
Supporting Statement
Implementation of Ambient Air Protocol Gas Verification Program
EPA ICR # 2375.02

PART A

1. Identification of the Information Collection

(a) Title of the Information Collection

Implementation of Ambient Air Protocol Gas Verification Program, EPA ICR number 2375.02, OMB Control Number 2060-0648

(b) Short Characterization/Abstract

This Information Collection Request (ICR) includes ambient air monitoring data reporting and recordkeeping activities associated with the 40 CFR part 58, appendix A, Quality Assurance Requirements for SLAMS, SPMs and PSD Air Monitoring. These data and information are collected by State, local, and Tribal air quality management agencies and reported to the U.S. Environmental Protection Agency (EPA).

The EPA Ambient Air Quality Monitoring Program's QA requirements 40 CFR part 58, appendix A require:

2.6 Gaseous and Flow Rate Audit Standards. Gaseous pollutant concentration standards (permeation devices or cylinders of compressed gas) used to obtain test concentrations for CO, SO₂, NO, and NO₂ must be traceable to either a National Institute of Standards and Technology (NIST) Traceable Reference Material (NTRM), NIST Standard Reference Materials (SRM) and Netherlands Measurement Institute (NMI) Primary Reference Materials (valid as covered by Joint Declaration of Equivalence) or a NIST-certified Gas Manufacturer's Internal Standard (GMIS), certified in accordance with one of the procedures given in reference 4 of this appendix. Vendors advertising certification with the procedures provided in reference 4 of this appendix and distributing gases as "EPA Protocol Gas" must participate in the EPA Protocol Gas Verification Program or not use "EPA" in any form of advertising.

These requirements give assurance to end users that all specialty gas producers selling EPA Protocol Gases are participants in a program that provides an independent assessment of the accuracy of their gases' certified concentrations. In 2010 EPA developed an Ambient Air Protocol Gas Verification Program (AA-PGVP) that provides end users with information about participating producers and verification results.

This program is considered a verification program because its current implementation level does not allow for a large enough sample of EPA Protocol Gases from any one specialty gas producer to be measured to yield a statistically rigorous assessment of the accuracy. It will not provide

end users with a scientifically defensible estimate of whether gases of acceptable quality can be purchased from a specific producer. Rather, the results provide information to end users that may inform their purchasing decisions. The final verification results will be reported with an explanation on how the results should be interpreted.

Each year, EPA will attempt to compare gas cylinders from every specialty gas producer being used by ambient air monitoring organizations. EPA Regions 7 and 2 have agreed to provide analytical services to provide verifications of 40 cylinders/lab or 80 cylinders total/year. Cylinders will be verified at a pre-determined time each quarter.

The selection goal in the following order would be:

- 1) Minimum one gas standard from every specialty gas vendor being used by the monitoring community
- 2) Selection of a minimum of 3 standards per specialty gas vendor
- 3) Weight additional standards by vendor market share in ambient air monitoring community.

In order to make the appropriate selection, EPA needs to know what specialty gas producers are being used by the monitoring organizations. Therefore EPA needs to collect information from each primary quality assurance organization every year on specialty gas producers being used and whether the monitoring organization would like to participate in the verification for the upcoming calendar year.

The burden estimates are for the 3-year period of 2014 through 2016. This ICR burden estimates are associated with the current monitoring portion of ICR #0940.27 (2060-0084).

This 3-year information collection is estimated to involve approximately 211 respondents for a total cost of approximately \$13,911 (labor) which equates to 211 hours. The estimate is only labor hours since EPA is asking the State, local, and Tribal air quality management agencies to complete an annual form that should take approximately 20 minutes to complete. In addition to the costs at the State, local, and Tribal air quality management agencies, there is a 3-year burden to EPA a total of 120 hours which equates to approximately \$17,532.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

The information requirements included within this ICR are necessary to provide the EPA with ambient air quality surveillance data in order to meet the code of federal regulation requirements to implement an Ambient Air Protocol Gas Verification Program. This program is integral to ensure the quality of the data that is used 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 EPA's goal of attaining the NAAQS in all areas of the United States is directly dependent upon the availability of quality ambient air data and the use of protocol gas calibration standards helps ensure this quality.

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 part 58, appendix A, QA regulations were 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. The Ambient Air Protocol Gas Verification Program reduce the uncertainty of data collected under § 7403 (c),

2(b) Practical Utility/Users of the Data

The EPA Office of Air Quality Planning and Standards (OAQPS) uses the data included within this collection to determine what specialty gas producers are selling calibration standards to monitoring organizations implementing ambient air monitoring under 40 CFR part 58 that are subject to use of protocol gasses. In addition, the information is used to determine the monitoring organizations willing to participate in the program by submitting the purchased gasses to EPA for verification testing.

