SUPPORTING STATEMENT
Revisions to the Air Emissions Reporting Requirements: Revisions to Lead (Pb) Reporting Threshold and Clarifications to Technical Reporting Details (Final Rule)
EPA ICR # 2170.05

PART A

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

Revisions to the Air Emissions Reporting Requirements: Revisions to Lead (Pb) Reporting Threshold and Clarifications to Technical Reporting Details

1(b) Short Characterization/Abstract

The Environmental Protection Agency (EPA) promulgated the Air Emissions Reporting Requirements (AERR) on December 17, 2008 (FR Vol 73, No. 243, 76539). The AERR consolidated and streamlined previous requirements of several older rules for state, territorial, and local air pollution control agencies to report air emissions to the EPA annually. The AERR has an approved information collection request (ICR) in place (ICR Number 2170.04). This supporting statement is being submitted in conjunction with the promulgated revisions to the AERR which would be effective starting with the 2014 inventory year. This supporting statement provides estimates of the burden of reporting air emissions-related information from state and local agencies for inventory years 2014, 2015, and 2016, which are due to be reported on December 31 of the year following each inventory year.

Under the final AERR ICR, 55 state and territorial air quality agencies, including the District of Columbia (DC), and an estimated 49 local air quality agencies, must annually submit emissions data for point sources emitting specified levels of oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO_2), volatile organic compounds (VOC), particulate matter less than or equal to 10 micrometers in diameter (PM_{10}), particulate matter less than or equal to 2.5 micrometers in diameter ($PM_{2.5}$), and ammonia (NH_3).

Every 3 years, states[1] are required to submit a point source inventory for the pollutants listed above, plus lead (Pb), as well as a statewide stationary nonpoint, onroad mobile, and nonroad mobile source inventory for all criteria pollutants and their precursors. The emissions data submitted for the annual and 3-year cycle inventories are used by the EPA's Office of Air

1 [1]Except where noted, future reference to "state(s)" in this supporting statement includes 50 states, 4 territories, 49 local agencies, and the District of Columbia (DC).

Quality Planning and Standards (OAQPS) to assist in developing ambient air quality emission standards, performing regional modeling, and preparing national trends assessments and other special analyses and reports.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

The purpose of the AERR is to coordinate the various state emission inventory reporting requirements and streamline the activities involved in submitting the emissions data to the EPA. The AERR has enabled the EPA to achieve uniformity and completeness in a national inventory to support national, regional, and local air quality planning and attainment. As the EPA moves towards a regional focus in addressing air quality issues, there is a greater need for states to develop consistent inventories and to share their emissions inventory data with other groups.

While the Clean Air Act (CAA) does not provide a specific authorization for a national emissions database, the CAA provides the EPA ample legislative authority for acquiring such data. Emissions data are of vital importance to the EPA for fulfilling a host of monitoring, standard-setting, rulemaking, reviewing, and reporting duties. Section 110 and 301(a) of the CAA provide a primary authority for a national emissions database. Section 110 requires each state to prepare a plan which provides for implementation, maintenance, and enforcement of the primary standard for each pollutant for which air quality criteria have been issued. This plan must include provisions for periodic reports identifying sources and listing amounts of emissions. Section 301(a) authorizes the Administrator to promulgate necessary regulations.

Congressional support for collecting and reporting emissions data is demonstrated in three sections of the CAA. Section 110(a)(2)(F) requires that each state provide for periodic reports on the nature and amounts of emissions of criteria pollutants from stationary sources. Sections 182(a)(3)(A) and 187(a)(5) of the CAA specify periodic inventory requirements for ozone and CO nonattainment areas, respectively. Section 182(a)(3)(A) requires states with ozone nonattainment areas to submit a current inventory of actual emissions of VOC, NO_x, and CO every 3 years. Section 187(a)(5) requires a similar inventory of actual CO emissions for CO nonattainment areas. Periodic inventories include emission estimates for all point, nonpoint, onroad mobile, and nonroad mobile sources. Section 172(c)(3) also provides the Administrator with discretionary authority to require other emissions data as deemed necessary for State Implementation Plan (SIP) development in nonattainment areas to meet the national ambient air quality standards (NAAQS).

