

**INFORMATION COLLECTION REQUEST
FOR THE COMPLIANCE ASSURANCE
MONITORING PROGRAM (40 CFR PART 64)**

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) TITLE OF THE INFORMATION COLLECTION

This document fulfills the Agency's requirements under the Paperwork Reduction Act (PRA) with regards to determining the regulatory burden associated with the Compliance Assurance Monitoring (CAM) Rule, codified at 40 CFR part 64. It has been assigned EPA tracking number 1663.07 and OMB Control Number 2060-0376. The title of this Information Collection Request (ICR) is "Compliance Assurance Monitoring Program (40 CFR Part 64)."

1(b) SHORT CHARACTERIZATION/ABSTRACT

Part 64 of the Code of Federal Regulations (CFR), as defined in the CAM Rule, requires monitoring, compliance certification, periodic reporting, and record keeping information collections by owners and operators of title V sources [57 Fed. Reg. 32250-32312] (1992) (codified at 40 C.F.R. part 70)¹ with controlled pollutant specific emissions units that have a pre-control potential to emit major amounts of regulated air pollutants.

CAM identifies two categories of emissions units:

- (1) **"Large" pollutant-specific emissions units (PSEU):** units that have the potential to emit, with controls, the applicable regulated air pollutant in an amount equal to or greater than the amount required for a source to be classified as a major source, and
- (2) **"Other" pollutant-specific emissions units:** the set of remaining affected pollutant specific emission units.

These two types of units are subject to different monitoring frequency requirements, but not to different reporting or recordkeeping requirements, which are the subject of this ICR. Additionally, "large" and "other" units are subject to different implementation timetables under part 64. However, this analysis assumes that no units had yet submitted their monitoring approaches to their permitting authorities as of January 2007, so all existing units would submit their monitoring approaches at permit renewal, in which case the implementation timetables are the same for both types of units. For these reasons, this analysis does not differentiate between "large" and "other" units.

Upon approval by the permitting authority (PA) of the monitoring proposed by the source, the source uses the approved monitoring method to collect data. These data provide the basis on which owners or operators can certify, in accordance with the requirements of the operating permit program, the compliance of their emissions units with the applicable requirements. In addition, these data provide the basis on which owners or operators submit monitoring reports on no less than a semi-annual basis. Consistent with the recordkeeping

¹ For purposes of simplicity, this ICR applies the terms "owners and operators", "firm", and "sources" interchangeably. References to actions or responsibilities of sources or firms should be interpreted as referring to the owners and operators of that source or firm.

period established in the operating permit program, CAM requires sources to store and maintain these data for at least five years.

In the next three years, the information collection and capital investment requirements of the CAM program will involve all of the affected pollutant points. When fully implemented, the Agency estimates the CAM program will involve approximately 25,000 emissions units. This ICR estimates the expected average annual burden over the next three years to be about 7.4 million hours, at an expected cost of \$260 million (2008 dollars). The activities at sources leading to these impacts include:

- Determination of a monitoring approach;
- Installation and operation of monitoring equipment, if necessary;
- Administrative burden for record keeping and reporting;
- Upgraded operating/maintenance activities;
- Improved quality assurance; and
- Permit fees to cover regulatory costs of the program.

For this ICR and the previous ICR issued in 2007, we have used updated emissions inventory data (draft 2002 NEI) that reflect current information on units that may be subject to the CAM rule.

In addition, we reviewed and updated, where necessary:

- labor rates;
- estimates of labor hours needed for each monitoring activity and monitoring practice (parameter monitoring, CEMS, work practices); and
- the implementation schedule for CAM using current Title V data for both existing and new sources.

We make specific assumptions about permit approvals and renewals in order to project when sources would submit their proposed monitoring approaches. We make the following assumptions to develop an implementation schedule that is consistent with the part 64 language:

- Sixty percent of owners of affected PSEUs submitted their proposed monitoring approaches during the July 2007 through January 2010 time period addressed by the previous ICR, leaving the remaining 40 percent to submit their proposed monitoring approaches during the three-year time period addressed in this current ICR (July 2010 through January 2013).
- Approximately 20 percent of existing part 70 permits are renewed each year, with half being renewed in January and half in July. The exact percentages have been calculated based on nationwide projections of part 70 permit renewals.
- Each year, part 70 permits will be issued for 20 new facilities, with half being issued in January and half in July. These facilities will have the same average number of PSEUs as in the full CAM database.
- There is homogeneity between sources and PSEUs. Therefore, if 10 percent of all part 70 permits are renewed at a given time, than 10 percent of owners of all affected PSEUs will schedule their CAM activities around that date.

Additionally, we assume that some new PSEUs would be built each year at existing permitted facilities, thus requiring a permit revision. We assume that 230 facilities nationwide would build additional PSEUs each year, with half being issued permit revisions in January and half in July.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED/AUTHORITY FOR THE COLLECTION

EPA decisions in both the operating permit and CAM programs require this information. The operating permit program requires owners or operators of units that emit air pollutants to submit annual compliance certifications, to submit monitoring results at least semiannually, and to report deviations promptly, but no implementation guidance is provided within the operating permit program. CAM provides the vehicle to implement operating permits program requirements in a cost-effective manner.²

The Clean Air Act (Act) Amendments of 1990, Public Law 101-549, enacted on November 15, 1990, establish the legal authority for this information collection. Section 502(b) directs EPA to promulgate regulations that will require the owners or operators of certain stationary sources of air pollution to conduct monitoring and to make compliance certifications. These provisions are set forth in both title V (operating permits provisions) and title VII (enforcement provisions) of the 1990 Amendments.

Title V directs the Agency to implement monitoring and compliance certification requirements through the operating permits program. Section 503(b)(2) requires at least annual certifications of compliance with permit requirements and prompt reporting of deviations from permit requirements. Section 504(a) mandates that owners or operators submit to the PA the results of any required monitoring at least every six months. This section also requires permits to include “such other conditions as are necessary to assure compliance with applicable requirements” of the Act. Section 504(b) of the Act also allows the Agency to prescribe, by rule, methods and procedures for determining compliance, and states that continuous emission monitoring systems need not be required if other methods or procedures provide sufficiently reliable and timely information for determining compliance. Under section 504(c), each operating permit must “set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.”

