1 in 40 CFR Part 98, Subpart A.
 - 4.2 Total emissions aggregated from all applicable supply categories in subparts KK through PP of proposed 40 CFR Part 98 and expressed in metric tons of CO₂e calculated using equation A-1 in Subpart A.
 - 4.3 Emissions from each applicable source category or supply category in subparts C through PP of the proposed 40 CFR Part 98, expressed in metric tons of each GHG.
 - 4.4 Emissions and other data for individual units, processes, activities, and operations as specified for each source category in the “Data Reporting Requirements” section of each applicable subpart of the proposed rule.
5. Total electricity generated in kilowatt hours.

6. Total pounds of synthetic fertilizer produced at the facility and total nitrogen contained in that fertilizer.
7. Total annual mass of CO₂ captured in metric tons.
8. A signed and dated certification statement provided by the designated representative of the owner or operator.

Stationary combustion. Stationary combustion is a source of emissions in most of the source categories included in this proposed rule. As such, in addition to the information required above, each facility with a stationary combustion unit that is subject to the requirements of proposed 40 CFR Part 98, Subpart C (approximately 800 respondents) would be required to include the following information in its annual GHG emissions report:

1. Unit ID number (if applicable);
2. Code representing the type of unit;
3. Maximum rated heat input of the unit (boilers, combustion turbines, engines, and process heaters only);
4. Each type of fuel combusted in the unit during the report year;
5. Calculated CO₂, CH₄, and N₂O emissions for each type of fuel combusted;
6. The method used to calculate the CO₂ emissions for each type of fuel combusted (e.g., Part 75, or the Tier 1 or 2 calculation methodology);
7. If applicable, an indication of the monitoring and reporting methodology from Part 75 used to quantify CO₂ emissions (e.g., CEMS, Appendix G, Low Mass Emissions methodology);
8. Calculated CO₂ emissions from sorbent (if any); and
9. The total GHG emissions from the unit for the reporting year, i.e., the sum of the CO₂, CH₄, and N₂O emissions for all fuel types, expressed in metric tons of CO₂e.

There are alternative reporting options for facilities with two or more small units that have a combined maximum rated heat input capacity of 250 mmBtu/hr. or less. Those that prefer may report the combined emissions for the group of units in lieu of itemizing the GHG emissions from the individual units, monitored common stack configurations, and common pipe configurations. The proposed rule describes the reporting requirements for these options (see 40 CFR 98.36(c)).

In addition, the owner or operator of a facility with a stationary combustion unit that is subject to the requirements of proposed 40 CFR Part 98, Subpart C would be required to report sufficient data and supplementary information to verify the reported GHG emissions. The owner or operator would apply, as appropriate, one of the four tiers (methodological) described in §98.33(b) to quantify GHG emissions from stationary combustion units. This approach includes four measurement tiers; Tier 1 provides the least certain estimate of annual GHG emissions and Tier 4 provides the best estimate. The following information would also be required in the annual facility GHG emissions report:

1. Tier 1 methodology: total quantity of each type of fuel combusted during the reporting year.
2. Tier 2 methodology

- a. Total quantity of each type of fuel combusted during each measurement period;
 - b. Number of required high heat value determinations for each type of fuel for the report year;
 - c. High heat value used to calculate annual CO₂ mass emissions for each type of fuel combusted;
 - d. An indication of whether each reported high heat value is a measured value or a substitute data value; and
 - e. An indication of the method(s) used to determine the high heat value for each type of fuel combusted.
 - f. For municipal solid waste (MSW), the total quantity of steam produced from MSW combustion during the year, and the ratio of the unit's maximum rate heat input capacity to its design rated steam output capacity.
3. Tier 3 methodology
- a. Total quantity of each type of fuel combusted during each month or day (as applicable);
 - b. Number of required carbon content determinations for each type of fuel for the report year;
 - c. Carbon content value used to calculate annual CO₂ mass emissions;
 - d. Molecular weight of fuel used to calculate annual CO₂ mass emissions for gaseous fuel combustion;
 - e. An indication of whether each reported carbon content value is a measured value or a substitute data value;
 - f. Dates and results of the initial calibrations and periodic recalibrations of the fuel flow meters used to measure the amount of fuel combusted during liquid and gaseous fuel combustion;
 - g. An indication of the method(s) used to make tank drop measurements for fuel oil combustion (if applicable);
 - h. An indication of the method(s) used to determine the carbon content for each type of fuel combusted; and
 - i. An indication of the method(s) used to calibrate the fuel flow meters (if applicable).
4. Tier 4 methodology
- a. Total number of source operating days and hours in the report year;
 - b. Whether the facility selected the CEMS certification and QA procedures of Part 75, Part 60, or of an applicable State monitoring program;
 - c. CO₂ emissions from each operating day (i.e., sum of calculated hourly values);
 - d. Number of source operating hours in which a substitute data value for CO₂ concentration, stack gas flow rate, and stack gas moisture content (if applicable) was used in the emissions calculations;
 - e. Dates and results of initial CEMs certification test; and
 - f. Dates and results of major QA tests performed on CEMs during the report year (e.g., linearity checks, cylinder gas audits, relative accuracy test audits).