2(b) Practical Utility/Users of the Data

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

- Evaluation of existing control strategies, such as the NO_x SIP Call for states and larger areas;

- Evaluation of control strategies for states and larger areas, including applications of regional scale models;

- Development of national control strategies and preparation of Regulatory Impact Analyses (RIA);

- Preparation and publication of national summaries of emissions including trend analyses;

- As a database to assist in the identification of important source categories for future regulation; and

- Preparation of the stationary source portion of a report to Congress on SO_2 emissions. This report is required by Section 406 of the CAA and is due on a 5-year cycle that began on January 1, 1995. The report must contain an inventory of national annual SO_2 emissions from industrial sources (as defined in Title IV of the CAA).

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

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

The collection of emissions data specific to nonattainment areas for certain criteria air pollutants is necessary to comply with requirements specified in Title I of the CAA. States with nonattainment areas rely on current information for point, nonpoint, and mobile sources to revise their SIPs and to plan for emission reductions mandated by the CAA. In addition, a statewide inventory compiled at least every 3 years for all point, nonpoint, and onroad and nonroad mobile sources is considered to be a key tool to assist states in meeting CAA requirements that address emissions tracking, compliance issues, and mid-course adjustments. Statewide emission inventories can be used by states affected by pollution transport from upwind areas to develop more efficient control strategies to meet the NAAQS. Statewide emission inventories that were developed by the EPA (the National Emissions Inventory or NEI) are being used by the Regional Planning Organizations (RPOs) as the starting point for the development of statewide emission inventories used in the regional haze program to define control strategies.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

Previous reporting requirements have occasionally forced state agencies into inefficient collecting and reporting activities. The AERR was promulgated specifically to simplify previously existing emission inventory reporting by states to the EPA, offer options for data collection and exchange, and unify reporting dates for various categories of inventories to avoid duplication of effort. For example, under the NO_x SIP Call rulemaking, the EPA required states to submit annual inventories for all NO_x sources for which states had adopted control measures to meet their NO_x budget. In addition, statewide NO_x inventories of all controlled and uncontrolled sources were required every 3 years. The Consolidated Emissions Reporting Rule (CERR) also required annual and triennial emission inventory reporting of many of the same data elements. The AERR aligned the reporting dates and combined data from these two previous collection activities to avoid duplication of information collected from sources, minimize the burden on industry, and reduce the effort for state and local government agencies to compile the data.

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

A draft of the revisions to the AERR has been included as part of the public docket. The proposed rule solicited public comment on this ICR submission.

3(c) Consultations

The EPA regularly participates on monthly conference calls chaired by the National Association of Clean Air Agencies (NACAA) to discuss issues raised by state agencies related to emission inventories. The EPA has developed and is operating a web-accessible database known as the Emission Inventory System (EIS) which serves as the repository for the state agency data submitted to the EPA under the AERR requirements. The EIS includes a Support Request area and a QA test environment for state agencies. In addition, the EPA provides annual training for the state agencies on the development of inventories and the use of the EIS via webinars and conferences.

3(d) Effects of Less Frequent Collection

The submittal dates required for reporting of emissions data to the EPA have been established to minimize the burden on state agencies, but also to ensure that state agencies are collecting timely and sufficient emission inventory data to support their air pollution control efforts. A statewide inventory compiled at least every 3 years for all point, nonpoint, onroad mobile and nonroad mobile sources is considered important to assist states in meeting various CAA requirements.

If the information collection were not carried out every 3 years for all sources and annually for major point sources, the EPA would not be able to maintain a central, national repository of emissions data from which to extract updated information needed to fulfill EPA mandates.

3(e) General Guidelines

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

3(f) Confidentiality

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

3(g) Sensitive Questions

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

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/North American Industry Classification System (NAICS) Codes

The emissions data required by the AERR is submitted by state, territorial, and local air pollution control agencies. Under the AERR, there are 55 state and territorial air pollution control agencies and 49 local air agencies that are subject to the national reporting requirements and are required to compile and report emissions information for large stationary point sources on an annual basis, and for smaller point sources, stationary nonpoint and onroad and nonroad mobile sources on a 3-year basis. The affected NAICS code is *924110 – Administration of Air and Water Resources and Solid Waste Management Programs*, which includes governmental environmental protection and control agencies, and pollution control agencies.

