# INFORMATION COLLECTION REQUEST
# SUPPORTING STATEMENT

# EFFLUENT GUIDELINES AND STANDARDS FOR THE AIRPORT DEICING CATEGORY PROPOSED RULE

**U.S. Environmental Protection Agency**
**Office of Water**
**Office of Science and Technology**

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# PART A OF THE SUPPORTING STATEMENT

## 1. Identification of the Information Collection

### a. Title of the Information Collection

Effluent Guidelines and Standards for the Airport Deicing Category; Proposed Rule (40 CFR Part 449). EPA ICR No. 2326.01.

### b. Short Characterization/Abstract

This Information Collection Request (ICR) seeks approval of the information requirements in the Proposed Rule for the Effluent Guidelines and Standards for the Airport Deicing Category. EPA is proposing wastewater regulations (effluent guidelines and standards or ELGs) for airports that conduct deicing operations. Aircraft are deiced by the spraying of chemicals called aircraft deicing fluids (ADF), which contain water pollutants. Airports also apply airfield pavement deicing chemicals to runways, taxiways and ramps which similarly contain water pollutants.

The proposed rule would require airports to collect ADF usage data, capture a specified amount of spent ADF, meet effluent limitations for chemical oxygen demand (COD) for the captured ADF. Larger airports would be required to capture 60 percent and smaller airports 20 percent of the spent ADF. For airfield pavement discharges, the proposed rule would require airports to eliminate use of urea-based deicers or meet numeric effluent limitations for ammonia.

An airport would be required to demonstrate compliance with the ADF "Percent Capture Requirement" to the appropriate permitting authority (state agency or EPA regional office). This requires one of three compliance options. The permittee may certify to the permitting authority that they are operating one of the ELG specified technologies as required in the regulation, they may work with their permitting authority to specify an alternative technology that will meet their collection requirement and certify that they are using that technology as required, or finally, the permittee may simply perform monitoring at a frequency specified by the permitting authority in order to report the amount of ADF that has been captured, and compare that with the amount of ADF applied in order to show their actual collection rate. For airfield pavement deicing operations, airports would be required to certify that they are not using urea-based deicers. EPA and the states will use this information to determine permittee compliance with the regulations and administer enforcement actions if needed.

## 2. Need for and Use of the Collection

### a. Need/Authority for the Collection

EPA is proposing the ELG pursuant to sections 301, 304, 306, 308, 402, 501 and 510 of the Clean Water Act, as amended; 33 U.S.C. 1311, 1314, 1316, 1318, 1342, 1361 and 1370. Airports are required by existing regulations (40 CFR Parts 122-125) to obtain wastewater discharge permits (NPDES program) and conduct periodic monitoring of effluent. CWA sec. 308 provides EPA and the states with explicit authority to require that permittees demonstrate compliance with regulatory requirements.

**b. Practical Utility/Users of the Data**

The utility of the data reporting requirements of the proposed rule is summarized below. In all cases, the users of the data would include both the airports and their permit authorities.

**i. ADF Usage Reporting**

ADF usage would be compared with the amount of ADF captured to show the ADF percent capture rate and would be used to demonstrate compliance with the proposed percent capture requirement. Total ADF usage will also be used to determine the percent capture rate required for an airport (e.g., in-scope airports with more than 460,000 gallons of annual propylene glycol/ethylene glycol usage are required to meet the 60% ADF capture rate).

**ii. ADF Percent Capture Demonstration**

Documentation of the operation and maintenance of a glycol recovery vehicle (GRV), centralized deicing pad(s), or a different ADF collection technology (as specified by the permitting authority) may be used to demonstrate compliance with the proposed ADF percent capture without having to determine the numeric percentage of ADF collected. A comparison of the amount of ADF sprayed and the amount of ADF collected could also be used to demonstrate compliance with the proposed percent capture requirement.

**iii. COD Effluent limitation Demonstration**

Monitoring data for COD will be used to demonstrate compliance with the proposed effluent limitations for COD.