Title VII of the 1990 Amendments added 114(a)(3) – a new section that requires EPA to promulgate rules on enhanced monitoring and compliance certifications. This paragraph provided, in part:

“The Administrator shall in the case of any person which is the owner or operator of a major stationary source, and may, in the case of any other person, require

² Efforts are currently underway to propose revisions to the 1997 CAM Rule. The proposed revisions address the: (1) conditions under which the CAM rule requirements would apply, and (2) development of monitoring of such emissions control measures not addressed in the current CAM rule.

enhanced monitoring and submission of compliance certifications. Compliance certifications shall include (A) identification of the applicable requirement that is the basis of the certification, (B) the method used for determining the compliance status of the source, (C) the compliance status, (D) whether compliance is continuous or intermittent, (E) such other facts as the Administrator may require.”

The 1990 Amendments also revised section 114(a)(1) of the Act to provide additional authority concerning monitoring, reporting, and record keeping requirements. As amended, that section provides the Administrator with the authority to require any owner or operator of a source, on a one-time, periodic or continuous basis to:

- establish and maintain such records;
- make such reports;
- install, use, and maintain such monitoring equipment;
- sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
- keep records on control equipment parameters, production variables, or other indirect data when direct monitoring of emissions is impractical;
- submit compliance certifications in accordance with section 114(a)(3); and
- provide such other information as the Administrator may reasonably require.

Obtaining ongoing compliance is a two-step process. First, the Agency must assure properly designed control measures are installed or otherwise employed. These measures include control devices, process modifications, operating limitations and other control measures as applicable. Furthermore, the Agency must assure the control measures are proven to be capable of achieving applicable requirements. In the past, this step has been addressed through new source review permitting, initial stack testing, compliance inspections and similar mechanisms. The title V permit application and review process, including the applicant’s initial compliance certification and compliance plan obligations, will add another tool for assuring that source owners or operators have adopted proper control measures for achieving compliance.

The second step involves monitoring by sources to determine continued assurance that the source’s control measures, once installed or otherwise employed, are properly operated and maintained so that they do not deteriorate to the point where the owner or operator fails to remain in compliance with applicable requirements. The Agency believes that monitoring, reporting, record keeping and ongoing or recurring compliance certification requirements under titles V and VII should be designed so that owners or operators carry out this second step in assuring ongoing compliance. The Agency has adopted the CAM approach to assure the proper operation and maintenance of control measures employed by sources. CAM establishes monitoring to:

- document continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements;

- indicate any excursions from these ranges; and
- respond to the data so that excursions are corrected.

This type of monitoring is an appropriate approach to enhanced monitoring in the context of title V permitting for significant emission units that use control devices to achieve compliance with emission limits. In particular, CAM:

- provides cost-effective achievement of air pollution emission reductions;
 - establishes voluntary compliance and self-certification by owners or operators;
- and
- holds owners or operators accountable for regulated air pollutants emitted by units.

2(b) PRACTICAL UTILITY/USERS OF THE DATA

Owners or operators of affected emissions units will use the information as the basis for the compliance certification required by the operating permit program, and as the basis for compliance assurance monitoring reports. Sources will also use the information to determine and maintain the efficiency of the process or emissions control devices.

PAs will use the information collected and submitted in permit applications in determining acceptability of proposed compliance assurance monitoring. The PAs will use source monitoring data to assess compliance, as input into reports to other agencies, and, when necessary, as evidence in enforcement proceedings. PAs will use the information on excursions and exceedances collected from owners or operators to require the development and implementation by source operators of a Quality Improvement Plan (QIP). The QIP will address the timetable, methods, and procedures for dealing with these excursions and exceedances.

PAs will also collect summaries of information on compliance and will review the information as part of their permitting responsibilities and ongoing compliance activities. The information may be entered into local, regional, or national databases for review and action by air pollution control agencies. Other Federal entities, such as the Department of Energy, may request and use the information collected to fulfill specific mission objectives. Citizens may request the information collected in order to determine the compliance status of any emissions unit or particular group of emissions units.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) NONDUPLICATION

For approval of a proposed ICR, the Agency must ensure that it has taken every reasonable step to avoid duplication in its paperwork requirements in accordance with 5 CFR 1320.4. The proposed part 64 rulemaking is mandated by the Act, and supports the title V permit program under 40 CFR part 70 as well as title VII enforcement provisions. Recognizing that many sources have already implemented monitoring strategies to fulfill their part 70 requirements, the part 64 monitoring guidelines were carefully crafted by the Agency and OMB to minimize any unnecessary duplication. The part 64 CAM Rule has also been carefully designed to function, as much as possible, in a manner complementary to that of the part 70 operating permit program managed by PAs.

3(b) PUBLIC NOTICE REQUIRED PRIOR TO ICR SUBMISSION TO OMB

EPA has complied with the public notice requirement set forth in 5 CFR 1320.8(d)(1) by publishing a notice of proposed information collection in the Federal Register on February 24, 2010 (75 FR 8333). This notice provided a 60-day public comment period. EPA received no comments. A notice of proposed information collection will be published concurrently in the Federal Register with the submission of this information collection request, followed by a 30-day comment period.

3(c) CONSULTATIONS

The Agency has continued discussions with stakeholders through a series of workshops and public meetings. The workgroups at these meetings discussed and reviewed CAM requirements and reviewed extensive public input concerning the development and implementation of CAM. For example, we conducted multiple workshops with state and local agency staff in over a dozen states since promulgating the rule and other monitoring related to the operating permits program. Those workshops have focused on the implementation of the rule. Much of the information exchange was in our describing the regulatory requirements in the 40 CFR part 64, other requirements that apply (e.g., part 70, operating permits), operating permits content and supporting documentation requirements, and case studies as technical examples. The participants shared experiences in implementing the regulatory requirements including the number of staff involved in permit reviews, level of effort, and burden. Information we received in conjunction with the workshops also include additional case study examples.

3(d) EFFECTS OF LESS FREQUENT COLLECTION

As part of the permit application required under the operating permit program, an owner or operator must submit to the PA monitoring that satisfies the design requirements in 64.3. In

addition, it must be demonstrated that the proposed monitoring is sufficient to provide compliance status information. Without such information, PAs will be unable to issue complete permits. Furthermore, owners or operators will be unable to certify compliance with emissions limitations or standards unless costly reference test methods are employed. Part 64 requires semi-annual reports because the statute requires all monitoring reports to be submitted at least semiannually (section 504(a)). In addition, without timely evaluation of the reports, excess emissions of regulated air pollutants could rise. Consequently, less frequent collection of monitoring information is not permissible under the statute and could result in a net loss of environmental quality and was not considered for this rulemaking.