4(b) Information Requested

The AERR consolidated emission inventory data that were being collected by states and reported to the EPA under several different provisions of the CAA, including periodic or 3-year cycle inventories and annual point source inventories. Every year, state agencies are required to submit emissions data for large stationary point sources emitting one or more of the following pollutants above a specified level: NO_x, CO, SO_2, VOC, PM_{10}, $PM_{2.5}$, and NH_3. The AERR also requires states to report point, nonpoint, onroad mobile, and nonroad mobile source emissions data for all criteria pollutants and their precursors every 3 years on a statewide basis. There are no annual reporting requirements for sources of lead (Pb), however, lead emissions must be included in the 3-year cycle inventories. Data elements that must be reported by state agencies for point, nonpoint, and onroad and nonroad mobile sources are listed in Appendix A to Subpart A of 40 CFR part 51

(ii) Respondent activities

For the point source inventory reporting requirements of the AERR, respondent activities generally involve copying emissions and related parameters from an existing state electronic file, resolving any errors or anomalies identified through edits or other qualitative reviews, and

providing it to the EPA electronically using eXtensible Markup Language (XML) format. Thus, the activities for generating criteria pollutant point source inventories are primarily data processing and typically do not involve the development of new data which does not already exist in the state's files. However, compiling a triennial statewide nonpoint, onroad mobile, and nonroad mobile source inventory is expected to involve additional effort by a state. The specific respondent activities associated with the AERR are outlined below, and are grouped into annual and triennial activities.

Annual state activities include submitting emissions data for Type A point sources emitting 2,500 tons per year (tpy) of NO_x, CO, or SO_2; or 250 tpy of VOC, PM_{10}, $PM_{2.5}$ or NH_3.

Triennial State activities include:

- Submitting emissions data for Type B point sources emitting 100 tpy of NO_x, SO_2, VOC, PM_{10}, $PM_{2.5}$, or NH_3; or 1,000 tpy of CO; or 0.5 tons of Pb, as well as emissions data for Type A sources;

- Developing and reporting statewide inventory emission estimates for stationary nonpoint, onroad mobile, and nonroad mobile sources for all criteria pollutants.

For states without nonattainment areas for the criteria air pollutants, the burden associated with preparing statewide stationary nonpoint, onroad mobile, and nonroad mobile source inventories was a new requirement for the 2002 inventory. However, many states had existing nonattainment areas and had already prepared stationary nonpoint, onroad mobile, and nonroad mobile source inventories for their nonattainment counties. For states with existing nonattainment areas, the incremental burden associated with preparing statewide stationary nonpoint, onroad mobile, and nonroad mobile source inventories every 3 years is associated with extending the inventories to cover attainment counties. This incremental burden will vary by state depending on the total number of counties as well as the number of nonattainment versus attainment counties within each state.

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

5(a) Agency Activities

The EPA activities associated with the AERR include:

- Receiving, reviewing, and storing emission inventory data submitted by each state;

- Processing and updating data submitted by states, including performing quality assurance of data, and coordinating efforts to resolve errors and anomalies; and

- Fulfilling information requests.

5(b) Collection Methodology and Management

The EPA has established a central repository of inventory data for all states termed the EIS database. Emissions inventory data reported electronically will be stored in the EIS database and used by the EPA and by other states for air modeling, tracking progress in meeting CAA requirements, setting policy and answering questions from the public.

The EPA has created and maintains the EIS database as a central repository of inventory data for all states, but the data must be supplied by the states in electronic form. The EPA requires that states use a defined XML schema for electronic data reporting using the EPA's Central Data Exchange (CDX).

5(c) Small Entity Flexibility

State and territorial control agencies are not considered to be small entities. According to the EPA's ICR Handbook, OMB's definition for a small entity includes small governmental jurisdictions with populations of less than 50,000. According to 2010 population data from the U.S. Census Bureau, no state or territory has a population below this threshold. In addition, none of the local air agencies that report under the AERR for their jurisdictions represent an area of less than 50,000.

5(d) Collection Schedule

States must annually report all required emissions data for Type A point sources of NO_x, CO, SO_2, VOC, PM_{10}, $PM_{2.5}$, and NH_3. States are also required to submit emissions data for all smaller point sources (i.e., Type B sources) for the same pollutants as Type A sources, plus lead (Pb), on a 3-year schedule. As part of the 3-year cycle reporting requirement, states must also submit statewide stationary nonpoint, onroad mobile, and nonroad mobile source emissions for all of the criteria pollutants listed above, including lead.

