

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

**OMB Control No. 2060-NEW  
EPA ICR No. 2374.01**

**March 8, 2010**

**SUPPORTING STATEMENT  
MANDATOR REPORTING OF GREENHOUSE GASES (PROPOSED RULE FOR  
CORPORATE PARENT REPORTING)  
EPA ICR #2374.01**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title of the Information Collection**

TITLE: “Mandatory Reporting of Greenhouse Gases – (Proposed Rule for Corporate Parent Reporting)”

OMB Control Number: 2060-NEW

**1(b) Short Characterization/Abstract**

The United States (U.S.) Environmental Protection Agency (EPA) is proposing to amend the GHG Reporting Rule to require facilities subject to the rule to provide additional information items. For Option 1, these items include the following: legal name, physical address, and ownership status of a facility’s ultimate US parent company; the facility’s primary North American Industry Classification System (NAICS) codes; and whether or not reported emissions include those from a cogeneration unit. Option 2 would collect the same information but also require facilities owned by more than one parent company to report the address and percent of facility ownership for each parent company. EPA is taking comment on both options in the preamble. However, for purposes of estimating the burden, the higher burden option is presented, which could result in a slight overestimate if a different option is finalized.

These items would be added to the monitoring, recordkeeping, and reporting burden calculated when the GHG Reporting Rule was promulgated on October 30, 2009 (74 FR 56260). The ICR for the existing requirements were approved by OMB under OMB Control Number 2060-0629. The final rule requires reporting of greenhouse gas emissions from all sectors of the economy. The rule does not require control of greenhouse gases, rather it requires only that sources above certain threshold levels monitor and report emissions.

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

### **2(a) Need/Authority for the Collection**

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

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

The Final GHG Reporting Rule fulfilled the requirements of the Appropriations Act. These amendments simply add additional reporting elements to the list of items in §98.3(c) of the final rule. Specifically, the first option under the proposed rule would require all facilities and suppliers that meet the applicability criteria in subpart A of 40 CFR Part 98 to list the name and address of their ultimate US parent company, the primary North American Industry Classification System (NAICS) code, indicate the ownership status of the ultimate parent company, report all other applicable NAICS codes, and to specify whether reported emissions include those from a cogeneration unit. The second option would collect the same information, except for ownership status and would also require facilities and suppliers owned by more than one parent company to report the address and percent of facility ownership for each parent company.

### **2(b) Practical Utility/Users of the Data**

The purpose of collecting the name and physical address of the U.S. parent company(s) on the annual reporting form for the Mandatory GHG Reporting Rule is to assist in aggregating facility-based GHG emissions data to the corporate level. This additional data element would allow EPA to compile more comprehensive information on corporate GHG emissions and conduct a variety of analyses. The data collected under the proposed rule would inform EPA’s implementation of section 103(g) of the Clean Air Act regarding improvements in sector-based non-regulatory strategies and technologies for preventing or reducing air pollutants.

In addition, corporate parent and NAICS code data could assist EPA in developing and improving air pollution emission inventories. A more detailed understanding of the sources and operational categories of GHG emissions could lead to improvements in air pollution emissions information that is relied upon to develop effective control methods. The additional information may also inform regulatory strategies being evaluated by EPA. By requiring all facilities subject to the Mandatory GHG Reporting Rule to report the operation of cogeneration units at their facility, EPA would significantly broaden its knowledge regarding the current implementation of cogeneration in all sectors of the economy. By collecting this information annually, EPA would also be able to track changes in the use of this technology in individual sectors and across the entire U.S. economy. Information on the types and characteristics of facilities that employ cogeneration technologies and the performance of cogeneration units could be important to future development of greenhouse gas mitigation strategies.

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

#### **3(a) Nonduplication**

EPA evaluated existing GHG programs and the GHG data currently available to determine whether the final GHG Reporting Rule duplicated other information collections. As this is simply an amendment for additional reporting requirements, the same analysis applies.

Documentation of EPA's review of GHG monitoring protocols for each source category used by federal, state, and international voluntary and mandatory GHG programs, and the review of state mandatory GHG rules, can be found in the docket at EPA-HQ-OAR-2008-0508-056.

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

The preamble to the proposed rule will give the public notice of and allow the public to comment on this ICR.