**iv. Urea-Based Deicer Certification**

The proposed rule would require airports to certify, at the time of permit application and renewal, that no urea is used for airfield pavement deicing (i.e. runways, taxiways, aprons and ramps). A proposed compliance alternative would allow airports to meet an effluent limitation for ammonia, and the airport would be demonstrate compliance by monitoring the effluent.

**3. Non-Duplication, Consultations, and Other Collection Criteria**

**a. Non-Duplication**

The proposed rule does not duplicate other information requirements. In developing the proposed rule, EPA reviewed existing NPDES permits held by airports. Permittees do not currently provide data to permit authorities on the usage of deicing chemicals or on the capture rate of their ADF collection systems. There are no public sources available from which a permitting authority would be able to obtain this information; the information must be submitted directly from the permittee with a signed certification, for enforcement purposes.

**b. Public Notice Required Prior to ICR Submission to OMB**

A summary of the ICR for the proposal is included in the proposed Airport Deicing ELG Federal Register notice.

**c. Consultations**

EPA met with industry stakeholders and attended airport deicing conferences during the development of the proposed rule. Participants included members of the Airports Council International-North America (ACI-NA), American Association of Airport Executives (AAAE) and Air Transport Association (ATA). Stakeholders offered recommendations on the design of airport and airline industry questionnaires (OMB No. 2040-0267) that were used to develop data for the proposed rulemaking, and discussed EPA's research findings, and related regulatory issues. EPA also consulted with the Federal Aviation Administration (FAA).

**d. Effects of Less Frequent Collection**

Airport permittees would only provide the ADF percent capture information and the certification of no use of urea to the permitting authority once per permit cycle, i.e. once every five years. Data submission less frequent than once every five years would prevent the permitting authorities from carrying out their duties to enforce the permit requirements.

Other reporting associated with monitoring COD would require annual reporting or as specified in the permit. Annual monitoring is the minimum required by NPDES regulations at 40 CFR 122.44(i)(2).

**e. General Guidelines**

The information collection requirements of the proposed rule are in accordance with the Paperwork Reduction Act guidelines in 5 CFR 1320.5(d)(2).

**f. Confidentiality**

Applications for an NPDES permit may contain confidential business information. However, EPA does not consider the specific information being requested by the proposed rule to be typical of confidential business or personal information. If a respondent does consider this information to be of a confidential nature, the respondent may request that such information be treated as such. All confidential data will be handled in accordance with 40 CFR 122.7, 40 CFR Part 2, and EPA's Security Manual Part III, Chapter 9, dated August 9, 1976.

**g. Sensitive Questions**

The proposed rule does not require respondents to divulge information of a sensitive nature, such as private or personal information.

## 4. The Respondents and the Information Requested

### a. Respondent NAICS Codes

The respondents affected by this information collection request are commercial airports. The North American Industry Classification System (NAICS) identification number applicable to airport respondents is: 488119: Other Airport Operations. The U.S. Census Bureau describes this U.S. industry as establishments primarily engaged in (1) operating international, national, or civil airports, or public flying fields or (2) supporting airport operations, such as runway maintenance services, hangar rental, and/or cargo handling services. The NAICS identification number applicable to airlines is 481: Air Transportation.

### b. Information Requested

#### i. Data Items, Including Record Keeping Requirements

When submitting a permit renewal or application (for an individual NPDES permit) or Notice of Intent (for a general permit), airports that are subject to ADF collection requirements must (1) report ADF usage; (2) demonstrate that the ADF capture percentage is being met; and (3) demonstrate compliance with the effluent limitations for COD for direct discharges.

Reporting ADF usage requires activity by both airlines and airports as airports would collect ADF usage data from the airlines to prepare the airport's usage report. The airlines would provide ADF usage for their aircraft and provide that information to the airport.

