
SUPPORTING STATEMENT
Inclusion of Delaware and New Jersey in the Clean Air Interstate Rule
(Renewal)
EPA ICR # 2184.03

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

Inclusion of Delaware and New Jersey in the Clean Air Interstate Rule, EPA ICR Number 2184.03, OMB Control Number 2060-0584

1(b) Short Characterization/Abstract

The United States (U.S.) Environmental Protection Agency (EPA) promulgated a Rule to add the States of Delaware and New Jersey to the States that are subject to the Clean Air Interstate Rule (CAIR) because of their PM_{2.5} impact on other States and to require that Delaware and New Jersey report all of the emissions related data required by CAIR. (Delaware and New Jersey are already affected by ozone-related requirements in CAIR.) The emissions data reporting requirements include reporting requirements and combine with existing requirements from the Consolidated Emissions Reporting Rule (CERR), the Emission Reporting Requirements for Ozone State Implementation Plan (SIP) Revisions Relating to Statewide Budgets for NO_x Emissions to Reduce Regional Transport of Ozone (NO_x SIP Call), the Acid Rain Program under Title IV of the Clean Air Act Amendments of 1990, and the Rule to Reduce Interstate Transport of Fine Particulate Matter and Ozone (Clean Air Interstate Rule, CAIR). Each of these four existing requirements has an approved ICR in place. The current ICRs are: for the CERR, ICR # 0916.12 (OMB 2060-0088), for the NO_x SIP Call, ICR # 1857.04 (OMB 2060-0445), for the Acid Rain Program, ICR # 1633.14 (OMB 2060-0258), and for CAIR, ICR # 2152.03 (OMB 2060-0570).

This supporting statement and ICR is being submitted to account for the incremental burden associated with the addition of Delaware and New Jersey to the CAIR for PM_{2.5}. As such, this supporting statement references the burden analysis included in ICR #s 0916.12, 1857.04, 1633.14 and 2152.03 and estimates the change in burden resulting from the additional requirements for Delaware and New Jersey on each of these ICRs. The original supporting statement for this information collection was open for public review and comment at the same time as the proposal to have the PM_{2.5} CAIR requirements apply to Delaware and New Jersey. There were no comments on this ICR, burden estimates, methodology, or the Agency's authority to collect the information.

EPA has included Delaware and New Jersey in the PM_{2.5} requirements under CAIR. This supporting statement details the additions and changes to reporting requirements. These changes can be divided in to two categories: 1. Changes to existing requirements for emission reporting under the

CERR and NO_x SIP Call and 2. The addition of reporting requirements to support emissions trading in states using the CAIR model cap and trade rules. Throughout this Supporting Statement, the burden analysis associated with these two categories will be discussed sequentially as “Emission Reporting Requirements” and “Emission Trading Requirements.”

Emission Reporting Requirements

Taken together, the existing emissions reporting requirements under the NO_x SIP Call and CERR are already rather comprehensive in terms of the States covered and the information required. Therefore, the practical impact of the changes for Delaware and New Jersey is to impose only one new requirement.

Under the existing CERR, yearly reporting is required only for sources whose emissions exceed specified amounts. Under the CAIR, the 23 States and the District of Columbia subject to the CAIR for reasons of PM_{2.5} must report to EPA each year a set of specified data elements for all sources subject to new controls adopted specifically to meet the CAIR requirements related to PM_{2.5}, unless the sources participate in an EPA-administered emissions trading program. This is like the every-year reporting requirement for controlled sources under the NO_x SIP Call, but covering SO₂ in addition to NO_x and covering the whole year – since the PM_{2.5} NAAQS at issue is the annual NAAQS – rather than only the ozone season. This rule does not increase the number of sources for which Delaware and New Jersey must submit reports each year rather than only every third year, since both Delaware and New Jersey: 1) do not control non-EGU sources under the CAIR; and 2) have joined the EPA trading programs for EGUs. This new requirement will begin with the 2009 inventory year, the report for which will be due to EPA by June 1, 2011. After the 2009 reporting year, this new requirement will have no effect on States that fully comply with the CAIR by requiring their EGUs to participate in the EPA model cap-and-trade programs.

Emission Trading Requirements

For purposes of this ICR, it is important that the burdens and costs be calculated only in terms of incremental impacts that have not already been included in the existing ICRs for the ARP and CAIR programs. Delaware sources are subject to the CAIR Federal Implementation Plan (FIP) for annual and ozone season NO_x, and for SO₂. New Jersey sources are subject to requirements consistent with the CAIR SO₂ and annual NO_x model trading rules. With the exception of a modification to the method with which the NO_x allowances are allocated, the requirements for New Jersey sources are consistent with the federal trading program. The trading program burden includes the paperwork burden related to (1) transferring and tracking allowances; (2) the allocation of allowances to affected units; (3) permitting; and (4) monitoring and reporting. Many of these burdens are covered under the existing ARP ICR (1633.15) for ARP sources and the CAIR ICR (2152.03) for non-ARP sources.

Like with the Acid Rain Program and the NO_x SIP Call, the ability to buy and sell (or transfer) allowances is expected to provide substantial economic benefits by encouraging the greatest emissions reductions where costs of reductions are lowest. Allowance trading cannot be implemented, however, unless regulations governing emissions monitoring and permitting of sources are in place as well. To ensure compliance with the emissions reduction requirements and to provide the region-wide consistency needed to foster the allowance market, the designated representative of the owners and operators of each source with affected units are required to have CAIR requirements integrated into their Title V permits for the affected source and to certify that an approved SO₂ and NO_x emissions monitoring system has been installed and is properly operated at each affected unit. For affected units currently required to monitor using Part 75 provisions, information for the allocation methodology is recorded and collected as part of the emissions monitoring and reporting process.

While many sources have already installed necessary emissions monitoring equipment due to requirements under other regulations, some sources may need to install new monitors or upgrade existing monitors. Capital costs also usually include the cost of initial certification of new or upgraded monitors and are included as part of start-up costs.

