

**SUPPORTING STATEMENT – INFORMATION COLLECTION REQUEST (ICR)
Federal Implementation Plans to Reduce Interstate Transport of
Fine Particulate Matter and Ozone (Final Rule)**

1.0 Identification of the Information Collection

1.1 Title of the Information Collection

Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone, EPA ICR Number 2391.02, OMB Control Number 2060-NEW.

1.2 Short Characterization/Abstract

The United States (U.S.) Environmental Protection Agency (EPA) is finalizing Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone (Transport Rule) that will supersede the Clean Air Interstate Rule (CAIR). It includes new reporting requirements, and combines these new requirements with existing requirements from the Emission Reporting Requirements for Ozone State Implementation Plan (SIP) Revisions Relating to Statewide Budgets for NO_x Emissions to Reduce Regional Transport of Ozone (NO_x SIP Call) and the Acid Rain Program (ARP) under Title IV of the Clean Air Act (CAA) Amendments of 1990. Each of these existing requirements has an approved ICR in place. The current ICRs are: CAIR (EPA ICR Number 2152.04/OMB Control Number 2060-0570), NO_x SIP Call (EPA ICR Number 1857.05/OMB Control Number 2060-0445) and ARP (EPA ICR Number 1633.15/OMB Control Number 2060-0258).

This supporting statement and ICR are being submitted to account for the incremental burden associated with the Transport Rule (TR) as it supersedes CAIR beginning in 2012. As such, this supporting statement references the burden analysis included in EPA ICR Numbers 2152.04, 1857.05, and 1633.15, and estimates the change in burden resulting from the TR beyond the scope of the existing ICRs for the NO_x SIP Call requirements and the Acid Rain Program. The burden included in this ICR includes start-up and capital costs for units newly affected by an emissions trading program and/or whose reporting status has changed (e.g., from ozone season only to annual reporting), annualized capital costs for units previously subject to the NO_x SIP call requirements or CAIR, as well as the incremental operation and maintenance costs for all TR-affected units. Under the TR, the burden and costs accounted for under the CAIR ICR (EPA ICR Number 2152.04) would no longer occur past 2011. Instead, all those burdens and costs would be accounted for under this ICR as part of TR implementation.

In addition to the states and facilities listed in the actual rule text, EPA has included costs/burdens associated with TR ozone season-affected units for the following states: IA, KS, MI, MO, OK, and WI. The TR NO_x Ozone Season Trading Program does not list these states in the current rule package, however EPA proposes to add them as part of a future supplemental rule package to the Transport Rule. In anticipation of this rulemaking, the costs/burdens associated with these facilities are included in the ICR to allow for a full accounting of the TR program at maturity. See Appendix A for a separate breakout of the cost/burdens associated with these facilities. In the event that some or all of these states are not included in the future rulemaking, EPA will amend this ICR accordingly.

EPA has published a Notice of Proposed Rulemaking in the Federal Register that details the additions and changes to reporting requirements associated with the TR. These changes can be logically divided in to two categories: (1) changes to existing requirements for emission reporting under the previous CAIR and NO_x SIP Call, and (2) the addition of reporting requirements to support emissions trading and compliance in states covered by the TR. Throughout this Supporting Statement, the burden analysis associated with these two categories will be discussed sequentially as "Emission Reporting Requirements" and "Emission Trading Requirements."

Emission Reporting Requirements

Taken together, the existing emission reporting requirements under CAIR, the Acid Rain Program, and the previous NO_x SIP Call cover many of the same sources and have similar or identical emission reporting requirements as the TR. The incremental burden imposed by the TR in general is described below.

First, sources located in Georgia and Texas are now required to report NO_x emissions during the five-month ozone season, in addition to the existing requirement for reporting emissions for the full year. These states are not among the 21 states previously subject to the NO_x SIP Call or the 26 states subject to CAIR ozone season (CAIROS) reporting and as a result, these changes will require sources to modify DAHS reporting software.

Second, sources located in Mississippi, Florida, and Louisiana, which under CAIR were required to report NO_x and SO₂ emissions annually, are now only required to report NO_x for the TR ozone season. This requirement would not impose any additional start-up/ capital burden on states, and is a reduction in reporting for sources subject to CAIR.

Third, sources located in Kansas, Minnesota, Nebraska, and Oklahoma are now affected under the TR. Specifically, sources in Minnesota and Nebraska are subject to TR NO_x and SO₂ annual reporting, sources in Oklahoma are subject to TR NO_x ozone season reporting, and sources in Kansas are subject to both the TR NO_x and SO₂ annual and NO_x ozone season reporting requirements. These sources were not previously subject to CAIR or the NO_x SIP Call, and will need to install and operate CEMS (or an approved alternative) and meet 40 CFR part 75 requirements for NO_x and SO₂, as applicable.

Fourth, sources located in Alabama, Illinois, Iowa, Indiana, Kentucky, Maryland, Missouri, Michigan, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, Virginia, West Virginia, and Wisconsin will continue to monitor and report NO_x and SO₂ emissions on a year round basis under the TR as currently required under CAIR. Sources located in Arkansas will, under the TR, continue to report for the ozone season only as currently required under CAIR.

Emission Trading Requirements

For this ICR, it is assumed that each state will eventually either adopt, in whole or in part, the relevant TR SO₂, NO_x annual, and/or NO_x ozone season trading rules. Initially, however, EPA will administer the programs under the Federal Implementation Plans (FIP) promulgated at 40 CFR Part 97. The trading program burden would include the paperwork burden related to (1) transferring and tracking allowances; (2) permitting; (3) annual year end compliance; and (4) monitoring and reporting starting in 2014. The monitoring and reporting requirements of a trading program will require capital and labor expenditures by industry, and these are evaluated, as are labor expenditures accrued by states and EPA, in managing the trading programs.

Similar to the ARP, the NO_x SIP Call, and CAIR, the ability to buy and sell (or transfer) allowances is expected to provide some economic benefits. Allowance trading cannot be implemented, however, unless regulations governing emissions monitoring and permitting of sources are in place as well. To ensure compliance with the state-specific emission reduction requirements and to provide the consistency needed to foster the allowance market, the designated representatives of the owners and operators of each source with affected units are required to have TR requirements integrated into their Title V permits for the affected source and to certify that an approved NO_x and SO₂ emissions monitoring system has been installed and is properly operated at each affected unit. Emissions data reported under 40 CFR part 75 by TR-affected sources is also relied upon in part by the Agency in determining allowance allocations to such TR-affected sources.

While many sources have already installed the necessary emissions monitoring equipment due to requirements under other regulations, some sources will need to install new monitors or upgrade existing monitors. Capital costs also usually include the cost of initial certification of new or upgraded monitors, and this is included as part of start-up costs. Capital costs addressed by this ICR include costs borne by newly affected units under the TR and annualized capital costs for existing CAIR or NO_x SIP Call units that are not subject to the ARP.

Emissions monitoring and reporting by sources in the trading programs is fundamental to the allowance trading system and compliance with the TR. EPA will use the data contained in the reports to verify actual emissions. Without accurate monitoring and reporting of emissions, the integrity of the allowance system would be undermined, and there would be no assurance that emissions had been reduced. To meet the emissions monitoring, recordkeeping and reporting requirements, affected units are required to: (1) submit a monitoring plan and certification reports for each monitoring system, (2) record hourly emissions data, and (3) submit reports of their emissions and operating data to EPA. All sources affected by the TR will be required to monitor and report NO_x and/or SO₂ emissions in accordance with 40 CFR part 75. Sources with monitors already certified under 40 CFR part 75 may be exempt from initial certification requirements.

All participants in the Allowance Management System (AMS) are required to either complete and submit an allowance transfer form for each allowance transfer, or to perform the transfer on-line. Participants in AMS that are not covered sources, such as allowance

brokers, fuel suppliers, and environmental groups are also required to file a onetime account information application to establish accounts in AMS.

