Supporting Statement for

1Ambient Air Quality Surveillance (Renewal) OMB #2060-0084, EPA ICR #0940.27

Incorporating: Nitrogen Oxides Ambient Monitoring ICR (OMB# 2060-0638, EPA ICR Number 2358.03) Sulfur Dioxides Ambient Monitoring ICR (OMB# 2060-0642, EPA ICR Number 2370.02)

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

Ambient Air Quality Surveillance (Renewal)

1(b) Short Characterization/Abstract

This Information Collection Request (ICR) includes ambient air monitoring data reporting and recordkeeping activities associated with the Ambient Air Quality Surveillance rule (40 CFR 58). These data and information are collected by various state and local air quality management agencies and reported to the Office of Air Quality Planning and Standards within the Office of Air and Radiation, U.S. EPA.

This ICR reflects revisions of the previous ICR update of 2011, and it covers the period of 2013-2015. Due to recent revisions to several National Ambient Air Quality Standards (NAAQS), many of the networks have made modifications and additional modifications will be expected over the next several years with new monitoring sites being established and existing monitors being moved or terminated. For the purposes of this ICR, the number of monitoring stations shown in the first year is what is currently operating while the number of monitoring stations shown in the second and third year may reflect a change based on NAAQS requirements. The sampling parameters and frequency of data collection and submittal is expected to remain stable from 2013 through 2015.

The data collected through this information collection consist of ambient air concentration measurements for the six air pollutants with NAAQS (i.e., ozone, sulfur dioxide, nitrogen dioxide, lead, carbon monoxide, particulate matter, ozone precursors, and meteorological variables at a select number of sites). Accompanying the pollutant concentration data are quality assurance/quality control data and air monitoring network design information.

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

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

Although the state and local air pollution control agencies and tribes are responsible for the operation of the air monitoring networks, the EPA funds a portion of the total costs through federal grants. These grants generally require an appropriate level of contribution, or "match," from the state/local agencies and tribes. The costs shown in this renewal are the total costs incurred for the monitoring program regardless of the source of the funding. This practice of using the total cost is consistent with prior ICR submittals and renewals.

This Information Collection is estimated to involve 168 respondents for a total cost of approximately \$194,490,047 (total capital, and labor and non-labor operation and maintenance) plus a total labor burden of 1,790,021 hours. The labor costs associated with the 1,790,021 hours is \$126,733,274. Included in the total are other costs of non-labor operations and maintenance of \$13,090,237 and equipment and contract costs of \$54,666,536. In addition to the costs at the State and local air pollution control agencies, there is a burden to EPA of 192,769 hours and \$11,014,728.

This ICR renewal combines requirements and burden currently approved under the Nitrogen Oxides Ambient Monitoring ICR (OMB# 2060-0638, EPA ICR Number 2358.03 and the Sulfur Dioxides Ambient Monitoring ICR (OMB# 2060-0642, EPA ICR Number 2370.02). When OMB approves this renewal and incorporates the associated requirements and burden into this ICR, 2060-0638 and 2060-0642 will be discontinued.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

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

The principal legal authority for this information collection is the Clean Air Act 42 U.S.C. §§ 7403, 7410, and 7511a, from which the 40 CFR 58 Ambient Air Quality Surveillance regulation was promulgated.

Under § 7403 (c), the Administrator is required to conduct a program of research, testing, and development of methods for sampling, measurement, monitoring, analysis, and modeling of air pollutants, specifically including a requirement to establish a national network to monitor, collect, and compile data with quantification of certainty in the status and trends of air emissions and air quality. This program will also include the development of improved methods and technologies to increase understanding of the sources of ozone precursors, ozone formation, ozone transport, regional influences on urban ozone, regional ozone trends, and interactions of ozone with other pollutants.

