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**Supporting Statement**  
**Data Requirements Rule for the 1-Hour Sulfur Dioxide Primary National Ambient Air**  
**Quality Standard (NAAQS)**

**EPA ICR #2495.01**

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**PART A**

**1. Identification of the Information Collection**

**(a) Title of the Information Collection**

**“Data Requirements Rule for the 1-Hour Sulfur Dioxide Primary National Ambient Air Quality Standard (NAAQS) - Proposal”**

**(b) Short Characterization/Abstract**

This Information Collection Request (ICR) includes estimates for ambient air monitoring data reporting and recordkeeping activities associated with the 40 CFR part 51 Requirements for Preparation, Adoption and Submittal of Implementation Plans.<sup>1</sup> These data and information are collected by State and local air quality management agencies and reported to the U.S. Environmental Protection Agency (EPA). This ICR also includes estimates for ambient air dispersion modeling which State and local air quality management agencies may choose to do to meet the requirements under the proposed Data Requirements Rule (RIN 2060-AR19).

The EPA is proposing a rule directing state, local, and tribal air quality management agencies to provide data to characterize current air quality in areas with large sources of sulfur dioxide (SO<sub>2</sub>) emissions for use in the NAAQS designations process.

The EPA is proposing that states characterize ambient air quality around sources with emissions greater than 1,000 tons per year which are located within any Core Based Statistical Area (CBSA) having 1,000,000 or more persons; and around sources with emissions greater than 2,000 tons per year located outside CBSAs having 1,000,000 or more persons. Based upon 2011 emissions data and 2013 census estimates, the proposed action would identify 443 SO<sub>2</sub> sources nationwide, which account for 75 percent of the total SO<sub>2</sub> emissions inventory.

The proposed rule describes criteria for identifying the source areas where air agencies would need to characterize SO<sub>2</sub> air quality. It also describes a process and timetables by which air quality management agencies would characterize air quality in source areas through ambient monitoring and/or air quality modeling techniques and submit such data to the EPA. The air quality data developed by the states in accordance with this rule would be used by the EPA in future rounds of area designations for the 1-hour SO<sub>2</sub> NAAQS.

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<sup>1</sup> Subpart J of Part 51: Ambient Air Quality Surveillance refers back to CFR 40 Part 58; throughout the rest of this ICR, reference will be made to Part 58 for monitoring requirements

For those air quality management agencies electing to conduct ambient monitoring to provide necessary air quality data, the EPA anticipates that they may take varied approaches to identify where and how many SO<sub>2</sub> monitors are appropriate. Those approaches likely include the following: 1) conduct new modeling to aid in monitoring site placement; 2) conduct exploratory monitoring to inform permanent monitor placement; and 3) take advantage of existing emissions data, existing monitoring data, and existing modeling, where possible, to aid in determining permanent monitoring site placement.

The State and local air quality management agencies with responsibility for reporting ambient air quality data and information as requested in this ICR submit these data electronically to the EPA's Air Quality System (AQS) and voluntary databases. 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 quality management agencies are responsible for the operation of this air monitoring network, they may have opportunities to work with industry to help support modeling exercises and/or monitor network installation, operations, and maintenance. There are two cost estimates shown in this ICR: 1) total estimated costs for the modeling option regardless of the source of the funding, and 2) total estimated costs incurred for the monitoring option regardless of the source of the funding.

(1) Modeling Option. Modeling can be used to designate an area around a source as attainment or nonattainment of the NAAQS. It is anticipated that electing to model to produce air quality data for designations purposes will use EPA's preferred near-field dispersion model, the AERMOD modeling system.<sup>2</sup> The use of AERMOD will include the following regulatory components:

- AERMOD dispersion model
- AERMAP terrain processor
- AERMET meteorological processor

Other components can be used with AERMOD, depending on the application, including:

- BPIPPRIME building processor (for downwash)
- AERMINUTE 1-minute ASOS winds pre-processor for input into AERMET
- AERSURFACE surface characteristics pre-processor for input into AERMET
- AERSCREEN, a screening version of AERMOD.

