
Supporting Statement
Revisions to Pb Ambient Air Monitoring Requirements – Proposed Rule
EPA ICR # 2378.01

PART A

1. Identification of the Information Collection

(a) Title of the Information Collection

“Revisions to Pb Ambient Air Monitoring Requirements – Proposed Rule”

(b) Short Characterization/Abstract

This Information Collection Request (ICR) includes ambient air monitoring data reporting and recordkeeping activities associated with the 40 CFR part 58 Ambient Air Quality Surveillance regulations. These data and information are collected by State and local air quality management agencies and reported to the U.S. Environmental Protection Agency (EPA).

The EPA is proposing to revise the network design requirements for the lead monitoring, to support the primary National Ambient Air Quality Standards (NAAQS) for Pb. Presently, state agencies, and local agencies when delegated by the state, are required to monitor for lead (1) near Pb emissions sources emitting 1.0 tpy or greater and (2) in Core Based Statistical Areas (CBSA) with a population greater than 500,000 people. Monitoring agencies are also currently allowed to request and receive a waiver from the requirement to monitor near Pb sources if Pb concentrations are expected to be less than 50% of the Pb NAAQS.

EPA is proposing to revise the current Pb monitoring requirements. Specifically, the EPA is proposing to lower the emission rate at which monitoring (or a waiver) would be required to 0.50 tpy, and to require Pb monitoring at NCore monitoring sites in lieu of the current requirements for monitoring in CBSA’s with a population greater than 500,000 people.

EPA and others (e.g., State and local air quality management agencies, environmental groups, academic institutions, and industrial groups) use the collected monitoring data for many purposes. Some of the more prominent uses include informing the public and other interested parties of an area’s air quality, judging an area’s (e.g., county, city, neighborhood) air quality in comparison with the established health or welfare standards (including both national and local standards), evaluating an air quality management agency’s progress in achieving or maintaining air pollutant levels below the national and local standards, developing and revising State Implementation Plans (SIPs) in accordance with 40 CFR part 51, evaluating air pollutant control strategies, developing or revising national control policies, providing data for air quality model development and validation, supporting enforcement actions, documenting episodes and initiating episode controls, air quality trends assessment, and air pollution research.

The State and local air quality management agencies with responsibility for reporting ambient air quality data and information as requested in this ICR submit these data electronically to the EPA's Air Quality System (AQS) and AIRNow databases. Quality assurance/quality control records and monitoring network documentation are also maintained by each State and local agency, in AQS electronic format where possible.

Although the State and local air quality management agencies are responsible for the operation of the air monitoring networks, the EPA funds a portion of the total costs through federal grants. Some of these grants require an appropriate level of contribution, or match, from the State/local air quality management agencies. The costs shown in this ICR are the total costs incurred for the monitoring program regardless of the source of the funding.

For the purpose of this ICR, we have estimated the maximum potential burden for the options being considered. The ICR estimates for the final rule will present the burden estimate based on the requirements contained in the final rule. The burden estimates are for the 3-year period of 2011 through 2013.

This Information Collection is estimated to involve 105 respondents for a total approximate cost of \$1,849,264 (total capital, and labor and non-labor operation and maintenance) and a total burden of 19,551 hours. The labor costs associated with these hours is \$926,176. Included in the \$1,849,264 total are other costs of non-labor operations and maintenance of \$592,505 and equipment and contract costs of \$330,583. In addition to the costs at the State and local air quality management agencies, there is a burden to EPA of total of 1,470 hours and \$ 185,681.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

The information requirements included within this ICR are necessary to provide the EPA with ambient air quality surveillance data to determine the United States air quality status, to make attainment decisions with respect to the NAAQS, to assist in developing necessary control strategies to ensure attainment of the NAAQS, to assess national trends in air pollution, to inform the public of air quality, and to determine the population's exposure to various ambient air pollutants. The EPA's goal of attaining the NAAQS in all areas of the United States is directly dependent upon the availability of ambient air quality data requested in this information collection. Additionally, the EPA, State, and local air quality management agencies, environmental groups, industrial groups, and academic organizations use these data to study atmospheric chemistry, e.g., the formation and fate of Pb, to determine the most appropriate and effective control strategies necessary to reduce air pollution.

The principal legal authority for this information collection is the Clean Air Act 42 U.S.C. 7403, 7410, and 7511a, from which the 40 CFR part 58 regulations were promulgated.