Emissions monitoring and reporting by sources in the cap and trade program is fundamental to the allowance trading system. EPA uses the data contained in the reports to verify actual emissions. Without accurate monitoring and reporting of emissions, the integrity of the allowance system would be undermined, and there would be no assurance that the cap is achieved and emissions had been reduced. To meet the emissions monitoring, recordkeeping and reporting requirements, affected units are required to (1) submit a monitoring plan and certification reports for each monitoring system, (2) record hourly emissions data, and (3) submit reports of their emissions and operating data to EPA. Sources with monitors already certified under Part 75 may be exempt from initial certification requirements.

All participants in the allowance transfer system are required either to complete and submit an allowance transfer form for each allowance transfer or to perform the transfer on-line. Participants in the transfer system that are not affected sources, such as allowance brokers, fuel suppliers and environmental groups are also required to file a one-time account information application to establish accounts in the allowance tracking systems. For sources affected by the CAIR, allowance transfers previously conducted under the NO_x SIP Call Program occur in the context of the CAIR Trading Program.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

While the Clean Air Act does not provide a specific authorization for a national emissions database, the Clean Air Act provides the EPA ample legislative authority for acquiring such data. Emissions data are of vital importance to the EPA for fulfilling a host of monitoring, standard-setting, rulemaking, reviewing, and reporting duties. Section 110 and 301(a) of the Clean Air Act provide a primary authority for a national emissions database. Section 110 requires each State to prepare a plan which provides for implementation, maintenance, and enforcement of the primary standard for each pollutant for which air quality criteria have been issued. This plan must include provisions for periodic reports identifying sources and listing amounts of emissions. Section 301(a) authorizes the Administrator to promulgate necessary regulations.

Congressional support for collecting and reporting emissions data is demonstrated in three sections of the Clean Air Act. Section 110(a)(2)(F) requires that each State provide for periodic reports on the nature and amounts of emissions of criteria pollutants from stationary sources.

Sections 182(a)(3)(A) and 187(a)(5) of the Clean Air Act specify periodic inventory requirements for ozone and CO nonattainment areas, respectively. Section 182(a)(3)(A) requires States with ozone nonattainment areas to submit a current inventory of actual emissions of VOC, NO_x, and CO every 3 years. Section 187(a)(5) requires a similar inventory of actual CO emissions for CO nonattainment areas. Periodic inventories include emission estimates for all point, nonpoint, onroad mobile, nonroad mobile, and biogenic sources. Section 172(c)(3) also provides the Administrator with discretionary authority to require other emissions data as deemed necessary for State Implementation Plan (SIP) development in nonattainment areas to meet the NAAQS. In 1998, EPA promulgated the NO_x SIP Call which requires the affected States and the District of Columbia to submit SIP revisions providing for NO_x reductions to reduce their adverse impact on downwind ozone nonattainment areas. (63 FR 57356, October 27, 1998). As part of that rule, codified in 40 CFR 51.122, EPA established emissions reporting requirements to be included in the SIP revisions required under that action. Another set of emissions reporting requirements, termed the Consolidated Emissions Reporting Rule (CERR), was promulgated by EPA in 2002, and is codified at 40 CFR part 51 subpart A. (67 FR 39602, June 10, 2002). These requirements replaced the requirements previously contained in subpart Q, expanding their geographic and pollutant coverages while simplifying them in other ways.

As noted above, at present, two sections of title 40 of the CFR contain emissions reporting requirements applicable to States: subpart A of part 51 (the CERR) and section 51.122 in subpart G of part 51 (the NO_x SIP Call reporting requirements). The rulemaking consolidates these for Delaware and New Jersey, with modifications. The modifications are intended to achieve the additional reporting needed to verify the reductions required by the CAIR.

2(b) Practical Utility/Users of the Data

Emission Reporting Requirements

Emissions data and related information on stationary point and nonpoint sources, as well as nonroad mobile and onroad mobile sources, are routinely used by the OAQPS and the EPA Regional Offices in carrying out a variety of activities. These activities support regulatory functions as well as functions that are more programmatic in nature such as trends analyses. Such projects include:

- Evaluation of existing control strategies, such as the NO_x SIP Call, for States and larger areas;
- Evaluation of control strategies for States and larger areas, including applications of regional scale models;
- Development of national control strategies and preparation of Regulatory Impact Analyses (RIA);
- Preparation and publication of national summaries of emissions including trend analyses;
- As a data base to assist in the identification of important source categories for future

regulation; and

- Preparation of the stationary source portion of a report to Congress on SO₂ emissions. This report is required by Section 406 of the Clean Air Act and is due on a 5-year cycle that began on January 1, 1995. The report must contain an inventory of national annual SO₂ emissions from industrial sources (as defined in Title IV of the Clean Air Act).

EPA's Office of Research and Development (ORD) uses emissions source data in determining priorities for control technology research and as a key data component in the application of regional scale models. The EPA's Regional Offices use emissions and other source parameters to support source inspections and in the analyses of the impact of new or modified sources within an area. EPA's Emission Inventory and Analysis Group (EIAG) use the data to assess and analyze trends in criteria pollutant emissions over time.

In addition to supporting projects and initiatives internal to EPA, both the OAQPS and the Regional Offices respond to numerous requests for reports on emission sources. Typically this is done under the Freedom of Information Act. Most requests come from contractors and consultants involved in special studies; a smaller number come from the press and universities and others involved in research.

The collection of emissions data specific to nonattainment areas for certain criteria air pollutants is necessary to comply with requirements specified in Title I of the Clean Air Act. States with nonattainment areas rely on current information for point, nonpoint, and mobile sources to revise their SIPs and to plan for emission reductions mandated by the Clean Air Act. In addition, a statewide inventory compiled at least every 3 years for all point, nonpoint, and mobile sources is considered to be a key tool to assist States in meeting Clean Air Act requirements that address emissions tracking, compliance issues, and mid-course adjustments. Statewide emission inventories can be used by States affected by pollution transport from upwind areas to develop more efficient control strategies to meet the NAAQS. Statewide emission inventories that were developed by EPA (the NEI) are being used by the Regional Planning Organizations (RPOs) as the starting point for the development of statewide emission inventories used in the regional haze program to define control strategies.