The dispersion modeling that will be used for SO<sub>2</sub> designations under the Data Requirements Rule requires:

- Source characterization information and emissions inputs for modeled sources
- Representative meteorological data of the area

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<sup>2</sup> EPA's preferred near-field dispersion model is AERMOD, the American Meteorological Society/Environmental Protection Agency Regulatory Model. See 40 CFR Part 51 Appendix W for more information.

- Terrain data to generate elevations for sources and receptor
- Receptor locations
- Background concentrations, and
- Building data for sources that will be affected by downwash.

Each modeling application is unique and the following inputs can require analyses that affect modeling costs:

- Determining the appropriate size of the modeling domain to capture potential modeled NAAQS violations
- Determining sources to model explicitly in the modeling, and sources to characterize in the modeling via background concentrations
- Estimating time-varying emissions for modeled sources
- Obtaining stack parameters for modeled sources
- Obtaining building information for sources subject to downwash effects
- Determination of the receptor grid and creating the elevations in the receptor grid via AERMAP
- Determining the representative meteorological surface and upper air stations for the model domain, downloading the meteorological and land use data for input into AERMINUTE, AERMET and AERSURFACE
- Calculating the appropriate background concentrations

Once these inputs have been generated and processed through the appropriate programs, AERMOD can be run and post-processed to generate design values to compare against the NAAQS. The level of post-processing (charts, tables, maps, etc.) can affect modeling costs as well.

Based on market research, stakeholder feedback, and the assumptions of the use of modeling for designations, an estimate of modeling costs is \$30,000 for a single modeling run centered on an identified source. If the air quality around all 443 sources expected to exceed the threshold in the proposed rulemaking was to be characterized through modeling, total national costs are estimated at \$13,300,000. If these costs were incurred over the course of three years, then the approximate annual cost for each year over that period would be \$4,433,333.

(2) Ambient Monitoring Option. Ambient monitoring costs are estimated under the assumption that each anticipated SO<sub>2</sub> source around which air quality is to be characterized will be done through monitoring (443 sources). Estimates are provided for a three year period and include a calculation for equipment amortization over seven years (as is typically done in monitoring-related ICRs). For the period of 2016, 2017, and 2018 (the SO<sub>2</sub> requirement begins in 2016), the total approximate average annual monitoring cost, including a calculation for equipment amortization is \$9,308,824 (total capital, and labor and non-labor operation and maintenance) with a total burden of 110,543 hours. The annual labor costs associated with these hours is \$7,608,287. Included in the \$9,308,824 total are other annual costs of non-labor operations and maintenance of \$760,011 and equipment and contract costs of \$940,526. For

reference purposes, an estimate for initial establishment of a new SO<sub>2</sub> monitoring station is \$92,614 (does not include equipment amortization). In addition to the costs at the State and local air quality management agencies, there is a burden to EPA of total of 52,717 hours and \$776,005.

## **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 and/or modeling 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 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 and/or modeling data requested in this information collection. Additionally, the EPA, State, and local air quality management agencies, environmental groups, industrial groups, and academic organizations use these data to study atmospheric chemistry, e.g., the formation and fate of SO<sub>2</sub>, 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 part 51 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. This program will also include the development of improved methods and technologies to increase understanding of the sources of nitrogen oxides, its formation, transport, regional influences and trends, and interactions with other pollutants.

Section 7410 (a) and (k) contain the SIP requirements, which include a requirement that each State submit a SIP that: 1) 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 and 2) provides for the performance of such air quality modeling as the Administrator may prescribe for the purpose of predicting the effect on ambient air quality of any emissions of any air pollutant for which the Administrator has established a national ambient air quality standard, and the submission, upon request, of data related to such air quality modeling to the designee as stipulated in the proposal.

### **2(b) Practical Utility/Users of the Data**

The EPA would use the ambient air quality data and/or the modeling data submitted pursuant to this collection to make area designation decisions with respect to the SO<sub>2</sub> NAAQS. For those areas that are determined to not attain the SO<sub>2</sub> NAAQS, the EPA intends to move forward with area designations. The affected State or local air quality management agency will work to develop an appropriate SIP for any area designated as nonattainment in order to improve air quality in the area such that it meets the applicable NAAQS expeditiously.

