

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

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# 1. IDENTIFICATION OF THE INFORMATION COLLECTION

## **1(a) TITLE OF THE INFORMATION COLLECTION**

This document fulfills the agency's requirements under the Paperwork Reduction Act with regards to determining the regulatory burden associated with the Compliance Assurance Monitoring (CAM) Rule, codified at 40 CFR part 64. It has been assigned EPA tracking number 1663.08 and OMB Control Number 2060-0376. The title of this Information Collection Request (ICR) is "Compliance Assurance Monitoring Program (40 CFR Part 64)."

## **1(b) SHORT CHARACTERIZATION/ABSTRACT**

In keeping with the requirements of the title V operating permit program (codified at 40 CFR parts 70 and 71), the CAM Rule requires monitoring, compliance certification, periodic reporting and recordkeeping information collections by owners and operators of title V sources<sup>1</sup> with controlled pollutant-specific emissions units (PSEUs) that have a pre-control potential to emit major amounts of regulated air pollutants. In addition, where the permitting authority has determined that the source has not used acceptable procedures in response to an excursion or exceedance, the CAM Rule allows permitting authorities (PAs) to require sources to prepare and implement Quality Improvement Plans (QIPs) and keep records of, and submit reports on, corrective actions taken under QIPs.

The CAM Rule identifies two categories of emissions units:

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

These two types of units are subject to different monitoring frequency requirements, but not to different reporting or recordkeeping requirements, which are the subject of this ICR. Additionally, "large" and "other" units were initially subject to different implementation timetables under part 64. However, this program has been in place long enough that all existing "large" and "other" PSEUs that became subject to the CAM Rule at the time of its promulgation have been integrated into the program as their title V permits have been renewed. New PSEUs of both types are covered under the CAM program in the same manner; both types of units become subject to the CAM program at the time that a new title V permit is issued for a new facility or an existing permit is revised to add the new unit(s). For these reasons, this analysis does not differentiate between "large" and "other" units.

Upon approval by the PA of the monitoring proposed by the source, the source uses the approved monitoring method to collect data. These data provide the basis on which owners or operators can certify, in accordance with the requirements of the title V operating permit program, the compliance of their emissions units with the applicable requirements. In addition,

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

these data provide the basis on which owners or operators submit monitoring reports on no less than a semi-annual basis, as required by the title V operating permit program. Consistent with the recordkeeping period established in the title V operating permit program, CAM requires sources to store and maintain these data for at least 5 years.

In the next 3 years, the information collection requirements of the CAM program will impact all new affected pollutant points (i.e., new PSEUs at new facilities and new PSEUs constructed at existing facilities) and any new and existing affected pollutant points for which QIPs must be developed. The EPA estimates for this ICR period that the CAM program will remain in effect at approximately 23,000 existing emissions units. However, except for new PSEUs at new facilities, new PSEUs at existing facilities and PSEUs for which QIPs must be developed, little changes are expected to existing title V permits, which already implement the monitoring, reporting, recordkeeping and compliance certification components of the CAM rule. This ICR estimates the expected average annual burden over the next 3 years to be about 50,000 hours, at an expected cost of \$2 million (2012 dollars). The activities at sources leading to these impacts include:

- Determination of a monitoring approach for new affected PSEUs;
- Preparation of a QIP, if necessary;
- Administrative burden for recordkeeping and reporting of corrective actions associated with a QIP;
- Installation and operation of monitoring equipment, if necessary;
- Administrative burden for recordkeeping and reporting;
- Upgraded operating/maintenance activities;
- Improved quality assurance; and
- Permit fees to cover regulatory costs of the program.

For this ICR, we have used data from the 2012 ICR for the title V operating permit program implemented by state agencies (i.e., the part 70 program) that reflect current information on the number of existing and new title V permits that may include units that are subject to the CAM Rule.

In addition, we reviewed and updated, where necessary:

- Labor rates;
- Estimates of labor hours needed for each activity associated with CAM monitoring (CAM approach development and review, QIP development and review, recordkeeping and reporting); and
- The implementation schedule for CAM using current title V data for both existing and new sources.

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

- All existing affected PSEUs submitted their proposed monitoring approaches during the July 2007 through January 2012 time period addressed by the previous two ICRs.

- Approximately 20 percent of existing title V permits are renewed during each year.
- Each year, title V permits will be issued for 100 new facilities. These facilities will have the same average number of PSEUs as in the full CAM database.
- There is homogeneity between sources and PSEUs. Therefore, if 10 percent of all title V permits are renewed at a given time, 10 percent of all affected PSEUs will be subject to renewal of their CAM plans on that date.
- The recordkeeping and reporting requirements for the CAM Rule for existing PSEUs are met by the requirements set forth in title V, unless a QIP is required. Therefore, in this ICR we are only attributing the recordkeeping and reporting requirements for those existing sources that are required to conduct a QIP.

Additionally, we assume that some new PSEUs would be built each year at existing permitted facilities, thus requiring a permit revision. We assume that 230 facilities nationwide would build additional PSEUs each year.