Emission Trading Requirements

Data from emissions monitoring is indispensable to successful implementation of the trading programs for two reasons:

- The primary purpose of the trading programs is to assist States in the attainment of the fine particulate matter national ambient air quality standard (NAAQS) by reducing the adverse effects of the transport of fine particles from upwind States by reducing annual emissions of sulfur dioxide and nitrogen oxides; and
- EPA can only enforce the program by comparing, for each affected unit, emissions data and the number of allowances held.

Information collected on allowance transfers is used by EPA or its designated agent to track allowances for the purpose of determining compliance with the CAIR annual NO_x and SO₂ Trading Programs. Information on allowance transfers is also used by participants in the allowance market and the public to evaluate the activities of affected sources, and by EPA for program evaluation.

Together, the allowance trading system, operating permits, and emissions data help to provide the accountability to allow the NO_x and SO₂ Trading Programs to function without more stringent command and control approaches.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

Emission Reporting Requirements

The EPA allows the direct reporting of point source data from sources to EPA to satisfy this requirement if the sources are subject to the monitoring and reporting requirements of 40 CFR Part 75. The direct reporting of data from sources to EPA minimizes the reporting burden on Delaware and New Jersey. Also, direct reporting avoids duplication of effort for sources subject to the Part 75 requirements.

Emission Trading Requirements

Reporting requirements for affected sources for the CAIR NO_x and SO₂ Trading Programs are integrated with existing Part 75 reporting. The reporting formats are currently used by Acid Rain Program units under Title IV of the Clean Air Act and were previously used by units subject to the NO_x SIP Call Trading Program implemented under Title I of the Clean Air Act. Thus, for units subject to Acid Rain or the CAIR quarterly reporting requirements, or both, only one submission will need to be made on a quarterly basis.

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

On May 11, 2009, EPA published a Federal Register notice (74 FR 21802) soliciting public comment on this ICR. EPA received no comments. EPA will publish a second notice concurrent with the submission of this ICR to OMB.

3(c) Consultations

Emission Reporting Requirements

Prior to the publication of the final rule on April 28, 2006 (71 FR 25288), discussions were held with STAPPA/ALAPCO to clarify EPA's logic in developing the rule and to answer questions.

Emission Trading Requirements

The requirements for the CAIR Trading Programs have been developed using both the methodology found in existing trading programs as well as consultations with interested parties. EPA built on the cap and trade strategy used in the Acid Rain Program, Ozone Transport Commission's NO_x Budget Program, and the NO_x SIP Call.

EPA held two workshops with states in the NO_x SIP Call or OTC programs to discuss lessons

learned in those programs. Additionally, EPA has frequent interaction with affected sources and states in the course of implementing the Acid Rain and NO_x SIP Call Trading Programs. EPA has received comments following the workshops and through these less formal interactions and considered and incorporated those comments into the rule and ICR.

Finally, as part of updating the ICR for the Acid Rain Program (Part 75) monitoring requirements, EPA contacted various affected parties to gather information on CEM capital costs, CEM operation and maintenance costs, fuel meter capital costs, and CEM/fuel meter testing costs. That information has been used in this ICR where appropriate.

3(d) Effects of Less Frequent Collection

Emission Reporting Requirements

The submittal dates required for reporting of emissions data to EPA have been established to minimize the burden on Delaware and New Jersey, but also to ensure that Delaware and New Jersey are collecting timely and sufficient emissions inventory data to support their air pollution control efforts. A statewide inventory compiled at least every 3 years for all point, nonpoint, and mobile sources is considered important to assist Delaware and New Jersey in meeting various Clean Air Act requirements.

If the information collection were not carried out every 3 years for all sources and annually for major point sources, the EPA would not be able to maintain a central, national repository of emissions data from which to extract updated information needed to fulfill EPA mandates.

If this information collection were not carried out annually for sources being controlled to meet the SO₂ and NO_x budgets, EPA would not be able to verify that emission reductions necessary to meet Delaware and New Jersey's SO₂ and NO_x emission budgets were being achieved.

In addition, a triennial report of all NO_x sources statewide is vital in enabling EPA to track Delaware and New Jersey's progress towards meeting the NO_x budgets. Because the SO₂ and NO_x budgets prescribed have been deemed essential in order for downwind States to attain the NAAQS in a timely manner, data collected less frequently would be of little or no use.

Emission Trading Requirements

Submittal of allowance trading information and emissions information on an annual basis provides necessary feedback on the requirements of the program, especially whether the program caps have been maintained. If this information collection were not carried out annually for sources being controlled to meet the SO₂ and NO_x budgets, EPA would not be able to verify that emission reductions necessary to meet each State's SO₂ and NO_x emission budgets were being achieved. Because the SO₂ and NO_x budgets prescribed have been deemed essential in order to aid downwind States in attaining the NAAQS in a timely manner, data collected less frequently would be of little or no use.

Quarterly collections of emissions data allows the opportunity to check data for errors and provide rapid feedback on needed adjustments to data collection systems, and thereby promotes accurate and reliable emissions data. For this same reason, existing federal and state emission monitoring programs often require quarterly reporting, or in some cases, monthly. Less frequent collection, such as semi-annually or annually, would increase the amount of preparation and review time at the end of the

reporting period both for regulated sources and for EPA. This would slow down the process for the verification of compliance.

3(e) General Guidelines

This ICR does not violate any of OMB's guidelines for information collections.

3(f) Confidentiality

Any data that is submitted to EPA under this rule will be considered in the public domain and cannot be treated as confidential.