There are alternative reporting requirements for facilities that generate CO₂ emissions from acid gas scrubbing with sorbent injection that are not captured using CEMs; that use ASTM methods WK 15321 and D 6866-06a to determine the biogenic portion of the annual CO₂ emissions from combustion of municipal solid waste; or that use CEMs to quantify the annual CO₂ emissions from units that combust both fossil fuel(s) and biogenic fuel(s).

Owners and operators of facilities that do not contain any of the source categories listed in Section 4(a) of this ICR, but emit more than 25,000 metric tons of CO₂e per year from stationary combustion units having an aggregate maximum rated heat input capacity of 30 mmBtu/hr or greater, have the option of submitting an abbreviated facility report for the first report due in 2011. This report shall be submitted electronically and include the following information:

1. Facility name, address, and ID number;
2. Year covered by the report;
3. Date of submittal;
4. Total facility GHG emissions aggregated for all stationary fuel combustion units calculated according to any specified method and expressed in metric tons of CO₂, CH₄, N₂O, and CO₂e; and
5. A signed and dated certification statement provided by the owner or operator.

Other source categories. Under the proposed rule, facilities that contain any of the source categories listed in Section 4(a) and that exceed the threshold for any source category (or include a source category in which all facilities report) would report information specific to each source category at the facility for which methods are specified in proposed 40 CFR Part 98, Subparts D through PP, in addition to the general reporting and stationary combustion requirements outlined above. Many facilities that would be affected by the proposed rule emit GHGs from multiple sources. The facility would be required to assess every source category that could potentially apply to each when determining if a threshold has been exceeded. If the threshold is exceeded for any one source category, the facility would be required to report emissions from all source categories, including those source categories that do not exceed the applicable threshold.

The sector-specific reporting requirements are outlined in Appendix A, Table A-1.

Recordkeeping Requirements

Coverage Determination. Facilities that have an aggregate maximum rated heat input capacity for stationary fuel combustion units (combined) of at least 30 mmBtu/hr would be required to assess whether they have emissions above the threshold. Under this approach, we estimate that 30,000 facilities will have to assess whether or not they have to report based on stationary combustion activities. Of the 30,000, approximately 13,000 facilities would likely meet the threshold and have to report. Therefore, an additional 17,000 facilities may have to assess their applicability but potentially not meet the threshold for reporting. Although the proposed rule does not include explicit reporting or recordkeeping requirements for facilities that conduct this assessment and determine that they are below the threshold, this ICR estimates a one-time burden and cost associated with recordkeeping for the first year for these facilities.

General requirements that apply to all sources. Under the proposed rule, the owner or operator of each facility that is subject to the GHG emissions reporting requirements would be required to keep the following records in an electronic or hard-copy format (as appropriate) for at least five years:

1. A list of all units, operations, processes and activities for which GHG emissions were calculated;
2. Data used to calculate emissions;
3. Documentation of the process used to collect data for emissions calculations;
4. Emissions calculations and methods used;
5. Emission factors used for emission calculations;
6. Facility operating data or process information used for emission calculations;
7. Names and documentation of key facility personnel involved in calculation and reporting of emissions;
8. Annual GHG emissions reports;
9. A log book documenting procedural changes (if any) to emissions accounting methods and changes (if any) to instrumentation critical to emissions determination;
10. Missing data computations; and
11. A written quality assurance performance plan (QAPP).