3(e) GENERAL GUIDELINES

OMB's general guidelines for information collections must be adhered to by all Federal Agencies for approval of any rulemaking's collection methodology. In accordance with the requirements of 5 CFR 1320.6, the Agency believes:

- Part 64 regulations do not require periodic reporting more frequently than semi-annually.
- The part 64 regulations do not require respondents to participate in any statistical survey.
- Responses to Agency inquiries are not required to be submitted in less than thirty days.
- Special consideration has been given in the design of part 64 to ensure that the requirements are, to the greatest extent possible, the same for Federal requirements and those permitting authorities who already have monitoring programs in place.
- Confidential, proprietary, and trade secret information necessary for the completeness of the respondent's permit are protected from disclosure under the requirements of '503(e) and '114(c) of the Act.
- The part 64 regulations do not require more than one original and two copies of the permit application, update, or revision to be submitted to the Agency.
- Respondents do not receive remuneration for the preparation of reports required by the Act or part 64.
- To the greatest extent possible, the Agency has taken advantage of automated methods of reporting.
- The Agency believes the impact of part 64 on small entities to be insignificant and not disproportionate.

The record keeping and reporting requirements contained in the CAM program regulations do not exceed any of the Paperwork Reduction Act guidelines contained in 5 CFR 1320.6, except for the guideline which limits retention of records by respondents to three years. The CAM program and the operating permit program require both respondents and State or local agencies to retain records for a period of five years. The justification for this exception is found in 28 U.S.C. 2462, which specifies five years as the general statute of limitations for Federal claims in response to violations by regulated entities. The decision in U.S. v. Conoco, Inc., No. 83-1916.E (W.D. Okla., January 23, 1984) found that the five year general statute of limitations applied to the Clean Air Act.

3(f) CONFIDENTIALITY

Confidentiality is not an issue for this rulemaking. In accordance with the Clean Air Act Amendments of 1990, monitoring information must be submitted by sources as a part of their permit application and update; and revisions – all of which are a matter of public record. To the extent that the information required is proprietary, confidential, or of a nature that could impair the ability of the source to maintain its market position, that information is collected and handled subject to the requirements of sections 503(e) and 114(c) of the Act. Information received and identified by owners or operators as confidential business information (CBI) and approved as CBI by EPA, in accordance with Title 40, Chapter 1, Part 2, Subpart B, shall be maintained appropriately (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

3(g) SENSITIVE QUESTIONS

Sensitive questions (i.e., sexual, religious, personal or other private matters) are not applicable to this rulemaking. The information gathered for purposes of establishing an operating permit for a source do not include personal data on any owner or operator.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) RESPONDENTS/SIC CODES

CAM applies to most Standard Industrial Classification (SIC) code groups and to certain service industries regulated under the Act.

As applies to sections 4(a) and 5(a) of this document, this rule affects the owners of facilities in most Standard Industrial Classification code groups and all permitting authorities. We surveyed a subset of the sample States' inspectors to determine baseline monitoring practices and to verify sample State database accuracy. We used the results of these surveys to establish the incremental impact of CAM for the surveyed PSEUs; these impacts are then projected to the remaining PSEU population in the sample States.

The criteria for selecting States, in order of priority, were:

- the availability of reasonably current, complete and electronically accessible pollutant-specific emissions unit data for all facilities in the State potentially subject to regulation under title V;
- the willingness of State managers to allow their data to be used in the analysis and to commit their compliance program staff to a sample survey;
- States that, altogether, would provide a reasonable representation of industry types throughout the United States; and
- States that, altogether, would provide a reasonable representation of air quality problems throughout the United States.

We applied the draft 2002 National Emissions Inventory (NEI) and the Air Facility System (AFS) as the sources of data for the sample States. We discussed the availability and quality of data for individual States within these databases with other EPA staff who maintain these databases. From those select states we identified as reporting complete facility-level information, we selected a subset of sample States based on geographic distribution and diversity of industry type and size. Based on these discussions, we selected the following nine States as the sample States: Arkansas, Colorado, Illinois, Maine, Missouri, North Carolina, Texas, Virginia, and Wyoming.

4(b) INFORMATION REQUESTED

4(b)(i) DATA ITEMS

The following matrices display the types of additional data required by the part 64 CAM Rule, along with the location of the requirement in the rule.

**FIGURE 4-1
DATA REQUIRED BY THE INFORMATION COLLECTION**

Additional Requirements for Permit Applications	Regulation Reference
For all major source pollutant-specific emission units that satisfy the applicability criteria outlined in 64.2, the owner or operator shall submit a proposed monitoring approach to the PA. The monitoring approach shall be submitted as part of the initial, revised, or renewed part 70 or 71 permit application.	64.5

Consistent with the design requirements in 64.3, the submission shall include the following information:

the indicators to be monitored to satisfy 64.3(a)(1)-(2).	64.4(a)(1)
either (i) the ranges or designated conditions for such indicators or (ii) the process by which such indicator ranges or designated conditions shall be established.	64.4(a)(2)
the performance criteria for the monitoring to satisfy 64.3(b).	64.4(a)(3)
if applicable, the indicator ranges and performance criteria for a CEMS, COMS, or PEMS pursuant to 64.3(d).	64.4(a)(4)

As part of the information submitted, the owner or operator shall submit:

a justification for the proposed elements of monitoring. The justification shall include any supporting data and may refer to any generally available sources of information such as air pollution engineering manuals or EPA or PA publications. In addition, the owner or operator may base the required justification exclusively on the regulatory precedents cited in 64.4(b)(1)-(5). If the performance specifications	64.4(b)
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**FIGURE 4-1
DATA REQUIRED BY THE INFORMATION COLLECTION**

Additional Requirements for Permit Applications	Regulation Reference
proposed to satisfy 64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences.	
control device (and process and capture system, if applicable) operating parameter data obtained during the conduct of applicable compliance or performance tests. Such data may be supplemented, if desired, by engineering assessments and manufacturer's recommendations to justify the indicator ranges.	64.4(c)(1)
documentation to certify that no changes to the pollutant-specific emissions unit, including the control device and capture system, have taken place.	64.4(c)(2)

If existing data from unit-specific compliance or performance testing specified in 64.4(c) are not available, the owner or operator:

shall submit a test plan and schedule for obtaining such data; or	64.4(d)(1)
may submit indicator ranges (or procedures for establishing indicator ranges) that rely on engineering assessments and other data, provided that the owner or operator demonstrates that factors specific to the type of monitoring, control device, or pollutant-specific emissions unit make compliance or performance testing unnecessary to establish indicator ranges at levels that satisfy the criteria in 64.3(a).	64.4(d)(2)