Under 7403 (c), the Administrator is required to conduct a program of research, testing, and development of methods for sampling, measurement, monitoring, analysis, and modeling of

air pollutants, specifically including a requirement to establish a national network to monitor, collect, and compile data with quantification of certainty in the status and trends of air emissions and air quality. This program will also include the development of improved methods and technologies to increase understanding of the sources of Pb, transport, regional influences and trends.

Section 7410 (a) contains the SIP requirements, which include a requirement that each State submit a SIP that provides for the establishment and operation of appropriate devices, methods, systems, and procedures necessary to monitor, compile, analyze, and make available to the Administrator data on ambient air quality.

2(b) Practical Utility/Users of the Data

The EPA Office of Air Quality Planning and Standards (OAQPS) uses the ambient air quality data included within this collection to make attainment decisions with respect to each air pollutant subject to NAAQS. For those areas that do not attain the NAAQS for one or more pollutants, the OAQPS, the affected EPA Regional Office, and the affected State or local air quality management agency will work to develop an appropriate SIP to address how the area's air quality can be improved to meet the applicable NAAQS.

To identify how the nation is progressing in improving air quality, the OAQPS prepares annually the National Air Quality and Emissions Trends report (<http://www.epa.gov/airtrends>) using the ambient air quality data collected through this ICR. The State and local air quality management agencies use these data for multiple purposes including tracking their progress toward achieving and maintaining air quality within the established NAAQS and any statewide standards they have established.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

This collection is not unnecessarily duplicative of information otherwise reasonably accessible to the agency. The AQS and AIRNow systems, which contain information based solely on this collection, are the only national air quality data repositories available to the EPA. The ambient air quality surveillance data and related information collected through this information collection are not otherwise reasonably accessible to the EPA.

A few State and local air quality management agencies have their own data storage systems (e.g., the California Air Resources Board); however, most State and local air quality management agencies use the AQS and AIRNow as their primary repositories for all air quality data.

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

The 1995 Paperwork Reduction Act requires that any agency developing a non-rule related ICR must solicit public comments for a 60-day period prior to submitting the ICR to OMB. This section is not applicable to this ICR because this is a rule-related ICR.

3(c) Consultations

Through the course of planning, monitoring, and improving upon this collection and its associated regulation, the EPA regularly consults with affected State and local air quality management agencies through various methods including the regulatory process, regular meetings, and training courses. The EPA conducts annual work shops and training on the AQS reporting system, e.g., the annual AQS Conference. The EPA Regional Offices conduct annual ambient air monitoring meetings with their affected State and local air quality management agencies to assist these affected agencies with this collection and its associated regulation. The EPA's OAQPS also meets regularly with leading State and local air monitoring managers to discuss the Nation's ambient air monitoring program and this collection, via large monthly phone calls and smaller in person meeting two or three times per year. Starting in 1999, the Clean Air Scientific Advisory Committee (CASAC) established the subcommittee on fine particle monitoring to provide advice to EPA on various implementation aspects of the PM monitoring networks. In addition, CASAC also has established a monitoring strategy subcommittee to extend consultation to the entire network.

3(d) Effects of Less Frequent Collection

State and local air quality management agencies would collect and report ambient air quality data without the 40 CFR 58 regulations associated with this collection. Sanctions do not automatically accrue to State or local air quality management agencies that fail to meet these requirements. The 40 CFR part 58 regulations and this associated collection do provide for a consistent system for reporting and record keeping that would not exist without these requirements. The effects of less frequent collection include:

- A national database that is not consistently updated and available for public consumption;
- Less timely attainment designations with respect to the NAAQS;
- More difficulty in identifying and repairing problems with an ambient air monitor-- i.e., data are used as to check a monitor's operating condition, and reporting data less frequently would delay a State or local agency's ability to recognize a problem with a monitor or a laboratory procedure; and
- The EPA would not be able to consistently answer questions from the public in a timely fashion regarding air quality in various areas of the country.

3(e) General Guidelines

All of the OMB's general guidelines for information collections in 5 CFR 1320.6 are met by this ICR. None of the guidelines are exceeded.

- Data reporting on a quarterly basis is the requirement. Nearly all respondents voluntarily report on a monthly basis.
- Record retention is for no more than 3 years (most records are kept by the EPA data repository, not the affected State and local air quality management agencies)
- Information is maintained and reported in the standardized electronic AQS format.