## 2. NEED FOR AND USE OF THE COLLECTION

### ***2(a) NEED/AUTHORITY FOR THE COLLECTION***

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

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

Title V directs the agency to implement monitoring and compliance certification requirements through the operating permits program. Section 503(b)(2) requires at least annual certifications of compliance with permit requirements and prompt reporting of deviations from permit requirements. Section 504(a) mandates that owners or operators be subject to the PA the results of any required monitoring at least every 6 months. This section also requires permits to include “such other conditions as are necessary to assure compliance with applicable requirements” of the Act. Section 504(b) of the Act also allows the agency to prescribe, by rule, methods and procedures for determining compliance, and states that continuous emission monitoring systems need not be required if other methods or procedures provide sufficiently reliable and timely information for determining compliance. Under section 504(c), each operating permit must “set forth inspection, entry, monitoring, compliance certification, and reporting requirements to assure compliance with the permit terms and conditions.”

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

“The Administrator shall in the case of any person which is the owner or operator of a major stationary source, and may, in the case of any other person, require enhanced monitoring and submission of compliance certifications. Compliance certifications shall include (A) identification of the applicable requirement that is the basis of the certification, (B) the method used for determining the compliance status of the source, (C) the compliance status, (D) whether compliance is continuous or intermittent, (E) such other facts as the Administrator may require.”

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

- Establish and maintain such records;
- Make such reports;
- Install, use, and maintain such monitoring equipment;
- Sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
- Keep records on control equipment parameters, production variables, or other indirect data when direct monitoring of emissions is impractical;
- Submit compliance certifications in accordance with section 114(a)(3); and
- Provide such other information as the Administrator may reasonably require.

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

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

- Document continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements;
- Indicate any excursions from these ranges; and
- Respond to the data so that excursions are corrected.

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

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

## **2(b) PRACTICAL UTILITY/USERS OF THE DATA**

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

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

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

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

### **3(a) NONDUPLICATION**

For approval of a proposed ICR, the agency must ensure that it has taken every reasonable step to avoid duplication in its paperwork requirements in accordance with 5 CFR 1320.4. The part 64 rulemaking is mandated by the Act and supports the title V permit program



under 40 CFR part 70 as well as title VII enforcement provisions. Recognizing that many sources have already implemented monitoring strategies to fulfill their part 70 requirements, the part 64 monitoring guidelines were carefully crafted by the agency and OMB to minimize any unnecessary duplication. The part 64 CAM Rule has also been carefully designed to function, as much as possible, in a manner complementary to that of the part 70 operating permit program managed by PAs.

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

The EPA has complied with the public notice requirement set forth in 5 CFR 1320.8(d) (1) by publishing a notice of proposed information collection in the *Federal Register* on June 13, 2013 (78 FR 35631). This notice provided a 60-day public comment period. The EPA received one question. The question asked us to explain how we came to the reduction in the number of annual labor numbers. We prepared an explanation regarding reductions in burden and responded back to the inquirer and posted this document to the docket. A notice of proposed information collection will be published concurrently in the *Federal Register* with the submission of this information collection request, followed by a 30-day comment period.

### **3(c) CONSULTATIONS**

In our first *Federal Register* notice the agency asked for comments on this current ICR. We have not received any comments on the burden that has been calculated.

### **3(d) EFFECTS OF LESS FREQUENT COLLECTION**

As part of the permit application required under the title V operating permit program, an owner or operator must submit to the PA monitoring that satisfies the design requirements in 40 CFR 64.3. In addition, it must be demonstrated that the proposed monitoring is sufficient to provide compliance status information. Without such information, PAs will be unable to issue complete permits. Furthermore, owners or operators will be unable to certify compliance with emissions limitations or standards unless costly reference test methods are employed. Part 64 requires semi-annual reports because the statute requires all monitoring reports to be submitted at least semi-annually (section 504(a)). In addition, without timely evaluation of the reports, excess emissions of regulated air pollutants could rise. Consequently, less frequent collection of monitoring information is not permissible under the statute and could result in a net loss of environmental quality and was not considered for this rulemaking.

### **3(e) GENERAL GUIDELINES**

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

- Part 64 regulations do not require periodic reporting more frequently than semi-annually.
- The part 64 regulations do not require respondents to participate in any statistical survey.
- Responses to agency inquiries are not required to be submitted in less than 30 days.

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

The recordkeeping and reporting requirements contained in the CAM program regulations do not exceed any of the Paperwork Reduction Act guidelines contained in 5 CFR 1320.6, except for the guideline which limits retention of records by respondents to 3 years. The CAM program and the operating permit program require both respondents and state or local agencies to retain records for a period of 5 years. The justification for this exception is found in 28 U.S.C. 2462, which specifies 5 years as the general statute of limitations for federal claims in response to violations by regulated entities. The decision in U.S. v. Conoco, Inc., No. 83-1916.E (W.D. Okla., January 23, 1984) found that the 5 year general statute of limitations applied to the Clean Air Act.