Results for the verification data can provide monitoring organizations with information on specialty gas producers that are participating in the Protocol Gas Verification Program and the results might also help monitoring organizations with their protocol gas purchasing decisions.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-duplication

This collection is not unnecessarily duplicative of information otherwise reasonably accessible to the agency. There is currently no nationwide database that would allow EPA to gather information of this detail.

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

The 1995 Paperwork Reduction Act requires that any agency developing a non-rule related ICR must solicit public comments for a 60-day period prior to submitting the ICR to OMB. This notice was published on 5/22/13 (78 FR 30300). No comments were received.

3(c) Consultations

Through the course of planning, monitoring, and improving upon this collection and its associated regulation, the EPA regularly consults with affected State, local, and Tribal air quality

management agencies through various methods including the regulatory process, regular meetings, and training courses. The EPA has developed an advisory group for this program made up of OAQPS, EPA Regions and representatives from the State, local, and Tribal air quality management agencies to assist in the development of this information collection. This Advisory Group meets quarterly to discuss pertinent issues associated with the AA-PGVP. The EPA Regional Offices conduct annual ambient air monitoring meetings with their affected State, local, and Tribal air quality management agencies to assist these affected agencies with this collection and its associated regulation. The EPA's OAQPS also meets regularly with leading State and local air monitoring managers to discuss the Nation's ambient air monitoring program and this collection, via large monthly phone calls and smaller in person meeting two or three times per year.

3(d) Effects of Less Frequent Collection

State, local, and Tribal 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 automatically accrue to State or local air quality management agencies that fail to meet these requirements. The 40 CFR part 58 regulations 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;
- EPA would not be able to ensure new specialty gas vendors were participating in the program and were selling gasses of acceptable quality.

3(e) General Guidelines

1All of the OMB's general guidelines for information collections in 5 CFR 1320.6 are met by this ICR. None of the guidelines are exceeded.

- Data reporting on an annual basis is the requirement.
- Record retention is for no more than 3 years (most records are kept by the EPA data repository, not the affected State, local, and Tribal air quality management agencies)
- Information is maintained and reported in the standardized electronic format.

3(f) Confidentiality

Information that is considered personal, private, proprietary, or confidential is not required for this collection.

3(g) Sensitive Questions

1This section is not applicable to this ICR because no information involving matters of a sensitive nature is collected.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

This ICR affects State, local, and Tribal governments (SIC code 951, Administration of Environmental Quality Program) that are currently operating and maintaining established ambient air quality networks. The 40 CFR part 58 regulations associated with this request require that State, local, and Tribal air quality management agencies conducting the ambient air quality surveillance under this regulation to use protocol gases from specialty gas producers participating in the AA-PGVP.

4(b) Information Requested

(i) Data items, including record keeping requirements

These data items are submitted electronically to EPA and are stored electronically within the EPA's AA-PGVP data base.

- Primary quality assurance organization (PQAO) name and code and Reporting Agency name and code. Both the name and codes can be found in the EPA Air Quality System (AQS) Database.
- Monitoring organization protocol gas point of contact and email address
- Specialty gas producer(s) used, their address and the gas concentrations normally purchased
- Information on when monitoring organizations might purchase protocol gas in the upcoming calendar year, whether they would like to participate in the verification activity and whether they have had DOT hazardous materials shipping training.

(ii) Respondent Activities

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

- Read the one page instructions on how to fill out the form.

- Complete the one page Microsoft Excel form each year within the specified time period and submit it to OAQPS AA-PGVP Lead.

The influence of the 40 CFR part 58 regulations has been to provide a nationally consistent mechanism for collecting ambient air quality data including uniform quality assurance procedures such as the use of protocol gasses.

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

5(a) Agency Activities

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

- Periodically review the 40 CFR part 58 regulations to update the information collection and monitoring requirements in light of new technological developments or new air pollutant standards. Develop revisions to the regulations in response to legislative action and program changes.
- Establish, maintain, and support the AA-PGVP data base as the national repositories for all State, local, and Tribal air quality management agency ambient air protocol gas information. Periodically evaluate and improve upon this system as new technologies, and new regulatory requirements would dictate.
- Answer respondent (generally State, local, and Tribal air quality management agencies, but also industrial organizations, environmental groups, and others) questions about ambient air monitoring, the 40 CFR part 58 protocol gas regulatory requirements.
- Support the AA-PGVP by ensuring that the EPA Region 2 and 7 laboratories are able to conduct verifications of specialty gas standards each year.
- Provide annual assessment reports of the protocol gas verifications for posting on the AMTIC website or public dissemination.

5(b) Collection Methodology and Management

The EPA has provided and will continue to provide resources for the maintenance and operation of the protocol gas database. 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. In submitting the information to EPA, we ensure that the data are publicly available, electronically stored, and electronically retrievable.