If the monitoring submitted by the owner or operator requires installation, testing, or other necessary activities prior to use for the purposes of part 64, the owner or operator shall include:

an implementation plan and	64.4(e)
schedule for installing, testing, and performing any other appropriate activities prior to the use of the monitoring.	64.4(e)

Reporting Requirements	Regulation Reference
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Submit monitoring reports in accordance with 70.6(a)(3)(iii). In addition the monitoring report shall include:

summary information of the number, duration and cause (including unknown cause,	64.9(a)(2)(i)
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if applicable) of excursions or exceedances and the corrective actions taken.	
summary information of the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).	64.9(a)(2)(ii)
a description of the actions taken to implement a quality improvement plan (QIP) specified in 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	64.9(a)(2)(iii)

Record Keeping Requirements	Regulation Reference
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Records shall be maintained in accordance with the requirements specified in 70.6(a)(3)(ii). In addition the records shall include:

records of monitoring data	64.9(b)
monitor performance data	64.9(b)
any written QIP required pursuant to 64.8	64.9(b)
any corrective actions taken to implement a QIP	64.9(b)
data used to document the adequacy of monitoring	64.9(b)
records of monitoring maintenance.	64.9(b)

Additional Requirements for Compliance Certification	Regulation Reference
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For all affected pollutant-specific units, an annual compliance certification is required. As part of the compliance certification, it is necessary to identify:

each term or condition of the permit that is the basis of the certification.	70.6(c)(5)(iii)(A)
the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or means provide continuous or intermittent data.	70.6(c)(5)(iii)(B)
the status of compliance with the terms and conditions of the permit for the period covered by the certification	70.6(c)(5)(iii)(C)
such other facts as the PA may require.	70.6(c)(5)(iii)(D)

4(b)(ii) RESPONDENT ACTIVITIES

The following list displays typical activities sources will have to perform to meet the additional permit application, record keeping, and reporting requirements of CAM:

- Review requirements;
- Determine monitoring approach;
- Specify monitoring plan elements;
- Prepare documentation;
- Revise CAM, as applicable;
- Renew CAM at permit renewal;
- Maintain records;
- Submit reports; and
- Certify facility compliance.

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

5(a) AGENCY ACTIVITIES

State and local agencies will perform the following activities:

- Rule familiarization;
- Determine applicability;
- Review and approve/disapprove monitoring chosen by owners/operators;
- Respond to requests for reviews/revisions to CAM;
- Review reports;
- Evaluate CAM renewals;
- Review annual facility certifications.

The EPA will perform the following activities:

- Provide oversight and guidance to State and local agencies;
- Assess requests for alternative monitoring.

5(b) COLLECTION METHODOLOGY AND MANAGEMENT

CAM does not mandate the use of standardized forms for reporting information. Section 64.9(b)(2) allows record keeping in a variety of media as long as all records are available for inspection and there are no conflicts with other record keeping requirements.

5(c) SMALL ENTITY FLEXIBILITY

The Agency assessed the impacts of the CAM Rule on small businesses, governments, and organizations in Chapter V of the rule's Regulatory Impact Analysis in 1997. This

assessment still holds true, indicating the CAM Rule will probably not have a significant impact on a substantial number of small entities (SISNOSE). For additional discussion on this assertion, the Agency invites the reader to review the CAM Rule RIA and ICR from 1997.

5(d) COLLECTION SCHEDULE

Submission of initial source information required under part 64 depends on whether the unit is classified as “Large” or “Other.” If the source’s permit application has not been filed, is being revised, or is not complete, “Large” units must submit monitoring information on or before the 180th day after publication of the final rule in the Federal Register. If these conditions are not met, sources must submit monitoring design criteria at the first significant permit revision, or at permit renewal, whichever occurs first. For all other pollutant-specific emission units subject to part 64 (i.e., “Other” units), the owner or operator shall submit the required information upon renewal of a part 70 or 71 permit.

Upon approval of the permit, sources must collect the information specified in their permits in accordance with the collection frequency specified, maintaining these data for at least five years. Sources must also submit semi-annual monitoring reports and annual compliance certifications.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

This section discusses the development of burden estimates and their conversion estimates into costs, which are separated into burden costs and capital and O&M costs. According to the latest guidance for ICRs, capital and O&M costs display the cost of any new capital equipment the source or PA may have to purchase solely for information collection, assimilation, and storage purposes. For example, if a source had to purchase a new mini-computer to store and manipulate CEMS data, that computer would be a cost of administration subject to reporting in the ICR. In addition, the latest guidance instructs the Agency to differentiate the burden associated with a source’s labor and that which it hires through outside contractors. However, a sensitivity analysis of the effect of contracted labor on the CAM Rule reveals that, if all of the affected sources were to employ contractors to perform as much as half of the work necessary for full compliance with the rule, overall costs would increase by less than five percent. Consequently, this analysis assumes sources will not employ contracted labor.

6(a) ESTIMATING TOTAL RESPONDENT BURDEN

This section presents estimates of the burden hours expected to be incurred at sources with emission units affected by Compliance Assurance Monitoring. Results are contained in Tables 6.1 through 6.2. These tables summarize burden impacts for all pollutants by activity. The burden estimates reflect the expert judgment of EPA staff, contractors, and industry experts. All burden estimates represent the increment over part 70 requirements.

The respondent data and certain assumptions used in this analysis are taken from the RIA that was prepared in 2008 for revisions to CAM which are expected to be proposed in 2010. These revisions would add requirements for additional units that are not subject to the current CAM rule, but would not modify the existing requirements for units subject to the existing part 64. Therefore, the data pertaining to units subject to the existing part 64 can be used in this ICR. Data on the numbers of units expected to conduct each activity were developed for a nine-State sample in the RIA and extrapolated to the nation. Assumptions made in the RIA that are used in this ICR analysis include assumptions pertaining to implementation timetables. EPA assumed that no units had yet submitted their monitoring approaches to their permitting authorities as of January 2007, so all existing units will submit their monitoring approaches at permit renewal, beginning in July 2007. The expiring ICR included the startup costs for some units while this current renewal ICR includes the startup costs for the remaining existing units.