### **3(f) CONFIDENTIALITY**

Confidentiality regarding CAM program measurement information, as well as monitoring data, is not an issue for this rulemaking. In accordance with the Clean Air Act Amendments of 1990, each permit issued under the title V operating permit program is to contain monitoring requirements to assure compliance with permit terms and conditions; generally, these terms and conditions are submitted by sources as a part of their permit or renewal applications but they are all a matter of public record. To the extent that the information required is proprietary, confidential or of a nature that could impair the ability of the source to maintain its market position, that information is collected and handled subject to the requirements of sections 503(e) and 114(c) of the Act. Information received and identified by owners or operators as confidential business information (CBI) and approved as CBI by EPA, in accordance with Title 40, Chapter 1, Part 2, Subpart B, shall be maintained appropriately (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

### **3(g) SENSITIVE QUESTIONS**

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

## 4. THE RESPONDENTS AND THE INFORMATION REQUESTED

### 4(a) RESPONDENTS/SIC CODES

The CAM Rule applies to most North American Industry Classification System (NAICS) code groups (and their predecessors, the Standard Industrial Classification (SIC) code groups), as well as certain service industries regulated under the Act. All PAs also are affected because they must review CAM plans, as well as any QIPs and associated reports.

### 4(b) INFORMATION REQUESTED

#### 4(b)(i) DATA ITEMS, INCLUDING RECORDKEEPING REQUIREMENTS

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

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

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

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

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

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

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

<b>Additional Requirements for Permit Applications</b>	<b>Regulation Reference</b>
a justification for the proposed elements of monitoring. The justification shall include any supporting data and may refer to any generally available sources of information such as air pollution engineering manuals or EPA or PA publications. In addition, the owner or operator may base the required justification exclusively on the regulatory precedents cited in 64.4(b)(1)-(5). If the performance specifications proposed to satisfy 64.3(b)(2) or (3) include differences from manufacturer recommendations, the owner or operator shall explain the reasons for the differences.	64.4(b)
control device (and process and capture system, if applicable) operating parameter data obtained during the conduct of applicable compliance or performance tests. Such data may be supplemented, if desired, by engineering assessments and manufacturer's recommendations to justify the indicator ranges.	64.4(c)(1)
documentation to certify that no changes to the pollutant-specific emissions unit, including the control device and capture system, have taken place.	64.4(c)(2)

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

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

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

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

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

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

<b>Recordkeeping Requirements</b>	<b>Regulation Reference</b>
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Records shall be maintained in accordance with the requirements specified in 70.6(a)(3)(ii). In addition the records shall include:

any written QIP required pursuant to 64.8	64.9(b)
any corrective actions taken to implement a QIP	64.9(b)

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

each term or condition of the permit that is the basis of the certification.	70.6(c)(5)(iii)(A) 71.6(c)(5)(iii)(A)
the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period.	70.6(c)(5)(iii)(B) 71.6(c)(5)(iii)(B)
the status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent.	70.6(c)(5)(iii)(C) 71.6(c)(5)(iii)(C)

such other facts as the PA may require.	70.6(c)(5)(iii)(D) 71.6(c)(5)(iii)(D)
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#### 4(b)(ii) RESPONDENT ACTIVITIES

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

- **Review Requirements:** Review the part 64 requirements to determine applicability. This is a one-time task for each newly-permitted facility, rather than each PSEU. This is assumed to require the same level of effort for each new title V facility with potentially subject PSEUs, regardless of the type of PSEUs (“Large” or “Other”) at the facility or the type of monitoring approach (instrumental or work practice) required for each.
- **Determine Monitoring Approach:** Determine a CAM monitoring approach for each control device for which a facility is required to propose a specific monitoring approach for PSEUs [per §§64.4(g) and (f)]. Each monitoring approach should specify the proposed technique (e.g., continuously recording combustion temperature at the incineration point of effluent gases in a thermal oxidizer), identify the frequency and method of data collection, establish performance criteria and recommend a quality assurance program.
- **Specify Monitoring Plan Elements:** Specify the CAM monitoring elements for each PSEU; that is, identify how the proposed monitoring approach will be implemented. This activity requires the facility to select performance indicators for each subject control device. The indicators establish monitoring performance characteristics and must provide reliable data for detection of significant adverse changes in control equipment performance. For the selected indicators, the design criteria must also: (1) specify operating ranges that reflect normal operating conditions, and (2) propose data collection sufficient to document continued operation of the control device in a satisfactory manner.
- **Design Documentation:** Develop and submit justification that supports the proposed monitoring approach for each PSEU. The type of documentation required could reference generally available information, existing applicable requirements, or site-specific data, if available. The documentation should demonstrate the adequacy of proposed indicator ranges to detect significant adverse changes in control performance. The language of the CAM Rule requires site-specific testing to be used in establishing indicator ranges unless the facility can justify using other information, such as manufacturer’s data or engineering assessments. Generally, existing site-specific test data will be applicable.
- **CAM Renewal:** At the time of title V permit renewal, prepare and submit the information required by the permitting authority for PSEUs with previously established CAM monitoring. Any desired revisions to the established CAM monitoring should also be addressed in the permit renewal application. The burden assumed for this activity reflects the effort incurred for CAM in addition to the general title V permit renewal burden (which is addressed in the ICRs for the title V program).