2.0 Need for and Use of the Collection

2.1 Need/Authority for the Collection

Emissions data are of vital importance to the EPA for fulfilling a host of monitoring, standard-setting, rulemaking, reviewing, and reporting duties. Section 110(a)(2)(D) of the CAA, often referred to as the “good neighbor” provision of the Act, requires states to prohibit certain emissions because of their impact on air quality in downwind states. Specifically, it requires all states, within 3 years of promulgation of new or revised NAAQS, to submit SIPs that prohibit certain emissions of air pollutants because of the impact they would have on air quality in other states. This action addresses the requirement in section 110(a)(2)(D)(i)(I) regarding the prohibition of emissions within a state that will significantly contribute to nonattainment or interfere with maintenance of NAAQS in any other state. EPA has previously issued two rules interpreting and clarifying the requirements of section 110(a)(2)(D)(i)(I). The NO_x SIP Call, promulgated in 1998, was largely upheld by the U.S. Court of Appeals for the D.C. Circuit in Michigan (213 F.3d 663). CAIR, promulgated in 2005, was remanded by the D.C. Circuit in North Carolina (531 F.3d 896), and modified on rehearing, (550 F.3d. 1176). These decisions provide additional guidance regarding the requirements of section 110(a)(2)(D)(i)(I) and are discussed later in this notice.

Section 301(a)(1) of the CAA also gives the Administrator of EPA general authority to prescribe such regulations as are necessary to carry out her functions under the Act, 42 U.S.C. § 7601(a)(1). Pursuant to this section, EPA has the authority to clarify the applicability of CAA requirements. In this action, among other things, EPA is clarifying the applicability of section 110(a)(2)(D)(i)(I) by identifying NO_x and SO₂ emissions that must be prohibited with respect to the PM_{2.5} NAAQS promulgated in 1997 and 2006 and the 8-hour ozone NAAQS promulgated in 1997. In addition, section 110(k)(1)(A) calls for the Administrator to establish criteria for determining whether SIP submissions are complete, 42 U.S.C. sec. 7410(k)(1)(A). Among other things, this action helps to clarify what SIP submissions must contain to address the requirements of section 110(a)(2)(D)(i).

Section 110(c)(1) of the Act also requires EPA to act in certain circumstances where state SIP deficiencies exist, regardless of the reason for the deficiency. EPA action may be required even if the SIP deficiency is not in any way the fault of the affected state, such as, for example, if the deficiency is caused by factors beyond the state’s control. Specifically, section 110(c)(1) requires the Administrator to promulgate a FIP at any time within two years after the Administrator finds that (1) a state has failed to make a required SIP submission; or (2) a SIP submission is incomplete; or (3) the Administrator disapproves a SIP submission. The Administrator must promulgate a FIP in the above-described scenarios unless the state corrects the deficiency and the Administrator approves the SIP revision before the Administrator promulgates the relevant FIP. 42 U.S.C. sec. 7410(c)(1).

2.2 Practical Utility/Users of the Data

Emission Reporting Requirements

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

- Evaluation of existing control strategies, such as the NO_x SIP Call, for states and larger areas;
- Evaluation of proposed control strategies for states and larger areas, including applications of regional scale models;
- Development of national control strategies and preparation of Regulatory Impact Analyses (RIAs);
- Preparation and publication of national summaries of emissions, including trend analyses;
- As a database to assist in the identification of important source categories for future regulation; and
- Preparation of the stationary source portion of a report to Congress on SO₂ emissions. This report is required by Section 406 of the CAA and is due on a five year cycle that began on January 1, 1995. The report must contain an inventory of national annual SO₂ emissions from industrial sources (as defined in Title IV of the CAA).

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

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

The collection of emissions data specific to nonattainment areas for certain criteria air pollutants is necessary to comply with requirements specified in Title I of the CAA. States with

nonattainment areas rely on current emissions information from point, nonpoint, and mobile sources to revise their SIPs and to plan for emission reductions mandated by the CAA. In addition, a state-wide inventory compiled at least every three years for all point, nonpoint, and mobile sources is considered to be a key tool to assist states in meeting CAA requirements that address emissions tracking, compliance issues, and mid-course adjustments. State-wide emission inventories can be used by states affected by pollution transport from upwind areas to develop more efficient control strategies to meet NAAQS. State-wide emission inventories that were developed by EPA (the National Emissions Inventory, or NEI) are being used by the Regional Planning Organizations (RPOs) as the starting point for the development of state-wide emission inventories used in the regional haze program to define control strategies.

Emission Trading Requirements

Permit applications, including proposed compliance plans, are used by states and EPA to issue operating permits. A permit application is legally binding on the owners, operators, and designated representative of a source until the permit is issued. Affected sources rely on the permit for information regarding the applicable requirements with which they must comply. Because permit applications and permits are public documents, they may be used by the public to examine activities undertaken by affected sources.

Accurate data from emissions monitoring under 40 CFR part 75 is indispensable to successful implementation of the trading programs for two reasons:

- Accurate emissions data is integral in EPA and state assessment of the impact of the trading programs in reducing NO_x and SO₂ emissions, and therefore in assisting states in meeting the ozone and fine particulate matter NAAQS. By reducing levels of NO_x and SO₂ emissions, the trading programs reduce the adverse effects of the transport of ozone, ozone precursors, and fine particles from upwind states.
- EPA enforces the program (in part) by comparing emissions data measured, recorded, and reported under 40 CFR part 75 from affected sources with the number of allowances held in the respective compliance accounts of such affected sources.

Information collected on allowance transfers is used by EPA to track allowances for the purpose of determining compliance with the NO_x and SO₂ trading programs. Information on allowance transfers is also used by participants in the allowance market and the public to evaluate the activities of affected sources, and by EPA for program evaluation.

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

3.0 Nonduplication, Consultations, and Other Collection Criteria

3.1 Nonduplication

Emission Reporting Requirements

EPA will allow the direct reporting of point source data from sources to EPA to satisfy the requirement for states to report such data if the sources are subject to the monitoring and reporting requirements of 40 CFR part 75. The direct reporting of data from sources to EPA will minimize the reporting burden on states. Also, direct reporting will avoid duplication of effort for sources subject to 40 CFR part 75 requirements.

Emission Trading Requirements

Reporting requirements for affected sources for the TR NO_x and SO₂ trading programs are integrated with existing reporting formats under 40 CFR part 75. These reporting formats are currently used by ARP-affected units under Title IV of the Act, as well as by CAIR-affected units. Thus, for units subject to Acid Rain or TR quarterly reporting requirements, or both, only one submission will need to be made on a quarterly basis. (CAIR trading program reporting will be superseded by TR reporting.)

3.2 Public Notice Required Prior to ICR Submission to OMB

The preamble to the proposed rule was provided to the public with notice of and the opportunity to comment on this ICR.

3.3 Consultations

Emission Reporting Requirements

During the development of CAIR, discussions were held with the National Association of Clean Air Agencies (NACAA) to clarify EPA's logic in developing the emissions reporting requirements contained within the rule and to answer questions. Information arising from those discussions, as well as the decision handed down in the *North Carolina v. EPA* court case related to CAIR (531 F.3d at 908), were taken into consideration when developing the TR emission reporting requirements.

Emission Trading Requirements

The requirements for the TR have been developed using the methodology found in existing trading programs, consultations with interested parties, and reflections on the decision handed down in the *North Carolina* court case (531 F.3d at 908). EPA modified the cap and trade strategy used in the ARP, Ozone Transport Commission's NO_x Budget Program, and the NO_x SIP Call to address the court's concerns related to "emissions from sources that contribute

significantly and interfere with maintenance" in another state. *North Carolina* (531 F.3d at 908). This resulted in the development of an unlimited intrastate and limited interstate trading program based on state-specific budgets rather than regional caps.

EPA held two workshops with states that participated in the NO_x SIP Call or OTC programs to discuss lessons learned in those programs when formulating the emission trading requirements of CAIR. Additionally, EPA has had frequent interaction with affected sources and states in the course of implementing the Acid Rain, NO_x SIP Call, and CAIR Trading Programs. In 2009, EPA held a series of conference calls and meetings with stakeholders to identify potential options for addressing the *North Carolina v. EPA* court decision. EPA has received comments following the workshops and through other interactions and considered and incorporated those comments into the TR and this ICR.

Finally, as part of updating the ICR for the ARP monitoring requirements (40 CFR part 75), EPA contacted various affected parties to gather information on CEM capital costs, CEM operation and maintenance costs, fuel meter capital costs, and CEM/fuel meter testing costs. That information has been used in this ICR, as appropriate.