As required by Section 114 of the Clean Air Act, estimates or measurements of emissions must be treated as non-confidential. Under Agency procedures, data items relating to the computation of emissions may be identified as sensitive by a State and are then treated as "State-sensitive" by EPA. The potentially State-sensitive items include the following: process rate, boiler design capacity, emission estimation codes, percent space heat, operating rate, and maximum operation rate/hour. Where Federal and State requirements are inconsistent, the appropriate EPA Regional Office should be consulted for final reconciliation.

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

4(a) Respondents/Standard Industrial Classification (SIC) Codes

The emissions data required by the rule will be submitted by Delaware and New Jersey's air pollution control agencies. Delaware and New Jersey must report to EPA each year a set of specified data elements for all sources subject to new controls adopted specifically to meet the CAIR requirements related to PM_{2.5}, unless the sources participate in an EPA-administered emissions trading program. The affected SIC code would be 9511 - *Air and Water Resource and Solid Waste Management* [NAICS 92411 Administration of Air and Water Resource and Solid Waste Management Programs], which includes governmental environmental protection and control agencies, and pollution control agencies.

This ICR also estimates a burden for affected industry sources to monitor SO₂ and NO_x mass emissions and demonstrate compliance with SO₂ and NO_x control measures. Sources may report data directly to EPA if a source is required to meet the monitoring and reporting requirements of Part 75. Delaware and New Jersey control large electric utility sources to ensure compliance with their SO₂ and NO_x emissions budgets. Electric utility combustion sources are generally classified as either SIC 4911 - *Electric Services*, or 4931 - *Electric and Other Services Combined* [NAICS 221112 Electric Power Distribution].

4(b) Information Requested

Emission Reporting Requirements

The CERR and NO_x SIP Call established the basic emission reporting requirements, and the associated burden is covered under ICRs 0916.13 and 1857.04, respectively. The CAIR changes some of these requirements such that the previously accounted for reporting burden also changes. Only the changes to the CERR and NO_x SIP Call reporting requirements that change reporting burden are discussed here.

Respondent activities

For the emission inventory reporting requirements of the CAIR, respondent activities are very similar to what has been required to satisfy reporting under CERR and the NO_x SIP Call. The previous iteration of this ICR, which preceded the final rule, covered a one-time state burden item of reading the reporting requirements of the rule. For this ICR, there are no specific State respondent activities associated with the CAIR that differ from the existing CERR and NO_x SIP Call requirements.

Emission Trading Requirements

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

(i) Data Items, Including Recordkeeping Requirements

(a) Allowance Tracking

There are several data items required for allowance tracking activities. First, the affected source must submit account certificates of representation for the CAIR designated representative and (if desired) alternate CAIR designated representative. This documentation, found in 40 CFR §§ 96.113 and .213, must include:

- o Identification of the source and unit,
- o Dates on which the unit commenced operation and commenced commercial operation,
- o Name and contact information for the CAIR designated representative and alternate,
- o A list of the owners and operators of each source and unit, and
- o A certification statement and signature of the CAIR designated representative and alternate.

Certification applications are to be kept for a period of 5 years pursuant to the general requirements imposed for Title V permitted facilities.

(b) Permitting

The basic requirement for permitting will be an application for a permit revision to a source's operating permit issued under Title V of the Act. Although there is some possibility that a non-Title V source could be affected under the CAIR Trading Program, all affected sources are assumed to be Title V sources for purposes of this ICR. Except for the permit revision application, all of the other monitoring, reporting or recordkeeping requirements associated with Title V permitting are either part of

the baseline Title V requirements or are covered separately under section 4(c). Title V permit applications must be kept for 5 years pursuant to Title V recordkeeping requirements. In addition, coal-fired units that are not part of the Acid Rain Program are expected to have to apply for a permit to construct under Title I of the Clean Air Act.

(c) Monitoring and Reporting

Affected trading program sources are required to monitor annual SO₂ and NO_x mass emissions, and record and report emissions data using the requirements of 40 CFR Part 75. The 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 SO₂ and NO_x mass emissions data electronically, by direct electronic submission to EPA, and must also include a certification statement by the designated representative of the unit. All monitoring records are to be kept for three years, with one possible exception under a voluntary option for fuel flowmeter calibration testing.

(ii) Respondent Activities

The primary tasks that will be performed by trading program respondents to meet the emissions monitoring requirements are (1) completing and submitting appropriate monitoring plan information 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. In addition, respondents will have to purchase the necessary monitoring hardware and purchase the electronic data reporting software (or software upgrades). For nearly all units in Delaware and New Jersey that are affected by CAIR, the burden associated with these activities, including the allowance tracking, permitting and monitoring and reporting requirements, is already covered in the existing CAIR ICR (i.e., ICR 2152.03). The only additional activities that need to be accounted for in this ICR renewal are the additional allowance transfer, SO₂ monitoring, and annual reporting requirements for those sources that were previously only affected by ozone-season NO_x requirements (i.e., NBP units in Delaware and New Jersey that are not affected by the ARP).

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

5(a) Agency Activities

Emission Reporting Requirements

The EPA activities associated with the rule include:

- Receiving, reviewing, and storing emission inventory data submitted by each State;

- Processing and updating data submitted by States, including performing quality assurance of data, and coordination of efforts to resolve errors and anomalies; and
- Fulfilling information requests.

Emission Trading Requirements

The major EPA activities related to the CAIR Trading Program include (1) maintenance and administration of the SO₂ and NO_x allowance tracking systems, (2) reviewing permit applications, (3) reviewing monitoring plans and certification applications, (4) processing, reviewing and evaluating reports of quarterly emissions data from affected units, (5) calculating/reviewing annual emissions from affected sources, and (6) reviewing total annual emissions data submitted to track each State's progress toward meeting its budgets and creating a summary report of emissions. EPA will use a computer system to track and maintain monitoring and emissions information. EPA will also answer respondent questions and conduct audits of data submissions.