- **Prepare QIP:** Prepare a QIP if required to do so by the PA because an affected PSEU is not consistently maintaining compliance with the applicable emission limitation. The QIP initially includes procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the source modifies the plan to include procedures to improve the performance of the control system.
- **Records of Corrective Actions:** Record activities undertaken to implement a QIP to bring a PSEU back into compliance after an excursion outside the normal control system operating range or exceedance of the applicable limitation.
- **Reporting of Corrective Actions:** Along with the semi-annual reports required under the title V operating permit program, report the corrective actions taken to implement a QIP.
- **Facility Certification:** As part of the annual compliance certification required under the title V operating permit program for the entire source, include any PSEUs subject to the CAM Rule.

State and local PA respondents perform the following activities in administering the CAM Rule:

- **Rule Familiarization:** Read the CAM Rule and associated EPA guidance materials to become familiar with the requirements.
- **Determine Applicability:** Review applicability determinations submitted by sources.
- **Initial CAM Review:** Review the CAM plans submitted by sources and approve or require revisions.
- **Evaluate CAM Renewals:** As part of the review of title V permit renewal applications under the title V operating permit program, review the portions related to PSEUs subject to the CAM Rule.
- **Review QIPs:** Review the QIPs prepared by sources to determine if they are acceptable.
- **Review Reports of Corrective Actions:** As part of the review of the semi-annual reports required under the title V operating permit program, review any reports of corrective actions taken under a QIP to determine whether they are adequate to assure compliance on an ongoing basis.
- **Review Annual Facility Certifications:** As part of the review of the annual compliance certification required under the title V operating permit program for the entire source, review any compliance certifications for PSEUs subject to the CAM Rule.

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

### 5(a) *AGENCY ACTIVITIES*

The EPA performs the following activities:

- Review the CAM Rule to become familiar the requirements;
- Provide oversight and guidance to state and local agencies;
- Assess requests for alternative monitoring.

### 5(b) *COLLECTION METHODOLOGY AND MANAGEMENT*

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

### 5(c) *SMALL ENTITY FLEXIBILITY*

The agency assessed the impacts of the CAM Rule on small businesses, governments and organizations in Chapter V of the rule’s Regulatory Impact Analysis in 1997. This assessment still holds true, indicating the CAM Rule will not have a significant impact on a substantial number of small entities (SISNOSE). For additional discussion on this assertion, the agency invites the reader to review the CAM Rule RIA and ICR from 1997.

### 5(d) *COLLECTION SCHEDULE*

During initial implementation of the CAM Rule, the timing for submission of the initial CAM plans required under part 64 depended on whether existing affected units were classified as “large” or “other.” However, the CAM program has been fully implemented for these existing PSEUs. Going forward, initial CAM plans for affected new “large” and “other” PSEUs must be submitted with the title V permit application for the new or modified facility at which the new PSEU is located.

Upon approval of the permit and consistent with the requirements of the title V operating permit program, sources must collect the information specified in their permits in accordance with the collection frequency specified, maintaining these data for at least 5 years. Sources must also submit semi-annual monitoring reports and annual compliance certifications as required by the title V operating permit program.

If the approved CAM monitoring results show that a PSEU is not consistently maintaining compliance as indicated by excursions or exceedances, the PA may require the source to develop and implement a QIP. The source must subsequently record and report on the corrective actions taken to implement the QIP.



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

This section discusses the development of burden estimates and their conversion estimates into costs, which are separated into burden costs and capital and O&M costs. According to the latest guidance for ICRs, capital and O&M costs display the cost of any new capital equipment the source or PA may have to purchase solely for information collection, assimilation, and storage purposes. For example, if a source had to purchase a new computer to store and manipulate CEMS data, that computer would be a cost of administration subject to reporting in the ICR. In addition, the latest guidance instructs the agency to differentiate the burden associated with a source's labor and that which it hires through outside contractors. However, a sensitivity analysis of the effect of contracted labor on the CAM Rule reveals that, if all of the affected sources were to employ contractors to perform as much as half of the work necessary for full compliance with the rule, overall costs would increase by less than 5 percent. Consequently, this analysis assumes sources will not employ contracted labor.

### **6(a) ESTIMATING RESPONDENT BURDEN**

This section presents estimates of the burden hours expected to be incurred at sources with emission units affected by the CAM Rule in carrying out the activities identified above in section 4(b)(ii). Results are contained in Tables 6.1a, b, and c for each of the 3 years covered by this ICR, respectively. Columns A through E in these tables summarize annual burden impacts that an individual PSEU will incur for each activity.

Columns A and B represent the estimated burden hours for clerical and technical personnel, respectively. These burden estimates reflect the expert judgment of EPA staff, contractors, and industry experts. Column C represents the management labor hours associated with each activity, computed at a rate of 5 percent of the total clerical and technical labor. All burden estimates represent the increment over part 70 requirements.