3.4 Effects of Less Frequent Collection

Emission Reporting and Trading Requirements

Submittal of allowance trading and emissions information on an annual basis (and/or on an ozone-season basis, as applicable) provides the data necessary to determine whether state budgets have been exceeded. If this information collection were not carried out annually for sources subject to the TR, EPA would not be able to verify that emission reductions necessary to meet each state's NO_x and SO₂ emission budgets were being achieved. Because the NO_x and SO₂ budgets prescribed have been deemed essential in order to aid downwind states in attaining the NAAQS in a timely manner, data collected less frequently would be of little or no use.

Quarterly collections of emissions data allows for frequent checking of data for errors and provides rapid feedback to industry of needed adjustments to data collection systems, thereby promoting more accurate and reliable emissions data. Also, existing federal and state emission monitoring programs often require quarterly reporting, or in some cases, monthly. Less frequent collection, such as semi-annually or annually, would increase the amount of preparation and review time at the end of the reporting period both for regulated sources and for EPA, and would slow down the process of compliance determination.

3.5 General Guidelines

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

3.6 Confidentiality

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

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

3.7 Sensitive Questions

This information collection does not ask any questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

4.0 The Respondents and the Information Requested

4.1 Respondents/Standard Industrial Classification (SIC) Codes

Emission Reporting and Trading Requirements

This ICR estimates a burden for affected industry sources to monitor NO_x and SO₂ mass emissions and demonstrate compliance with NO_x and SO₂ control measures. Sources report data directly to EPA as required to meet the monitoring and reporting requirements of 40 CFR part 75. This rule affects large electric utility sources which are generally classified as either SIC 4911 - *Electric Services*, or 4931 - *Electric and Other Services Combined* [NAICS 221112 Electric Power Distribution].

4.2 Information Requested

Emission Reporting Requirements

The ARP and NO_x SIP Call established the basic emission reporting requirements. CAIR modified these requirements and the TR would continue to implement the changes included in the CAIR requirements such that the previously accounted for reporting burden would also change. Only the incremental changes to the ARP and NO_x SIP Call reporting requirements that would change reporting burden are discussed here.

Emission Trading Requirements

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

(i) Data Items, Including Recordkeeping Requirements

(a) Allowance Tracking

There are several data items required for allowance tracking activities. For each affected source, the designated representative must submit a certificate of representation. Under 40 CFR §§ 97.416, 97.516, 97.616, and 97.716, a complete certificate of representation includes:

- Identification of the source and unit;
- Dates on which the unit commenced commercial operation;
- Name and contact information for the TR designated representative and alternate (if applicable);
- A list of the owners and operators of each unit; and
- A certification statement and signature of the TR designated representative and alternate (if applicable).

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

Second, sources and other trading program participants must submit allowance transfer, allowance deduction, and compliance assurance information, as necessary.

(b) Permitting

The basic requirement for permitting is an application for a permit revision to a source's operating permit issued under Title V of the Act. Although there is some possibility that a non-Title V source could be affected under the TR, all TR-affected sources are assumed to be Title V sources for purposes of this ICR. It is assumed the permit revision application and all other monitoring, reporting, or recordkeeping requirements associated with Title V permitting are either part of the baseline Title V requirements or are covered separately under section 4(c). Title V permit applications must be kept for five years pursuant to Title V recordkeeping requirements.

(c) Monitoring and Reporting

TR-affected sources are required to monitor NO_x and SO₂ mass emissions, and record and report emissions data using the requirements of 40 CFR part 75. The emissions monitoring requirements specify that affected sources must (1) submit a monitoring plan for each affected unit at a source, (2) submit data for certification of each monitor, (3) record hourly operational, pollutant monitor, and flow monitor data for each affected unit, and (4) submit quarterly reports of their emissions data to EPA.

Respondents are required under 40 CFR 75.64 to submit the quarterly NO_x and SO₂ mass emissions data via direct electronic submission to EPA. Such data must include a certification statement by the designated representative of the facility attesting to the accuracy, truthfulness,

and completeness of the submission. Generally, all monitoring records are required to be kept for three years.

(ii) Respondent Activities

The primary tasks that will be performed by respondents to meet the emissions monitoring requirements are: (1) completing and submitting appropriate monitoring plan forms for each affected source and each affected unit at a source; (2) conducting tests to certify monitors and submitting test results to EPA; (3) recording hourly emissions data (this activity is generally performed electronically); (4) performing operation and maintenance activities associated with monitoring, including quality assurance activities; (5) assuring data quality, preparing quarterly reports of emissions data, and submitting these reports to EPA; and (6) responding to error messages generated by such submissions. In addition, respondents will have to purchase the necessary monitoring hardware and electronic data reporting software (or software upgrades).

5.0 The Information Collected – Agency Activities, Collection Methods, and Information Management

5.1 Agency Activities

Emission Reporting Requirements

The EPA activities associated with the rule include:

- Receiving, reviewing, and storing emission inventory data submitted by each source;
- Processing and updating data submitted by sources, including performing quality assurance of data, and coordination of efforts to resolve errors and anomalies; and
- Fulfilling information requests.

Emission Trading Requirements

The major EPA activities related to the TR include (1) allocation of allowances to affected units, (2) maintenance and administration of the NO_x and SO₂ Allowance Management System, (3) reviewing and processing certificates of representation, (4) reviewing permit applications, (4) reviewing monitoring plans and certification applications, (5) processing, reviewing, and evaluating reports of quarterly emissions data from affected units, (6) calculating/reviewing annual emissions from affected sources, and aggregating such annual emissions for compliance assurance purposes, and (7) reviewing total annual emissions data submitted to track each state's progress toward meeting its budgets and creating a summary report of emissions. EPA uses a computer system to track and maintain monitoring and emissions information, and will also answer respondent questions and conduct audits of data submissions.

5.2 Collection Methodology and Management

Emission Reporting Requirements

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

The EPA has created and maintains the NEI database as a central repository of inventory data for all states, but the data must be supplied by the states in an electronic format. The EPA currently requires that states use the Consolidated Emissions Reporting Schema (CERS) for electronic data reporting (EDR).

Emission Trading Requirements

To ensure consistency region wide and to expedite data entry, EPA requires that standard formats used for reporting under 40 CFR part 75 be used to submit the information collected for the TR.

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

The EPA has also established a Clean Air Markets website, which includes detailed information collected from emissions reports. Those without access to the internet may use the Clean Air Markets Hotline to request information, including summary reports. The Agency will rely on these electronic means to disseminate information about the TR as the program is implemented.

5.3 Small Entity Flexibility

Emission Reporting and Trading Requirements

The TR applies to fossil fuel-fired units (stationary boilers and combustion turbines) that serve an electrical generator with nameplate capacity greater than 25 MWe. Units with a lower capacity (such as those with an annual generating capacity of less than four million kWh) are not subject to the TR because of the high cost of monitoring emissions from these sources and the *de minimis* nature of their emissions. In addition, some cogeneration units and solid waste incinerators are exempt from the TR if they meet certain criteria.

The low mass emissions provisions under 40 CFR 75.19 provide for optional reduced monitoring, quality assurance, and reporting requirements for units that combust natural gas and/or fuel oil. Such units must emit no more than 100 tons of NO_x annually, 50 tons of NO_x

during the ozone season (May 1 – September 30), 25 tons of SO₂ annually, and calculate no more than these same amounts based on specified procedures for calculating and reporting emissions. Units that qualify are exempted from certain requirements to install and operate monitoring equipment, conduct fuel sampling, and perform quality assurance or quality control tests. Moreover, emissions reporting requirements are significantly simplified for these units.

Gas- or oil-fired units that do not qualify for the low mass emissions unit provisions under 40 CFR part 75 may still meet criteria that allows for the use of alternative methods to measure emissions. As discussed in the Regulatory Impact Analysis of the final ARP regulations (October 19, 1992), smaller utilities are more likely to be dependent on these oil- and gas-fired units, especially very small utilities.

5.4 Collection Schedule

Collection frequency under the TR is on a quarterly basis. All affected industry sources will use ECMPS to submit monitoring plan, quality assurance, certification test, and emissions data to EPA quarterly. In addition, the TR requires the collection of allowance trading information as transfers are submitted, as well as information regarding other "event" submissions made on a one-time or annual basis.

6.0 Estimating the Burden and Cost of the Collection

6.1 Estimating Respondent Burden

Emission Reporting and Trading Requirements

This section estimates the paperwork burden and cost of submitting permit applications, certificates of representation, allowance tracking and transfer materials, year-end compliance activities, submittal of monitoring plans, obtaining certification of each monitoring system, conducting monitor quality assurance activities, and recording and reporting data from CEM systems (or approved alternatives).