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 monitoring-related ICRs. 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.

### **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. The AQS and AIRNow systems, which contain information based solely on this collection, are the only national air quality data repositories available to the EPA. The ambient air quality surveillance data and related information collected through this information collection are not otherwise reasonably accessible to the 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 and AIRNow as their primary repositories for all air quality data.

#### **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 section is not applicable to this ICR because this is a rule-related ICR and we are accepting public comments on this proposed rule and will address them in the final rulemaking.

#### **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 and local air quality management agencies through various methods including the regulatory process, regular meetings, and training courses. The EPA conducts workshops and training on the AQS reporting system. The 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 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. Prior to this proposal, EPA conducted several stakeholder meetings to discuss issues associated with implementation of the SO<sub>2</sub> standard. In addition, EPA developed two Technical Assistance Documents for Monitoring and Modeling. These documents provide technical advice on the use of modeling and monitoring to determine if an area meets the 2010 SO<sub>2</sub> air quality standard.

### **3(d) Effects of Less Frequent Collection**

State and local air quality management agencies would collect and report ambient air quality data without the 40 CFR 51 regulations 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;
- Less timely attainment designations with respect to the NAAQS;
- More difficulty in identifying and repairing problems with an ambient air monitor-- i.e., data are used as 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 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**

All 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.

- Monitoring data reporting would be required on a quarterly basis. Nearly all respondents voluntarily report on a monthly basis. If the modeling option is chosen for some areas, one initial dispersion modeling run would be required.
- Record retention is for no more than 3 years (most records are kept by the EPA data repository, not the affected State and local air quality management agencies)
- Monitoring information is maintained and reported in the standardized electronic AQS format.

### **3(f) Confidentiality**

Information that is considered personal, private, proprietary, or confidential is not required for this collection. One purpose of collecting ambient air data through AQS and AIRNow 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. Security measures are taken to prevent tampering with the AQS electronic database by limiting the access to the AQS mainframe only to authorized users

### **3(g) Sensitive Questions**

This 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 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 part 51 regulations associated with this request require that State and local air quality management agencies conduct either modeling or the ambient air quality surveillance and report the data to the EPA. Although industrial, environmental, and research organizations may use the data available through the AQS, they are not required to report any information for this information collection. Monitoring data submittal to AIRNow is voluntary for all organizations, but most State and local agencies reporting to AQS also report to AIRNow.

### **4(b) Information Requested For Areas Where Monitoring Option is Implemented**

#### *(i) Data items, including record keeping requirements*

These data items are submitted electronically to EPA's AQS as required by 40 CFR part 58. These data are stored electronically within the EPA's AQS, and separate records kept by the State or local air quality management agency are not required.

- Hourly and sub-hourly (5-minute) ambient air pollutant concentrations of SO<sub>2</sub> collected at SLAMS sites or any third party monitoring sites identified and eligible to satisfy proposed requirements of the data requirements rule.
- Precision and accuracy data for all SLAMS sites, Special Purpose Monitors (SPM), and any third party monitor identified as eligible to satisfy proposed requirements of the data requirements rule.

- Monitoring network description information, including the site AQS identification number, site location, sampling and analysis method, operating schedule, monitoring objective, site's scale of representation, identity of the urban area represented, and quality assurance plan.
- 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.

*(ii) Respondent Activities*

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

- Read the 40 CFR part 51 regulatory provisions and other EPA guidance (for example, please reference our Internet site at [www.epa.gov/ttn/amtic](http://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 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 or otherwise provide oversight to ambient air quality monitoring, incorporating all appropriate quality assurance procedures such as calibrations, precision and accuracy checks, and, if necessary, concurrent monitoring.
- Validate the ambient air data for quality assurance considerations.
- Electronically submit the complete and validated ambient air data to AQS.
- Prepare and submit to EPA annually the SLAMS sites summary report.

Each of these activities are conducted using existing reporting and recordkeeping practices, including electronic submittal to the AQS.