#### **3(c) Consultations**

EPA met with over 4,000 people and 135 groups since proposal signature (March 10, 2009) of the GHG Reporting Rule. Details of these meetings are available in the docket (EPA-HQ-OAR-2008-0508).

No additional consultations were held during the drafting of these amendments.

### **3(d) Effects of Less Frequent Collection**

If the information collection were not carried out on this schedule, the Agency would not be able to develop an informed tracking system of trends in GHG emissions across the country. The year-by-year GHG emissions information from a broad range of industry sectors may eventually be used to inform future climate change policy decisions.

EPA recognizes that highest level US parent company and primary NAICS code(s) may change more frequently than annually. However, EPA believes that the burden of requiring facilities to update these data elements on a more frequent basis, such as every time a facility's highest level US parent company changes, or primary product(s), activity(s), or service(s), is greater than the benefit of obtaining that additional information. Therefore, EPA is only proposing to require reporting on these data elements annually, thus lessening the burden as much as possible while still gathering the required information.

### **3(e) General Guidelines**

This collection of information is consistent with all OMB guidelines under 5 CFR 1320.6. However, these amendments, as well as the final GHG Reporting Rule, require that facilities retain records for a period of 5 years, which exceeds the 3-year retention period specified in the general information collection guidelines in 5 CFR 1320.6(f) of the Office of Management and Budget (OMB) regulations implementing the Paperwork Reduction Act.

Facilities or suppliers that have emissions or products with emission less than 25,000 metric tons CO<sub>2</sub>e for five years in a row may cease reporting. Those that cease reporting must have records to cover those five years of emissions. EPA selected a 5-year period, instead of a shorter time frame, because it allows facilities or suppliers that consistently report less than 25,000 metric tons CO<sub>2</sub>e to stop reporting, but avoids the situation where a facility or supplier near this level would be constantly moving in and out of the reporting program due to small variations from one year to the next. EPA believes 5 years of records for these respondents is needed to document that they meet the provisions to cease reporting and so that questions about past emission estimates can be resolved, if needed. Thus, the 5-year record retention requirement of the rule adds no additional burden.

### **3(f) Confidentiality**

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

This ICR does not involve matters of a sensitive nature.

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

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

The proposed amendments would affect owners and operators of fuel and chemicals suppliers and direct emitters of GHGs who are already subject to 40 CFR Part 98 of the GHG Mandatory Reporting Rule as well as those who would become subject to this part of the rule in the future. However, the burden estimate presented in this statement is based on facilities and suppliers currently subject to the GHG Reporting Rule and does not account for facilities expected to be added to the program through upcoming supplemental proposals. The methods and assumptions used to estimate the compliance costs for facilities and suppliers currently subject to the rule would likewise apply to those that may be added to 40 CFR Part 98 of the Mandatory Reporting Rule in the future. The addition of new industries would increase the reporting burden in proportion to the increase of the reporting universe. EPA will update and amend this statement as it adds new facilities to the Mandatory Reporting Program.

Industry sectors are listed in Table 4.1 by their corresponding category, the corresponding NAICS codes, and examples of affected facilities and suppliers.

**Table 4.1. Respondent Industry Sectors**

<b>Category*</b>	<b>NAICS Code</b>	<b>Examples of regulated entities</b>
General Stationary Fuel Combustion Sources		Facilities operating boilers, process heaters, incinerators, turbines, and internal combustion engines:
	211	Extractors of crude petroleum and natural gas.
	321	Manufacturers of lumber and wood products.
	322	Pulp and paper mills.
	325	Chemical manufacturers.
	324	Petroleum refineries, and manufacturers of coal products.
	316, 326, 339	Manufacturers of rubber and miscellaneous plastic products.
	331	Steel works, blast furnaces.
	332	Electroplating, plating, polishing, anodizing, and coloring.
	336	Manufacturers of motor vehicle parts and accessories.
	221	Electric, gas, and sanitary services.
	622	Health services.
	611	Educational services.
Electricity Generation	221112	Fossil-fuel fired electric generating units, including units owned by Federal and municipal governments and units located in Indian Country.
Adipic Acid Production	325199	Adipic acid manufacturing facilities.
Aluminum Production	331312	Primary Aluminum production facilities.
Ammonia Manufacturing	325311	Anhydrous and aqueous ammonia manufacturing facilities.
Cement Production	327310	Portland Cement manufacturing plants.
Ferroalloy Production	331112	Ferroalloys manufacturing facilities.
Glass Production	327211	Flat glass manufacturing facilities.
	327213	Glass container manufacturing facilities.
	327212	Other pressed and blown glass and glassware manufacturing facilities.
HCFC-22 Production and HFC-23 Destruction	325120	Chlorodifluoromethane manufacturing facilities.
Hydrogen Production	325120	Hydrogen manufacturing facilities.
Iron and Steel Production	331111	Integrated iron and steel mills, steel companies, sinter plants, blast furnaces, basic oxygen process furnace shops.
Lead Production	331419	Primary lead smelting and refining facilities.
	331492	Secondary lead smelting and refining facilities.
Lime Production	327410	Calcium oxide, calcium hydroxide, dolomitic hydrates manufacturing facilities.
Nitric Acid Production	325311	Nitric acid manufacturing facilities.
Petrochemical Production	32511	Ethylene dichloride manufacturing facilities.
	325199	Acrylonitrile, ethylene oxide, methanol manufacturing facilities.
	325110	Ethylene manufacturing facilities.
	325182	Carbon black manufacturing facilities.
Petroleum Refineries	324110	Petroleum refineries.