EPA's proposal provides an airport with three alternative methods to demonstrate compliance with the percent ADF captured. One method is to certify that the airport and/or airlines are operating and maintaining one of the specified ADF collection technologies, such as a glycol recovery vehicle, a centralized deicing pad(s), or an alternative technology that demonstrates achievement of the percent capture requirement. This demonstration constitutes compliance with the applicable percent collection requirement without the airport having to determine the numeric percentage of ADF collected. An airport must operate and maintain these control technologies according to set technical specifications.

Technical specifications for a GRV require the airport to describe areas where ADF is collected and document that GRV collection of spent ADF is available for each of these areas. Airports must document that a GRV collects spent ADF as soon after deicing activities as is practical and safe and that an emulsifier is used to aid in ADF recovery. Airports must also document that a GRV is maintained according to the manufacturer's specifications and that it is inspected at the beginning and end of each deicing season.

Technical specifications for operation of a centralized deicing pad require the airport to document that all aircraft deicing takes place on a deicing pad(s) except where low volume deicing for safety purposes (less than 25 gallons of normalized ADF) is required to move a plane from a parked location to a deicing pad. Deicing pad draining valves must be activated to collect spent ADF before deicing activities commence. To ensure that the dimensions of the deicing pad(s) can accommodate the size and volume of aircraft, the airport must document that the deicing pad(s) are sized to accommodate the airport's peak hourly departure rate, and that their

width and length equals the wingspan and fuselage length, respectively, of the most demanding aircraft using the deicing pad.

If information relevant to the operation and maintenance of ADF collection and control is included in the airport's Stormwater Prevention Pollution Plan (SWPPP), the airport could submit the SWPPP as documentation reducing duplication and overall burden.

The second method an airport may utilize to demonstrate compliance with the percent of ADF collected by the airport is to propose an alternative ADF control technology to those specified in the regulations. The airport would be required to provide documentation to its permitting authority that the technology would capture at least 20 or 60 percent of the ADF, as applicable, and meet the technical specifications set by the permitting authority for the proper operation and maintenance of the chosen collection technology.

The third proposed method for an airport to demonstrate compliance with the percent of ADF captured would require the airport to periodically monitor the amount of ADF sprayed and collected using sample collection devices, detection equipment or other means as determined by the permitting authority.

In addition to reporting ADF usage and demonstrating the applicable percent ADF captured, an airport subject to ADF collection requirements with direct discharge of deicing stormwater would demonstrate compliance with the effluent limitations for COD by providing monitoring data for the aircraft deicing fluid included in the scope of the regulation. The airport would collect samples and provide the analytical results of the monitoring samples to meet this requirement.

The proposed rule requires airports to certify that urea-based deicers are not used for airfield pavement deicing. The compliance alternative establishes effluent limitations for discharges resulting from the deicing of airfield pavement and requires an airport to provide monitoring data for ammonia. The airport would collect samples at each outfall receiving airfield deicing stormwater and provide the analytical results of the samples.

**ii. Respondent Activities**

A respondent could be required to prepare/provide documentation and reports, collect data, and/or prepare a certification letter when submitting a permit renewal application (for an individual NPDES permit) or Notice of Intent (for a general permit) as required by this proposed rule. Except for annual monitoring reports for COD, these activities occur once per permit cycle which is typically five years. The proposed rule would require 110 airports with 10,000 or more departures a year and more than 1000 jet departures; as well as, 108 airports with more than 1,000 jet departures but less than 10,000 total departures to perform these activities as applicable. EPA estimates that the total number of respondents would be 218 airports and approximately 65 airlines that deice aircraft at these airports.

Reporting ADF usage would require activities by both airports and airlines. An airport would collect data on ADF usage for aircraft deicing from their airline tenants. The data would represent ADF usage during the deicing season which EPA estimates to average approximately six months or 26 weeks per deicing season. The number of deicing airlines per airport varies and

EPA has estimated that the average number of deicing airlines per airport is ten. EPA estimates that the airline data collection would require two hours a week for 26 weeks for the estimated 10 airlines/airport for a total of 520 hours. Airports would collect airline usage information, compile that data for an average of 10 airlines, and prepare a usage report. EPA estimates the collection and compilation of the data by an airport would require five hours a month for six months and 10 hours to prepare the usage report for a total of 40 hours. Documentation of these activities would be required once every five years.