The AERR also contains a provision that allows states the option of estimating one-third of their 3-year cycle inventories, including Type B sources, in any given year. This enables states to spread out the effort required to prepare a complete 3-year cycle inventory over 3 years. Some conditions apply if a state chooses this reporting option (e.g., emission estimates for each year that comprise a complete 3-year cycle inventory must be compiled identically), and states subject to the NO_x SIP Call may not report triennial NO_x emissions inventories in this manner.

For all of the above reporting activities, the EPA requires that states submit the appropriate emissions data within 12 months of the end of the inventory year (e.g., a statewide pollutant emissions inventory for the year 2014 is required by December 31 of 2015).

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

The respondent burden for complying with the reporting requirements of this AERR ICR is estimated based on the burden associated with meeting the annual Type A point source inventory

reporting requirements and the 3-year cycle complete inventory reporting requirements. The state, territorial, and local agencies reporting to the EPA under the AERR maintain their own air quality management systems, including permitting programs and annual emissions fee programs for their point sources. The efforts they expend to collect and manage emissions inventory data for these purposes are not included as part of the burden estimates for reporting the data to the EPA under the AERR. The efforts expended to support their permitting and emissions fee statement programs and other state uses include:

- Collecting emissions data and other associated information;
- Training staff in coding and submissions techniques;
- Quality-assuring emissions data and resolving errors and anomalies; and
- Maintaining records associated with data submitted by sources.

The additional tasks performed in order to submit the point source data to the EPA include:

- Extracting the necessary data from the state electronic data system;
- Converting any new Facility Inventory data into the XML submittal format required by the EPA;
- Converting the point emissions data into the XML submittal format required by the EPA;
- Running the automated Quality-assurance checks provided in the EPA data system and resolving any critical errors;
- Submitting the final file to the EPA;
- Responding to any follow-up inquiries from the EPA.

For the complete 3-year inventories, the efforts required for point sources are similar to the above, except a larger number of facilities must be extracted from the state data system, formatted into XML, checked for critical errors, and submitted. In addition, the states must make estimates for their nonpoint, onroad, and nonroad emission sources for the 3-year complete inventories. Most of the state agencies and some of the local agencies operate their own systems and capabilities for estimating emissions from such source types for their own air quality management planning purposes. For such agencies, the additional tasks to submit the emissions data to the EPA are similar to the above steps for point sources. For agencies that don't otherwise have a need to estimate nonpoint, onroad, and nonroad emissions, additional estimation steps are needed.

The following sections discuss the assumptions used to develop burden hour estimates for annual and triennial activities. Table 6-1 lists the burden items included under these categories, and presents their associated burden hours for 1 year. In general, managerial time was estimated to be 5 percent of technical staff time. Burden hours and associated costs were estimated for the

3-year period that the affected states would have to report emissions data to the EPA. In this case, that period corresponds to the years 2015, 2016, and 2017 (since they would likely begin collecting data for the emissions year 2014 during 2015, and would report the data within 12 months of the end of 2014, i.e., December 31, 2015). Table 6-2 presents the state and local respondent annual burden hours and costs by activity.

Annual activities

For 2 of the 3 years in each triennial cycle, the agencies submit only point source data for Type A sources. Based on an analysis of the 2008 NEI, the number of such sources (i.e., facilities) emitting 2,500 tpy of NO_x, CO, or SO_2, or 250 tpy of VOC, PM_{10}, $PM_{2.5}$, or NH_3, was 1,498. The number of Type A plus Type B sources (those emitting 100 tpy of SO_2, NO_x, VOC, PM_{10}, $PM_{2.5}$, or NH_3; or 1,000 tpy of CO) was found to be 5,398. A review of the 2011 Toxics Inventory Release shows 98 facilities with greater than 0.5 tons of Pb emissions that would be required to be reported by states to the NEI. However, these sources are all large fuel combustion, mining, or steel facilities that are already required to be reported to the NEI based upon their emissions of one or more of the other criteria pollutants. A total of 55 state and territorial agencies and 49 local agencies are required to report to the AERR. This equates to an average of 14 large, Type A sources to be reported per agency for 2 of the 3 years, and an average of 52 facilities to be reported per agency for the triennial inventories. The number of sources can be much larger for the large, heavily-industrialized states, and smaller (all the way down to zero Type A sources) for some smaller states and local agencies. Because much of the effort needed to report the point source emissions data from the state and local data systems to the EPA involves automated data manipulations, there are economies of scale for the states with many sources. The per respondent burden estimates shown in Table 6-1 are based on the average number of sources per respondent. Use of these averages should provide an overly conservative (larger) estimate of total burden hours, because the burden values for the smaller agencies are being overestimated since they will actually have fewer sources than average, and the average burden values do not include the economies of scale experienced by the larger agencies.