Tables 6.1a, b, and c report labor burdens for all units for each of the next three years. Table 6.2 presents a summary of the burdens for these three years. Average annual labor burden is computed as the arithmetic average of the sum of the annual labor burden across the three years of the information collection. Total annual burden for the nine-State sample is computed as the product of the annual labor hours per respondent for a specific activity times the number of respondents. National totals are extrapolated using the assumption that the nine sample States represent 21.4 percent of the Title V facilities nationwide. The national average annual labor burden over the first three years for all emissions units, extrapolated from the five sample States, is estimated to be about 7.4 million hours. Differences between the prior ICR and the results in Tables 6.1 and 6.2 are due to changes in the estimated numbers of units that would have CAM monitoring incorporated into their permit during the current three-year period.

6(b) ESTIMATING TOTAL RESPONDENT COSTS

6(b)(i) Estimating Labor Costs

Tables 6.1a, b, and c also show the costs associated with each year. Burden costs in Tables 6.1a, b, and c are classified into one of three categories: costs associated with CAM design activities, record keeping activities, or reporting activities.

This ICR identifies three labor categories. Labor rates, on a per-hour basis, are taken from the Bureau of Labor Statistics (BLS) Occupational Employment Statistics Web site (<http://www.bls.gov/oes/>) as posted for May 2008. For each type of personnel, the median hourly wage was averaged across the following sectors: (1) Manufacturing; (2) Professional, Scientific, and Technical Services; (3) Administrative and Support and Waste Management and Remediation Services; (4) Educational Services; (5) Healthcare and Social Assistance; and (6) Federal, State and Local Government. For managerial labor, an "Engineering Manager" occupation was selected with a base hourly labor rate of \$51.99; for technical personnel, "Environmental Engineering Technician" was selected with a base rate of \$19.56; and for clerical personnel, "Secretaries, Except Legal, Medical, and Executive" was selected with a base rate of \$14.44. The labor rates include fringe benefits, including paid leave, insurance, etc. The labor rates were then adjusted by an overhead and profit rate of 160 percent. Therefore, the total "loaded" wage rates are calculated by the following equation:

base labor rate x 1.67 = loaded wage rate

Given the overhead cost adjustments, the final total loaded wage rates are \$86.83 for managerial personnel, \$32.66 for technical personnel, and \$24.11 for clerical personnel. All labor rates are in 2008 dollars.

For each response activity, Tables 6.1a, b, and c display the Annual Labor Hours per Respondent (by labor category) assumed necessary to complete each required activity. For each activity, the nine State total cost is computed by multiplying the appropriate wage rate by the number of labor hours in that category, adding the three values together, and then multiplying that cost by the number of affected units. National totals are extrapolated using the assumption that the nine sample States represent 21.4 percent of the Title V facilities nationwide. From Table 6.2, the national total annualized cost (\$2008) is \$260 million for all units.

Tables 6.3a, b, and c show the burden and costs for State and Local Agencies for all units. The Agency believes the activities shown in the tables fully define the State and Local Agencies' burden under part 64. The methodology used to derive the State and Local burden hours and costs parallels the procedures described in the original CAM RIA and ICR. The approach is "bottom-up," with the estimates of the labor hours needed to perform each activity combined with an estimate of the number of respondents. The labor hour estimates for each activity are based on the expert knowledge of EPA staff. The labor estimates for these activities reflect the PA hours required to complete the activities for one pollutant specific emissions unit. Depending on the activity, the labor hours required may be broken out by the type of existing monitoring and the type of response.

Column B in Tables 6.3a, b, and c show the number of occurrences of each PA activity per year. In most cases, these numbers reflect the numbers of units expected to be submitting CAM approaches, revisions, renewals, or reports each year and are the same as the numbers of PSEUs used in Tables 6.1a, b, and c. Because each unit must submit two reports per year, the "number of occurrences" for the PA activity "review reports" is twice the number of units that will be expected to submit reports that year. The costs are reported in 2008 dollars and reflect a time horizon of three years. Total annualized costs for the PAs are \$3.5 million for all units, as displayed in Table 6.4.

The operating permits program requires the cost of administering a State permit program to be fully repaid out of the permitting fees collected by that State. Therefore, the true cost of the CAM Rule to States and other PAs is zero, and the recorded cost of administration should be allocated to sources.

6(b)(ii) Estimating Capital and Operations and Maintenance Costs

Tables 6.1 and 6.2 show the capital and operations and maintenance (O&M) costs as zero for all units over the next three years. As explained above, the only capital costs to be included in an ICR are those for any new capital equipment the source or PA may have to purchase solely for information collection, assimilation, and storage purposes. However, EPA assumes that any such equipment needed by sources to comply with part 64 would be purchased as part of a

monitoring equipment purchase and could not be separately estimated. Therefore, O&M costs for operating such capital equipment could also not be separately estimated. Other possible O&M costs associated with reporting and recordkeeping include such things as postage fees for submitting reports. However, part 64 does not require any new reports be submitted, rather it provides additional information that must be included in reports required under part 70. Therefore, postage costs for these reports are attributable to part 70 and not to part 64.

6(c) ESTIMATING AGENCY BURDEN AND COST

Table 6.5 shows the burden and costs for EPA.

6(d) REASONS FOR CHANGE IN BURDEN

The CAM Rule requires affected pollutant points to submit initial information to the PA upon renewal of the part 70 or part 71 permit. The burden is expected to increase, in part, due to the increased number of permit renewals expected over the next three years.

6(e) BURDEN STATEMENT

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 134 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2003-0152, which is available for online viewing at www.regulations.gov, or in person viewing at the Air 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 Air Docket is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and

Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA.
Please include the EPA Docket ID Number EPA-HQ-OAR-2003-0152 and OMB Control
Number 2060-0376 in any correspondence.