<b>Category*</b>	<b>NAICS Code</b>	<b>Examples of regulated entities</b>
Phosphoric Acid Production	325312	Phosphoric acid manufacturing facilities.
Pulp and Paper Manufacturing	322110	Pulp mills.
	322121	Paper mills.
	322130	Paperboard mills.
Silicon Carbide Production	327910	Silicon carbide abrasives manufacturing facilities.
Soda Ash Manufacturing	325181	Alkalies and chlorine manufacturing facilities.
	212391	Soda ash, natural, mining and/or beneficiation.
Titanium Dioxide Production	325188	Titanium dioxide manufacturing facilities.
Zinc Production	331419	Primary zinc refining facilities.
	331492	Zinc dust reclaiming facilities, recovering from scrap and/or alloying purchased metals.
Municipal Solid Waste Landfills	562212	Solid waste landfills.
	221320	Sewage treatment facilities.
Suppliers of Coal Based Liquids Fuels	211111	Coal liquefaction at mine sites.
Suppliers of Petroleum Products	324110	Petroleum refineries.
Suppliers of Natural Gas and NGLs	221210	Natural gas distribution facilities.
	211112	Natural gas liquid extraction facilities.
Suppliers of Industrial GHGs	325120	Industrial gas manufacturing facilities.
Suppliers of Carbon Dioxide (CO <sub>2</sub> )	325120	Industrial gas manufacturing facilities.

\*Manure Management (subpart JJ) is not included. EPA will not implement subpart JJ of the GHG Reporting Rule due to a Congressional restriction prohibiting the expenditure of funds for this purpose.

## 4(b) Information Requested

### *(i) Data Items*

Using Option 1, these amendments would require all facilities and suppliers reporting under the GHG Reporting Rule (40 CFR Part 98) to list the name and address of their highest level US parent company and the primary North American Industry Classification System (NAICS) code for the facility. Each reporting facility and supplier would also be required to indicate (by checking yes or no) if reported emissions include those from a cogeneration unit.

A reporting facility or supplier's highest level US parent company is the company that exercises ultimate financial control over the facility and its GHG emitting operations, either directly or indirectly, through one or more intermediaries. The ultimate US parent company is the highest level company, located in the United States, and with the largest ownership interest in a facility as of December 31 of the reporting year.

Each reporting facility would also be required to indicate ownership status by selecting one of the following descriptions:

“S”—single ownership (the reporting entity is entirely owned by a single company which is not owned by any other company, e.g., it is not a subsidiary or division of another company).

“W”—wholly owned (the reporting entity is entirely owned by a single company which is, itself, owned by another company, e.g., it is a subsidiary or division of another company).

“M”—multiple owners (the reporting entity is owned by more than one company).

The primary NAICS code is defined as the six-digit NAICS code that represents the primary product(s)/activity(s)/service(s) at the facility as defined in "North American Industrial Classification System Manual 2007," available from the U. S. Department of Commerce, National Technical Information Service. The primary NAICS code is the principal source of revenue. EPA is proposing to define additional NAICS codes as those codes that correspond to product(s)/activity(s)/service(s) that provide economic profit, but that are not related to the principal source of revenue.