5(c) Small Entity Flexibility --

This collection contains a minimum amount of information in order to implement the AA-PGVP. The AA-PGVP form is not anticipated to take more than 10 minutes for any entity, regardless of size, to complete. 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 EPA, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6))

5(d) Collection Schedule-

The information will be reported annually from September through November and the results will reflect the following calendar year.

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

- Upon request to the appropriate EPA Regional office, or to the OAQPS;
- By Freedom of Information Act Request to the appropriate 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 EPA channels.
- Through EPA public reports, such as the annual National Air Quality and Emissions Trends Report, or
- through report specifically generated for this program.

Due to the nature of the program, information related to what specialty gas cylinders were use from individual monitoring organizations will not be published until the cylinder has been analyzed and data validated. In this manner specialty gas vendors will not be aware ahead of time that a specific cylinder is being used for the verification.

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 presented in Worksheet 1. The detailed burden and cost estimates for the different types of monitors are based on information provided in the updated version of *Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants* (prepared by Desert Research Institute for the EPA Office of Air Quality Planning

and Standards, Air Quality Assessment Division, Ambient Air Monitoring Group, January 2005). The cost estimates presented in this guidance document are based on existing literature and direct monitoring experience. The costs for equipment and supplies were verified with vendors. The monitoring costs are based on vendor quotes for the monitor type that EPA expects respondents to use to comply with the requirements. Costs for level of effort estimates are verified with selected State and local agencies. All cost values presented in the guidance document are adjusted to 2004 dollars, based on the average of the first two quarters.

For use in preparing the burden estimates for this ICR, costs for the monitoring requirements were inflated to 2014, 2015, and 2016. The cost escalation factors were estimated based on the appropriate Gross Domestic Product (GDP) price indices. Tables showing the detailed burden estimate calculations are presented below. A summary of the average annual respondent burden costs follows.

Worksheet 1: Annual Average Respondent Burden Estimates

| Collection Activities | Total Labor Minutes Per Respondent Per Year (211 respondents) |
|------------------------------|--|
| 1. Read instructions | 5 |
| 2. Complete Form | 15 |
| TOTAL | 20 minutes |

6(b) Estimating Respondent Costs

All activities listed with section 4 (b) (ii) of this ICR Supporting Statement are included in the Worksheet 2. A summary of the average annual respondent burden costs follows.

Worksheet 2: Annual Average Respondent Cost Estimates

| Collection Activities | Total Labor Cost Per Respondent Per Year (211 respondents) |
|------------------------------|---|
| 1. Read instructions | \$5.54 |
| 2. Complete Form | \$16.61 |
| TOTAL | \$22.15 |

Costs in Worksheet 2 were averaged over the 3-year period (2014-2016)

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, and the ten Regional Offices. The in-house activities for this collection are completed by a variety of individuals with a variety of salaries; therefore, we used EPA payroll averages (one estimate for EPA Regions and one estimate for OAQPS) as an average for computing the program costs. We estimated a total of 40 hours (\$5,888) total agency annual burden.

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

Worksheet 3 shows the total annual respondent hourly burdens and costs which was taken from section 6(b) above for the estimated 211 respondents. The total annual labor burden for the respondents was estimated to be 70.3 hours (\$4,674).

Worksheet 3: Annual Total Respondent Labor Burden/Cost Estimates

| Collection Activities | Total Labor Hours Per Year | Total Labor Cost Per Year |
|------------------------------|-----------------------------------|----------------------------------|
| 1. Read Instructions | 17.6 | \$1169 |
| 2. Complete Form | 52.7 | \$3505 |
| TOTAL | 70.3 | \$4674 |

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

Respondent Total Annual Burden = 70 hours

Respondent Total Annual Labor Cost = \$4674

(ii) The Agency Tally

Agency Total Annual Burden = 40 hours

Agency Total Annual Cost = \$5888

(iii) Variations in The Annual Bottom Line.

We do not expect any significant variations in the annual bottom line for the ambient air monitoring networks for the clearance period requested.

6(f) Reasons for Change in Burden

EPA requires monitoring organization to submit information to EPA on an annual basis on the specialty gas vendors they use in order to ensure specialty gas producer participation in the Ambient Air Protocol Gas Verification Program. There is no change in burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 20 minutes 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 and verifying information, processing and maintaining information, and disclosing and providing information; 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 allow 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 established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2010-0050 which has been available for public viewing at the Air and Radiation Docket and Information Center Docket in the EPA Docket Center (EPA/DC), WJC 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, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2010-0050 and OMB Control Number 2060-0648 in any correspondence.

PART B OF SUPPORTING STATEMENT

This section is not applicable to this ICR because statistical methods are not used in the data collection.