For the activities associated with developing and documenting a CAM plan, we estimate different burdens for PSEUs depending on whether they are “without existing monitoring” or “with existing monitoring.” For the new PSEUs that become subject to the CAM Rule going forward, this is defined as follows:

- “Without existing monitoring” denotes PSEUs that are subject to emission limits and therefore must control emissions, but the applicable requirements do not specify monitoring requirements. For these PSEUs, the source must develop the entire monitoring program and documentation required by the CAM Rule.
- “With existing monitoring” denotes PSEUs whose applicable requirements include monitoring requirements, but these requirements are insufficient to meet the requirements of the CAM Rule. For these PSEUs, some of the monitoring elements are already present, and the source need only upgrade the monitoring program and documentation to meet the CAM Rule requirements.

We believe that sources with PSEUs “with existing monitoring” will experience less uncertainty about what is needed for adequate monitoring and, thus, developing a CAM plan and the necessary documentation for these units will require less effort than for PSEUs “without

existing monitoring.” As a result, the estimated per-PSEU burden is greater for PSEUs “without existing monitoring.”

For one source activity, recordkeeping for corrective actions under a QIP, we estimate different burdens for PSEUs depending on whether the CAM monitoring relies on an instrumental system or uses work practices. We believe that there will be less recordkeeping burden for PSEUs monitored with instrumental systems because those systems employ electronic capturing and monitoring information that previously was attributed to manual labor. Automated processes can collect hundreds of data points per second; whereas humans require considerably longer to accurately collect and process the same information. Column D of Tables 6.1a, b, and c gives the annual occurrences of each source activity for each PSEU. There will be one occurrence of each activity per year except for reports of corrective actions, for which we project two occurrences consistent with the title V operating permit program requirement for semi-annual reporting. Finally, Column E totals the burden hours incurred by a source for each PSEU.

Tables 6.2a, b, and c present estimates of the burden hours expected to be incurred by PAs in carrying out the activities identified in section 4(b)(ii) in each of the 3 years covered by this ICR, respectively. The burden estimates are based on the expert knowledge of EPA staff. The technical labor estimates for these activities in Column A generally reflect the PA hours required to complete the activities for one PSEU. For review of CAM plans, the estimated level of effort is greater for sources “without existing monitoring” than for those “with existing monitoring” because we believe that PAs will need to apply greater scrutiny to CAM submissions from sources that must develop their entire monitoring program and documentation absent applicable monitoring requirements.

Column B in Tables 6.2a, b, and c shows the number of occurrences of each PA activity per year. In most cases, these numbers reflect the numbers of units expected to be submitting CAM plans, renewals, QIPs or certifications each year and, thus, are based on the numbers of PSEUs carrying out the analogous activities listed in Column I of source Tables 6.1a, b, and c (as discussed below in section 6(d)). Consistent with the title V operating permit semi-annual reporting requirement, the “number of occurrences” for the PA activity “review corrective action reports” is twice the number of units that will be expected to submit such reports each year. For Tables 6.2a, b, and c, the management burden hours in Column D are computed at a rate of 5 percent of the total annual technical labor for each PA activity that appears in Column C.

As noted, the estimated burden and number of occurrences for the PAs’ activities in Columns A and B of Tables 6.2a, b, and c are generally based on individual PSEUs. The exception is the estimates for “rule familiarization” listed under the first activity in these tables, which are presented for each PA rather than each PSEU. Because the CAM program is now a mature, fully implemented program, the PAs are generally familiar with the CAM Rule. Accordingly, we have assumed that the technical labor burden (Column A) for each PA is limited to 12 hours for new staff to familiarize themselves with the rule. Column B reflects the number of PAs (112) rather than the number of PSEUs.

## **6(b) ESTIMATING RESPONDENT COSTS**

### **6(b)(i) Estimating Labor Costs**

Tables 6.1a, b, and c show the sources' per-PSEU annual labor costs associated with each activity for each year covered by this ICR. This annual labor cost appears in Column F of each table.

This ICR identifies three labor categories: management, technical, and clerical. Labor rates, on a per-hour basis, are taken from the Bureau of Labor Statistics (BLS) Occupational Employment Statistics website (<http://www.bls.gov/oes/>) as posted for May 2012. For each type of personnel, the median hourly wage was averaged across the following sectors: (1) Manufacturing; (2) Professional, Scientific and Technical Services; (3) Administrative and Support and Waste Management and Remediation Services; (4) Educational Services; (5) Healthcare and Social Assistance; and (6) Federal, State and Local Government. For managerial labor, an "All Other Managers" occupation was selected with a base hourly labor rate of \$46.65; for technical personnel, "Environmental Engineering Technician" was selected with a base rate of \$23.39; and for clerical personnel, "Secretaries, Except Legal, Medical, and Executive" was selected with a base rate of \$15.48. The labor rates were then adjusted by an overhead and profit rate of 167 percent. Therefore, the total "loaded" wage rates are calculated by the following equation:

$$\text{base labor rate} \times 1.67 = \text{loaded wage rate}$$

Given the overhead cost adjustments, the final total loaded wage rates are \$77.90 for managerial personnel, \$39.06 for technical personnel, and \$25.85 for clerical personnel. All labor rates are in 2012 dollars.

For each source activity, Column F in Tables 6.1a through 6.1c displays the total labor cost per year assumed necessary to complete each required activity. For each activity, the appropriate wage rate is multiplied by the number of labor hours in that category from Columns A, B, and C, the three values are added together, and then that cost is multiplied by the number of annual occurrences from Column D.