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

For the purposes of this analysis, the trading sources are grouped into the following categories:

- Trading units located in SO₂ Group 1 (Georgia, Illinois, Indiana, Iowa, Kentucky, Michigan, Missouri, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and Wisconsin);
- Trading units located in SO₂ Group 2 (Alabama, Kansas, Maryland, Minnesota, Nebraska, New Jersey, and South Carolina);

- Trading units located in a TR NO_x Annual state (Alabama, Illinois, Iowa, Indiana, Kentucky, Maryland, Missouri, Michigan, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, Virginia, West Virginia, Wisconsin, Georgia, Texas, Kansas, Minnesota, and Nebraska);and
- Trading units located in a TR NO_x ozone state .

The TR requires all affected sources to monitor their NO_x emission rate, SO₂ emission rate, and heat input in order to determine NO_x mass emissions and SO₂ mass emissions. Coal-fired units use NO_x, SO₂, and flow CEMS to meet those requirements. Oil and gas units have alternatives. For SO₂, these units can use fuel sampling and analysis (or an SO₂ default factor for pipeline natural gas) combined with a fuel flowmeter. In addition, peaking units that burn natural gas and/or fuel oil may use an alternative method for calculating NO_x emission rates. EPA will also allow certain low mass emissions units to use assumed emissions factors together with operational data to calculate emissions.

For purposes of this ICR, burdens and costs are calculated only in terms of incremental impacts for units located in TR states or subject to the ARP. Under the TR, and for purposes of this ICR, the incremental ozone season burdens were limited to GA, KS, MN, NE, OK, and TX. Several states in the NO_x SIP Call region are excluded from the TR's NO_x Ozone Season Trading Program: CT, DC, DE, and MA. Similarly, units subject to the ARP already have much of the monitoring and reporting capability required under the TR. Finally, sources not subject to the TR could still have existing requirements for CEMS in some cases. Thus, it should be noted that the labor hours and cost estimates per unit identified in this document represent the weighted average burden and cost for all units and do not represent the actual burden and cost for a particular unit. See the following table for a graphical reference of state reporting classifications related to CAIR, the NO_x SIP Call, and the TR.

**Table 6-1:
 State Reporting Classifications for the NO_x SIP Call, CAIR, and the TR**

State	NO _x SIP Call Ozone	CAIR Ozone	CAIR Annual (NO _x & SO ₂)	TR Ozone	TR Annual (NO _x & SO ₂)
No Change in Classification					
Arkansas		X		X	
Alabama	X	X	X	X	X
Illinois	X	X	X	X	X
Iowa		X	X	X	X
Indiana	X	X	X	X	X
Kentucky	X	X	X	X	X
Maryland	X	X	X	X	X
Missouri	X	X	X	X	X
Michigan	X	X	X	X	X
New Jersey	X	X	X	X	X
New York	X	X	X	X	X
North Carolina	X	X	X	X	X
Ohio	X	X	X	X	X
Pennsylvania	X	X	X	X	X
South Carolina	X	X	X	X	X
Tennessee	X	X	X	X	X
Virginia	X	X	X	X	X
West Virginia	X	X	X	X	X
Wisconsin		X	X	X	X
Annual Reporters with Ozone Status Changes					
Georgia			X	X	X
Texas			X	X	X

(cont.)

**Table 6-1:
State Reporting Classifications for the NO_x SIP Call, CAIR, and the TR (cont.)**

State	NO _x SIP Call Ozone	CAIR Ozone	CAIR Annual (NO _x & SO ₂)	TR Ozone	TR Annual (NO _x & SO ₂)
Now Ozone-Only					
Mississippi		X	X	X	
Florida		X	X	X	
Louisiana		X	X	X	
New States					
Kansas				X	X
Minnesota					X
Nebraska					X
Oklahoma				X	
States Not Covered under the TR					
Connecticut	X	X			
Delaware	X	X	X		
District of Columbia	X	X	X		
Massachusetts	X	X			

The following discussion highlights some of the basic differences for the categories of units. Included in this discussion is the consideration of monitoring and reporting that is done by many of these sources under the ARP and CAIR Programs.

Trading units in NO_x/SO₂ annual and ozone season states, in NO_x/SO₂ annual-only states in the CAIR region, or which report for the ARP, will have the smallest incremental burden with regard to monitoring and reporting. Acid Rain-affected units are already monitoring and reporting both NO_x and SO₂ emissions on a year round basis and will not incur additional burdens (or capital, operating, and maintenance costs) as a result of the TR since they have already installed and are operating a CEMS (or approved alternative) and meet 40 CFR part 75 requirements for both NO_x and SO₂. Similarly, CAIR annual units will not incur any additional capital costs as they have already installed and operate a CEMS (or approved alternative) and meet 40 CFR part 75 requirements for both NO_x and SO₂. However, this ICR incorporates the burden and costs associated with monitoring at these CAIR units, including annualized capital costs that would continue to be born under the TR.

Sources that are not affected by the ARP but were subject to the NO_x SIP call are already monitoring and reporting NO_x emissions during the ozone season. In a TR-affected NO_x/SO₂ annual state, these sources will need to extend their monitoring and reporting throughout the year and add SO₂ monitoring for the TR. These units will have a small additional burden associated with permit applications and certain allowance transactions.

TR-affected units in NO_x/SO₂ annual and ozone season states, or NO_x/SO₂-only states not in the NO_x SIP Call or CAIR region are similarly impacted by the TR reporting requirements. These states have ARP-affected units that are already monitoring and reporting SO₂ emissions and NO_x rates on a year round basis and in accordance with 40 CFR part 75. These sources will need to report NO_x mass emissions year round and, for the NO_x/SO₂ annual and ozone season states, must also report ozone season NO_x mass emissions. These sources are already measuring and reporting SO₂ mass emissions, which requires heat input measurement that can be used with the NO_x emission rate information to calculate NO_x mass emissions. Therefore, these sources would need to make minor modifications to their reporting practices in order to report NO_x mass emissions under the TR, but would not likely need to purchase additional monitoring equipment. The non-ARP-affected units in these states were required to monitor under 40 CFR part 75 with the implementation of CAIR, and these requirements continue under the TR. The monitoring burden depends in part on the type of fuel combusted and the amount of time the unit is operated. Therefore, the costs will vary depending on what monitoring alternative is appropriate for the unit and what monitoring requirements apply to the unit under other regulatory programs. This ICR includes updated estimates for all units previously affected under CAIR and adds newly affected sources in TR states.

TR-affected units in TR ozone season states that are in CAIR will continue monitoring NO_x under 40 CFR part 75 during the ozone season. The burdens and costs associated with monitoring and reporting were previously reflected in the CAIR ICR but are now included in this ICR. TR-affected units in TR ozone season states that are not subject to the ARP, CAIR, or in the NO_x SIP Call region must install NO_x monitoring systems to comply with 40 CFR part 75 during the ozone season.

Sources will be subject to TR NO_x and SO₂ monitoring and reporting requirements starting in 2012. Table 6-5 shows the burden associated with monitoring NO_x and SO₂ under the TR at various types of sources.

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

(i) Respondent Permitting Activities

Some sources will also be required to construct additional facilities, and therefore will need to complete a permit to construct application. Based on the existing CAIR ICR, the Agency estimates that this task will take 20 hours of managerial and 20 hours of technician time, per permit.

Under the TR, the designated representative for each affected source must submit a certificate of representation to EPA . Since most existing TR-affected sources are already subject to the ARP and/or CAIR, the Agency believes that the DRs for most TR-affected sources will only need to revise their certificates of representation, and that such revisions are routine. The Agency therefore estimates that, on a per unit basis, about one half hour of managerial time and one half hour of technical time will be required to revise the certificate of representation.

(ii) Agency Permitting Activities

Agency permitting activities include receiving and processing certificates of representation and retired unit exemptions. The Agency estimates that these activities will require 2,992 hours per year (see Table 6-6).