A cogeneration unit means a unit that produces electric energy and useful thermal energy, for industrial, commercial, or heating or cooling purposes through the sequential [or simultaneous] use of the original fuel energy.

Using Option 2, facilities and suppliers would report the preceding information for all parent companies except for ownership status (S, W, or M) and would also report the percent of ownership for each parent company.

*(ii) Respondent Activities*

Respondent activities required by the standards are introduced in Section 6(a). To the extent practicable, the activities required by respondents were designed to make use of or to be consistent with existing reporting and recordkeeping practices.

In this proposed rulemaking, the following data elements would be reported under Option 1:

- Facility North American Industrial Classification System (NAICS) Code(s);
- Facility Cogeneration;
- U.S. Parent Company Legal Name;
- U.S. Parent Company Physical Address; and
- Ownership Status (S, W, or M).

In this proposed rulemaking, the following data elements would be reported under Option 2:

- Facility NAICS Code(s);
- Facility Cogeneration
- U.S. Parent Company Legal Name(s);
- U.S. Parent Company Physical Address(es); and
- Percent of Facility Ownership by each Parent Company.

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

### **5(a) Agency Activities**

There are not expected to be any EPA Headquarters activities associated with these amendments. Contractor burden will include changes to the electronic reporting forms and verifying the submitted data.

### **5(b) Collection Methodology and Management**

EPA has already established a central repository of inventory data for all respondents. Respondents will report data electronically, and EPA will store the data in the database. The electronic format, which will reflect the underlying electronic data reporting system, will be developed prior to the first reporting date.

These amendments will require facilities and suppliers subject to 40 CFR Part 98 (GHG Reporting Rule) to provide additional information items. The methodology for entering these data elements has not changed since the GHG Reporting Rule was promulgated on October 30, 2009 (74 FR 56260).

### **5(c) Small Entity Flexibility**

EPA took several steps to minimize the impacts on small entities when the GHG Reporting Rule was finalized. The Agency met several times with industry trade associations to discuss the reporting options considered and their possible impacts on small entities. EPA further minimized impacts on small entities by not requiring facilities below a certain emissions threshold to report their emissions. Where feasible, EPA also used existing GHG emissions estimation and reporting methodologies or provided simplified methodological options to reduce reporting burden.

The same thresholds established by the final GHG Reporting Rule also apply to these amendments.

### **5(d) Collection Schedule**

Facilities must report highest level US parent company information and facility primary NAICS code(s) annually. EPA is proposing to require that the highest level US parent company and NAICS code(s) be reported as of December 31st of the reporting year, to remain consistent with the other requirements of the GHG Reporting Rule.

## 6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section presents EPA’s estimates of the burden and costs to respondents associated with the activities described in Section 4 as well as the federal burden hours and costs associated with the activities described in Section 5(a).

The average respondent reporting burden is estimated at 8,772 hours per year over the three years covered by this information collection for Option 1 and 8,879 hours for Option 2.

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

### 6(a) Estimating Respondent Burden

The annual burden estimates for reporting are presented in Table 6.1a and Table 6.1b for the first, second, and third year of the rule for Option 1 and Option 2, respectively.

**Table 6.1a Estimated Total Labor Burden and Total Cost for Option 1**

	<i>Total Labor Burden (hours)</i>	<i>Total Cost</i>
<b>First Reporting Year</b>		
US Parent Company Legal Name, Physical Address, and Ownership Status	6,579	\$396,162
Facility NAICS Code(s) and Cogeneration	6,579	\$396,162
<b>All Data Elements</b>	<b>13,157</b>	<b>\$792,323</b>
<b>Subsequent Reporting Years</b>		
US Parent Company Legal Name, Physical Address, and Ownership Status	4,934	\$297,121
Facility NAICS Code(s) and Cogeneration	1,645	\$99,040
<b>All Data Elements</b>	<b>6,579</b>	<b>\$396,162</b>

**Table 6.1b Estimated Total Labor Burden and Total Cost for Option 2**

	<i>Total Labor Burden (hours)</i>	<i>Total Cost</i>
<b>First Reporting Year</b>		
US Parent Company Legal Name, Physical Address, and Percent Ownership	6,686	\$402,620
Facility NAICS Code(s) and Cogeneration	6,579	\$396,162
<b>All Data Elements</b>	<b>13,265</b>	<b>\$798,782</b>
<b>Subsequent Reporting Years</b>		
US Parent Company Legal Name, Physical Address, and Percent Ownership	5,041	\$303,580
Facility NAICS Code(s) and Cogeneration	1,645	\$99,040
<b>All Data Elements</b>	<b>6,686</b>	<b>\$402,620</b>

**6(b) Estimating Respondent Costs**

Costs to respondents associated with these amendments include labor costs incurred by facility staff to report the additional information collection requirements.