Triennial activities

Every 3 years, states are required to submit emissions data for the criteria pollutants for all point, nonpoint, onroad mobile, and nonroad mobile sources within the state. The point source threshold definition for this triennial inventory year is lowered from the Type A source thresholds used for the annual inventory (2500 tpy for NO_x, CO, and SO_2; 250 tpy for VOC, PM_{10}, $PM_{2.5}$, and NH_3) to 1000 tpy for CO and 100 tpy for the remaining Type A source pollutants. In addition, Pb sources with greater than 0.5 tons per year are required to be reported for the triennial years. As noted above under **Annual Activities**, the number of point sources required to be reported increases from 1,498 to 5,398 for the triennial reporting years. Table 6-1 shows the average hour burden estimates for this triennial point source reporting. It is conservatively estimated that the additional hours needed for tasks 4 and 6, resolving critical QA errors and responding to EPA follow-up questions, will increase by a factor of 4 compared to the annual Type A reporting. Tasks 2 and 3, converting both the Facility Inventory and point emissions data into the XML format, is conservatively estimated to require just twice the effort

needed for the annual Type A sources, because the task is largely the same regardless of the number of sources. Tasks 1 and 5, extracting data from a state data system and submitting a final file to the EPA are estimated to require the same amount of effort as for a Type A annual reporting year.

In addition to the point source reporting, a burden is expected for states to develop the statewide stationary nonpoint, onroad mobile, and nonroad mobile source inventories every 3 years. The burden for a state agency to develop and report statewide inventories was estimated to entail the use of 1.0 FTE (2080 hours) every third year in the previous ICR (2170.04). We estimate that half of those prior ICR hours (1040 hours) would be for the nonpoint sources, with one-quarter for onroad sources (520 hours) and one quarter for nonroad sources (520 hours). The changes to the AERR being estimated for this ICR include requiring the reporting of the onroad and nonroad model inputs, rather than having to run each model and report the larger resulting data sets for onroad and nonroad emissions. We estimate that this will reduce the hours for each of the onroad and nonroad portions of the inventory from 520 hours to 350 hours, for a total reduction of 340 hours (1040 – 700). Managerial time of 87 hours (5 percent of the total of nonpoint 1,040 hours plus onroad 350 hours plus nonroad 350 hours) were added for this activity.

For local agencies responsible for developing and reporting nonpoint and mobile source emissions for each county within their jurisdiction, the triennial burden was estimated to be one-half of that estimated for a state agency (i.e., ½ of 1,740 = 870 technical hours plus 44 managerial hours). Additional hours were also estimated for all local agencies (i.e., 49 agencies) to coordinate and provide some de minimis emissions inventory data or supporting information to their corresponding state agency. The time estimated for each local agency to perform these activities every 3 years was estimated to be 80 technical hours and 4 managerial hours.

6(b) Estimating Respondent Costs

Table 6-2 presents state and local respondent annualized hours and costs for each information collection activity. To estimate annualized hours and costs for triennial activities, the burden estimate is divided by 3 to estimate the annualized burden spread over a 3-year period. For the annual Type A point source reporting activities, annualized hours are the same as shown in Table 6-1. However, in the case of the additional hours needed in each triennial reporting year to report the larger number of point sources, the incremental hours above the Type A source effort is divided by 3 to estimate the annualized burden.

(i) Estimating Labor Costs

For this ICR, the labor rate used for technical staff at state, territorial, and local agencies is $32.58 per hour, and the labor rate for managerial employees at these agencies is $43.95 per hour. These labor rates are found in data shown on the U.S. Department of Labor, Bureau of Labor Statistics web site at http://www.bls.gov/oes/current/naics4_999200.htm ("National Industry-Specific Occupational Employment and Wage Estimates, May 2011"). The technical rate represents the mean hourly wage for Environmental Engineers for NAICS 999200 - State Government. The managerial rate represents the mean hourly wage for Computer and Information Systems Managers in the same NAICS. An overhead rate of 100% was applied to

both the technical and managerial mean hourly wage rates to derive the bottom-line rates of $65.16 and $87.90 used in the calculations and shown in Table 6-2.