Stationary combustion. Stationary combustion is a source of emissions in most of the source categories included in this proposed rule. As such, the owner or operator of a facility with a stationary combustion unit that is subject to the requirements of proposed 40 CFR Part 98, Subpart C would also keep the records listed below (if applicable):

1. Fuel consumption (if facility uses mass balance method in Part 75 to quantify CO₂ emissions, Tier 1 and Tier 2 methodologies to calculate annual CO₂ mass emissions, or Tier 3 methodologies to calculate annual CO₂ mass emissions when solid fuel is combusted);
2. Fossil fuel consumption (if facility combusts both fossil and biogenic fuels and uses CEMs to quantify CO₂ emissions);
3. Sorbent use (if facility uses acid gas emission controls with sorbent injection);

4. Procedures used to ensure the accuracy of the estimates of fuel usage and/or sorbent usage reported in 1 – 3 above; and
5. Missing data substitution procedures for missing fuel usage information, sorbent usage information, stack flow rate, fuel flow rate, and site-specific source testing data, as applicable.

Other source categories. Facilities that are required to report and that contain any of the source categories listed in Section 4(a) would also be required to retain records for information specific to the given source category. The sector-specific recordkeeping requirements are outlined in Appendix A, Table A-2.

(ii) Respondent Activities

Facilities that do not meet the applicability criteria for the source categories listed in section (4)(a) and that have an aggregate maximum rated heat input capacity of the stationary fuel combustion of at least 30 mmBtu/hr would be required to assess whether they have stationary combustion emissions above the threshold. The proposed would require facilities to follow methodologies in the rule to make a determination on whether they meet the threshold for reporting. It is assumed that a facility would utilize a fuel sampling methodology, the steps of which include regulatory review, resolving questions, developing a sampling approach, data reduction and review, and fuel sampling (1 sample). This would be a one-time burden for facilities that assess whether they must report and determine that they do not meet the reporting threshold.

The owner or operator of a facility that is subject to the proposed rule's reporting requirements would report total annual GHG emissions in metric tons of CO₂e from all the source categories at the facility. The primary tasks that would be performed by reporting program respondents include:

1. Developing appropriate monitoring plans for each affected source and each affected unit at a source, as applicable;
2. Operation and maintenance activities associated with the monitoring, including quality assurance activities;
3. Ensuring data quality, preparing annual reports of emissions data and submitting these reports to EPA;
4. Potentially responding to questions or error messages from EPA; and
5. Maintaining records for a minimum of 5 years. In addition, respondents would have to purchase the necessary monitoring hardware and purchase the electronic data reporting software (or software upgrades) if they had not done so for another reporting program.

If the reporting program respondent uses CEMs, the following tasks would be performed in addition to the five tasks listed above:

1. Conducting tests to certify the operation of monitors, and submitting test results to EPA; and
2. Recording hourly emissions data (this activity generally is performed electronically).

The report would present the annual mass GHG emissions from each source category separately. The calculations used to determine GHG emissions, the frequency at which those calculations are required, the methods used to estimate missing data, and the QA/QC requirements depend on the specific source category. These sector-specific requirements, along with the regulatory citations associated with these requirements, are presented in Appendix B.

5. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODS, AND INFORMATION MANAGEMENT

5(a) Agency Activities

EPA Headquarters activities associated with the rule include program start-up activities to prepare for receiving the reported data. These activities include database and software design, developing guidance and training affected sources, responding to stakeholders, and communication and outreach on the rule requirements.

Once the reporting program is in place, EPA program operation activities would include monitoring and verification of emission reports, database and software maintenance, communication and outreach, and program evaluation.

5(b) Collection Methodology and Management

EPA would establish a central repository of inventory data for all respondents. Data would be reported electronically by respondents and would be stored in the database. The data could be used by EPA and other agencies, and other organizations and stakeholders for air modeling, analyzing emissions by industry sector and region, informing future climate change policy decisions, and answering questions from the public. The new system would follow Agency standards for design, security, data element and reporting format conformance, and accessibility. In designing the data base, EPA would attempt to minimize respondents' burden by integrating the new reporting requirements with existing data collection and data management systems, when feasible.

5(c) Small Entity Flexibility

EPA took several steps to minimize the impacts on small entities. The Agency met several times with industry trade associations to discuss the reporting options considered and their possible impacts on small entities. EPA further minimized impacts on small entities by not requiring facilities below a certain emissions threshold to report their emissions. Where feasible, EPA also used existing GHG emissions estimation and reporting methodologies or provided simplified methodological options to reduce reporting burden. Because a potentially large number of facilities would need to calculate their emissions in order to determine whether they had to report under the proposed rule, EPA is proposing that any facility that has an aggregate maximum rated heat input capacity of the stationary fuel combustion units less than 30 mmBtu/hr may presume it has emissions below the threshold. According to the Agency's analysis, a facility with stationary combustion units that have a maximum rated heat input capacity of less than 30 mmBtu/hr, operating full time with all types of fossil fuel, would not exceed 25,000 metric tons CO₂e/yr.