The personnel responsible for reporting the required information in the proposed rule are likely to vary by industry sector and/or by facility. Table 6.2 provides estimates of the expected personnel titles, labor categories, and loaded hourly wage rates. Loaded hourly wage rates represent the total cost to the facility per hour of labor, accounting for costs beyond the hourly rate paid to the employee such as fringe benefits and overhead.

To reflect that management, legal and technical staff will be involved in reporting the required data elements; a blended management/legal wage rate was created from the average of hourly wage rates of management and legal staff. A similar blended technical wage rate was calculated from the average of certain technical staff job classifications. An overall weighted wage rate was then developed based on estimates from the TRI program for similar data element reporting at similar facilities. According to the TRI estimates, management and legal staff are estimated to be involved in approximately 0.8% of the reporting effort, while technical staff are likely to be needed for the remaining 99.2%. Using these proportions, the weighted loaded wage rate, i.e., the blended labor rate, used in this analysis is \$60.22 per hour.

**Table 6.2. Labor Rates**

Personnel Type	Hourly Wage Rate
<b>Management Personnel</b>	
electricity manager	\$88.79
refinery manager	\$101.31
industrial manager	\$71.03
lawyer	\$101.00
<b>Blended Management and Legal Wage Rate</b>	<b>\$90.53</b>
<b>Technical</b>	
electricity engineer/technician	\$60.84
refinery engineer/technician	\$63.89
industrial engineer/technician	\$55.20
<b>Blended Technical Wage Rate</b>	<b>\$59.98</b>
Percent reporting by Management and Legal Personnel	0.8%
Percent reporting by Technical Personnel	99.2%
<b>Blended Labor Rate</b>	<b>\$60.22</b>

The time required to report the additional information collection requirements were estimated at approximately 80 minutes per facility in the first year (40 minutes per facility in subsequent years) to complete the following activities for Option 1 and Option 2, except as noted:

- o Identify and record parent company name,
- o Identify and record parent company address,
- o Determine and record type of company ownership<sup>1</sup>,
- o Determine and record percentage of company ownership<sup>2</sup>,
- o Identify and record primary NAICS code,
- o Identify and record 2 additional applicable NAICS codes, and
- o Identify and record cogeneration.

For each additional parent company, Option 2 would also require approximately 20 minutes, in all years, to complete the following activities:

- o Identify and record parent company name, and
- o Identify and record parent company address.

Each facility reporting more than one ultimate parent company under Option 2, would also require a yearly labor burden of 5 minutes to determine, record, and rank percent ownership

For purposes of these estimates, it was assumed that 9,868 respondents would have at least one parent company and 143 respondents would have multiple parent companies. It was estimated that the multiple ownership respondents have an average of 3 parent companies per facility. More details are contained in a memorandum entitled, "Total Labor Burden and Cost

<sup>1</sup>Required under Option 1 but not Option 2.

<sup>2</sup>Required under Option 2 but not Option 1.

for Reporting of Corporate Parent Name, Address, and Percent Ownership: an Amendment to the GHG Reporting Rule.” The memo is located in the docket (EPA-HQ-OAR-2008-0508).

### **6(c) Estimating Agency Burden and Cost**

There are not expected to be any EPA activities associated with these amendments. However, contractor support for modifying the reporting database forms (which will only occur in Year 1) and for verifying the information submitted (which will occur in all years) does contribute non-labor costs. The costs were estimated as follows:

- o Option 1, year 1 = \$85,000
- o Option 1, subsequent years = \$40,000
  
- o Option 2, year 1 = \$90,000
- o Option 2, subsequent years = \$40,000

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

Every facility regulated under the GHG Reporting Rule will be required to report on the additional data elements covered under these amendments.

The total number of respondents is estimated at 9,868 per year for Option 1 and Option 2. These estimates assume that all facilities with multiple parent companies will comply with Option 2.

### **6(e) Bottom Line Burden Hours and Costs**

The bottom line burden hours and costs are shown in Table 6.3a and Table 6.3b for Option 1 and Option 2, respectively.