Tables 6.2a, b, and c show the costs for state and local agency PAs for all activities. The methodology used to derive the State and Local costs parallels the procedures used in the original CAM RIA and the previous ICRs. The hourly wage rates for state and local personnel are derived from the rates paid to federal workers who carry out such activities.

For technical labor, the hourly wage rate is based on 2012 wages at a pay grade of GS-12, Step 5 (\$32.73); managerial labor is based on a pay grade of GS-15, Step 5 (\$54.10). In each case, the base hourly wage rate was adjusted by a factor of 1.67 to "loaded" wage rates of \$54.66 for technical labor and \$90.35 for managerial labor.

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

Tables 6.1a, b, and c and Tables 6.2a, b, and c show the capital and operations and maintenance (O&M) costs as zero for all activities over the next 3 years. As explained above, the only capital costs to be included in an ICR are those for any new capital equipment the source or PA may have to purchase solely for information collection, assimilation, and storage purposes.

However, EPA assumes that any such equipment needed by sources to comply with part 64 would be purchased as part of a monitoring equipment purchase and could not be separately estimated. Therefore, O&M costs for operating such capital equipment also could not be separately estimated. Other possible O&M costs associated with reporting and recordkeeping include such things as postage fees for submitting reports. However, part 64 does not require any new reports to be submitted; rather, it provides that information related to CAM be included in reports otherwise required under the title V program codified at 40 CFR part 70. Therefore, postage costs for these reports are attributable to part 70 and not to part 64.

### **6(b)(iii) Capital/Start-up vs. O&M Costs**

As discussed in the previous section, EPA estimates that there will be no capital/start-up costs or O&M costs attributable to the CAM Rule for sources or PAs.

### **6(b)(iv) Annualizing Capital Costs**

As discussed in the previous section, EPA estimates that there will be no capital/start-up costs attributable to the CAM Rule for sources or PAs. As a result, there are no annualized capital/start-up costs included in this ICR.

## **6(c) ESTIMATING AGENCY BURDEN AND COST**

Table 6.3 shows the burden and costs for EPA. Based on input from the EPA regional offices, we assume that each regional office devotes a total of approximately 0.1 of a “full-time equivalent” to CAM each year, or about 200 hours per regional office per year. Across the 10 EPA regional offices, this totals 2,000 hours per year. We assume that the majority of this time (1,880 hours) is spent reviewing CAM plans; the remaining time (120 hours) is allocated to rule familiarization for new staff.

We assume that 5 percent of the EPA’s total labor associated with the CAM Rule is managerial labor and the remaining 95 percent is technical labor. The cost of this effort is calculated using the same loaded labor rates discussed above for PAs. Based on these assumptions, the total estimated cost to the EPA is a bit under \$113,000 per year for each of the 3 years covered by this ICR.

## **6(d) ESTIMATING THE RESPONDENT UNIVERSE AND TOTAL BURDEN AND COSTS**

In Tables 6.1a, b, and c, each PSEU that is subject to the CAM Rule is considered a respondent, except as otherwise indicated in the tables. The number of respondents in each row of these tables was estimated based on information on the number of new and existing title V permits taken from the 2012 ICR for the part 70 operating permit program.

The assumptions underlying the number of respondents for each activity in Tables 6.1a, b, and c taken from the 2012 ICR for the part 70 program are as follows:

- Each year, 100 new facilities receive title V permits.
- In 2014 (the second year of the part 70 ICR and the first year of this ICR) there will be 15,204 existing title V permits. Of these, there will be 184 permits that were issued solely due to greenhouse gas (GHG) emissions. Because there are currently no

control devices for GHGs, these permits will not include any PSEUs subject to the CAM Rule, leaving 15,020 existing title V permits that may include PSEUs subject to the CAM Rule.

To estimate the number of respondents of each type (“large” or “other” PSEUs) for which CAM plans must be developed and submitted each year, we used the following equation and factors derived from the 2010 ICR.

$$P_c = RS \times S_c \times P_c \times A_c$$

Where:

- $P_c$  is the number of PSEUs in Category  $c$  expected to become subject to CAM at a given time. The Categories are “large” PSEUs and “other” PSEUs.
- $RS$  is the number of relevant title V permits nationwide.
- $S_c$  is the percent of sources expected to construct at least one new PSEU in Category  $c$ . For “large” PSEUs,  $S_c = 11.5$  percent; for “other” PSEUs,  $S_c = 34.8$  percent.
- $P_c$  is the number of new Category  $c$  PSEUs expected to be constructed at a facility that has at least one Category  $c$  PSEU. For new facilities,  $P_c$  is 3.15 for “large” PSEUs and 7.06 for “other” PSEUs. For existing facilities adding new PSEUs,  $P_c$  is 1 for both “large” and “other” PSEUs.
- $A_c$  is the percent of PSEUs in Category  $c$  that are projected to be subject to the CAM Rule. For “large” PSEUs,  $A_c = 53.8$  percent; for “other” PSEUs,  $A_c = 53.6$  percent.