(iii) Respondent Monitoring Activities

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

Start-up Activities

A large part of start-up activities involves both capital expenditures and labor costs associated with the acquisition, installation, and testing of monitoring equipment, as follows:

- 1) For Acid Rain units in CAIR OS states, the TR imposes no start-up burdens beyond existing programs.
- 2) For Acid Rain units in other TR ozone season states, the owner or operator will incur some small amount of burden and costs associated with DAHS upgrades for reporting ozone season emissions.
- 3) For the non-Acid Rain units in NO_x/SO₂ annual and ozone season TR states that are in the CAIR region, the burdens and costs reflect arranging for SO₂ CEMS purchase (as required) and oversight of the certification process.
- 4) For non-Acid Rain/CAIR annual units in NO_x/SO₂ annual and ozone season TR states burdens reflect purchase and certification of NO_x and SO₂ monitoring systems.

Note that where the start-up burdens were already incurred as a result of CAIR, this ICR reflects minimal burden hours or non-capital costs, but continues to account for annualized capital costs.

Regulatory Review

The ICR includes an allocation of time for the managerial and technical staff to review the regulatory requirements as well as the XML formats and instructions associated with electronic emissions data submissions. The units not in the ARP or CAIR programs will have a burden similar to that estimated for ARP units in the ARP ICR -- 16 hours of managerial time and 16 hours of technician time in year one of the program and four hours each for managerial and technician time, per year, after year one. The burden estimates for all units previously included in the ARP or CAIR is reduced because of the similar requirements involved in these trading programs. The estimates for these units are ten hours of managerial time and ten hours of technician time in year one and one hour each per year after year one.

Response to Error Messages

The Agency provides feedback for errors that are found in monitoring plans or other reports. The Agency estimates that for each unit not previously included in the Acid Rain or CAIR, an owner or operator will spend approximately four hours of managerial time and eight hours of technician time responding to these error messages each year. (The time for the other sources is accounted for in other ICRs.)

DAHS Debugging

Based on experience with the ARP and CAIR Programs, some effort will be involved to fix problems with the DAHS software used to report in the 40 CFR part 75 formats. This burden is assumed to fall primarily on units that have not previously been affected under the ARP, CAIR, or NO_x SIP Call programs. Consistent with the existing 40 CFR part 75 ICR, the Agency estimates that about 14 managerial and 80 technician hours will be spent on this task in the first year of implementation, and then one managerial and four technician hours will be required in the second and subsequent years of implementation. Units that are subject to the ARP, and/or were previously subject to CAIR, are expected to incur the "subsequent years" burden.

Monitoring Plans

The regulations require submittal of monitoring plans. Because most of the monitoring plan elements are now part of the reporting format, the effort involved in developing and maintaining the plans are incorporated into the overall reporting burden estimate.

Monitor Certification/Recertification

Initial certification burdens and costs for new monitoring equipment are addressed above under start-up activities since these costs are often part of the overall purchase expense for the equipment. For some non-ARP-affected units, however, there will be burdens associated with certifying existing monitors used under other programs, as well as burdens for recertification to the extent a change in a monitoring system requires recertification. Based on the current CAIR ICR, EPA estimates that approximately ten percent of all units will have to recertify each year following the year in which the initial certification occurs. The ICR incorporates a labor burden

estimate generally consistent with existing Agency models for the labor burdens associated with certification. However, note that the ICR reduces the labor hours for this activity to avoid double counting hours that are already accounted for in the quality assurance activity area (see the following subsection). The double counting would occur because a portion of the labor incurred for the certification or recertification event replaces the labor burden that is generally allocated to the annual relative accuracy test audit (RATA) in the year in which the certification event occurs.

Quality Assurance

Quality assurance (QA) activities and other routine maintenance for monitoring systems is the largest burden item under the TR. These requirements generally include daily, quarterly, and annual QA requirements, depending on the monitoring approach being used. For reporting units that use a CEMS, the Agency has assumed a per unit labor burden based on a variety of sources, including the existing ARP ICR, information provided by ARP and CAIR sources, a CEM cost model developed by EPA, and comments submitted in response to the section 110 SIP Call for ozone transport. For units that rely on alternative methodologies, reduced labor burden estimates apply because the quality assurance activities for the excepted methods are less than for a CEMS. Consistent with the existing ARP and CAIR ICRs, the labor burden is expected to be almost entirely technician labor.

Quarterly Reports

Tasks performed by utilities in preparing quarterly reports include: (1) assuring the quality of the data, (2) preparing the quarterly report, (3) revising the monitoring plan, if necessary, (4) preparation of hard copy documentation accompanying the quarterly reports, and (5) managerial review. The existing Acid Rain ICR was used as the basis for these estimates.

Fuel Sampling

To calculate heat input where the source is using the fuel flow meter option for an oil or gas-fired unit, the source must obtain gross calorific value data from sampling in accordance with Appendix D of 40 CFR part 75. For purposes of this ICR, it is assumed that the GCV data would be collected as part of standard business operating procedures to assure compliance with contractual specifications. Thus no additional fuel sampling burdens or costs should be incurred.

(iv) Agency Monitoring Activities

Agency activities related to the monitoring and reporting of emissions data include processing, reviewing, and evaluating reports of quarterly emissions data from affected units. The Agency estimates that these activities will require 4,500 hours per year (see Table 6-10).

(v) Respondent Allowance Transaction Activities

The Agency anticipates the average number of additional allowance transactions will be approximately 7,500 per year beginning in 2012. This estimate is based on transaction data associated with the current CAIR trading programs. A portion of all sources will likely conduct

transactions in each year solely as a result of this program. The Agency believes that each transaction will involve about one hour each of managerial and technician time.

(vi) Agency Allowance Transaction Activities

Agency activities related to allowance transactions include allocating allowances to existing and new units, reviewing allowance transfer information, recording transfers, notifying transfer participants, entering deduction data and deducting allowances, and ensuring compliance assurance provisions are met. In the event that compliance assurance provisions are not met it is estimated that the burden for each state exceeding compliance assurance levels would be 160 hours, however the agency assumes that zero states would exceed the limit during the 2012-2013 time period. The Agency estimates that these activities will require 290 hours per year (see Tables 6-8 and 6-9).

6.2 Estimating Respondent Costs

Table 6-4 presents state and local respondent annualized hours and costs for each information collection activity. To estimate annualized hours and costs for one-time activities, the burden estimate is divided by three to estimate the burden over a three-year period. Table 6-5 summarizes the annual industry respondent costs. The following discussion describes how the costs were derived.

(i) Estimating Labor Costs

For this ICR, the labor rate used for technical staff at state agencies is \$40.28 per hour, and the labor rate for managerial employees at state agencies is \$48.93. These labor rates include benefits and overhead, and are derived from data shown on the Bureau of Labor Statistics website at <http://stats.bls.gov/news.release/ecec.toc.htm>. Wage and salary rates are shown at the link "Table 3: State and local government, by major occupation and industry group (December 2010)." The wage and salary rates from this table account for benefits provided to workers. When considering both technical and managerial hours, labor costs for state and territorial agencies are estimated to be \$53,000 per year per respondent, and labor costs for local agencies are estimated to be \$34,000 per year per respondent for the emissions reporting requirements.

In estimating labor costs for industry, EPA used the following amounts: \$94.04 per hour for managers and \$65.21 per hour for technicians. These rates were used in the existing ARP ICR (EPA ICR Number 1633.15) and are the consistent with the Current Employment Cost Index year 2010.

Federal Agency labor rates were assumed to be \$49.49 per hour. This labor rate was derived from the federal government's 2009 U.S. Office of Personnel Management General Schedule "Salary Table 2011-GS" (<http://opm.gov/oca/11tables/html/gs.asp>) using the factors in Table 6-2 below.

**Table 6-2:
 Determination of Federal Wage Rates**

Labor Category	Factors	Total
Annual Salary of Technical Staff, GS 11 Step 3		\$53,639
Annual Cost of Supervisory Staff, GS 13, Step 3	\$76,452	
Factor (1/11)	0.09	
		\$6,881
Annual Cost of Support Staff, GS 6, Step 6	\$35,672	
Factor (1/8)	0.13	
		\$4,637
Annual Applicable Salary of Permit Staff		\$65,157
Benefits	1.6	
Total Cost per FTE		\$102,948
Total Hourly Cost (total per FTE dividend divided by 2,080 hours per year)		\$49.49

(ii) Estimating Capital and Operations and Maintenance Costs

Emission Reporting Requirements

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

Emission Trading Requirements

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

ARP-affected units in CAIR states are not expected to incur any non-labor costs associated with this program. Based on the existing CAIR ICR, the total non-labor cost for capital/start-up items for Acid Rain units in other states that would be subject to the TR is estimated at \$4,000 per unit for CAIR-affected units that are not in the NO_x SIP Call region (to account for a DAHS upgrade). For non-Acid Rain/CAIR annual units, most units will require a DAHS upgrade (estimated at \$4,000 per unit) and an SO₂ analyzer (estimated at \$42,525). For

non-Acid Rain units not in the CAIR region, the units using fuel flowmeters are expected to incur DAHS and SO₂ analyzer costs, while the other units will require some combination of a NO_x diluent, SO₂, and/or flow CEMS. The costs for these units ranges from \$15,000 to \$192,000. Cost variance is due to the monitoring methodology used and what monitoring equipment may already be in place at the unit.