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

### **5(a) Agency Activities**

The EPA conducts the following activities to implement the monitoring option of 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 AQS national repository for all State and local air quality management agency ambient air quality data and monitoring information. 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 part 58 regulatory requirements, and AQS. This includes the establishment of the Ambient Monitoring Technology Information Center bulletin board, the AQS toll-free hotline, and other written or verbal communication.
- Support the quality assurance program by working within the EPA and with the respondents to evaluate precision and accuracy data, oversee the National

Performance Audit Program, participate in systems audits, and conduct 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 AQS. All monitoring 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 AQS 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 AQS, 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 50,000). 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)), the use of such techniques as:

- Establishing differing compliance or reporting requirements or timetables that account for 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 EPA with consideration of the respondent's resources);

- Clarification, consolidation, or simplification of compliance and reporting requirements (e.g., by establishing, maintaining, and improving as needed the AQS and AIRNow national repositories for ambient air quality data and information);
- Exemption from coverage of the collection of information, or any part thereof (e.g., the 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 for Monitoring Data**

Ambient air quality surveillance data and precision and accuracy data for criteria air pollutants are submitted according to the schedule defined in 40 CFR 58.16. These current regulations require 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 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 applies to all SLAMS and all SPM monitoring data that have been submitted by May 1.

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

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, to AQS;
- Through EPA public reports, such as the annual “National Air Quality and Emissions Trends Report”; or
- Through AQI reporting mechanisms which include newspaper, television, Internet and other publicly available notices (see [www.epa.gov/airnow](http://www.epa.gov/airnow)).

## 6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION FOR THE MONITORING OPTION

### 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 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 monitoring cost estimates presented in this guidance document were based on existing literature and direct monitoring experience. The costs for equipment and supplies were verified with vendors. The monitoring costs were 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 were verified with selected State and local agencies.

For use in preparing the burden estimates for the monitoring option of this ICR, costs for the monitoring requirements were inflated to 2016, 2017 and 2018. 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**

<b>Collection Activities</b>	<b>Total Labor Hours Per Respondent Per Year (113 respondents)</b>
1. Network design	5.4
2. Site installation	11.3
3. Sampling & analysis	313.6
4. Maintenance & repairs	177.7
5. Data management	101.9
6. Quality assurance	203.6
7. Supervision	164.7
TOTAL	978.2

### 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 (113 respondents)
1. Network design	\$415.1
2. Site installation	\$697.7
3. Sampling & analysis	\$22,038.1
4. Maintenance & repairs	\$11,613.2
5. Data management	\$6,826.6
6. Quality assurance	\$13,992.4
7. Supervision	\$11,746.9
TOTAL	\$67,330.0

### 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 the actual salary as an average for computing the program costs. Actual contractor expenses were used for those activities completed using extramural resources. We estimated a total of 52,717 hours and \$776,005 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 section 6(b) above for the estimated 113 respondents. The total labor burden for the respondents was estimated to be 110,543 hours at a total cost of \$7,608,287.

**Worksheet 3: Annual Total Respondent Labor Burden/Cost Estimates**

<b>Collection Activities</b>	<b>Total Labor Hours Per Year</b>	<b>Total Labor Cost Per Year</b>
1. Network design	613	\$46,908
2. Site installation	1,278	\$78,845
3. Sampling & analysis	35,440	\$2,490,302
4. Maintenance & repairs	20,082	\$1,312,286
5. Data management	11,518	\$771,411
6. Quality assurance	23,004	\$1,581,140
7. Supervision	18,606	\$1,327,396
TOTAL	110,543	\$7,608,287

**6(e) Bottom Line Burden Hours and Cost Tables**

*(i) Respondent Tally*

Respondent Total Annual Burden = 110,543 hours  
 Respondent Total Annual Labor Cost for O & M = \$7,608,287  
 Respondent Total Annual Cost for Non-labor O & M = \$760,011  
 Respondent Total Equipment/Contract = \$940,526

*(ii) The Agency Tally*

Agency Total Annual Burden = 52,717 hours

Agency Total Annual Cost = \$776,005

*(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**

The new burden requested in this ICR results from the requirements under the Proposed SO2 Data Requirements Rule.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 978 hours per respondent under the monitoring option. 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-2013-0711, 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), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](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-2013-0711 and OMB Control Number 2060-NEW 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 associated with the rule amendments.