Additional assumptions used in the 2010 ICR to estimate the number of respondents (PSEUs) for source activities were found to remain appropriate and include the following:

- 230 existing title V sources add PSEUs each year.
- Of affected “large” PSEUs, 56.3 percent are “without existing monitoring” and 43.7 percent are “with existing monitoring.”
- Of affected “other” PSEUs, 31 percent are “without existing monitoring” and 69 percent are “with existing monitoring.”
- All affected “large” PSEUs meet CAM Rule requirements using instrumental monitoring systems.
- All affected “other” PSEUs meet CAM Rule requirements using work practice monitoring approaches.

Additional assumptions used to estimate the number of respondents (PSEUs) for source activities include the following:

- All existing “large” and “other” PSEUs that became subject to the CAM Rule at the time of its promulgation have been integrated into the program as their title V permits were renewed.

- Thus, the only PSEUs for which CAM approaches and documentation must be developed and submitted during the period of this ICR are those at new facilities, which are receiving their initial title V permits, and those being constructed at existing facilities. As noted above, there are 100 new facilities and 230 existing facilities that construct PSEUs each year.
- Each new facility must review the requirements of the CAM Rule to determine whether its PSEUs are subject to the rule (Activity 1 in Tables 6.1a, b, and c). Note that the respondents for this activity facilities, rather PSEUs.
- For the activities related to developing and documenting CAM plans, the number of respondents is determined using the equation above (Activities 2, 3, and 4).
- Each year, 20 percent of all existing title V permits are renewed, and thus CAM plans are renewed for 20 percent of all PSEUs each year (Activity 5).
- Each year, 0.04 percent of all existing and new PSEUs are required to prepare a QIP and record information and submit reports about corrective actions (Activities 6, 7, and 8). This number is based on the number of enforcement actions taken in a given year.
- All title V facilities are required to submit annual certifications, so there are no additional facilities with affected PSEUs that must submit such certifications (Activity 9).
- Each facility that has at least one affected PSEU has an average of 4.27 affected PSEUs. This factor is used to convert the per-PSEU impacts to per-facility impacts.

Tables 6.1a, b, and c present the total burden and costs of the CAM Rule for sources in each of the 3 years covered by this ICR, respectively. Table 6.4 presents a summary of the burdens for these 3 years. The average annual labor burden reported in Table 6.4 is computed as the arithmetic average of the sum of the annual labor burden across the 3 years of the ICR. The national average annual labor burden for sources over the 3 years covered by this ICR is estimated to be about 44,000 hours at an estimated labor cost of about \$1.7 million. There are no annualized capital costs or O&M costs to report.

As discussed previously in section 6(a), Column B in PA Tables 6.2a, b, and c gives the total number of occurrences of each activity each year, generally reflecting the number of PSEUs expected to be submitting CAM plans, renewals, QIPs, or certifications each year, and these values are based on the numbers of PSEUs carrying out the analogous activities listed in Column I of source Tables 6.1a, b, c. The exception is “rule familiarization” listed under the first activity in Tables 6.2a, b, and c, which is based on the number of PAs (112) rather than the number of PSEUs. Because the CAM program is now a mature, fully implemented program, the PAs are generally familiar with the CAM Rule. Accordingly, we have assumed that the technical labor burden (Column A) for each PA is 12 hours for new staff to familiarize themselves with the rule.

Tables 6.2a, b, and c present the total burden and costs of the CAM Rule for PAs in each of the 3 years covered by this ICR, respectively. Table 6.5 presents a summary of the burdens for these 3 years. Again, the average annual labor burden reported in Table 6.5 is computed as the arithmetic average of the sum of the annual labor burden across the 3 years of the ICR. The national average annual labor burden for PAs over the 3 years covered by this ICR is estimated

to be less than 7,000 hours at an estimated labor cost of about \$375,000. There are no annualized capital costs or O&M costs to report

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

## **6(e) BOTTOM LINE BURDEN HOURS AND COST TABLES**

### **6(e)(i) Respondent Tally**

The total annual burden hours and costs for source and PA respondents are reported in Table 6.6. As shown in the table, sources are estimated to incur less than 44,000 labor hours and less than \$1.7 million per year, while PAs are estimated to incur less than 7,000 labor hours and a little under \$375,000 annually. Thus, total burden for all respondents comes to about 50,000 hours and \$2 million per year. As noted previously, the title V operating permit program requires the cost of administering a title V permit program to be fully repaid out of the permitting fees collected by the PA. Therefore, the true cost of the CAM Rule to states and other PAs is zero, and the cost of administration should be allocated to sources.

### **6(e)(ii) The Agency Tally**

The total annual burden and costs for the EPA are reported in Table 6.3. As shown in the table, the expected annual burden for EPA will be 2,000 hours and about \$113,000.

### **6(e)(iii) Variations in the Annual Bottom Line**

The burden and associated labor costs are not expected to vary significantly over the 3 years covered by this ICR.