5(b) Collection Methodology and Management

Emission Reporting Requirements

The EPA has established a central repository of inventory data for all States termed the National Emissions Inventory (NEI) database. Emissions inventory data reported electronically will be stored in the NEI database and used by the EPA and by other States for air modeling, tracking progress in meeting Clean Air Act requirements, setting policy and answering questions from the public.

The EPA has created and maintains the NEI database as a central repository of inventory data for all States, but the data must be supplied by the States in electronic form. The EPA currently requires that States use the NEI Input Format (NIF) for electronic data reporting.

Emission Trading Requirements

To ensure consistency region-wide and to expedite data entry, EPA will require that standard formats used for Part 75 reporting be used to submit the information collected for the CAIR SO₂ and NO_x Trading Programs.

Several computer systems and associated databases have been developed to (1) track allowances, (2) record quarterly emissions monitoring data, and (3) calculate the number of allowances to be deducted each year. The systems and databases are designed to coordinate the information for easy access and use by the Agency, states, regulated community, and the public.

The EPA also has established a Clean Air Markets Page on the Internet, which includes detailed information collected from emissions reports. Those without access to the Internet may use the Clean Air Markets Hotline to request information, including summary reports. The Agency expects to rely on these electronic means to disseminate information about the CAIR Trading Program as the program is developed and implemented.

5(c) Small Entity Flexibility

Emission Reporting Requirements

State and Territorial control agencies are not considered to be small entities. According to EPA's ICR Handbook, OMB's definition for a small entity includes small governmental jurisdictions with populations of less than 50,000. According to 1999 population data from the U.S. Census Bureau, no State or Territory has a population below this threshold. However, certain local air pollution agencies may be in charge of individual counties or multi-county areas whose population is less than 50,000.

These local agencies have had experience compiling their 2002 inventories that were submitted to EPA in June 2004 as required by the CERR. The emission reporting requirements in CAIR are estimated to result in a net burden reduction for the reporting agencies.

Emission Trading Requirements

The CAIR Trading Program includes fossil fuel-fired units (stationary boilers, combustion turbines, and combined cycle systems) that serve an electrical generator of capacity greater than 25 MWe. Units with a lower capacity are not included because of the high cost of monitoring emissions from these sources and the *de minimis* nature of their emissions.

There is one small unit provision applicable to the CAIR Trading Program which provides for reduced monitoring. The low mass emissions provisions (40 CFR 75.19) allows optional reduced monitoring, quality assurance, and reporting requirements for units that combust natural gas and/or fuel oil and that emit no more than 100 tons of NO_x annually provided that no more than 50 tons of NO_x is emitted in the ozone season (May 1 – September 30) and no more than 25 tons of SO₂ annually and that calculate no more than the same amount based on specified procedures for calculating and reporting emissions. Utilities that qualify are not required to keep monitoring equipment installed on (or conduct fuel sampling for) low mass emissions units, nor are they required to perform quality assurance or quality control tests. Moreover, emissions reporting requirements are significantly simplified for these units.

Even if a gas or oil-fired unit does not qualify for the "low mass emissions unit" provisions, the monitoring provisions of Part 75 do allow for the use of alternative methods to determine emissions. 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 gas or oil-fired units, especially very small utilities (see p. 5-14 of that RIA document). This analysis remains relevant to this rulemaking.

5(d) Collection Schedule

There are no requirements in the CAIR that will impact the reporting schedule for Delaware and New Jersey.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Emission Reporting Requirements

The respondent burden for complying with the reporting requirements of the rule is estimated incremental to the burden associated with existing annual inventory and periodic inventory reporting requirements.

In general, States already have mechanisms in place for reporting emissions data to EPA under the existing CERR and NO_x SIP Call inventory requirements. As specified in Section 4(b)(i) of this supporting statement, there are no significant changes that Delaware and New Jersey will face in existing reporting to EPA.

Emission Trading Requirements

This section estimates the paperwork burden and cost of submitting permit applications, allowance tracking and transfer materials (including applications for early reduction credits), submittal of monitoring plans, obtaining certification of each monitoring system, conducting monitor quality assurance activities, and recording and reporting data from CEM systems (or approved alternatives). The burden associated with many of these activities is already included in the existing ARP and CAIR ICRs for the affected units in Delaware and New Jersey.

To estimate the burden and/or cost of each incidence of the various rule revisions, EPA had available prior estimates of the costs of various activities, estimates provided by affected utilities in comments to the Agency, and estimates based on the Agency's experience in implementing the existing trading programs.

All units in Delaware and New Jersey that are likely to be affected by this rule have already been regulated by the Acid Rain Program or the NO_x SIP Call trading program or both.

The CAIR Trading Program requires all affected sources to monitor a NO_x emission rate, SO₂ emission rate and heat input in order to determine NO_x mass emissions and SO₂ mass emissions. Affected gas and oil-fired units may elect to use a SO₂ emissions rate CEM and a fuel flowmeter. In addition, peaking units that burn natural gas and/or fuel oil may use an alternative method for calculating NO_x emission rates. EPA will also allow certain low mass emissions units to use assumed emissions factors together with operational data to calculate emissions.

For purposes of this ICR, burdens and costs are calculated only in terms of incremental impacts resulting from this rule. It should be noted that the labor hour and cost estimates per unit identified in this document, represent the weighted average burden and cost for all units and do not represent the actual burden and cost for a particular unit.

Units subject to Acid Rain and NO_x SIP Call requirements will incur only labor burdens associated with permit applications and certain allowance transactions. These units will not incur additional burdens (or capital and operating and maintenance costs) as a result of the rule since they have already installed and are operating a CEMS (or approved alternative) and meet Part 75 requirements for both SO₂ and NO_x.