3(f) Confidentiality

Information that is considered personal, private, proprietary, or confidential is not required for this collection. One purpose of collecting ambient air data through AQS and AIRNow is to inform the public of general air quality in ambient air (air considered generally accessible to the public), and as such, does not present a need for maintaining a confidential nature. Security measures are taken to prevent tampering with the AQS electronic database by limiting the access to the AQS mainframe only to authorized users

3(g) Sensitive Questions

This section is not applicable to this ICR because no information involving matters of a sensitive nature is collected.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

This ICR affects State and local governments (SIC code 951, Administration of Environmental Quality Program) that are currently operating and maintaining established ambient air quality networks. The 40 CFR part 58 regulations associated with this request require that State and local air quality management agencies conduct the ambient air quality surveillance and report the data to the EPA's AQS. Although industrial, environmental, and research organizations may use the data available through the AQS, they are not required to report any information for this information collection. Data submittal to AIRNow is voluntary for all organizations, but most State and local agencies reporting to AQS also report to AIRNow.

4(b) Information Requested

(i) Data items, including record keeping requirements

These data items are submitted electronically to EPA's AQS as required by 40 CFR part 58. These data are stored electronically within the EPA's AQS, and separate records kept by the State or local air quality management agency are not required.

- 24 hour average Pb concentration.
- 24 hour average pressure and temperature.
- Precision and accuracy data for all SLAMS sites, PAMS, and Special Purpose Monitors (SPM).
- SLAMS monitoring network description information, including the site AQS identification number, site location, sampling and analysis method, operating schedule, monitoring objective, site's scale of representation, identity of the urban area represented, and quality assurance plan.
- Results of the annual ambient air monitoring network and quality assurance plan review.
- Annual SLAMS summary report which includes the location, date, pollution source, and duration of each incident of air pollution during which ambient levels of a pollutant reached or exceeded the significant harm levels as defined in 40 CFR 51.151, the certification of the report's accuracy by a designated State air pollution control officer, and various other summary statistics as provided by the AQS system.

(ii) Respondent Activities

A model respondent would engage in the following activities to comply with this information request:

- Read the 40 CFR part 58 regulatory provisions and other EPA guidance (for example, please reference our Internet site at www.epa.gov/ttn/amtic.)
- Plan ambient air monitoring activities, such as developing a quality assurance plan for the network operation and maintenance, developing and reviewing the ambient air quality surveillance network design, planning where to locate sites, plan how to maintain and operate each site, develop a data reporting and validation plan.
- Write the quality assurance plan for network operation and maintenance, the ambient air quality surveillance network plan, and the data reporting and validation plan. Submit these plans to the EPA Regional or Headquarters office for review, and approval if appropriate.
- Obtain on-site leases or agreements to locate ambient air quality surveillance equipment.
- Investigate vendors, and procure equipment necessary to meet the ambient air quality network plan.

- Receive training for site operation and maintenance, quality assurance procedures, and data processing and reporting.
- Make arrangements for appropriate utility hookups for each ambient air quality surveillance site, i.e., electricity, telephones, data lines for electronic submission of concentrations from automated analyzers.
- Install ambient air quality surveillance equipment and equipment shelter. Ensure security of the site.
- Conduct ambient air quality monitoring, incorporating all appropriate quality assurance procedures such as calibrations, precision and accuracy checks, and, if necessary, concurrent monitoring.
- Validate the ambient air data for quality assurance considerations.
- Electronically submit the complete and validated ambient air data to the AQS and/or AIRNow data repositories.
- Prepare and submit to EPA annually the SLAMS sites summary report.

Each of these activities are conducted using existing reporting and recordkeeping practices, including electronic submittal to the AQS and to AIRNow . If the 40 CFR part 58 regulations did not exist, and presumably the related AQS and AIRNow, the quality assurance procedures, and the siting guidance did not exist, the State and local air quality management agencies would in a majority of cases conduct monitoring; however, methods used by each agency would vary and data would not be readily available to EPA and the public. The influence of the 40 CFR part 58 regulations has been to provide a nationally consistent mechanism for collecting ambient air quality data including uniform quality assurance procedures, data collection and storage mediums (AQS), and uniform methodology. Without this regulations and associated ICR, managing and maintaining a national air quality program would be extremely difficult, if possible.

5. THE INFORMATION COLLECTED--AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The EPA conducts the following activities to implement this ICR and associated regulation:

- Periodically review the 40 CFR part 58 regulations to update the information collection and monitoring requirements in light of new technological developments

or new air pollutant standards. Develop revisions to the regulations in response to legislative action and program changes.