(ii) Estimating Capital and Operations and Maintenance Costs

The methodology for estimating capital and operations and maintenance costs presented below is based on the method used in the ICR for the previous CERR annual inventory (EPA ICR #0916.12, OMB #2060-0088). Assumptions regarding the number of respondents and work stations are unchanged.

The number of respondents reflects the number of agencies (state, territorial and local) believed to be reporting data directly to the EPA. The number of work stations assumed for each respondent reflects the number of work stations that would be dedicated to reporting under the AERR. It was assumed that each agency would require 5 work stations to comply with the reporting provisions of the AERR (1 for point sources, 1 for nonpoint sources, 1 for onroad mobile, 1 for nonroad mobile, and 1 for managerial/coordination activities). These costs are accounted for in Table 6-2 under the annual activity involving the submittal of Type A point source data by states, although the estimates are anticipated to cover the costs involved in developing statewide nonpoint and mobile source inventories as well.

The cost for replacing a work station, when replacement becomes necessary, is assumed to be approximately $1,000 per agency. For this ICR, it is assumed that 20 percent of the work stations will be replaced each year. Thus, the costs of replacement per agency would be:

5 work stations/agency x 20% replacement/year x $1000/work station = $1000/agency/year

Cost of work station replacement for all agencies equals: $1000/replacement costs/year x 104 agencies/year = $104,000/year

Maintenance costs are attributed to the normal maintenance of the work stations used to submit the required annual and triennial reports to the EPA. These costs are estimated to be approximately $120 per agency. Thus, total maintenance costs for the respondents are:

$120/agency x 104 agencies = $12,480/year

6(c) Estimating Agency Burden and Cost

The EPA's costs that relate to this collection can be grouped into three areas:

1) Emission Inventory System (EIS) annual operation and maintenance costs;

2) Review of data; and

3) Information requests.

As of fiscal year 2013, the EIS annual operation and maintenance costs are estimated to be as follows: 2.0 FTE positions, $300,000 in Working Capital Funds and $750,000 for an Information Technology contractor.

The costs of reviewing data submitted by states include costs relating to data review, coordination of efforts to resolve any errors or anomalies, and updating of the files after the quality assurance and reconciliation assurance efforts have been completed. Within the EPA, the Regional Offices annually use about 2 FTEs in total across the 10 Regions to coordinate state efforts in making their submissions, perform software edits and other quality reviews, and if required, coordinate updates performed by the OAQPS. The OAQPS uses approximately 1 FTE at a cost of $100,000 to track and process annual data. Therefore, approximately 3 FTEs at an annual cost of $300,000 are used by the EPA to track and process data.

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

The number of respondents is estimated to be 51 states (including DC), 4 territories and 49 local agencies, resulting in 104 total respondents. As detailed in table 6-2, the total annual hourly burden for all state, territorial and local respondents is estimated to be 58,740 hours per year and the total annual cost is estimated to be $4,017,043.

6(e) Bottom Line Burden Hours and Cost Tables

Total Estimated Respondent Burden and Cost Summary

Burden Element/Cost	Respondents	EPA	Total
Number of Respondents	104		104
Total Hours Per year	58,740	10,400	69,140
Annual Capital Cost	$104,000	$300,000	$404,000
Annual O&M Cost	$12,480	$750,000	$762,480
Total Annual Capital and O&M Costs	$116,480	$1,050,000	$1,166,480
Labor Cost Per Year	$3,900,563	$500,000	$4,400,563
Total Cost Per Year	$4,017,043	$1,550,000	$5,567,043

6(f) Reasons for Change in Burden

The net change in emission reporting burden as compared with the existing approved ICR for the AERR (EPA ICR #2170.04) is shown in the table below. The existing approved ICR burden estimates were developed and documented only as incremental changes compared to two prior approved ICRs for two rules (the CERR and the NO_x SIP Call) which the AERR replaced. The existing approved ICR does not contain specific bottom-line burden hour estimates for two of the three AERR changes that will reduce respondent burden. These two items are the removal of the current requirement to report emissions from wildfires and the removal of the current requirement to report non-annual emissions by states with ozone or CO non-attainment areas and states covered by the NO_x SIP Call. It cannot be determined conclusively that the prior burden estimates included any estimates for the estimation of these two reporting items. This ICR, therefore, does not include any reduction estimate for the burden of these two items, although we do expect reductions in practice.