Units subject only to NO_x SIP Call requirements are already required to meet the monitoring and

reporting requirements in Part 75 for NO_x. These units have been required to calculate and report hourly, quarterly and ozone season or annual NO_x mass emissions. These sources will continue monitoring and reporting NO_x mass emissions. These sources will need to monitor and report NO_x mass emissions year round; therefore needing to modify operational practices but not purchase any equipment. However, the existing ICRs do not assume any difference in burden between NO_x SIP Call/CAIR units that opt to report on an ozone season versus annual basis, because the difference is expected to be slight. Thus, the existing CAIR ICR already assumes year-round reporting for sources subject only to the CAIR ozone season program. There will also be labor burdens associated with permit applications, certain allowance transactions, and some additional emission collection and reporting, and the installation of systems to measure SO₂ in accordance with Part 75. These sources will need to make some additions to their existing monitoring systems to account for SO₂ mass emissions, but will not need to install a full monitoring and reporting system in order to comply with the monitoring and reporting requirements in the CAIR SO₂ Trading Program. As a result, these units will incur additional capital and other operating costs. Finally, these units are expected to incur some costs associated with upgrading the data acquisition and handling system (DAHS) to collect the new SO₂ and additional NO_x data for this program.

In 2009, sources in Delaware and New Jersey are subject to the CAIR Trading Programs NO_x monitoring and reporting requirements as well as the SO₂ monitoring and reporting requirements. The current CAIR ICR (2152.03) covers the burden associated with meeting the CAIR NO_x ozone season program. This ICR only includes the incremental burden for meeting the CAIR annual trading program for NO_x and SO₂. Compliance with the emissions caps (with allowance holding requirements) began in 2009 for NO_x and will start in 2010 for SO₂. Table 6-2 shows the incremental burden associated with monitoring SO₂ and NO_x under CAIR trading programs at the sources in Delaware and New Jersey.

The primary tasks performed by owners and operators of affected units are (1) permitting, (2) monitoring, recording, and reporting emissions data, (3) allowance trading activities and (4) submittal of the year end compliance certification.

(i) Permitting.

Each affected entity had to submit a permit revision application to include in the source's Title V permit the necessary conditions related to compliance with the CAIR Trading Programs. The Agency believes that this application should be relatively routine, and that a standard method of incorporating the requirements by reference or a standard set of permit conditions is available. The Agency estimated that, on a per unit basis, about 4 managerial hours will be required to revise the Title V permit. No burden for this activity is expected in 2009 and subsequent years because the activity should be complete. For new units or facilities, the CAIR ICR adequately accounts for these burdens, with no additional burdens to include the annual trading program requirements.

Some sources may also construct additional facilities to meet the CAIR requirements, and therefore must complete a permit to construct application. For the initial ICR, the Agency estimated that this requirement would be necessary for all coal-fired units that are not in the Acid Rain Program and that the task would take 20 hours of managerial and 20 hours of technician time, per permit. This activity is expected to be completed by 2009, and thus no ongoing burden in this area should occur.

(ii) Monitoring.

For monitoring, the burdens differ greatly based on the amount and type of monitoring the unit is already subject to and the particular subtask of monitoring being conducted. The specific elements of burden are:

Start-up Activities. A large part of start-up activities involves capital and test contractor costs. However, the owner or operator will incur some labor burden for these activities, as applicable. For Acid Rain units, the rule imposes no start-up burdens beyond existing programs. For non-Acid Rain units, the burdens reflect arranging for SO₂ CEMS purchase (as required) and oversight of the certification process.

Regulatory Review. The ICR includes an allocation of time for the managerial and technical staff to review the regulatory requirements and the electronic data reporting formats and instructions (using EPA's Emissions Collection and Monitoring Plan System or ECMPS). Affected units in Delaware and New Jersey are expected to be relatively familiar with the trading program requirements because of similar Acid Rain and NO_x SIP Call requirements and therefore the incremental burden is expected to be 1 hour of managerial and technician time each year.

DAHS Debugging. Based on experience with the Acid Rain Program, some effort will be involved to fix problems with the DAHS software used to report using ECMPS. This burden is assumed to fall primarily on units that are not affected under either the Acid Rain or NO_x SIP Call programs. Since all units in Delaware and New Jersey will be familiar with this process it is estimated that 1 managerial and 4 technician hours will be required each year for this activity.

Monitoring Plans. The regulations require submittal of monitoring plans. Because most of the monitoring plan elements are now submitted electronically through ECMPS, the effort involved in developing and maintaining the plans are incorporated into the overall reporting burden estimate.

Monitor Certification/Recertification. Initial certification burdens and costs for new monitoring equipment are addressed above under start-up activities since these costs are often part of the overall purchase expense for the equipment. For some non-Acid Rain units, however, there will be burdens associated with certifying existing monitors used under other programs for this program, as well as burdens for recertification to the extent a change in a monitoring system requires recertification. EPA estimates that approximately 10% of all units will have to recertify each year following the year in which the initial certification occurs. The ICR incorporates a labor burden estimate generally consistent with existing Agency models for the labor burdens associated with certification. However, note that the ICR reduces the labor hours for this activity to avoid double counting hours that are already accounted for in the quality assurance activity area (see the following subsection). The double counting would occur because a portion of the labor incurred for the certification or recertification event replaces the labor burden that is generally allocated to the annual relative accuracy test audit (RATA) in the year in which the certification event occurs.

Quality Assurance. Quality assurance (QA) activities and other routine maintenance for monitoring systems are the largest burden items under the CAIR Trading Programs. These requirements generally include daily, quarterly and annual QA requirements, depending on the monitoring approach being used. For reporting units that use a CEMS, the Agency has assumed a per unit labor burden based on a variety of sources, including the existing Acid Rain Program ICR, the existing NO_x SIP Call ICR, information provided by Acid Rain Program sources, a CEM cost model developed by EPA, and comments submitted in response to the section 110 SIP Call for ozone transport. For units that rely on

alternative methodologies, reduced labor burden estimates apply because the quality assurance activities for the excepted methods are less than for a CEMS. Consistent with the existing Acid Rain Program ICR, the labor burden is expected to be almost entirely technician labor.