Demonstration of the ADF percent capture requirement would require airports to document operation and maintenance of a designated or alternative ADF control technology, or monitor the amount of ADF sprayed and collected. Airports demonstrating operation and maintenance of a GRV, a centralized deicing pad(s), or an approved alternative control technology are not required to monitor the amount of ADF sprayed and collected. Airports with these technologies would perform inspections at the start and end of the deicing season and perform weekly inspections during the deicing season. The GRV and centralized deicing pad inspections would document the technical specifications and operation and maintenance information, described in Section 4(b)(i) above, and airports would compile the information for submittal with the permit application or renewal. Documents on the design and/or construction and maintenance of the technology already exist and reduce the burden of the respondents. EPA estimates that inspections at the start and end of the deicing season and preparing the reports would require a total of 20 hours; the weekly inspections would require two hours a week for 26 weeks for a total of 52 hours. Demonstration of the operation and maintenance of the ADF control technologies would require a total of 72 hours once every five years.

Airports without the ADF control technologies would be required to either provide documentation of the percent collection to meet the ADF percent capture requirement or otherwise demonstrate compliance in a manner specified by the permitting authority. EPA expects that airports that are in compliance would use a consultant to document the percent collection and would require 304 hours to collect the information and prepare a report.

For the purposes of estimating burden in this ICR, EPA assumed that airports not using the specified technologies would demonstrate compliance by performing a mass balance calculation on ADF usage versus collection and engineering analysis to develop a strategy for compliance. These airports would monitor each deicing outfall for the average number of snow or freezing precipitation (SOFP) days. Specific activities would include developing a wastewater sampling plan, collecting samples, and analyzing the samples. EPA estimates that sampling would require 73 hours for each deicing outfall plus 200 hours for each SOFP day for engineering analysis. Demonstration of the percent capture requirement for airports without ADF control technologies would be required once every five years.

Demonstration of compliance with effluent limitations proposed for COD would require airports with direct discharge of deicing stormwater to monitor the discharges associated with the aircraft deicing runoff. Airports would collect one sample a day for five days a week for an estimated six months during the deicing season, assuming one hour to collect a sample. EPA estimates that sample collection would require 130 hours per airport for 82 airports that reported direct discharge. The COD monitoring would be required on an annual basis or as specified by the permitting authority.

For airfield pavement deicing, the airports would prepare a certification letter certifying non-use of urea-based deicers. EPA estimates that preparation of the certification letter would take 5 hours per airport. For the compliance alternative, airports that use urea-based deicers would monitor their effluent and provide monitoring reports once a year. These airports would collect one sample a day at each deicing outfall impacted for five days a week during the deicing season (26 weeks). EPA estimates that up to 45 airports that reported use of urea could be required to monitor ammonia on an annual basis.

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

### a. Agency Activities

Every airport is currently covered by either EPA's MSGP, an equivalent state general permit, or an individual permit, and the NPDES permitting authorities already receive, process, and review permit applications, and Notices of Intent (NOIs). Permitting authorities would also process and review certifications for operation and maintenance of ADF collection systems, reports of ADF sprayed and collected, certifications of non-use of urea-based deicers, and monitoring data as applicable.

### b. Collection Methodology and Management

Permittees will submit their certifications to the permitting authority as part of their permit application or Notice of Intent (NOI) to be covered by a general permit. The permitting authority will review the information as part of the permit issuance or renewal process, and retain the information in the official permit file.

### c. Small Entity Flexibility

The proposed rule would affect only a small number of "small" airports. (See section XIII.C, Regulatory Flexibility Act, in the preamble of the proposed rule.) The reporting requirements discussed in this document are intended to give flexibility to airports that must comply with the regulations.