### **6(f) Reasons for Change in Burden**

Change in burden is the result of Program Change due to Agency Discretion. The existing GHG Reporting Rule ICR is being updated to include these amendments to the data collection requirements.

**Table 6.3a Bottom Line Annual Burden and Cost for Option 1**

<b>First Reporting Year</b>	
Number of Respondents	9,868
Total Annual Responses	59,208
Number of Responses per Respondent	6
Total Respondent Labor Hours	13,157
Respondent Hours per Response	0.22
Annual Respondent Labor Cost	\$792,323
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$792,323
Total Agency Labor Hours	850
Annual Agency Labor Cost	\$85,000
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	14,007
Total Cost (Respondents plus Agency)	\$877,323
<b>Subsequent Reporting Years</b>	
Number of Respondents	9,868
Total Annual Responses	59,208
Number of Responses per Respondent	6
Total Respondent Labor Hours	6,579
Respondent Hours per Response	0.11
Annual Respondent Labor Cost	\$396,162
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$396,162
Total Agency Labor Hours	400
Annual Agency Labor Cost	\$40,000
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	6,979
Total Cost (Respondents plus Agency)	\$436,162

**Table 6.3b Bottom Line Annual Burden and Cost for Option 2**

<b>First Reporting Year</b>	
Number of Respondents	9,868
Total Annual Responses	59,637
Number of Responses per Respondent	6.04
Total Respondent Labor Hours	13,265
Respondent Hours per Response	0.22
Annual Respondent Labor Cost	\$798,782
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$798,782
Total Agency Labor Hours	900
Annual Agency Labor Cost	\$90,000
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	14,165
Total Cost (Respondents plus Agency)	\$888,782
<b>Subsequent Reporting Years</b>	
Number of Respondents	9,868
Total Annual Responses	59,637
Number of Responses per Respondent	6.04
Total Respondent Labor Hours	6,686
Respondent Hours per Response	0.11
Annual Respondent Labor Cost	\$402,620
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$402,620
Total Agency Labor Hours	400
Annual Agency Labor Cost	\$40,000
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	7,086
Total Cost (Respondents plus Agency)	\$442,620

## **6(g) Burden Statement**

For Option 1, approximately 9,900 facilities will incur 13,200 hours and \$790,000 in the first year and 6,600 hours and \$400,000 in subsequent years. Costs are approximately \$80 per facility in the first year and \$40 per facility in subsequent years. The annual public reporting and recordkeeping burden for this option is estimated to average 0.15 hours per response.

For Option 2, approximately 9,900 facilities will incur 13,300 hours and \$800,000 in the first year and 6,700 hours and \$400,000 in subsequent years. Costs are approximately \$81 per facility in the first year and \$41 per facility in subsequent years. The annual public reporting and recordkeeping burden for this option is estimated to average 0.15 hours per response.

The average annual burden hours and costs are shown in Table 6.3c and Table 6.3d for Option 1 and Option 2, respectively.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2008-0508, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation docket in the EPA Docket Center (EPA/DC), EPA West Building, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation docket is (202) 566-1742. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2008-0508 and OMB Control Number 2060-NEW on any correspondence.

**Table 6.3c Average Annual Burden and Cost for Option 1**

Number of Respondents	9,868
Total Annual Responses	59,208
Number of Responses per Respondent	6.00
Total Respondent Labor Hours	8,772
Respondent Hours per Response	0.15
Annual Respondent Labor Cost	\$528,216
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$528,216
Total Agency Labor Hours	550
Annual Agency Labor Cost	\$55,000
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	9,322
Total Cost (Respondents plus Agency)	\$583,216

**Table 6.3d Average Annual Burden and Cost for Option 2**

Number of Respondents	9,868
Total Annual Responses	59,637
Number of Responses per Respondent	6.04
Total Respondent Labor Hours	8,879
Respondent Hours per Response	0.15
Annual Respondent Labor Cost	\$534,674
Annual Respondent O&M and Capital Cost	\$0
Total Respondent Cost (labor + non)	\$534,674
Total Agency Labor Hours	567
Annual Agency Labor Cost	\$56,667
Annual Agency non-labor cost	\$0
Total Hours (Respondents and agency)	9,445
Total Cost (Respondents plus Agency)	\$591,341