5(d) Collection Schedule

Facilities must collect data and calculate emissions at varying frequencies, as described in the proposed rule, and summarized in Appendix B. Although the proposed rule would not explicitly require reporting or recordkeeping for facilities that are below the emission threshold, this ICR includes a one-time recordkeeping burden for facilities that must assess whether they must report based on stationary combustion activities, but determine that they do not meet the threshold for reporting. Most facilities that must meet the rule's reporting requirements would be required to submit GHG emission reports annually. Facilities that are already monitoring and reporting emissions of CO₂ under the continuous emission monitoring requirements of 40 CFR Part 75 to EPA on a quarterly basis would continue to submit quarterly reports. As these reports are already submitted to EPA, there should be no additional burden associated with this approach.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section presents EPA's estimates of the burden and costs to respondents associated with the activities described in Section 4 as well as the Federal burden hours and costs associated with the activities described in Section 5(a). EPA estimates that, over the three years covered by this request, the total respondent burden associated with this reporting would average 1.6 million hours per year and the cost to respondents of the information collection would average \$143.0 million per year.

Section 6(a) of this ICR provides estimates of burden hours for all respondent types. Section 6(b) contains estimates of respondent costs for the information collection. Section 6(c) summarizes Federal burden and costs. Section 6(d) describes the respondent universe and the total burden and cost of this collection to respondents. Section 6(e) presents the bottom line burden and cost. The burden statement for this information collection is in Section 6(f).

6(a) Estimating Respondent Burden

Respondent burden estimates are presented in Exhibit 6.1. EPA estimates that the total annual burden to all affected entities would be 1,630,730 hours per year over the three years covered by this information collection. EPA also estimated the number of responses, or actions taken as a result of the rule, per respondent (facility) per year; for facilities collecting samples on a daily basis, this would mean a minimum of 365 responses per year. Exhibit 6.1 presents aggregate burden by sector only; for the details of EPA burden calculations, please see Appendix C.

6(b) Estimating Respondent Costs

Costs to respondents associated with this information collection include labor costs (i.e., the cost of labor by facility staff to meet the information collection requirements of the proposed rule) and non-labor costs (e.g., the cost of purchasing and installing monitoring equipment or contractor costs associated with providing the required information).

To calculate labor costs, EPA estimated technical, managerial, clerical, and legal loaded labor rates for each industry sector using labor rates from the Bureau of Labor Statistics^[1] and applying a 60% loading factor^[2]; these rates vary somewhat by sector. For all subparts except JJ, Manure Management, the labor rates are: \$88.79 for electricity managers; \$101.31 for refinery managers, \$71.03 for industrial managers; \$60.84 for electricity engineers/technicians, \$63.89 for Refinery Engineers/Technicians, and \$55.20 for Industrial Engineers/Technicians; \$29.65 for clerical staff, and \$101.00 for legal staff. For Subpart JJ, Manure Management, all labor is that of a farm owner or designee and the rate is \$34.30. Non-labor costs (capital and O&M) for individual sectors are presented in Appendix C.

EPA estimates that the total annual cost to all affected non-Federal entities would be \$143.0 million over the three years covered by this information collection. Exhibit 6.1 presents aggregate costs by sector only; for the details of EPA's cost calculations, please see Appendix C.

^[1] These rates reflect adjustments of the manufacturing sector's average productivity increase of 3.7% per year for 6 quarters between 2006 Q2 and 2007 Q4, based on the estimate released by the Bureau of Labor Statistics in March 2008.

^[2] The ICR Handbook (November 2005) recommends using a multiplier of 1.6 to account for benefits and overhead related to government wages; this is considered a conservative estimate (potentially high) for the private sector.