### d. Collection Schedule

The proposed rule would require documentation of ADF percent capture and reporting of ADF usage to be reported once every permit cycle, which is every five years. The frequency of monitoring requirements for COD (and ammonia, for airports choosing the urea compliance alternative) would be once a year or as directed by the permitting authority.

## 6. Estimating the Burden and Cost of the Collection

### a. Estimating Respondent Burden

For the purpose of estimating burden, the airports subject to this proposed rule have more than 1,000 jet departures and 10,000 or more departures a year (estimated at 110 airports) or; more than 1,000 jet departures but less than 10,000 total departures (estimated at 108 airports)

and perform aircraft and/or airfield deicing. Therefore, EPA estimates that 218 airports may fit this scope. Other factors that may affect airport burden include the use of ADF collection/ control technologies, discharge status, and the type of deicing chemical used. In addition to airports, airlines that deice aircraft at these airports would provide ADF usage to the airports to enable airports to meet the reporting requirement for ADF usage, specifically the amount of ADF that is required for collection (20 or 60 percent) is based on the amount of ADF used annually. EPA estimates that 65 airlines perform aircraft deicing at these airports.

Tables A.6-1 through A.6-4 present a breakout of estimated respondent burden. Most of the costs associated with ADF percent capture determinations and monitoring for COD are accounted for in the proposal option costs. These costs have been broken out for review purposes in this ICR and are not additional costs to the industry.

To meet the reporting requirement for ADF usage, airports would collect airline and airport ADF usage data representing the deicing season (estimated to be a period of 26 weeks). EPA estimates that the average number of airlines deicing aircraft at a "station", or a single airport location, is 10 airlines. For the airlines, EPA estimates it would take the 10 airlines an average of two hours a week for 26 weeks to collect ADF usage information for a total of 520 hours. EPA estimates it would take an airport five hours per month for six months to collect airline ADF usage information, compile the data and prepare the usage report. EPA estimates that the total burden for 110 airports would be approximately 4,400 hours. EPA estimates the average total respondent burden for airports and airlines would be approximately 61,600 hours. Airports would report ADF usage once every five years. Table A.6-1 presents the average hour burden for airlines and airport and the total respondent burden to report ADF usage.

**Table A.6-. Estimated Respondent Burden and Cost for ADF Usage and Reporting**

| Activity | Estimated Hours Burden | Estimated Cost Burden [a] | Number of Airports Where Activity is Conducted | Total Hours | Total Cost |
|---|---|---|---|---|---|
| **Airports with 10,000 or More Departures** | | | | | |
| Report Amount of ADF Used | 40 | $1314 | 110 | 4,400 | $144,594 |
| **Airlines** | | | | | |
| Report Amount of ADF Used | 520 | $17,160 | 110 | 57,200 | $1,887,600 |
| **Total Respondent Burden** (Estimated for Airlines and Airports) | | | | **61,600** | **$2,032,194** |

a – Labor rate of $33/hours based on average labor costs from EPA's airport questionnaire database.

As stated above there are three options an airport has to demonstrate compliance with the percent capture requirement in the regulation and EPA evaluated a range of burden based on these approaches. Under one approach (see proposed §449.20(b)(3)), an airport may monitor the amount of ADF sprayed and collected, and demonstrate compliance as specified by the permitting authority.

Alternatively, under proposed §449.20(b)(1), an airport may use specified control technologies (i.e., GRV, centralized deicing pad(s), or approved alternative control technology) and document operation and maintenance according to the technical specifications described in

Section 4(b)(i) of this document. Existing documents on design and construction and maintenance of these technologies would reduce the burden for these airports. EPA estimates that airports will use this option to demonstrate compliance with the percent capture requirements in the regulation. EPA estimates airports would perform inspections at the start and end of the season and prepare reports, taking an average of 20 hours; the weekly inspections during the deicing season are estimated to take two hours a week for 26 weeks or 52 hours for a total average burden of 72 hours. EPA estimates the average minimum total respondent burden if all in-scope airports were to demonstrate the ADF percent capture requirement using this approach would be 7,920 hours. The means of demonstrating compliance with the ADF collection requirement does not apply to airlines. Table A.6.2 presents the average hour burden for airports and the total minimum respondent burden for airports.