## **6(f) REASONS FOR CHANGE IN BURDEN**

There is decrease of over 7.4 million hours in the total estimated respondent burden compared with the ICR currently approved by OMB. The main reason for this decrease is that we found that all sources have had their title V permits issued and, with the exception of sources required to develop a QIP, sources were meeting the reporting and recordkeeping requirements for CAM by complying with the requirements of the title V program. We revised some of our assumptions to account for the additional requirements set forth under the CAM rule that are not outlined in the title V program, while at the same time ensuring that requirements met under the title V program were not being re-counted in this assessment. This change results in an estimated burden decrease of 6.2 million hours. Additionally, other reasons for the decrease include: most facilities are now using electronic monitoring to conduct their recording, thus, resulting in a decrease in the number of labor hours needed and all facilities with existing permits that include approved 40 CFR part 64 monitoring have now submitted the existing monitoring approach in their renewal applications, therefore, significantly reducing the costs for new monitoring development. Furthermore, in order to reflect projected trends for the next 3 years, we updated some of the formulas used to calculate burden. All of these factors combined result in around 1.2 million hour per year reduction in burden.

## **6(g) BURDEN STATEMENT**

The annual reporting and recordkeeping burden for this collection of information is estimated to average about 2 hours per PSEU that is subject to the CAM Rule and about 59 hours per PA for administering the CAM program. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2003-0152, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air Docket in the EPA Docket Center (EPA/DC), WJC West Building, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2003-0152 and OMB Control Number 2060-0376 in any correspondence.







# TABLE 6.1c Total Source Burden and Lal

# TABLE 6.2a Total Permitting Authority Bu


# TABLE 6.2b Total Permitting Authority Bu


# TABLE 6.2c Total Permitting Authority Bu


**TABLE 6.3 Federal Labor Hours and Costs for "Large & Other" Sources - All Pollutants, 2014-2016**

CAM Activities	Annual Burden				Three Year Total			
	Technical Hours	Management Hours	Total Hours	Annual Cost	Technical Hours	Management Hours	Total Hours	Total Cost
Rule Familiarization <sup>1</sup>	114	6	120	\$6,773	342	18	360	\$20,320
Review CAM Plans <sup>1</sup>	1,786	94	1,880	\$106,114	5,358	282	5,640	\$318,341
<b>Total Cost and Burden:</b>	<b>1,900</b>	<b>100</b>	<b>2,000</b>	<b>\$112,887</b>	<b>5,700</b>	<b>300</b>	<b>6,000</b>	<b>\$338,661</b>

<sup>1</sup> We assumed 0.1 FTEs, or 200 hours per region per year; 200 hours/region \* 10 regions = 2,000 hours/yr. We assumed the majority of the time is spent reviewing CAM plans; some time was allocated to Rule familiarization for new staff.

**TABLE 6.4 Average Source Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants**

Year	Annual total hours	Annual labor cost	Annual capital & O&M cost	Total annual cost
2014	43,829	\$1,657,264	\$0	\$1,657,264
2015	43,829	\$1,657,264	\$0	\$1,657,264
2016	43,838	\$1,657,581	\$0	\$1,657,581
<b>Total</b>	<b>131,496</b>	<b>\$4,972,109</b>	<b>0</b>	<b>\$4,972,109</b>
<b>Average</b>	<b>43,832</b>	<b>\$1,657,370</b>	<b>\$0</b>	<b>\$1,657,370</b>
Burden per Affected PSEU				
Year	# PSEUs subject to CAM	Annual total hours	Hours per PSEU	Hours per facility <sup>a</sup>
2014	22,915	43,829	2	8
2015	23,123	43,829	2	8
2016	23,331	43,838	2	8
<b>Total</b>	<b>69,369</b>	<b>131,496</b>	<b>6</b>	<b>24</b>
<b>Average</b>	<b>23,123</b>	<b>43,832</b>	<b>2</b>	<b>8</b>
<sup>a</sup> Assumes 4.27 PSEUs per facility				



**TABLE 6.5 Average Permitting Authority Burden and Labor Costs for All "Large" and "Other" Sources - All Pollutants**

<b>Year</b>	<b>Annual total hours</b>	<b>Total annual cost</b>
2014	6,641	\$374,253
2015	6,641	\$374,253
2016	6,642	\$374,312
<b>Total</b>	<b>19,923</b>	<b>\$1,122,819</b>
<b>Average</b>	<b>6,641</b>	<b>\$374,273</b>

<b>Table 6.6 Total Estimated Respondent Burden and Cost Summary</b>							
<b>Type of respondent</b>	<b>Average annual number of respondents</b>	<b>Average annual labor hours</b>	<b>Average annual labor cost</b>	<b>Average annual capital and O&amp;M cost</b>	<b>Average total annual cost</b>	<b>Average annual labor hours per respondent</b>	<b>Average annual cost per respondent</b>
Sources <sup>a</sup>	23,123	43,832	\$1,657,370	\$0	\$1,657,370	2	\$72
PAs	112	6,641	\$374,273	\$0	\$374,273	59	\$3,342
<b>Total</b>	<b>23,235</b>	<b>50,473</b>	<b>\$2,031,642</b>	<b>\$0</b>	<b>\$2,031,642</b>		

<sup>a</sup>For sources, the number of respondents is the number of PSEUs subject to the CAM Rule. There are an average of 4.27 affected PSEUs per facility with at least one PSEU.