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

Section 7511a (c)(1) states that the Administrator will promulgate rules that require state and local air quality management agencies conduct enhanced monitoring of ozone and its precursors (oxides of nitrogen and volatile organic compounds) in serious, severe, or extreme ozone nonattainment areas.

2(b) Practical Utility/Users of the Data

The Office of Air Quality Planning and Standards (OAQPS) uses the ambient air quality data included within this collection to make attainment decisions with respect to the NAAQS for ozone, sulfur dioxide, nitrogen dioxide, carbon monoxide, lead, and particulate matter. For areas that do not attain the NAAQS for one or more pollutants, the OAQPS, the affected U.S. EPA Regional Office, and the affected state or local air quality management agency will work to develop an appropriate control strategy plan (SIP) to address how the area's air quality can be improved.

To identify how the nation is progressing in improving air quality, the OAQPS prepares annually the National Air Quality and Emissions Trends report (http://www.epa.gov/airtrends) using the ambient air quality data collected through this ICR. The state and local air quality management agencies use these data for multiple purposes, including tracking their progress toward achieving and maintaining air quality within the established NAAQS and any statewide standards they have established. For example, California has established a state ozone air quality standard that is more stringent than the U.S. EPA NAAQS for ozone; therefore, they use ambient air data to determine compliance with both standards.

Using the Air Quality Index (AQI) reporting system outlined within the 40 CFR 58 regulation (on which this ICR is based), state and local air quality management agencies report air quality to the public in all metropolitan areas with a population greater than 350,000. Details on the AQI system can be found at http://www.epa.gov/airnow. The AQI reporting mediums can vary depending upon the location; however, it is generally reported in newspapers, on local television news stations, through a central telephone number, and/or by radio.

The U.S. EPA, state and local air quality management agencies, the regulated community (e.g., industrial groups), environmental groups, and air pollution researchers (such as those at the Georgia

Institute of Technology and the Harvard School of Public Health) use ambient air pollutant and meteorological data to study the emission of air pollutants, the formation of secondary air pollutants (e.g., ozone, fine particles), the transport of these pollutants over large distances, and the effects of various pollutants on the public's health and welfare. The Photochemical Assessment Monitoring Station (PAMS) program, which is included within this information collection, is designed specifically to assist the U.S. EPA and these same groups with the study of ozone formation and accumulation in areas with significant ambient ozone pollution problems. These areas are defined within the Clean Air Act Amendments of 1990 as serious, severe, and extreme ozone NAAQS nonattainment areas.

Given the significant impact of ambient air data upon the air pollution program, it is essential that the U.S. EPA provide the means for ensuring that the ambient air quality data are of a high quality. The means for accomplishing this take on several forms, such as the requirements that state and local agencies report precision and accuracy testing results, incorporate quality assurance/quality control procedures in their daily monitoring site operation, conduct equipment and procedure audits through the National Performance Audit Program, and work with the U.S. EPA to conduct systems audits periodically. Records detailing the operation and maintenance practices for each ambient air monitoring site are necessary in order to meet the quality assurance/quality control requirements and recommendations.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

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

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

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

In compliance with the 1995 PRA, EPA published a Federal Register Notice soliciting public comments on February 21, 2013 (78 FR 12052). One comment was received in support of the ICR.

3(c) Consultations

During the development of this ICR renewal, the EPA consulted with the National Association of Clean Air Agencies (NACAA) Monitoring Subcommittee. The Subcommittee is comprised of various state and local air quality management agency contacts. Through the course of planning, monitoring, and improving upon this collection and its associated regulation, the U.S. EPA regularly consults with

affected state and local air quality management agencies through various methods including the regulatory process, regular meetings, and training courses. The U.S. EPA routinely conducts workshops and training on the AQS reporting system. The U.S. EPA Regional Offices conduct annual ambient air monitoring meetings with their affected state and local air quality management agencies to assist these affected agencies with this collection and its associated regulation. The U.S. EPA's OAQPS also meets twice annually with the NACAA Monitoring Subcommittee to discuss the nation's ambient air monitoring program and this collection. Starting in 1999, the Clean Air Scientific Advisory Committee (CASAC) established the subcommittee on fine particle monitoring to provide advice to the U.S. EPA on various implementation aspects of the PM monitoring networks.