**Table A.6- . Estimated Respondent Burden and Cost to Demonstrate ADF Percent Capture**

| Activity | Estimated Hours Burden | Estimated Cost Burden | Number of Airports Conducting Activity | Total Hours | Total Cost |
|---|---|---|---|---|---|
| Inspect Operation and Maintenance of designated or alternative ADF Control Technology | 72 | $2,366 | 110 | 7,920 | $260,269 |
| **Total Respondent Burden** | | | | **7,920** | **$260,269** |

To demonstrate compliance with the effluent limitations proposed for COD, airports with direct discharge of deicing stormwater would monitor the effluent of their treatment system. EPA estimates that 82 airports directly discharge deicing stormwater. These airports would collect one composite sample/day for five days for 26 weeks during the deicing season, assuming one hour to collect a sample. EPA estimates it would take airports an average of 130 hours to monitor their effluent. EPA estimates the total respondent burden to monitor COD would be 10,660 hours. These airports would provide monitoring reports in accordance with their permit, with a minimum of at least once a year. Table A.6-3 presents the average hour burden for 82 airports and the total respondent burden to demonstrate compliance with the proposed COD effluent limitations.

**Table A.6-3. Estimated Respondent Burden for COD Monitoring**

| Activity | Estimated Hours Burden | Estimated Cost Burden [a] | Number of Airports Conducting Activity | Total Hours | Total Cost |
|---|---|---|---|---|---|
| **Airports with Direct Discharge** | | | | | |
| Sample Collection | 130 | $4,322 | 82 | 10,660 | $353,485 |
| Sample Analysis (contract laboratory) | NA | $2,874 | 82 | NA | $235,656 |
| **Total Respondent Burden** | | | | **10,660** | **$589,141** |

a – Labor rate of $33/hours based on average labor costs from EPA's airport questionnaire database. Source of sample analysis costs from EPA for COD sample analysis by contract laboratory.

Airports would prepare a certification letter certifying non-use of urea-based deicers for airfield pavement deicing. EPA estimates it would take an average of 5 hours to prepare a certification letter, and the total respondent hours to prepare the letters would be 1,089 hours.

Airports that elect to use the compliance alternative for airfield pavement would be required to monitor their discharges and comply with an ammonia limit. EPA anticipates that airports will discontinue urea use and prepare certification letters, as opposed to continuing use of urea-based deicers, because the capture and treatment of airfield runoff is prohibitively expensive, much more so than not using urea. However, EPA has prepared a burden estimate for the compliance alternative, as it is included in the proposed rule.

EPA estimates that 45 airports may currently use urea-based deicers. If these airports would collect one sample per day at each affected airfield outfall for five days for 26 weeks during the deicing season, EPA estimates it would take an average of 1,212 hours per airport to monitor for ammonia. EPA estimates the maximum total respondent burden to monitor ammonia would be 54,730 hours. EPA estimates the total potential respondent burden to monitor ammonia and prepare certification letters would be 55,819 hours. Table A.6-4 presents the average hour burden for airports to monitor ammonia or prepare certification letters and the total respondent burden to demonstrate compliance with the proposed ammonia effluent limitations.

Because EPA anticipates that airports will choose to prepare certification letters, the Agency estimates that the Total Minimum Response Burden of 1,089 hours is the most representative.

**Table A.6-4. Estimated Respondent Burden for Certification of No Use of Urea or Ammonia Monitoring**

| Activity | Estimated Hours Burden | Estimated Cost Burden [a] | Number of Airports Conducting Activity | Total Hours | Total Cost |
|---|---|---|---|---|---|
| **Total Minimum Respondent Burden (all airports certify)** | | | | | |
| Certify No Use of Urea | 5 | $165 | 218 | **1,089** | **$35,937** |
| **Total Maximum Respondent Burden – Compliance Alternative (airports currently certifying + remaining airports monitor for ammonia)** | | | | | |
| Sample Collection | 1,212 | $19,672 | 45 | 54,730 | $888,525 |
| Sample Analysis (by contract laboratory) | NA | $12,692 | 45 | NA | $573,251 |
| Certify No Use of Urea | 5 | $165 | 173 | 865 | $28,545 |

a – Labor rate of $33/hours based on average labor costs from EPA's airport questionnaire database. Source of sample analysis costs from EPA for ammonia sample analysis by contract laboratory.