- Establish, maintain, and support the AQS and AIRNow as the national repositories for all State and local air quality management agency ambient air quality data and monitoring information. Periodically evaluate and improve upon this system as new technologies, and new regulatory requirements would dictate.
- Answer respondent (generally State and local air quality management agencies, but also industrial organizations, environmental groups, and others) questions about ambient air monitoring, the 40 CFR part 58 regulatory requirements, and the AQS and AIRNow. This includes the establishment of the Ambient Monitoring Technology Information Center bulletin board, the AQS toll-free hotline, and other written or verbal communication.
- Support the quality assurance program by working within the EPA and with the respondents to evaluate precision and accuracy data, oversee the National Performance Audit Program, participate in systems audits, and conduct data validation checks on the AQS data submittal.
- Provide within the AQS mechanisms for statistical calculations, such as the number of times a particular ambient air quality monitoring site exceeds the NAAQS. Distribute the AQS data in various ways including upon written request, by Freedom of Information Act request, by press release, and in the annual National Air Quality and Emissions Trends Report.
- Provide adequate electronic storage space within the AQS for all ambient air quality surveillance data and information.
- Provide various reports and graphics for users of AIRNow.

5(b) Collection Methodology and Management

All State and local ambient air monitoring networks have access to and use well-established quality assurance procedures as defined in the Quality Assurance Handbook for Air Pollution Measurement Systems, Volumes I and II, EPA/600/R-94/038a & b. These documents ensure that all ambient air quality data are accurate and reliable.

The EPA has provided and will continue to provide resources for the maintenance and operation of the AQS and AIRNow national data repositories. All data required by this collection are submitted electronically to reduce the burden of the collection and to improve data quality, agency efficiency, and responsiveness to the public. Various statistical and graphical summaries are also provided by the AQS and AIRNow systems which enhance the utility of the information for consumption by the public and all affected State and local air quality management agencies. In submitting ambient air data into the AQS and AIRNow national

repositories, we ensure that the data are publicly available, electronically stored, and electronically retrievable. State and local air quality management agencies and the EPA have been submitting data to the AQS since its inception in 1987.

5(c) Small Entity Flexibility

This collection contains a minimum amount of information in order to manage the air quality program for the United States. The smallest entities affected by this collection are local air quality management agencies, typically consisting of the governing agencies for a county or group of counties, or a smaller metropolitan area (e.g., cities with a population of 50,000). This collection reduces to the extent practicable and appropriate the burden on entities that provide ambient air quality data and information to or for the EPA, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:

- Establishing differing compliance or reporting requirements or timetables that account for the resources available to those who are to respond (e.g., the monitoring and reporting requirements decrease as the population of an area decreases, and various timetables for deploying ambient air monitoring stations are negotiated between the affected State or local air quality management agency and the EPA with consideration of the respondent's resources);
- Clarification, consolidation, or simplification of compliance and reporting requirements (e.g., by establishing, maintaining, and improving as needed the AQS and AIRNow national repositories for ambient air quality data and information);
- Exemption from coverage of the collection of information, or any part thereof (e.g., the EPA negotiates with State and local air quality management agencies to determine the most effective and most efficient ambient air quality networks with respect to the monitoring needs, technical abilities, and resources available to each affected agency).

5(d) Collection Schedule

Ambient air quality surveillance data and precision and accuracy data for criteria air pollutants are submitted according to the schedule defined in 40 CFR 58.16. These current regulations require that State and local air quality management agencies report their data within 90 days after the end of the quarter during which the data were collected.

The annual SLAMS report is submitted by May 1 (effective 2010) of each year for data collected from January 1 through December 31 of the previous year in accordance with 40 CFR 58.15. This certification applies to all SLAMS and all SPM monitoring data that have been submitted by May 1.

The annual air quality surveillance network reviews are conducted and reports are submitted to the EPA on a schedule that is determined by the affected State or local air quality management agency and the EPA Regional Office.

Ambient air quality data and information are made available to the public **at any time** in various ways, including:

- Upon request to the appropriate EPA Regional office, or to the OAQPS;
- By Freedom of Information Act Request to the appropriate EPA Regional Office or the OAQPS;
- From the State or local air quality management agency responsible for collecting the ambient air quality data and information;
- By obtaining access, through appropriate EPA channels, to the AQS and AIRNow to obtain the data electronically;
- Through EPA public reports, such as the annual ANational Air Quality and Emissions Trends Report@; or
- Through the AIRNow data base and the AQI reporting mechanisms which include newspaper, television, Internet and other publicly available notices (see www.epa.gov/airnow).