Quarterly Reports. Tasks performed by utilities in preparing quarterly reports include: (1) assuring the quality of the data, (2) preparing the quarterly report, (3) revising the monitoring plan, if necessary, (4) preparation of hard copy documentation accompanying the quarterly reports, and managerial review. The existing Acid Rain Program ICR was used as the basis for these estimates.

Fuel Sampling. To calculate heat input where the source is using the fuel flowmeter option for an oil or gas-fired unit, the source must obtain gross calorific value data from sampling in accordance with Appendix D of Part 75. For purposes of this ICR, it is assumed that the GCV data is collected as part of standard business operating procedures to assure compliance with contractual specifications. Thus no additional fuel sampling burdens or costs should be incurred.

(iii) Allowance transaction activities.

The Agency anticipates the average number of additional allowance transactions will be approximately 100 per year beginning in 2008. A portion of all units will likely conduct transactions in each year solely as a result of this program. The Agency believes that each transaction will involve about 1 hour each of managerial and technician time.

6(b) Estimating Respondent Costs

Table 6-1 presents the burden associated with the activities covered under this ICR for state and local respondents. Table 6-2 summarizes the annual industry respondent costs for those units for which the additional incremental burden associated with the inclusion of Delaware and New Jersey applies. The following discussion describes how the costs were derived.

(i) Estimating Labor Costs

For this ICR, the labor rate used for technical staff at State agencies is \$39.51 per hour, and the labor rate for managerial employees at State agencies is \$48.32. These labor rates include benefits and overhead. These labor rates are derived from data shown on the U. S. Department of Labor, Bureau of Labor Statistics, web site at <http://stats.bls.gov/news.release/ecec.t03.htm>. Wage and salary rates are given in Employee Costs for Employee Compensation “Table 3. State and local government, by major occupation and industry group (March 2009).” The wage and salary rates from this table account for benefits provided to workers. As shown in Table 6-1, when considering both technical and managerial hours, labor costs for State and Territorial agencies are estimated to be \$8,868 per year per respondent. As shown in Table 6-2, EPA used the following labor rates for industry respondents: \$83.43 per hour for managers and \$58.00 per hour for technicians. These rates are consistent with those used in the existing CAIR ICR.

(ii) Estimating Capital and Operations and Maintenance Costs

Emission Reporting Requirements

EPA has concluded that the Capital and Operations and Maintenance Costs estimated under the CERR and the NO_x SIP Call are sufficient to accommodate the modest changes in reporting burden for CAIR. Therefore, no estimate of Capital and Operations and Maintenance Costs were made for this ICR.

Emission Trading Requirements

Capital/start-up costs include the cost of installing required CEMS or alternatives. Operation and maintenance costs (exclusive of labor costs) reflect ongoing costs to a unit and include both contractor costs for the required recertification, diagnostic, and quality assurance (QA) testing, and other direct maintenance-related expenses (e.g., spare parts and calibration gases). These cost estimates have been derived from EPA CEM cost models, existing ICRs, Agency staff experience under the Acid Rain and NO_x SIP Call programs, and supplemental estimates provided by affected utilities and others related to the various cost items.

Acid Rain affected units are not expected to incur any non-labor costs associated with this program. They are already monitoring and reporting SO₂ and NO_x year round. Non-Acid Rain units will need a DAHS upgrade, estimated at \$4,000 per unit and an SO₂ analyzer for \$42,525.

Note that testing contractor costs for certification, recertification and annual relative accuracy test audits (RATAs) are presented as other direct costs and are not converted to equivalent source labor hours. This approach is consistent with the common business practice for obtaining outside contractors to conduct certification/recertification tests and annual RATAs. For initial certification, the certification test costs are commonly bundled with equipment purchase contracts, according to information provided by a range of CEMS equipment vendors. For RATAs that are conducted either as part of the annual quality assurance requirements or as part of recertification, industry contacts have indicated that RATA testing is usually performed under a fixed price contract basis, except for travel costs that may be billed on an hourly basis beyond the basic contract cost.

The Agency also notes that this ICR does not include a cost for the purchase of monitoring equipment for all affected units. Many sources covered by the CAIR Trading Programs are already required to have CEMS under other regulatory programs. Therefore, to the extent that no new equipment is needed by these sources, capital costs are not included because those costs were included in the ICRs of those other programs. Thus, the capital and other costs included in Table 6-2, represent weighted average costs for each respondent, not the total individual cost for any particular respondent.

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

Capital costs for emissions trading reflect one-time costs for purchase of equipment that will be used over a period of years. Conversely, operating and maintenance costs are those costs that 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.

(iv) Annualizing Capital Costs

The relevant capital costs for the emissions trading portion of this ICR were annualized at a rate of 7%, (i.e., the annualized capital cost was calculated assuming money to purchase the capital equipment was borrowed at a 7% annual interest rate). The cost of the loan was amortized over the life of the loan

to repay original borrowed amount plus interest. The result is the annualized capital cost reported.

(6)(c) Estimating Agency Burden and Costs

The tasks that will be performed by EPA include processing, reviewing, and evaluating emissions data reports submitted by utilities, and conducting appropriate audit activities to verify the information provided. However, it is assumed that there is little burden to Agency staff in addition to the burden already estimated and included in ICR 2152.03 because the CAIR ICR assumes all sources submit reports on an annual basis, even for the CAIR NO_x ozone season program. With additional SO₂ data, EPA estimates that the Agency burden would be one hour per report. Assuming that affected sources will submit 126 emissions reports to EPA per quarter, the total annual burden incurred by the Agency will be 504 hours. The total annual cost to EPA to process, review, and evaluate these quarterly emissions reports will be approximately \$24,575.

Federal Agency labor rates were assumed to be \$48.76 per hour. This labor rate was derived from the federal government’s 2009 General Schedule published by the U.S. Office of Personnel Management using the factors in the following table.