For permitting authority (state agency) costs, all of the base labor rates and compensation factors were derived from published employment cost trends for state and local government workers for the second quarter of 2004 (BLS, 2003). EPA chose the BLS labor category of white-collar professional specialist to represent the senior administrative and technical staff that would oversee and manage the NPDES permit program. The base hourly rate for this category

was approximately $32 per hour, and after adjusting for compensation and inflation it is approximately $51 per hour.

Similarly, EPA chose the BLS labor category of white-collar professional technical to represent the junior technical staff that EPA expects to perform the majority of the actual NPDES permitting work. The reported base pay for this category was approximately $19 per hour, which becomes approximately $33 per hour after being adjusted for compensation, overhead, and inflation. The hourly wage for State government clerical workers was $14 per hour before adjustments and approximately $25 afterward. Table A.6-5 presents an estimate of the incremental annual burden and labor cost that the permitting authority would incur to process the permit applications/renewals. The table identifies the activity to be performed by the permitting authority (the state) to process the NPDES permit.

In this proposed rule, the submitted documents would be added to the permittee's electronic permit file, or documents would get added into the hard copy file. The burden estimates are based on permit submittals for the 110 airports with 10,000 or more departures. EPA estimates that it will take an additional 85 hours per year to review the permit submittals from 110 airports (submitted on a 5-year cycle) plus 109 hours per year to review submittals of monitoring data.

EPA estimates that submittals of monitoring data from approximately 218 airports would take on average 30 minutes to review once a year. EPA estimates that it would take an average of 45 minutes to review each permit submittal and 24 hours to manage the permit program. Submittals from airports with an ADF collection technology would require additional time as their submittals would include additional documentation. Table A.6-5 below presents a summary of the total estimated burden for the Agency.

**Table A.6-5. Estimated Agency (Permitting Authority) Burden and Labor Cost**

| | Burden (hours) | | | | Labor Cost [a] | | | |
|---|---|---|---|---|---|---|---|---|
| **Activities** | **Manager** | **Jr. Tech.** | **Clerical** | **Total Hours** | **Manager $51/hr.** | **Jr. Tech. $33/hr.** | **Clerical $25/hr.** | **Total Cost** |
| Review permits | | 33 | 52 | 85 | | $1,079 | $1,295 | $2,374 |
| Review monitoring data | | 109 | | 109 | | $3,597 | | $3,597 |
| Manage permit program | 24 | | | 24 | $1,224 | | | $1,224 |
| **TOTAL** | **24** | **142** | **52** | **218** | **1,224** | **$4,676** | **$1,295** | **$7,195** |

a – Note: Rounding errors involved.

## b. Estimating Respondent Costs

### i. Estimating Labor Costs

EPA estimated respondent labor costs for the specific activities related to the reporting and monitoring requirements of the proposed rule. Costs for the collection of data by airport personnel are based on average labor costs from EPA's airport questionnaire database and the average labor rate is $33/hour. EPA used the estimated hours required to respond to the various

requirements of the proposed rule and multiplied these costs by this labor rate. Tables A.6-1 through A.6-4 present the average and total respondent costs to meet the various reporting and monitoring requirements related to this proposed rule.

### ii. Estimating Capital and Operations and Maintenance (O&M) Costs

Because EPA would not require respondents to purchase any nonexpendable goods, including equipment or machinery, to perform compliance demonstration reporting, the Agency does not expect capital costs to result from the administration of these reporting requirements. Operation and maintenance costs would include only photocopying and postage for the completed permit application. These are costs that a facility would experience without the promulgation of this regulation. All airports are subject to existing NPDES permits.