3(d) Effects of Less Frequent Collection

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

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

3(e) General Guidelines

In following the OMB's general guidelines for information collections, this ICR and its associated regulation require:

- (1) data reporting on a quarterly basis;
- (2) record retention for no more than 3 years (most records are kept by the U.S. EPA data repository, not the affected state or local agencies);
- (3) maintain and provide information in the standardized electronic AQS format.

3(f) Confidentiality

Information that is considered personal, private, proprietary, or confidential is not required in this collection. One purpose of collecting ambient air data through the AQS is to inform the public of general air quality in ambient air (air considered generally accessible to the public) and, as such, does not present a need for maintaining a confidential nature.

Measures are taken to secure the AQS electronic database to prevent tampering with the database by limiting the access to the AQS mainframe. The U.S. EPA also provides a secure data input area for state and local agencies that collect ambient air data that they do not want to provide to the general public (e.g., special study data or industrial data). These data are not required to be collected under this ICR; nonetheless, this secured area is available to each state and local agency that wishes to use the AQS as a repository for these data.

3(g) Sensitive Questions

This section does not apply.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

This ICR affects state and local governments (SIC code 951, Administration of Environmental Quality Program) that are currently operating and maintaining established ambient air quality networks. The 40 CFR 58 rule associated with this request requires that state and local air quality management agencies conduct the ambient air quality surveillance and report the data to the U.S. EPA's AQS. Although industrial, environmental, and research organizations may use the data available through the AQS, they are not required to report any information in this information collection.

4(b) Information Requested

(i) Data items, including record keeping requirements

Report on these data items to be submitted electronically to the U.S. EPA's AQS as required by 40 CFR 58 (www.epa.gov/ttn/amtic):

- Hourly ambient air pollutant concentrations of ozone, sulfur dioxide, nitrogen dioxide, and carbon monoxide and some measurements of particulate matter collected by state, local agencies, and tribes.*
- Maximum 5-minute average concentrations for each hour for sulfur dioxide.*
- Daily (24-hour) concentration values of particulate matter and lead collected at state, local agencies and tribes.*
- Ozone precursor and meteorological data collected at PAMS.*

- Precision and accuracy data for all state, local agencies and tribes.
- Ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, lead, and particulate matter concentration data as collected by SPMs, if these data are to be used for regulatory purposes.* This includes data collected by collocated samplers or concurrent monitors as appropriate.
- State and local agencies and tribal monitoring network description information, including the site AQS identification number*, the site location*, the sampling and analysis method*, the operating schedule*, the monitoring objective*, the site's scale of representation*, the identity of the urban area represented*, and the quality assurance plan.
- PAMS network description which includes an implementation schedule, the identification of the monitoring area represented*, the AQS site identification number*, the site location*, the site type*, the sampling and analysis method*, the operating schedule*, and an ozone event forecasting scheme if appropriate.
- Results of the annual ambient air monitoring network and quality assurance plan review.
- Annual SLAMS summary report which includes the location, date, pollution source, and
 duration of each incident of air pollution during which ambient levels of a pollutant
 reached or exceeded the significant harm levels as defined in 40 CFR § 51.151*, the
 certification of the report's accuracy by a designated state air pollution control officer,
 and various other summary statistics as provided by the AQS system*.
- In metropolitan areas with a population greater than 350,000, the appropriate state or local air quality management agency must report to the public through prominent notice (e.g., newspaper, radio, local weather forecast, at a publicly accessible area) the AQI value indicating the status of the area's air quality (i.e., good, moderate, unhealthful, very unhealthful, hazardous). This prominent notice must be made on at least 5 days per week. The AQI* is calculated using information collected in this request.