The third AERR change that will reduce respondent burden is replacing the current requirement for states to report complete onroad and nonroad emission estimates with a requirement that they instead report just the emission model inputs used to estimate those emissions. As described in section 6(a) above for Triennial activities, and as shown in line 7 of Table 6-1, we estimate this change will reduce burden hours by 340 technical hours for the average state agency and by 170 technical hours for the average local agency during the triennial reporting years. Managerial hours for this task are also reduced accordingly.

In addition to the burden hour reductions described above, a minor portion of the change in the cost estimate shown in Table 6-2 are due to updating the labor costs per hour to use the latest BLS values.

Burden Change

	Currently Approved ICR	Change	Total Requested
Annual Responses	104	0	104
Annual Hour Burden	68,192	-9,452	58,740
Annual Cost Burden	4,735,411	-718,368	4,017,043

6(g) Burden Statement

Table 6-2 indicates that the reporting of emissions data required by the AERR is estimated to involve an average of 565 hours per year for each state, territorial and local air pollution control agency required to submit. 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2004-0489, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA 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. 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-2004-0489 and OMB Control Number 2060-0580 in any correspondence.

Table 6-1. State Respondent Burden Hours by Activity

Information Collection Activity	Hours Per Respondent		
	Managerial Hours	Technical Hours	Total
Annual			
1. Extract data from the state data system		4	4
2. Convert data into the XML format – Facility info		8	8
3. Convert data into the XML format – Emissions info		4	4
4. Run quality-assurance checks and resolve critical errors	2	24	26
5. Submit final file to the EPA via CDX		2	2
6. Respond to follow-up inquiries from the EPA	2	4	6
Subtotal for Annual Point Source Reporting – Type A sources	4	46	50
Triennial			
1. Extract data from the state data system		4	4
2. Convert data into the XML format – Facility info		16	16
3. Convert data into the XML format – Emissions info		8	8
4. Run quality-assurance checks and resolve critical errors	8	96	104
5. Submit final file to the EPA via CDX		2	2
6. Respond to follow-up inquiries from the EPA	8	16	24
Subtotal for Triennial Point Source Reporting – all point sources	16	142	158
Subtotal for Triennial Point Source Reporting – increment 3rd year	12	96	108
7. For state agencies, develop and report statewide inventory for stationary nonpoint, nonroad mobile, and onroad mobile sources for all pollutants	87	1,740	1,827
8. For local agencies, develop and report county-level inventories for stationary nonpoint, nonroad mobile, and onroad mobile sources for all pollutants	44	870	911
9. For local agencies, coordinate with state agencies to complete stationary nonpoint, nonroad mobile, and onroad mobile sources for all pollutants	4	80	84

Table 6-2. Annualized Respondent Burden and Cost by Activity

Information Collection Activity	Hours and Costs Per Respondent						Total Hours and Costs		
	Mgr. Hrs/yr @ $87.90/Hr	Tech. Hrs/yr @ $65.16/Hr	Respondent Hours/Year	Labor Cost/Year	Capital Cost	O & M Cost	Number of Respondents	Total Hours/Year[1]	Total Cost/Year[2]
Annual									
Submit Type A point sources	4.00	46.00	50.00	3,349	104,000[3]	12,480[3]	104	5,200	464,776
Triennial (triennial hours from Table 6-1 divided by 3 to annualize)									
Submit Type B point sources (increment above Type A)	4.00	32.00	36.00	2,437			104	3,744	253,448
For state agencies, develop and report statewide inventory for stationary nonpoint, onroad mobile, and nonroad mobile sources	29.00	580.00	609.00	40,342			55	33,495	2,218,810
For local agencies, develop and report county-level inventories for stationary nonpoint, onroad mobile, and nonroad mobile sources	14.67	290.00	304.67	20,186			49	14,929	989,114
For local agencies, coordinate with state agencies to complete stationary nonpoint, onroad mobile, and nonroad mobile sources	1.33	26.67	28.00	1,855			49	1,372	90,895
Total	53.00	974.67	1027.67	68,168	104,000	12,480	varies	58,740	4,017,043

[1] Hours per year are rounded to the nearest hour.
[2] Costs per year are rounded to the nearest dollar.
[3] These costs represent the total annual cost for all agencies, not the cost per agency.

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