Determination of Federal Wage Rates

Annual Salary, Technical Staff, GS 11 Step 3		\$52,846
Annual Salary, Supervisory Staff, GS 13 Step 3	\$75,323	
Factor (1/11)	0.09	\$ 6,779
Annual Cost of Support Staff, GS 6 Step 6	\$35,145	
Factor (1/8)	0.13	\$ 4,569
Annual Applicable Salary of Permit Staff		\$64,194
Benefits (16%)		\$ 10,271
Sick Leave/Vacation (10%)		\$ 6,419
General Overhead (32%)		\$20,542
Total Cost per FTE		\$101,426
Total Hourly Cost (total per FTE dividend / 2,080 hours per year)		\$ 48.76

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

Emission Reporting Requirements

The number of respondents is 2 States. The burden associated with the emission reporting requirements for these states is already covered in the ICRs for CERR and other programs.

Emission Trading Requirements

The number of industry respondents varies depending on the activity in question. Activities such as title V permit application or processing allowance transfers can involve approximately sixty sources. The number of units which will be required to install a particular type of monitoring equipment will be less since many sources already have monitoring equipment especially since they are in the NO_x SIP Call region. Table 6-1 provides estimates of State burden. These burdens include activities associated

with participating in an emissions trading program. Table 6-2 provides estimates of the industry burden starting in 2009. This burden includes monitoring, reporting and other activities involved in participating in an emissions trading program. The total number of respondents is estimated to be 60 facilities.

6(e) Bottom Line Burden Hours and Cost Tables

Total Estimated Respondent Burden and Cost Summary

	Number of Respondents	Total Hours Per Year for all Respondents	Total Costs Per Year for all Respondents
State Respondents	2	440	\$17,737
Industry Respondents	~ 60	1,894	\$218,188

6(f) Reasons for Change in Burden

Emission Reporting Requirements

There is no emission reporting burden in addition to the burden already incorporated in the existing CERR and NO_x SIP Call ICRs. The prior ICR included a one-time estimate of 1 hour per state to read the rule requirements.

Emission Trading Requirements

The burden associated with this rule is a result of the costs of monitoring, certifying, quality assuring and reporting emissions data from large electric generating units regulated under the rule. This burden is reduced as a result of the integration of these monitoring and reporting requirements with those already required under the Acid Rain and NO_x SIP Call trading programs. Otherwise, the burden would be significantly higher and the number of sources would be greater. In addition, most of the burden associated with Delaware and New Jersey sources affected by CAIR is covered under the existing CAIR ICR. The change in burden from the previous ICR primarily reflects removal of certain one-time burdens.

6(g) Burden Statement

For purposes of this ICR, reporting of emissions data required by the CAIR is estimated to be small for State air pollution control agencies in DE and NJ given the burden already incorporated in the existing ICRs for the CERR, NO_x SIP Call and CAIR. Monitoring and reporting emissions under the CAIR Trading Programs is estimated to involve up to 32 hours per year for industrial sources and most of this burden is also covered under existing ICRs. This estimate considers the most hours expected for a source. With acceptable variations in monitoring methodologies, many sources will spend much less time each year meeting these requirements.

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 4 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-2009-0295, which is available for online viewing at 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. 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-2009-0295 and OMB Control Number 2060-0584 in any correspondence.

Table 6-1. Annual State Respondent Burden and Cost by Activity

Information Collection or Trading Rule Activity	Hours and Costs Per Respondent				Total Hours and Costs		
	Mgr. \$48.32/Hr ¹	Tech. \$39.51/Hr ¹	Respondent Hours/Year	Labor Cost/Year	Number of Respondents	Total Hours/ Year	Total Cost/Year
Annual							
Trading Program related (monitoring certifications, audits)	20	200	220	\$8,868.40	2	440	\$17,736.80

¹ See Section 6 (b) (i) for labor and overhead rates.

Table 6-2. Annual Industry Respondent Burden and Cost by Activity, 2009 and subsequent years

Information Collection Activity	Mgr. \$83.43 /Hour 2009	Tech. \$58.00 /Hour 2009	Respondent Hours/Year 2009	Respondent Labor Cost/Year 2009	Annual Capital Startup Costs 2009	O & M Cost 2009	Number of Respondents 2009	Total Hours/ Year 2009	Total Cost/Year 2009
Title V permit application	0	0	0	\$ 0	-	-	0	0	\$ 0.00
Permit to Construct	0	0	0	\$ 0	-	-	0	0	\$ 0.00
Startup/ Capital Items									
~ nonAR Sources in PM States in SIP Call region									
a. add SO2 monitoring	13	3	16	\$ 1,258.59	\$ 6,417.00	-	2	32	\$ 15,351.18
b. DAHS modification	2	4	6	\$ 398.86	\$ 604.00	-	92	552	\$ 92,263.12
Review Instructions and Requirements									
~ nonAR Sources in PM States in SIP Call region	1	1	2	\$ 141.43	-	-	92	184	\$ 13,011.56
Debug Computer Software									
~ nonAR Sources in PM States in SIP Call region	1	4	5	\$ 315.43	-	-	92	460	\$ 29,019.56
Certify Monitors									
~ nonAR Sources in PM States in SIP Call region									
a. SO2 monitor	5	16	21	\$ 1,345.15	-	\$ 2,817.00	2	42	\$ 8,324.30
Perform QA Testing and Maintenance									
~ nonAR Sources in PM States in SIP Call region									
a. SO2 monitor	10	200	210	\$12,434.30	-	\$10,462.00	2	420	\$ 45,792.60
Year-End Compliance Activities									
~ Assure Data Quality, Prepare Reports, Submit Reports	1	1	2	141.43			2	4	282.86
~ Allowance Transfers	1	1	2	\$ 141.43	-	-	100	200	\$ 14,143.00
TOTAL								1,894	\$218,188.18