*From the above list, those data marked with an asterisk are stored electronically within the U.S. EPA's AQS, and separate records kept by the state or local air quality management agency are not needed.

In addition to those items stored within the U.S. EPA's AQS, state and local air quality management agencies will maintain records on the following items:

- Approved PAMS network description for areas designated as serious, severe, or extreme ozone nonattainment areas.
- Site information that is not maintained on the AQS system (e.g., site maps, pictures), and

any siting waiver documentation provided by the Regional Administrator, the Administrator, or their designee.

• The network quality assurance plan for the measurement of ozone, nitrogen dioxide, sulfur dioxide, lead, carbon monoxide, and particulate matter. This includes operational procedures for the entire network, e.g., the selection of methods; training; equipment installation; selection and control of calibration standards; calibration; zero/span checks and adjustments of automated analyzers; control checks and their frequency; control limits for zero, span and other control checks, and respective corrective actions when such limits are surpassed; calibration and zero/span checks for multiple range analyzers; preventive and remedial maintenance; quality control procedures for air pollution episode monitoring; recording and validating data; data quality assessment (precision and accuracy); and quality control documentation.

(ii) Respondent Activities

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

- Read the 40 CFR 58 regulatory provisions and other U.S. EPA guidance (for example, please reference our Internet site at www.epa.gov/ttn/amtic).
- Plan ambient air monitoring activities, such as developing a quality assurance plan for the network operation and maintenance, developing and reviewing the ambient air quality surveillance network design, planning where to locate sites, plan how to maintain and operate each site, develop a data reporting and validation plan.
- Write the quality assurance plan for network operation and maintenance, the ambient air quality surveillance network plan, and the data reporting and validation plan. Submit these plans to the U.S. EPA Regional or Headquarters office for review, and approval if appropriate.
- Obtain on-site leases or agreements to locate ambient air quality surveillance equipment.
- Investigate vendors, and procure equipment necessary to meet the ambient air quality network plan.
- Receive training for site operation and maintenance, quality assurance procedures, and data processing and reporting.
- Make arrangements for appropriate utility hookups for each ambient air quality surveillance site, i.e., electricity, telephones, data lines for electronic submission of concentrations from automated analyzers.
- Install ambient air quality surveillance equipment and equipment shelter. Ensure security

of the site.

• Conduct ambient air quality monitoring, incorporating all appropriate quality assurance procedures such as calibrations, precision and accuracy checks, and, if necessary, concurrent monitoring.

- For particulate matter and lead, conduct necessary filter collection and analyses to obtain concentration data.
- Report ambient air pollutant concentration data electronically if from an automated analyzer (generally, this includes ozone, nitrogen dioxide, sulfur dioxide, and carbon monoxide measurements), and from a central location, such as a laboratory, if for particulate matter, ozone precursors, or lead samplers.
- Validate the ambient air data for quality assurance considerations.
- Electronically submit the complete and validated ambient air data to the AQS data repository.
- Provide the U.S. EPA with the SLAMS summary report annually.

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

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

5(a) Agency Activities

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

- Periodically review the 40 CFR 58 regulation to update the information collection and monitoring requirements in light of new technological developments or new air pollutant standards. Develop revisions to the regulation in response to legislative action and program changes.
- Establish, maintain, and support the AQS as the national repository for all state and local air quality management agency ambient air quality data and monitoring information and tribal data. Periodically evaluate and improve upon this system as new technologies, and new regulatory requirements would dictate.
- Answer respondent (generally state and local air quality management agencies, but also industrial organizations, environmental groups, and others) questions about ambient air

monitoring, the 40 CFR 58 regulatory requirements, and the AQS. This includes the establishment of the Ambient Monitoring Technology Information Center website, the AQS toll-free hotline, and other written or verbal communication.