**Exhibit 6.1 Annual Average Respondent Burden and Cost
For the GHG Reporting Rule (\$K)**

Source Category	No. Respondents	Responses/Respondent	Total Responses	Average Burden per Response (hrs)	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
Coverage Determination	5,613	1	5,613	13.0	72,965	\$4,028	\$0	\$842	\$4,870
C. Stationary Combustion (general unspecified)	3,000	61	183,541	1.9	354,739	\$19,568	\$1,633	\$5,142	\$26,344
D. Electricity Generation	1,092	3	3,231	18.1	58,537	\$3,231	\$0	\$0	\$3,231
E. Adipic Acid Production	4	23	92	9.2	850	\$47	\$0	\$33	\$81
F. Aluminum Production	14	10	140	50.0	7,004	\$407	\$0	\$8	\$415
G. Ammonia Mfg.	24	102	2,448	1.4	3,496	\$198	\$3	\$155	\$355
H. Cement Production	107	366	39,180	1.2	48,073	\$2,426	\$658	\$2,073	\$5,156
I. Electronics Mfg.	96	64	6,119	6.1	37,423	\$2,060	\$0	\$1,375	\$3,434
J. Ethanol Production	85	86	7,310	0.5	3,762	\$204	\$29	\$224	\$458
K. Ferroalloy Production	9	104	934	2.4	2,200	\$115	\$0	\$121	\$236
L. Fluorinated Greenhouse Gas Production	12	86	1,032	0.0	424	\$23	\$0	\$0	\$23
M. Food Processing	113	86	9,718	0.7	6,980	\$376	\$3	\$30	\$410
N. Glass Production	55	113	6,197	1.0	6,047	\$338	\$3	\$122	\$462
O. HCFC-22 Production and HFC-23 Destruction	3	87	261	2.9	758	\$40	\$0	\$0	\$40
P. Hydrogen Production	41	38	1,545	2.8	4,370	\$245	\$3	\$114	\$362
Q. Iron and Steel Production	121	86	10,406	17.7	184,447	\$15,197	\$290	\$0	\$15,487
R. Lead Production	13	113	1,465	1.8	2,625	\$140	\$1	\$122	\$262
S. Lime Mfg.	89	540	48,030	0.6	29,444	\$1,628	\$541	\$1,623	\$3,792
T. Magnesium Production	11	10	110	18.7	2,054	\$114	\$0	\$2	\$116
V. Nitric Acid Production	45	47	2,130	4.2	9,040	\$524	\$24	\$243	\$791
W. Oil and Natural Gas Systems	1,375	86	118,250	2.0	238,705	\$16,476	\$9,164	\$3,904	\$29,544
X. Petrochemical Production	88	366	32,208	0.7	22,262	\$1,259	\$0	\$342	\$1,601
Y. Petroleum Refineries	150	102	15,267	1.7	25,369	\$1,552	\$181	\$1,325	\$3,057
Z. Phosphoric Acid Production	14	572	8,009	0.6	4,909	\$271	\$91	\$274	\$636
AA. Pulp & Paper Mfg.	425	110	46,921	1.0	47,483	\$2,595	\$6,261	\$393	\$9,249
BB. Silicon Carbide Production	1	31	31	5.3	164	\$9	\$0	\$1	\$10
CC. Soda Ash Mfg.	5	87	435	1.8	766	\$43	\$0	\$0	\$43
DD. Sulfur Hexafluoride (SF6) from Electric Power Systems	141	86	12,126	0.0	10,540	\$550	\$0	\$0	\$550
EE. Titanium Dioxide Production	8	87	696	1.8	1,226	\$68	\$0	\$0	\$68
FF. Underground Coal Mines	100	30	3,000	9.5	28,579	\$1,619	\$80	\$376	\$2,074
GG. Zinc Production	5	129	643	1.4	872	\$48	\$2	\$12	\$62
HH. Landfills	2,524	86	217,064	0.0	162,543	\$8,756	\$862	\$2,297	\$11,915
II. Wastewater	0	0	0	0.0	0	\$0	\$0	\$0	\$0
JJ. Manure Management	43	84	3,612	0.7	2,523	\$145	\$1	\$38	\$183
KK. Suppliers of Coal and Coal-based Products &									
LL. Suppliers of Coal-based Liquid Fuels	1,237	91	112,144	0.0	61,648	\$5,204	\$873	\$1,167	\$7,244
MM. Suppliers of Petroleum Products	214	96	20,468	0.0	14,541	\$1,168	\$0	\$0	\$1,168
NN. Suppliers of Nat Gas and Nat Gas Liquids	1,554	67	103,802	0.0	24,379	\$1,543	\$0	\$0	\$1,543
OO. Suppliers of Industrial GHG	121	9	1,089	0.0	5,659	\$315	\$0	\$0	\$315
PP. Suppliers of CO2	13	30	390	0.0	579	\$32	\$0	\$0	\$32
Mobile Sources	350	1	350	407.8	142,743	\$7,400	\$0	\$0	\$7,400
TOTAL	18,775	Varies	1,026,006	Varies	1,630,730	\$99,960	\$20,704	\$22,356	\$143,020

6(c) Estimating Agency Burden and Cost

This section describes the burden and cost to the Federal government associated with this information collection. Federal activities under this information collection include EPA Headquarters oversight of the reporting program and required reporting by Federally owned GHG generating facilities.