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

All activities listed with section 4 (b) (ii) of this ICR Supporting Statement are presented in Worksheet 1. The detailed burden and cost estimates for the different types of monitors are based on information provided in the updated version of *Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants* (prepared by Desert Research Institute for the EPA Office of Air Quality Planning and Standards, Air Quality Assessment Division, Ambient Air Monitoring Group, January 2005). The cost estimates presented in this guidance document are based on existing literature and direct monitoring experience. The costs for equipment and supplies were verified with vendors. The monitoring costs are based on vendor quotes for the monitor type that EPA expects respondents to use to comply with the requirements. Costs for level of effort estimates are verified with selected State and local agencies. All cost values presented in the guidance document are adjusted to 2004 dollars.

For use in preparing the burden estimates for this ICR, costs for the monitoring requirements were inflated to 2010, 2011, and 2012. The cost escalation factors were estimated

based on the appropriate Gross Domestic Product (GDP) price indices as reported in the report available at <http://www.jsc.nasa.gov/bu2/inflateGDP.html>. Tables showing the detailed burden estimate calculations are presented below. A summary of the average annual respondent burden costs follows.

Worksheet 1: Annual Average Respondent Burden Estimates

Collection Activities	Total Labor Hours Per Respondent Per Year (105 respondents)
1. Network design	11
2. Site installation	9
3. Sampling & analysis	83
4. Maintenance & repairs	14
5. Data management	45
6. Quality assurance	21
7. Supervision	2
8. Meteorological Instrumentation	0
TOTAL	186

6(b) Estimating Respondent Costs

All activities listed with section 4 (b) (ii) of this ICR Supporting Statement are included in the Worksheet 2. A summary of the average annual respondent burden costs follows.

Worksheet 2: Annual Average Respondent Cost Estimates

Collection Activities	Total Labor Cost Per Respondent Per Year (105 respondents)
1. Network design	\$268
2. Site installation	\$5,236
3. Sampling & analysis	\$7,409
4. Maintenance & repairs	\$986
5. Data management	\$2,231
6. Quality assurance	\$1,349
7. Supervision	\$133
8. Meteorological Instrumentation	\$0
TOTAL	\$17,612

6(c) Estimating Agency Burden and Cost

We estimated the Agency burden and cost by using current burden and cost of the ambient air monitoring program related to this collection. We included burden and cost for the OAQPS, the ten Regional Offices, and associated contract activities. The in-house activities for this collection are completed by a variety of individuals with a variety of salaries; therefore, we used the actual salary as an average for computing the program costs. Actual contractor expenses were used for those activities completed using extramural resources. We estimated a total of 14,147 hours and \$858,280 total agency burden.

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

Worksheet 3 shows the total respondent hourly burdens and costs which was taken from section 6(b) above for the estimated 105 respondents. The total labor burden for the respondents was estimated to be 19,551 hours at a total cost of \$1,849,264.

Worksheet 3: Annual Total Respondent Labor Burden/Cost Estimates

Collection Activities	Total Labor Hours Per Year	Total Labor Cost Per Year
1. Network design	1,155	\$28,155
2. Site installation	960	\$549,816
3. Sampling & analysis	8,763	\$777,903
4. Maintenance & repairs	1,493	\$103,554
5. Data management	4,768	\$234,223
6. Quality assurance	2,185	\$141,658
7. Supervision	227	\$13,956
8. Meteorological Instrumentation	0	0
TOTAL	19,551	\$1,849,264

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

Respondent Total Annual Burden =19,551 hours

Respondent Total Annual Labor Cost for O & M = \$926,176

Respondent Total Annual Cost for Non-labor O & M = \$592,505

Respondent Total Equipment/Contract Dollars = \$330,583

Total Respondent Tally = \$1,849,264

(ii) The Agency Tally

Agency Total Annual Burden = 1,470 hours

Agency Total Annual Cost = \$185,681

(iii) Variations In The Annual Bottom Line.

We do not expect any significant variations in the annual bottom line for the ambient air monitoring networks for the clearance period requested.

6(f) Reasons for Change in Burden

N/A

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 193 hours per respondent. 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 allow 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 established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2006-0735 which has been available for public viewing at the Air and Radiation Docket and Information Center Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 Docket is (202) 566-1742. An electronic version of the public docket was made available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. The public was able to use EDOCKET 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 have been available electronically. The public was also advised to send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA.

PART B OF SUPPORTING STATEMENT

This section is not applicable to this ICR because statistical methods are not used in the data collection associated with the rule amendments.