- Support the quality assurance program by working within the U.S. EPA and with the respondents to evaluate precision and accuracy data, oversee the National Performance Audit Program, participate in systems audits, and conduct weekly data validation checks on the AQS data submittal.
- Provide within the AQS mechanisms for statistical calculations, such as the number of times a particular ambient air quality monitoring site exceeds the NAAQS. Distribute the AQS data in various ways including upon written request, by Freedom of Information Act request, by press release, and in the annual National Air Quality and Emissions Trends Report.
- Provide adequate electronic storage space within the AQS for all ambient air quality surveillance data and information.

5(b) Collection Methodology and Management

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

The EPA has provided and will continue to provide resources for the maintenance and operation of the AQS national data repository. All data required by this collection are submitted electronically to reduce the burden of the collection and to improve data quality, agency efficiency, and responsiveness to the public. Various statistical and graphical summaries are also provided by the AQS and AIRS Graphics systems which enhance the utility of the information for consumption by the public and all affected state and local air quality management agencies. In submitting ambient air data into the AQS national repository, we ensure that the data are publicly available, electronically stored, and electronically retrievable. State and local air quality management agencies and the EPA have been submitting data to the AQS since its inception in 1987.

5(c) Small Entity Flexibility

This collection contains a minimum amount of information in order to manage the air quality program for the United States. The smallest entities affected by this collection are local air quality management agencies, typically consisting of the governing agencies for a county or group of counties, or a smaller metropolitan area (e.g., cities with a population of 100,000). This collection reduces to the extent practicable and appropriate the burden on entities that provide ambient air quality data and information to or for the U.S. EPA, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:

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

5(d) Collection Schedule

Ambient air quality surveillance data and precision and accuracy data for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, and particulate matter are submitted according to the schedule defined in 40 CFR §§ 58.16. This current regulation requires that state and local air quality management agencies report their data within 90 days after the end of the quarter during which the data were collected. The PAMS volatile organic compound data are reported within 6 months following the end of each quarterly reporting period.

The annual SLAMS report is submitted by May 1 of each year for data collected from January 1 through December 31 of the previous year in accordance with 40 CFR § 58.15. This certification also requires that all SPM monitoring data to be used for regulatory purposes by the affected state or local air quality management agency have been certified by May 1.

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

Serious, severe, and extreme ozone nonattainment areas that are subject to the PAMS monitoring requirements under 40 CFR Appendix D, section 5 must provide the PAMS network design plan within 6 months of their designation as a serious, severe, or extreme ozone nonattainment area.

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

- Upon request to the appropriate U.S. EPA Regional office, or to the OAQPS;
- By Freedom of Information Act Request to the appropriate U.S. EPA Regional Office or the OAQPS;

- From the state or local air quality management agency responsible for collecting the ambient air quality data and information;
- By obtaining access, through appropriate U.S. EPA channels, to the AQS to obtain the data electronically;
- Through U.S. EPA public reports, such as the annual "National Air Quality and Emissions Trends Report"; or
- Through the AQI reporting mechanisms which include newspaper, television, Internet and other publicly available notices (see www.epa.gov/airnow).

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

All activities listed with section 4 (b) (ii) of this ICR Supporting Statement are included within Tables 1 and 2 of the Appendix. As discussed in Section 1, this ICR reflects a modest update of the previous ICR submittal.

The detailed burden hour estimates for the 2013 ICR were based on estimates provided in the <u>Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants</u>, January 2005. We conferred with affected state and local agencies to examine the burden estimates and to compare these values with hourly burdens experienced by their agencies. These agencies are representative of those affected state and local agencies that respond to this collection.

The ICR burden estimates contained within this renewal are based upon program estimates with the addition of inflationary increases.