EPA burden and cost

EPA activities associated with the proposed rule include Headquarters oversight and implementation of the reporting program, e.g., monitoring and verification of emission reports, database and software maintenance, communication and outreach, and program evaluation. EPA estimates that Headquarters would devote up to 30 full time equivalents (FTEs), or 62,400 hours to these activities.

To develop EPA labor costs, EPA estimates the average hourly labor rate for salary and overhead and benefits for Agency staff to be \$50.14. To derive this figure, EPA multiplied the hourly compensation at GS-12, Step 5 on the 2008 GS pay scale (\$31.34) by the standard government benefits multiplication factor of 1.6 to account for overhead and benefits.

In addition to the labor cost, EPA would incur a one-time cost of \$8 million in Year 1 of the information collection for database and software design, developing guidance, training, responding to stakeholders, and communication and outreach. In the second and third years, EPA would spend \$7 million annually on program oversight; e.g., for contractor support and data base maintenance. Thus, the Agency would incur an average of \$7.3 million annually in non-labor costs.

Burden and cost for other Federal respondents

Federal respondents also include Federally owned stationary combustion facilities that exceed the CO₂e threshold for this industry sector and are therefore required to report their GHG emissions. EPA calculated the reporting burden and cost for these facilities in the same manner as it did for other reporting facilities. EPA estimates that these respondents would incur 870 burden hours, for an annual total cost of \$48,000. Federal respondents similarly include 27 Federally owned municipal solid waste (MSW) facilities for which methane emissions exceed the CO₂e threshold. The Agency estimates that MSW facilities would incur 1,555 hours of burden per year for an annual total cost of \$95,554.

Exhibit 6.2 presents the annual burden and cost to Federal respondents.

Exhibit 6.2 Annual Agency Burden and Cost

Information Collection Activity	Annual Responses	Total Annual Burden	Labor Cost	Non-Labor Cost	Total Annual Cost
EPA: Implement program, analyze data.	1	62,400	\$3,128,736	\$7,333,333	\$10,462,069
D. Electricity Generation	16	870	\$48,000	\$0	\$48,000
HH. Landfills	27	1,555	\$88,934	\$6,620	\$95,554
TOTAL	44	64,824	\$3,265,670	\$7,339,953	\$10,605,623

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

The number of respondents in each sector that would perform the required activities under this information collection is presented in Exhibit 6.1. The activities to be performed depend on whether the facility would be required to report its GHG emissions and on the applicable sector-specific reporting requirements. These activities are described in Section 4(b) of this ICR.

6(e) Bottom Line Burden Hours and Costs

The bottom line burden hours and costs are shown in Exhibit 6.3.

Exhibit 6.3 Bottom Line Annual Burden and Cost

Number of Respondents	18,775	From Exhibit 6.1
Total Annual Responses	1,026,006	From Exhibit 6.1
Number of Responses per Respondent	55 = 1,026,006 18,775	Total annual responses from above ÷ Total respondents from above
Total Respondent Hours	1,630,730	From Exhibit 6.1
Hours per Response	1.59 = 1,630,730 1,026,006	Total annual hours from above ÷ Total responses from above
Annual O&M and Capital Cost	\$43,059,789	From Exhibit 6.1
Total Respondent Cost (labor + non)	\$143,019,561	From Exhibit 6.1
Total Hours (Respondents and agency)	1,695,554 = 1,630,730 64,824	Total respondent hours from above + Total EPA hours
Total Cost (Respondents plus Agency)	\$153,625,184 = \$143,019,561 \$10,605,623	Total respondent cost from above + Total EPA cost

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

6(f) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1.59 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.

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-2008-0508-0138, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation docket in the EPA Docket Center (EPA/DC), EPA West Building, 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 is (202) 566-1742. An electronic version of the public docket is available at <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-2008-0508-0138 and OMB Control Number 2060-NEW on any correspondence.