TABLE 6.1a Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2010-11

Reporting and Recordkeeping Requirements		Hours ¹ and Costs Per Respondent								Total Hours and Costs				
		A	B	C	D	E	F	G	H	I	J	K	L	M
		Clerical hours per occurrence	Technical hours per occurrence	Management hours per occurrence [(A+B) x 0.05]	Annual occurrences	Annual person hours	Labor cost/yr	Annualized capital costs	Annualized O&M costs	Total number of respondents	Total hourly cost (E x I)	Total labor cost	Total capital & O&M cost	Total annual cost
1	Review Requirements ²	5	15	1	1	21	\$69.7	\$0	\$0	0	0	\$0	\$0	
2	Determine Monitoring Approach ³													
	Units without existing monitoring	0.75	2.25	0.15	1	3.15	\$105	\$0	\$0	407	1,282	\$42,572	\$0	\$42,572
	Units with existing monitoring	0.25	0.75	0.05	1	1.05	\$35	\$0	\$0	767	805	\$26,742	\$0	\$26,742
3	Specify Monitoring Elements ²													
	Units w/o existing monitoring - non CEMCOM responses	4	12	0.8	1	16.8	\$55.8	\$0	\$0	407	6,838	\$227,050	\$0	\$227,050
	Units w/o existing monitoring - CEMCOM responses	2	6	0.4	1	8.4	\$27.9	\$0	\$0	0	0	\$0	\$0	\$0
	Units with existing monitoring - non CEMCOM responses	2	6	0.4	1	8.4	\$27.9	\$0	\$0	767	6,443	\$213,939	\$0	\$213,939
	Units with existing monitoring - CEMCOM responses	1	3	0.2	1	4.2	\$13.9	\$0	\$0	0	0	\$0	\$0	\$0
4	Design Documentation (Management) ³													
	Units w/o existing monitoring - non CEMCOM responses	0	4	0.2	1	4.2	\$14.8	\$0	\$0	407	1,709	\$60,243	\$0	\$60,243
	Units w/o existing monitoring - CEMCOM responses	0	2	0.1	1	2.1	\$7.4	\$0	\$0	0	0	\$0	\$0	\$0
	Units with existing monitoring - non CEMCOM responses	0	2	0.1	1	2.1	\$7.4	\$0	\$0	767	1,611	\$56,764	\$0	\$56,764
	Units with existing monitoring - CEMCOM responses	0	1	0.05	1	1.05	\$3.7	\$0	\$0	0	0	\$0	\$0	\$0
5	CAM Relations													
	Units without existing monitoring	0	4	0.2	1	4.2	\$14.8	\$0	\$0	0	0	\$0	\$0	\$0
	Units with existing monitoring	0	2	0.1	1	2.1	\$7.4	\$0	\$0	0	0	\$0	\$0	\$0
6	CAM Renewal	2	6	0.4	1	8.4	\$27.9	\$0	\$0	14	118	\$3,905	\$0	\$3,905
7	Recordkeeping Activities													
	Incremental recordkeeping burden - Upgrade instrumental systems	0	0.5	0.025	52	27.3	\$96.2	\$0	\$0	1,989	54,309	\$1,913,937	\$0	\$1,913,937
	Incremental recordkeeping burden - Upgrade work practices	0	0.5	0.025	52	27.3	\$96.2	\$0	\$0	1,771	48,300	\$1,704,280	\$0	\$1,704,280
	Incremental recordkeeping burden - Install VE monitor	0	0.5	0.025	52	27.3	\$96.2	\$0	\$0	0	0	\$0	\$0	\$0
	Daily recordkeeping - Install instrumental monitor	0	1.5	0.075	200	409.5	\$14,432	\$0	\$0	1,531	626,841	\$22,090,984	\$0	\$22,090,984
	Daily recordkeeping - Initiate work practices	0	1.5	0.075	200	409.5	\$14,432	\$0	\$0	1,167	477,961	\$16,844,208	\$0	\$16,844,208
8	Incremental reporting	0	0.5	0.025	2	1.05	\$3.7	\$0	\$0	4,381	4,600	\$162,114	\$0	\$162,114
9	Facility Certification ⁴	0.39	0	0.020	1	0.41	\$11	\$0	\$0	4,381	1,816	\$49,206	\$0	\$49,206
Total - 9 Sample States											1,232,692	\$43,395,943	\$0	\$43,395,943
Total - Nationwide											5,760,244	\$202,784,780	\$0	\$202,784,780
Notes:														
¹ Hours are per facility, not per PSBU; number of respondents are facilities, not PSBUs														
² One-time activity														
³ 3 hours per facility converted to impact per PSBU by dividing by the average number of Category A pollutant points per facility with at least one PSEU (7.6)														
⁴ All hours are per PSBU unless otherwise noted														
⁵ Costs are based on the following hourly rates: \$86.83 for managerial personnel; \$32.06 for technical personnel, and \$24.11 for clerical personnel														

TABLE 6.1b Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2011-12

Reporting and Recordkeeping Requirements		Hours ^d and Costs Per Respondent								Total Hours and Costs				
		A	B	C	D	E	F	G	H	I	J	K	L	M
		Clerical hours per occurrence	Technical hours per occurrence	Management hours per occurrence ((A+B)x 0.05)	Annual occurrences	Annual person hours	Labor cost/year	Annualized capital costs	Annualized O&M costs	Total number of respondents	Total hours/year (Ex H)	Total labor cost	Total capital & O&M cost	Total annual cost
1	Review Requirements ^a	5	15	1	1	21	\$697	\$0	\$0	0	0	\$0	\$0	
2	Determine Monitoring Approach ^b													
	Units without existing monitoring	0.75	2.25	0.15	1	3.15	\$105	\$0	\$0	0	0	\$0	\$0	
	Units with existing monitoring	0.25	0.75	0.05	1	1.05	\$35	\$0	\$0	0	0	\$0	\$0	
3	Specify Monitoring Elements ^b													
	Units without existing monitoring - non CEMCOM responses	4	12	0.8	1	16.8	\$508	\$0	\$0	0	0	\$0	\$0	
	Units without existing monitoring - CEMCOM responses	2	6	0.4	1	8.4	\$279	\$0	\$0	0	0	\$0	\$0	
	Units with existing monitoring - non CEMCOM responses	2	6	0.4	1	8.4	\$279	\$0	\$0	0	0	\$0	\$0	
	Units with existing monitoring - CEMCOM responses	1	3	0.2	1	4.2	\$139	\$0	\$0	0	0	\$0	\$0	
4	Design Documentation (Management) ^b													
	Units without existing monitoring - non CEMCOM responses	0	4	0.2	1	4.2	\$148	\$0	\$0	0	0	\$0	\$0	
	Units without existing monitoring - CEMCOM responses	0	2	0.1	1	2.1	\$74	\$0	\$0	0	0	\$0	\$0	
	Units with existing monitoring - non CEMCOM responses	0	2	0.1	1	2.1	\$74	\$0	\$0	0	0	\$0	\$0	
	Units with existing monitoring - CEMCOM responses	0	1	0.05	1	1.05	\$37	\$0	\$0	0	0	\$0	\$0	
5	CAM Revisions													
	Units without existing monitoring	0	4	0.2	1	4.2	\$148	\$0	\$0	0	0	\$0	\$0	
	Units with existing monitoring	0	2	0.1	1	2.1	\$74	\$0	\$0	0	0	\$0	\$0	
6	CAM Renewal	2	6	0.4	1	8.4	\$279	\$0	\$0	21	176	\$5,858	\$0	
7	Recordkeeping Activities													
	Incremental recordkeeping burden - Upgrade instrumental systems	0	0.5	0.025	52	27.3	\$962	\$0	\$0	2,522	68,863	\$2,426,860	\$0	
	Incremental recordkeeping burden - Upgrade work practices	0	0.5	0.025	52	27.3	\$962	\$0	\$0	2,246	61,323	\$2,161,116	\$0	
	Incremental recordkeeping burden - Install VE monitor	0	0.5	0.025	52	27.3	\$962	\$0	\$0	0	0	\$0	\$0	
	Daily recordkeeping - Install instrumental monitor	0	1.5	0.075	260	409.5	\$14,432	\$0	\$0	1,943	795,739	\$28,043,258	\$0	
	Daily recordkeeping - Initiate work practices	0	1.5	0.075	260	409.5	\$14,432	\$0	\$0	1,480	606,090	\$21,359,326	\$0	
8	Incremental reporting	0	0.5	0.025	2	1.05	\$37	\$0	\$0	5,555	5,833	\$205,556	\$0	
9	Facility Certification ^c	0.39	0	0.020	1	0.41	\$11	\$0	\$0	5,555	2,302	\$62,392	\$0	
Total - 9 Sample States											1,540,317	\$54,264,374	\$0	
Total - Nationwide											7,197,741	\$25,571,843	\$0	
Notes:														
^a Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs														
^b One-time activity.														
^c 3 hours per facility converted to impact per PSEU by dividing by the average number of Category A pollutant points per facility with at least one PSEU [7.6]														
^d All hours are per PSEU unless otherwise noted.														
^e Costs are based on the following hourly rates: \$86.83 for managerial personnel; \$32.66 for technical personnel, and \$24.11 for clerical personnel														