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

The Agency also notes that this ICR does not include a cost for the purchase of monitoring equipment for all affected units. Many sources covered by the TR are already required to have CEMS under other regulatory programs. Therefore, to the extent that no new equipment is needed by these sources, capital costs are not included because those costs were included in the ICRs of those other programs. Thus, the capital and other costs included in Table 6-5 represent weighted average costs for each respondent, not the total individual cost for any particular respondent.

EPA has concluded that the Capital and Operations and Maintenance Costs estimated for the Agency under the ARP ICR are sufficient to accommodate the modest changes in reporting burden for the TR. Therefore, no further estimate of Capital and Operations and Maintenance Costs for the Agency were made for this ICR.

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

Capital costs for emissions trading reflect one-time costs for purchase of equipment which will be used over a period of years. Conversely, operating and maintenance costs are those costs which are incurred on an annual or other scheduled basis. For instance, costs associated with quality assurance activities, such as spare parts or contractor costs for work, will be incurred on an annual basis.

(iv) Annualizing Capital Costs

The relevant capital costs for the emissions trading portion of this ICR were annualized at a rate of seven percent, (i.e., the annualized capital cost was calculated assuming money to purchase the capital equipment was borrowed at a seven percent annual interest rate). The cost of the loan was amortized over the life of the loan to repay the borrowed amount plus interest. The result is the annualized capital cost reported.) The annualized cost of the necessary capital

purchases varies from \$2,304 to \$29,572 per year per unit, depending on the type of monitoring methodology. Table 6-5 contains a breakdown of annual costs by monitoring methodology.

6.3 Estimating the Respondent Universe and Total Burden and Costs

Emission Reporting Requirements

The number of non-industry respondents is estimated to be 50 states and the District of Columbia, four territories and 49 local agencies, totaling 104 respondents. Table 6-4 details state, territory, and local agency burdens associated with reading the rule upon publication.

Emission Trading Requirements

The number of industry respondents varies depending on the activity in question. Activities such as Title V permit application submission or allowance transfers can involve nearly two thousand sources. The number of units which will be required to install a particular type of monitoring equipment is fewer since many already have the necessary monitoring equipment, especially if they are ARP units and/or are in CAIR states. Table 6-5 gives estimates of annual industry burdens beginning in 2012. These burdens include monitoring, reporting, and other activities involved in participating in an emissions trading program. The total number of respondents is estimated to be 1,201 facilities. Tables 6-6 through 6-10 give estimates of Agency burdens associated with permitting and managing the emissions trading programs.

6.4 Bottom Line Burden Hours and Cost Table

Table 6-3 summarizes the bottom line burden and costs for state, industry, and Agency respondents.

**Table 6-3:
 Total Estimated Emissions Trading Respondent Burden and Cost Summary**

	Number of Respondents	Total Hours Per Year (All Respondents)	Total Costs Per Year (All Respondents)
State Respondents	104	69	\$3,016
Industry Respondents	1,201	185,132	\$26,225,946
Agency	1	7,716	\$380,306

6.5 Reasons for Change in Burden

Emission Reporting and Trading Requirements

The largest burden associated with this rule is the cost of monitoring, certifying, quality assuring and reporting emissions data from the large electric generating units regulated under the TR. This burden is tempered, however, by the integration of these monitoring and reporting requirements with those already required under the ARP and CAIR. Otherwise, the burden would be significantly higher and the number of sources would be greater.

6.6 Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 11 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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, maintaining, disclosing, and providing information; adjusting the existing ways to comply with any previously applicable instructions and requirements; training personnel to be able to respond to a collection of information; searching data sources; completing and reviewing the collection of information; and transmitting or otherwise disclosing 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 No. EPA-HQ-OAR-2009-0491, which is available for public viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center 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, DC 20503, Attention: Desk Office for EPA. Please include EPA Docket ID No. EPA-HQ-OAR-2009-0491 and OMB Control Number 2060-NEW in any correspondence.

**Table 6-4:
 Annual State Respondent Burden and Cost by Activity**

Information Collection or Trading Rule Activity	Hours and Costs Per Respondent				Total Hours and Costs		
	Mgr. \$48.93/Hr ¹	Tech. \$40.28/Hr ¹	Respondent Hours/Yr	Labor Cost/Yr	Number of Respondents	Total Hours/Yr ²	Total Cost/Yr ³
One-time (Annualized)							
Read the reporting requirements of the rule	0.33	0.33	0.66	\$29	104	69	\$3,016
Total					104	69	\$3,016

¹ See Section 6.2 (i) for labor and overhead rates.

² Hours per year are rounded to the nearest hour.

³ Costs per year are rounded to the nearest dollar.

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Permit to Construct (units)	20	20	40	\$3,185			8	317	\$25,257
Certificate of Representation	0.50	0.50	1	\$80			1201	1,201	\$95,630
Startup/Capital Items									
Kansas, Minnesota, Nebraska, Oklahoma (Previously Not Affected)									
a. DAHS modification (facilities)	2	4	6	\$449	\$1,333		35	210	\$62,367
b. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	34	23	57	\$4,697	\$29,752		7	399	\$241,144
c. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	64	10	74	\$6,671	\$19,200		17	1,258	\$439,801
d. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	20	10	30	\$2,533	\$2,304		29	870	\$140,270

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital				
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
Startup/Capital Items (cont.)									
Georgia and Texas (Ozone Status Changes, Annual Status Remains)									
a. DAHS modification (facilities)	2	4	6	\$449	\$600		161	966	\$168,876
b. Solid Fuel: NO _x , and Flow CEMS (units)	0	0	0	\$0	\$29,752		1	0	\$29,752
c. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	0	0	0	\$0	\$19,200		38	0	\$729,600
d. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	0	0	0	\$0	\$2,304		39	0	\$89,856

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Startup/Capital Items (cont.)									
Mississippi, Florida, and Louisiana (Now Ozone Season Only)									
a. DAHS modification (facilities)	2	4	6	\$449	\$600		27	162	\$28,321
b. Solid Fuel: NO _x , and Flow CEMS (units)	0	0	0	\$0	\$22,500		6	0	\$135,000
c. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	0	0	0	\$0	\$19,200		6	0	\$115,200
d. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	0	0	0	\$0	\$2,304		62	0	\$142,848
States with No Change in Classification									
a. Solid Fuel: NO _x , and Flow CEMS (units)	0	0	0	\$0	\$29,752		64	0	\$1,904,128
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	0	0	0	\$0	\$19,200		67	0	\$1,286,400
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	0	0	0	\$0	\$2,304		533	0	\$1,228,032

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital				
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost	Number of Respondents	Total Hours/Year	Total Cost/Year
Review Instructions and Requirements									
States with No Change in Classification	4	4	8	\$637			261	2,088	\$166,257
States in which Ozone Season Status Changes, Annual Status Remains	4	4	8	\$637			161	1,288	\$102,557
States now Ozone Season Only - Mississippi, Florida, Louisiana	4	4	8	\$637			27	216	\$17,199
States Not Previously Covered - Kansas, Minnesota, Nebraska, Oklahoma	8	8	16	\$1,274			35	560	\$44,590

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Respond to EPA Generated Error Messages									
States with No Change in Classification	6	18	24	\$1,738			261	6,264	\$453,623
States in which Ozone Season Status Changes, Annual Status Remains	6	18	24	\$1,738			161	3,864	\$279,821
States now Ozone Season Only – Mississippi, Florida, Louisiana	6	18	24	\$1,738			27	648	\$46,927
States Not Previously Covered - Kansas, Minnesota, Nebraska, Oklahoma	6	18	24	\$1,738			35	840	\$60,831
Debug Computer Software									
States with No Change in Classification	1	4	5	\$355			261	1,305	\$92,624
States in which Ozone Season Status Changes, Annual Status Remains	6	18	24	\$1,738			161	3,864	\$279,821