### iii. Capital/Start-up Operating and Maintenance Costs

There would be no capital or start-up costs associated with compliance demonstration reporting, as described above.

### iv. Annualizing Capital Costs

There would be no capital costs associated with compliance demonstration reporting, as described above.

## c. Estimating Agency Burden and Costs

There would be no federal government burden or costs associated with compliance demonstration reporting because this responsibility is delegated to state permitting authorities as discussed above.

## d. Estimating the Respondent Universe and Total Burden Costs

The estimated respondent universe for compliance determination reporting under the proposed rule is 218 airports and approximately 65 airlines. The burdens presented by activity in Tables A.6-1 and A.6-2 represent the totals for all the documentation, monitoring, and reports required for one permit application or renewal. This burden is required once every five years and EPA is converting this once every five years burden estimate into an annual burden estimate by dividing the totals by five. Annual submission of effluent monitoring data may be required for COD. In addition, airports must certify no use of urea for airfield pavement deicing. These annual burden and costs are presented in Tables A.6-3 and A.6-4. Table A.6-6 below presents a summary of the total estimated activity burden for airport and airline respondents by activity.

**Table A.6-6. Estimated Respondent Burden and Cost by 5-Year Permit Cycle and Annual Requirement**

| Activity | 5-Year Permit Cycle | | Annual | |
|---|---|---|---|---|
| | Total Hours | Total Cost | Total Hours | Total Cost |
| **ADF Usage Reporting** | | | | |
| Report Amount of ADF Used (Airport) | 4,400 | $144,594 | 880 | $28,919 |

**Table A.6-6. Estimated Respondent Burden and Cost by 5-Year Permit Cycle and Annual Requirement**

| Activity | 5-Year Permit Cycle | | Annual | |
|---|---|---|---|---|
| | Total Hours | Total Cost | Total Hours | Total Cost |
| Report Amount of ADF Used (Airline) | 57,200 | $1,887,600 | 11,440 | $377,520 |
| **ADF Percent Capture Determination** | | | | |
| Total Respondent Burden | 7,920 | $260,269 | 1,584 | $52,054 |
| **COD Monitoring** | | | | |
| Sample Collection and Analysis | - | - | 10,660 | $589,141 |
| **Urea Certification** | | | | |
| Total Respondent Burden | - | - | 1,089 | $35,937 |
| **Total for All Respondent Activities** | | | | |
| **Total Respondent Burden** | - | - | **25,653** | **$1,083,571** |

## e. Bottom Line Burden Hours and Cost Tables

### i. Respondent and Agency Burden Hours and Costs

Table A.6-7 presents the average annual burden and costs for airport, airline, and permitting authorities for this ICR. The average annual airport burden uses the burden estimates summarized in Table A.6-6, where the ADF percent capture determination burden is estimated as the average of the minimum and maximum values.

**Table A.6-7. Summary of Average Annual Burden and Costs for Respondents (Airports and Airlines) and Permitting Authority**

| | Respondents | Average Annual Burden (Hours) | Average Annual Costs |
|---|---|---|---|
| Airports | 218 | 14,213 | $706,051 |
| Airlines | 65 | 11,440 | $377,520 |
| Permitting Authority | | 218 | $7,195 |
| **TOTAL** | | **25,871** | **$1,090,766** |

### ii. Variations in the Annual Bottom Line

Respondent burden may vary as shown in Table A.6-6 based on the following:

- The number of airlines submitting ADF usage information to any specific airport;
- The method used to demonstrate compliance with the ADF percent capture requirement.

## f. Reasons for Change in Burden

Not applicable because this request does not renew or modify an existing ICR.

## g. Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 45.8 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–OW–2004–0038, which is available for online viewing at www.regulations.gov, or in person viewing at the Water Docket 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 Water Docket is (202) 566-2426. 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–OW–2004–0038 and OMB Control Number 2040-NEW in any correspondence.