TABLE 6.1c Total Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2012-13

Reporting and Recordkeeping Requirements		Hours ^d and Costs Per Respondent									Total Hours and Costs				
		A	B	C	D	E	F	G	H	I	J	K	L	M	
		Clerical hours per occurrence	Technical hours per occurrence	Management hours per occurrence [(A+B) x 0.05]	Annual occurrences	Annual person hours	Labor cost/year	Annualized capital costs	Annualized O&M costs	Total number of respondents	Total hours/year (E x H)	Total labor cost	Total capital & O&M cost	Total annual cost	
1	Review Requirements ^a	5	15	1	1	21	\$697	\$0	\$0	0	0	\$0	\$0	\$0	
2	Determine Monitoring Approach ^b														
	Units without existing monitoring	0.75	2.25	0.15	1	3.15	\$105	\$0	\$0	0	0	\$0	\$0	\$0	
	Units with existing monitoring	0.25	0.75	0.05	1	1.05	\$35	\$0	\$0	0	0	\$0	\$0	\$0	
3	Specify Monitoring Element ^c														
	Units w/o existing monitoring - non CEM/COM responses	4	12	0.8	1	16.8	\$558	\$0	\$0	0	0	\$0	\$0	\$0	
	Units w/o existing monitoring - CEM/COM responses	2	6	0.4	1	8.4	\$279	\$0	\$0	0	0	\$0	\$0	\$0	
	Units with existing monitoring - non CEM/COM responses	2	6	0.4	1	8.4	\$279	\$0	\$0	0	0	\$0	\$0	\$0	
	Units with existing monitoring - CEM/COM responses	1	3	0.2	1	4.2	\$139	\$0	\$0	0	0	\$0	\$0	\$0	
4	Design Documentation (Management) ^b														
	Units w/o existing monitoring - non CEM/COM responses	0	4	0.2	1	4.2	\$148	\$0	\$0	0	0	\$0	\$0	\$0	
	Units w/o existing monitoring - CEM/COM responses	0	2	0.1	1	2.1	\$74	\$0	\$0	0	0	\$0	\$0	\$0	
	Units with existing monitoring - non CEM/COM responses	0	2	0.1	1	2.1	\$74	\$0	\$0	0	0	\$0	\$0	\$0	
	Units with existing monitoring - CEM/COM responses	0	1	0.05	1	1.05	\$37	\$0	\$0	0	0	\$0	\$0	\$0	
5	CAM Revisions														
	Units without existing monitoring	0	4	0.2	1	4.2	\$148	\$0	\$0	0	0	\$0	\$0	\$0	
	Units with existing monitoring	0	2	0.1	1	2.1	\$74	\$0	\$0	0	0	\$0	\$0	\$0	
6	CAM Renewal	2	6	0.4	1	8.4	\$279	\$0	\$0	1,215	10,206	\$338,900	\$0	\$338,900	
7	Recordkeeping Activities														
	Incremental recordkeeping burden - Upgrade in instrumented systems	0	0.5	0.025	52	27.3	\$962	\$0	\$0	2,522	68,863	\$2,426,800	\$0	\$2,426,800	
	Incremental recordkeeping burden - Upgrade work practices	0	0.5	0.025	52	27.3	\$962	\$0	\$0	2,246	61,323	\$2,161,116	\$0	\$2,161,116	
	Incremental recordkeeping burden - Install VE monitor	0	0.5	0.025	52	27.3	\$962	\$0	\$0	0	0	\$0	\$0	\$0	
	Daily recordkeeping - Install instrumented monitor	0	1.5	0.075	260	409.5	\$14,432	\$0	\$0	2,909	1,215,886	\$42,849,983	\$0	\$42,849,983	
	Daily recordkeeping - Initiate work practices	0	1.5	0.075	260	409.5	\$14,432	\$0	\$0	1,480	606,080	\$21,359,335	\$0	\$21,359,335	
8	Incremental reporting	0	0.5	0.025	2	1.05	\$37	\$0	\$0	5,555	5,833	\$205,556	\$0	\$205,556	
9	Facility Certification ^e	0.39	0	0.020	1	0.41	\$11	\$0	\$0	5,555	2,302	\$62,392	\$0	\$62,392	
Total - 9 Sample States												\$69,404,142	\$0	\$69,404,142	
Total - Nationwide												9,207,912	\$324,318,418	\$0	\$324,318,418
Notes:															
^a Hours are per facility, not per PSEU; number of respondents are facilities, not PSEUs															
^b One-time activity															
^c 3 hours per facility converted to impact per PSEU by dividing by the average number of Category A pollutant points per facility with at least one PSEU (7.6)															
^d All hours are per PSEU unless otherwise noted															
^e Costs are based on the following hourly rates: \$86.83 for managerial personnel, \$32.66 for technical personnel, and \$24.11 for clerical personnel															