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Debug Computer Software (cont.)									
States now Ozone Season Only - Mississippi, Florida, Louisiana	1	4	5	\$355			27	135	\$9,582
States Not Previously Covered - Kansas, Minnesota, Nebraska, Oklahoma	16	88	104	\$7,243			35	3,640	\$253,509
Certify Monitors									
Kansas, Minnesota, Nebraska, Oklahoma (Previously Not Affected)									
a. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	15	48	63	\$4,541		\$2,800	1	63	\$7,341
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	10	32	42	\$3,027		\$2,800	1	42	\$5,827
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	8	24	32	\$2,317		\$10,000	5	160	\$61,587

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Certify Monitors (cont.)									
Georgia and Texas (Ozone Status Changes, Annual Status Remains)									
a. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	15	48	63	\$4,541		\$2,800	1	63	\$7,341
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	10	32	42	\$3,027		\$2,800	4	168	\$23,308
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	8	24	32	\$2,317		\$10,000	4	128	\$49,269
Mississippi, Florida, and Louisiana (Now Ozone Season Only)									
a. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	15	48	63	\$4,541		\$2,800	1	63	\$7,341
a. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	10	32	42	\$3,027		\$2,800	1	42	\$5,827
b. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	8	24	32	\$2,317		\$10,000	6	192	\$73,904

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Certify Monitors (cont.)									
States With No Change in Classification									
a. Solid Fuel: NO _x , and Flow CEMS (units)	15	48	63	\$4,541		\$2,800	6	378	\$44,044
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	10	32	42	\$3,027		\$2,800	7	294	\$40,790
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	8	24	32	\$2,317		\$10,000	50	1,600	\$615,868
Perform QA Testing and Maintenance									
Kansas, Minnesota, Nebraska, Oklahoma (Previously Not Affected)									
a. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	50	600	650	\$43,828		\$31,949	7	4,550	\$530,439
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	20	375	395	\$26,335		\$17,818	17	6,715	\$750,593
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	5	30	35	\$2,427		\$1,843	29	1,015	\$123,816

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Perform QA Testing and Maintenance (cont.)									
Georgia and Texas (Ozone Season Status Changes, Annual Status Remains)									
a. Solid Fuel: NO _x , and Flow CEMS (units)	40	400	440	\$29,846		\$31,949	1	440	\$61,795
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	20	375	395	\$26,335		\$17,818	38	15,010	\$1,677,797
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	5	30	35	\$2,427		\$1,843	39	1,365	\$166,511
Mississippi, Florida and Louisiana (Now Ozone Season Only)									
a. Solid Fuel: NO _x , and Flow CEMS (units)	40	400	440	\$29,846		\$31,949	6	2,640	\$370,768
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	20	375	395	\$26,335		\$17,818	6	2,370	\$264,915
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	5	30	35	\$2,427		\$2,209	62	2,170	\$287,401

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Perform QA Testing and Maintenance (cont.)									
States With No Change in Classification									
a. Solid Fuel: NO _x , and Flow CEMS (units)	40	400	440	\$29,846		\$31,949	64	28,160	\$3,954,854
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	20	375	395	\$26,335		\$17,818	67	26,465	\$2,958,221
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	5	30	35	\$2,427		\$1,843	533	18,655	\$2,275,644
Assure Data Quality, Prepare Reports, Submit Reports									
States with No Change in Classification	16	42	58	\$4,243			261	15,138	\$1,107,543
States in which Ozone Season Status Changes, Annual Status Remains	16	42	58	\$4,243			161	9,338	\$683,197

(cont.)

**Table 6-5:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Perform QA Testing and Maintenance (cont.)									
States now Ozone Season Only - Texas and Mississippi	8	21	29	\$2,122			27	783	\$57,287
States Not Previously Covered - Kansas, Minnesota, Nebraska, Oklahoma	16	42	58	\$4,243			35	2,030	\$148,521
Other Trading Program Activities									
Allowance Transfers	1	1	2	\$159			7500	15,000	\$1,194,375
Compliance Assurance Activities ¹	.5	1	1.5	\$112			0	0	0
TOTAL								185,132	\$26,225,946

1. Assumes that no States will exceed their limits for the years covered by this ICR (i.e., compliance years 2012 and 2013), so, overall there would be zero burden for these provisions to industry.

**Table 6-6:
Agency Burden – Permitting Authority**

Information Collection Activity	Burden Hours per Occurrence	Cost per Source ¹	Total Burden (Hours)	Total Cost
EPA reviews certificates of representation and records information. ²	0.5	\$24.75	600	\$29,628
Review permit application, and issue draft, proposed, and final permit. ³				
Permitting Authority action.	8	\$395.92	2,000	\$98,760
EPA review.	1	\$49.38	240	\$11,851
Receive and process retired unit exemptions. ⁴				
Permitting Authority action.	2	\$98.98	66	\$3,259
EPA review.	0.3	\$14.85	20	\$988
TOTAL			2,926	\$144,486

1. 2011 dollars.
2. Assumes 1201 sources submit a certificate of representation.
3. Assumes 240 sources (approximately 20% of all affected sources) will submit a permit application each year.
4. Assumes 33 retired unit exemptions are submitted each year.

**Table 6-7:
Agency Burden – Emissions Reporting**

Information Collection Activity	Quarterly Burden Hours per Report	Quarterly Cost per Report ¹	Number of Reports ²	Total Burden per Year (Hours)	Total Cost
Process, review, and evaluate quarterly report and issue feedback letter.	1	\$49.49	4,500	4,500	\$222,705

1. Based on an average total compensation rate of \$49.49 per hour.
2. Assumes 1125 TR only emissions data reports are submitted each quarter.

**Table 6-8:
Agency Burden - Allowance Allocations**

Information Collection Activity	Total Burden (Hours)	Total Cost
Initial and annual allocation of allowances to existing and new units.	200	\$9,898

**Table 6-9:
Agency Burden – Allowance Transfer & Deduction Burden**

Information Collection Activity	Burden Hours per Occurrence	Cost per Occurrence ¹	Total Burden ² (Hours)	Total Cost
Review allowance transfer information, record transfer, and notify transfer participants.	1	\$49.49	40	\$1,980
Enter deduction data and deduct allowances.	0.5	\$24.75	50	\$1,237
Compliance Assurance Provisions ³	1	\$49.49	40	\$1,980
TOTAL			90	\$3,217

1. 2011 dollars.
2. Assumes 20 transfers and 100 optional deduction forms are submitted annually.
3. Assumes zero states would exceed the limit during the time period 2012-2013.

**Table 6-10:
Agency Burden – Aggregate**

Information Collection Activity	Total Burden (Hours)	Total Cost ¹
Annual allocation of allowances to existing and new units.	200	\$9,898
Allowance transfers and deductions.	90	\$3,217
Permits.		
Permitting Authority.	2,066	\$102,019
EPA.	860	\$42,467
Emissions reporting.	4,500	\$222,705
TOTAL	7,716	\$380,306

1. 2011 dollars.

SUPPORTING STATEMENT
Rule To Reduce Interstate Transport of Fine Particulate Matter and Ozone (Final Rule)

Appendix A

In addition to the states and facilities listed in the final rule text, EPA has included costs/burdens associated with TR NO_x Ozone Season Trading Program for the following states: IA, KS, MI, MO, OK, and WI. The TR NO_x Ozone Season Trading Program does not list these states in the current rule package, however EPA will propose, as part of a future supplemental rule package, that these states be covered by the TR NO_x Ozone Season Trading Program. In anticipation of this rule making, the costs/burdens associated with this Program in these states are included in the ICR to allow for a full accounting for the TR program at maturity. In the event that some or all of these states are not included in the future rulemaking, EPA will amend this ICR accordingly.

Table A-1:
Total Estimated Emissions Trading Respondent Burden and Cost Summary

	Number of Respondents	Total Hours Per Year (All Respondents)	Total Costs Per Year (All Respondents)
Industry Respondents	58	31,538	4,412,094
Agency	1	452	\$22,074

**Table A-2:
 Annual State Respondent Burden and Cost by Activity**

Information Collection or Trading Rule Activity	Hours and Costs Per Respondent				Total Hours and Costs		
	Mgr. \$48.93/Hr ¹	Tech. \$40.28/Hr ¹	Respondent Hours/Yr	Labor Cost/Yr	Number of Respondents	Total Hours/Yr ²	Total Cost/Yr ³
One-time (Annualized)							
Read the reporting requirements of the rule.	0.33	0.33	0.66	\$29	2	69	\$59
Total			749	30,645.48	2	3,749	\$49,391

¹ See Section 6.2 (i) for labor and overhead rates.