Worksheet 1: Annual Respondent Burden/Cost Estimates

Collection Activities	Total # Labor Hours Per Respondent Per Year (168 respondents)
1. Network design	270
2. Site installation	93
3. Sampling & Analysis	1973
4. Maintenance & repairs	1577
5. Data management	3707
6. Quality assurance	1895
7. Supervision	1140
TOTALS	10,655

6(b) Estimating Respondent Costs

All activities listed with section 4 (b) (ii) of this ICR Supporting Statement are included within the Table 1 of the Appendix.

The detailed burden and cost estimates are based on information provided in the <u>Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants</u>, January 2005. All costs from this document for 2004 were inflated to 2013, 2014, or 2015 by using the Gross Domestic Product (GDP) price indices as reported in the report available at http://www.cost.jsc.nasa.gov/inflation/nasa/inflateNASA.html. A summary of the average annual respondent burden costs follows.

Worksheet 2: Annual Respondent Burden/Cost Estimates

Collection Activities	Total Labor Cost Per Respondent Per Year (168 respondents)	
1. Network design	\$14,813	
2. Site installation	\$ 8,096	
3. Sampling & Analysis	\$253,256	
4. Maintenance & repairs	\$ 88,224	
5. Data management	\$207,774	
6. Quality assurance	\$110,539	
7. Supervision	\$ 71,662	
TOTALS	\$754,364	

6(c) Estimating Agency Burden and Cost

We estimated the Agency burden and cost by using current burden and cost of the ambient air monitoring program related to this collection. We included burden and cost for the OAQPS, the ten Regional Offices, and associated contract activities. The in-house activities for this collection are completed by a variety of individuals with a variety of salaries; therefore, we used an average salary for computing the program costs. Actual contractor expenses were used for those activities completed using extramural resources. We estimated a total of 192,769 hours and \$11,014,728 total agency burden.

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

Worksheet 3 shows the total respondent hourly burdens and costs which was taken from sections 6(b) and 6(c) above for the estimated 168 respondents. The total hourly burden for the respondents was estimated to be 1,790,021 hours and \$126,733,274.

Worksheet 3: Annual Total Respondent Labor Burden/Cost Estimates for 168 Respondents

Collection Activities	Total # Labor Hours for U.S. Per Year	Total Labor Cost Per Year
1. Network design	45,410	\$ 2,488,544
2. Site installation	15,612	\$ 1,360,143
3. Sampling & Analysis	331,463	\$42,547,005
4. Maintenance & repairs	264,973	\$14,821,710
5. Data management	622,759	\$34,906,106
6. Quality assurance	318,362	\$18,570,633
7. Supervision	191,442	\$12,039,134
TOTALS	1,790,021	\$126,733,274

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

Respondent Total Annual Burden = 1,790,021 hours

Respondent Total Annual Labor Cost for O & M = \$126,733,274

Respondent Total Annual Cost for Non-labor O & M = \$13,090,237

Respondent Total Equipment/Contract Dollars = \$54,666,536

Total Respondent Tally = \$194,490,047

(ii) The Agency Tally

Agency Total Annual Burden = 192,769 hours

Agency Total Annual Cost = \$11,014,728

(iii) Variations In The Annual Bottom Line.

We do expect modifications to the monitoring networks to occur over the next several years as state and local air pollution control agencies install and remove monitoring stations to comply with recent revisions to the National Ambient Air Quality Standards.

6(f) Reasons for Change In Burden

The previously approved ICR estimate of burden hours is 2,057,168. This ICR renewal burden hour estimate updates the previous submittal. There is a decrease of 297,855 hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB. This decrease reflects the U.S. EPA's consolidation of monitors into fewer sites, termination of unnecessary monitors, and more efficient procedures for measuring and reporting data.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2664 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 the U.S. 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, the U.S. EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2002-0091, which is available for public viewing at the Air and Radiation Docket and Information Center Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30

p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center Docket is (202) 566-1742. An electronic version of the public docket 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 the EPA Docket ID No. EPA-HQ-OAR-2002-0019 and OMB control number 2060-0084 in any correspondence.