TABLE 6.2 Average Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants

Year	Annual total hours	Annual labor cost	Annual capital & O&M cost	Total annual cost
2010-11	5,760,244	\$202,784,780	\$0	\$202,784,780
2011-12	7,197,741	\$253,571,843	\$0	\$253,571,843
2012-13	9,207,912	\$324,318,418	\$0	\$324,318,418
Total	22,165,896	\$780,675,042	0	\$780,675,042
Average	7,388,632	\$260,225,014	\$0	\$260,225,014
Burden per Response				
Year	# PSEUs submitting reports	Annual total hours	Hours per PSEU	Hours per facility ^a
2010-11	20,472	5,760,244	281	2,138
2011-12	25,958	7,197,741	277	2,107
2012-13	25,958	9,207,912	355	2,696
Total	72,388	22,165,896	913	6,942
Average	24,129	7,388,632	304	2,314
^a Assumes 7.6 PSEUs per facility				

TABLE 6.3a Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2010-11

		A	B	C	D	E
Burden Item		Technical hours per occurrence ^a	Occurrences per year	Technical hours per year (AxB)	Management hours per year (C x 0.05)	Total cost per year
1	CAM Activities					
	Rule Familiarization	54	0	0	0	\$0
	Applicability Determination	0.67	1,174	787	39	\$44,570
2	Initial CAM Review					
	Units w/o existing monitoring: non CEM/COM	2	407	814	41	\$46,124
	Units w/o existing monitoring: CEM/COM	1	0	0	0	\$0
	Units with existing monitoring: non CEM/COM	1	767	767	38	\$43,460
	Units with existing monitoring: CEM/COM	0.5	0	0	0	\$0
3	CAM Revisions					
	Units w/o existing monitoring	1	0	0	0	\$0
	Units with existing monitoring	0.5	0	0	0	\$0
4	CAM Renewals	1	14	14	1	\$793
5	Review Reports	1	8,762	8,762	438	\$496,482
6	Certifications	0.33	4,381	1,446	72	\$81,920
	Total - 9 Sample States			12,589	629	\$713,349
	Total - Nationwide			58,829	2,941	\$3,333,409

^aAll hours are per PSEU unless otherwise noted.

^cCosts are based on the following hourly rates: \$86.51 for managerial personnel and \$52.34 for technical personnel

TABLE 6.3b Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2011-12

		A	B	C	D	E
Burden Item		Technical hours per occurrence ^a	Occurrences per year	Technical hours per year (AxB)	Management hours per year (C x 0.05)	Total cost per year
1	CAM Activities					
	Rule Familiarization	54	0	0	0	\$0
	Applicability Determination	0.67	0	0	0	\$0
2	Initial CAM Review					
	Units w/o existing monitoring: non CEM/COM	2	0	0	0	\$0
	Units w/o existing monitoring: CEM/COM	1	0	0	0	\$0
	Units with existing monitoring: non CEM/COM	1	0	0	0	\$0
	Units with existing monitoring: CEM/COM	0.5	0	0	0	\$0
3	CAM Revisions					
	Units w/o existing monitoring	1	0	0	0	\$0
	Units with existing monitoring	0.5	0	0	0	\$0
4	CAM Renewals	1	21	21	1	\$1,190
5	Review Reports	1	11,110	11,110	556	\$629,527
6	Certifications	0.33	5,555	1,833	92	\$103,872
	Total - 9 Sample States			12,964	648	\$734,589
	Total - Nationwide			60,580	3,029	\$3,432,659

^aAll hours are per PSEU unless otherwise noted.

^eCosts are based on the following hourly rates: \$86.51 for managerial personnel and \$52.34 for technical personnel

TABLE 6.3c Total Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants, 2012-13

		A	B	C	D	E
Burden Item		Technical hours per occurrence^a	Occurrences per year	Technical hours per year (AxB)	Management hours per year (C x 0.05)	Total cost per year
1	CAM Activities					
	Rule Familiarization	54	0	0	0	\$0
	Applicability Determination	0.67	0	0	0	\$0
2	Initial CAM Review					
	Units w/o existing monitoring: non CEM/COM	2	0	0	0	\$0
	Units w/o existing monitoring: CEM/COM	1	0	0	0	\$0
	Units with existing monitoring: non CEM/COM	1	0	0	0	\$0
	Units with existing monitoring: CEM/COM	0.5	0	0	0	\$0
3	CAM Revisions					
	Units w/o existing monitoring	1	0	0	0	\$0
	Units with existing monitoring	0.5	0	0	0	\$0
4	CAM Renewals	1	1,215	1,215	61	\$68,846
5	Review Reports	1	11,110	11,110	556	\$629,527
6	Certifications	0.33	5,555	1,833	92	\$103,872
	Total - 9 Sample States			14,158	708	\$802,245
	Total - Nationwide			66,160	3,308	\$3,748,807

^aAll hours are per PSEU unless otherwise noted.

^eCosts are based on the following hourly rates: \$86.51 for managerial personnel and \$52.34 for technical personnel

TABLE 6.4 Average Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants

Year	Annual total hours	Total annual cost
2010-11	61,770	\$3,333,409
2011-12	63,609	\$3,432,659
2012-13	69,468	\$3,748,807
Total	194,847	\$10,514,874
Average	64,949	\$3,504,958

TABLE 6.5 Federal Labor Hours and Costs for "Large & Other" Sources - All Pollutants, 2010-2013

CAM Activities	Annual Burden				Three Year Total			
	Technical Hours	Management Hours	Total Hours	Annual Cost	Technical Hours	Management Hours	Total Hours	Total Cost
Rule Familiarization ¹	380	20	400	\$21,618	1,140	60	1,200	\$64,855
Review CAM Plans ¹	5,320	280	5,600	\$302,659	15,960	840	16,800	\$907,976
Total Cost and Burden:	5,700	300	6,000	\$324,277	17,100	900	18,000	\$972,832

¹ Based on input from the Regions -- one region said they spent .1 FTE or less and another region said they spent .5 FTE.

We assumed .3 FTEs, or 600 hours per region per year; 600 hours/region * 10 regions = 6000 hours/yr.

We assumed the majority of the time is spent reviewing CAM plans; some time was allocated to Rule familiarization for new staff.

250 new PSEU's per year expected.