² Hours per year are rounded to the nearest hour.

³ Costs per year are rounded to the nearest dollar.

**Table A-3
Agency Burden – Permitting Authority**

Information Collection Activity	Burden Hours per Occurrence	Cost per Source ¹	Total Burden (Hours)	Total Cost
EPA reviews certificates of representation and records information. ²	0.5	\$25	24	\$1,188
Review permit application, and issue draft, proposed, and final permit. ³				\$0
Permitting Authority action.	8	\$395	80	\$3,959
EPA review.	1	\$49	10	\$495
Receive and process retired and new unit exemptions. ⁴				\$0
Permitting Authority action.	2	\$99	4	\$198
EPA review.	0.3	\$15	20	\$990
TOTAL			138	\$6,830

1. 2011 dollars.
2. Assumes 48 sources submit a certificate of representation.
3. Assumes ten sources (approximately 20% of all affected sources) will submit a permit application each year.
4. Assumes two retired and two new unit exemptions are submitted each year.

**Table A-4:
Agency Burden – Emissions Reporting**

Information Collection Activity	Quarterly Burden Hours per Report	Quarterly Cost per Report ¹	Number of Reports ²	Total Burden per Year (Hours)	Total Cost
Process, review, and evaluate quarterly report and issue feedback letter.	1	\$49.49	318	318	\$15,738

1. Based on an average total compensation rate of \$49.49 per hour.
2. Assumes 318 Ozone emissions data reports are submitted each year.

**Table A-5:
Agency Burden - Allowance Allocations**

Information Collection Activity	Total Burden (Hours)	Total Cost
Initial and annual allocation of allowances to existing and new units. ¹	0	\$0

1. Assumes the allocation for these units would be performed as part of the TR allocations.

**Table A-6:
Agency Burden – Allowance Transfer & Deduction Burden**

Information Collection Activity	Burden Hours per Occurrence	Cost per Occurrence ¹	Total Burden ² (Hours)	Total Cost
Review allowance transfer information, record transfer, and notify transfer participants.	1	\$49.49	10	\$495
Enter deduction data and deduct allowances.	0.5	\$24.75	10	\$248
Compliance Assurance Provisions. ³	160	7901	0	0
TOTAL			20	\$741

1. 2011 dollars.
2. Assumes 10 transfers and 10 optional deduction forms are submitted annually.
3. Assumes zero states would exceed the limit during the time period 2012-2013.

**Table A-7:
Agency Burden – Aggregate**

Information Collection Activity	Total Burden (Hours)	Total Cost ¹
Annual Allocation of Allowances to existing and new units.	20	\$742
Allowance transfers and deductions.		
Permits.	84	\$4,157
Permitting Authority.	54	\$2,672
EPA.	318	\$15,738
Emissions reporting.	476	\$23,310
TOTAL	20	\$742

1. 2011 dollars.

**Table A-8:
Annual Industry Respondent Burden and Cost by Activity**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Permit to Construct (units)	20.00	20.00	40.00	\$3,185			1.00	40.00	\$3,114
Certificate of Representation	0.50	0.50	1.00	\$80			48.00	48.00	\$3,736
Startup/Capital Items									
Kansas, Minnesota, Nebraska, Oklahoma (Previously Not Affected)									
a. DAHS modification (facilities)	2.00	4.00	6.00	\$449	\$1,333		10	60	\$17,819
b. Solid Fuel: SO ₂ , NO _X , and Flow CEMS (units)	34.00	23.00	57.00	\$4,697	\$29,752		4	228	\$137,797
c. Gas-Oil: NO _X CEMS and Appendix D fuel monitoring (units)	64.00	10.00	74.00	\$6,671	\$19,200		2	148	\$51,741
d. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	20.00	10.00	30.00	\$2,533	\$2,304		19	570	\$91,901

(cont.)

**Table A-8:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Startup/Capital Items (cont.)									
Iowa, Michigan, Missouri, Wisconsin (Ozone Status Changes, Annual Status Remains)									
a. DAHS modification (facilities)	2.00	4.00	6.00	\$449	\$600		48	288	\$50,348
b. Solid Fuel: NOX, and Flow CEMS (units)	0.00	0.00	0.00	\$0	\$29,752		6	0	\$178,512
c. Gas-Oil: NOX CEMS and Appendix D fuel monitoring (units)	0.00	0.00	0.00	\$0	\$19,200		34	0	\$652,800
d. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	0.00	0.00	0.00	\$0	\$2,304		31	0	\$71,424

(cont.)

**Table A-8:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Review Instructions and Requirements									
States in which Ozone Season Status Changes, Annual Status Remains	4.00	4.00	8.00	\$637			48	384	\$30,576
States Not Previously Covered - Kansas and Oklahoma	8.00	8.00	16.00	\$1,274			10	160	\$12,740
Respond to EPA Generated Error Messages									
States in which Ozone Season Status Changes, Annual Status Remains	6	18	24	\$1,738			48	1152	\$83,425
States Not Previously Covered - Kansas and Oklahoma	6	18	24	\$1,738			10	240	\$17,380
Debug Computer Software									
States in which Ozone Season Status Changes, Annual Status Remains	6	18	24	\$1,738			48	1152	\$83,425

(cont.)

**Table A-8:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Debug Computer Software (cont.)									
States Not Previously Covered - Kansas and Oklahoma	16	88	104	\$7,243			10	1040	\$72,431
Certify Monitors									
Kansas and Oklahoma (Previously Not Affected)									
a. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	15	48	63	\$4,541		\$2,800	1	63	\$7,341
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	10	32	42	\$3,027		\$2,800	1	42	\$5,827
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	8	24	32	\$2,317		\$10,000	2	64	\$24,635

(cont.)

**Table A-8:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Certify Monitors (cont.)									
Iowa, Michigan, Missouri, Wisconsin (Ozone Status Changes, Annual Status Remains)									
a. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	15	48	63	\$4,541		\$2,800	1	63	\$7,341
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	10	32	42	\$3,027		\$2,800	3	126	\$17,481
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	8	24	32	\$2,317		\$10,000	3	96	\$36,952
Perform QA Testing and Maintenance									
States Not Previously Covered - Kansas and Oklahoma									
a. Solid Fuel: SO ₂ , NO _x , and Flow CEMS (units)	50	600	650	\$43,828		\$31,949	4.00	2600	\$303,108
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	20	375	395	\$26,335		\$17,818	2.00	790	\$88,305

(cont.)

**Table A-8:
Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Perform QA Testing and Maintenance (cont.)									
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	5	30	35	\$2,427		\$1,843	19.00	665	\$81,121
Iowa, Michigan, Missouri, Wisconsin (Ozone Season Status Changes, Annual Status Remains)									
a. Solid Fuel: NO _x , and Flow CEMS (units)	40	400	440	\$29,846		\$31,949	6.00	2640	\$370,768
b. Gas-Oil: NO _x CEMS and Appendix D fuel monitoring (units)	20	375	395	\$26,335		\$17,818	34.00	13430	\$1,501,187
c. Gas-Oil Peaking Units: Appendix D fuel sampling, Appendix E, or LME methods (units)	5	30	35	\$2,427		\$1,843	31.00	1085	\$132,355

(cont.)

**Table A-8:
 Annual Industry Respondent Burden and Cost by Activity (cont.)**

				Respondent Labor Cost/Year	Annual Capital		Number of Respondents	Total Hours/Year	Total Cost/Year
	Manager \$94.04 Per Hour (2010)	Technical \$65.21 Per Hour (2010)	Respondent Hours/Year		Startup Costs	O&M Cost			
Assure Data Quality, Prepare Reports, Submit Reports									
States in which Ozone Season Status Changes, Annual Status Remains	16	42	58	\$4,243			48	2,784	\$203,686
States Not Previously Covered - Kansas and Oklahoma	16	42	58	\$4,243			10	580	\$42,435
Allowance Transfers	1	1	2	\$159			500	1,000	\$79,625
TOTAL								31,538	\$4,461,492