

**STATEMENT SUPPORTING THE RENEWAL OF INFORMATION COLLECTION  
FOR THE DISTRIBUTION OF OFFSITE CONSEQUENCE ANALYSIS INFORMATION  
UNDER SECTION 112(r)(7)(H) OF THE CLEAN AIR ACT  
EPA #1981.06**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

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

Distribution of Offsite Consequence Analysis Information under Section 112(r)(7)(H) of the Clean Air Act (CAA), as amended (Renewal) – EPA No. 1981.06, OMB Control Number 2050-0172.

**1(b) Short Characterization**

This ICR is the renewal of the ICR developed for the final rule, *Accidental Release Prevention Requirements; Risk Management Programs Under the Clean Air Act Section 112(r)(7); Distribution of Off-Site Consequence Analysis Information*. CAA section 112(r)(7) required EPA to promulgate reasonable regulations and appropriate guidance to provide for the prevention and detection of accidental releases and for responses to such releases. The regulations include requirements for submittal of a risk management plan (RMP) to EPA. The RMP includes information on offsite consequence analyses (OCA) as well as other elements of the risk management program.

On August 5, 1999, the President signed the Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (CSISSFRA). This Act required the President to promulgate regulations on the distribution of OCA information (CAA section 112(r)(7)(H)(ii)). The President delegated to EPA and the Department of Justice (DOJ) the responsibility to promulgate regulations to govern the dissemination of OCA information to the public.

The final rule which was published on August 8, 2000 (65 FR 48108) imposed minimal information collection and record keeping requirements. The federal government established 55 reading rooms at federal facilities geographically distributed across the United States and its territories. At these reading rooms, members of the public are able to read, but not mechanically copy or remove paper copies of OCA information for up to 10 stationary sources per calendar month. At these reading rooms, the members of the public may also have access to OCA information that the Local Emergency Planning Committee (LEPC) in whose jurisdiction the person lives or works is authorized to provide.

At most of the reading rooms, access is available by appointment only. There are few walk-in reading rooms. The requestor will need to display photo identification issued by a federal, state, or local government agency, sign a sign-in-sheet, and certify that the individual has not received access to OCA information for more than 10 stationary sources for that calendar month. Persons requesting access to OCA information at the federal reading rooms for local stationary sources will also be asked to sign-in and to display documentation demonstrating that he or she lives or works in the LEPC jurisdiction for which the OCA information is requested. Requestors will be limited to access to paper copies of OCA information for a total of 10 stationary sources during a calendar month, regardless of how many reading rooms they visit

during a single month.

EPA also established a Vulnerable Zone Indicator System (VZIS) that informs any person located in any state whether an address specified by that person might be within the vulnerable zone of one or more stationary sources, according to the data reported in RMPs. The VZIS is available on the Internet. Members of the public who do not have access to the Internet are able to obtain the same information by regular mail request to the EPA.

The final rule authorizes and encourages LEPCs and related local government agencies (such as police, fire, emergency management and planning departments) to provide read-only access to OCA sections of RMPs for sources located within the jurisdiction of the LEPC and for any other stationary sources with vulnerability zones extending into the LEPC's jurisdiction. These local agencies would receive OCA information upon request for all the sources in the LEPC jurisdiction and for any sources whose vulnerable zones extend into the LEPC's jurisdiction. They are authorized to make the OCA information available for reading, but not copying mechanically, to members of the public. These agencies that provide read-only access are not required to limit the number of stationary sources for which a person can gain access, ascertain a person's identity or place of residence or work, or keep records of public access provided. Local agencies are authorized and encouraged, but are not required to provide public access to OCA sections of RMPs.

State government agencies (such as emergency management, environmental protection, health, and natural resources departments) can receive OCA data upon request for all facilities in the state. They are authorized to make the OCA information available for reading, but not copying mechanically, to members of the public for the same stationary sources as the LEPC in whose jurisdiction the person lives or works. If the states choose to provide this information, they need to verify the person's address or place of employment. State agencies are not required to provide public access to OCA information.

CSISSFRRA allows any member of an LEPC, State Emergency Response Commission (SERC) and any other state or local government official to convey to the public any OCA data elements orally or in writing, provided that the data elements are not conveyed in the format of sections 2 through 5 of an RMP or any electronic database that EPA has developed that includes OCA data elements.

State and local government officials can also have access to OCA information for their official use. These officials must send a request on their official letterhead to certify that they are covered persons under P.L. 106-40, and that they will use the data for official use only.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need/Authority for the Collection**

The information collection for disseminating OCA information is authorized under the Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (CSISSFRRA). From the members of the public wishing to view OCA information at federal reading rooms, this ICR collects a signature and certification stating that the requestor has not received access to OCA information for more than 10 stationary sources during that calendar month. The federal reading room staff will view photo identification of the requestor and view documentation demonstrating where he or she lives (for those who are requesting OCA information on local stationary sources at federal reading rooms.) Members of the public contacting the central office

will be asked to give their name, telephone number, residential address, and names of the stationary sources for which they wish to view the OCA information. This ICR also covers the collection of written requests from state and local officials for OCA information. In addition, it governs the maintenance and disclosure of the OCA information by state and local entities for public use, as authorized and encouraged by CSISSFRRRA and codified in 40 CFR Part 1400.

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

The information collected from the public under 40 CFR Part 1400 will be collected to assure compliance with 40 CFR 1400.3 (“Public access to paper copies of off-site consequence analysis information”). Signatures and certifications will be collected to ensure that members of the public are in compliance with 40 CFR 1400.3(c), which provides that a reading room may not provide a person access to OCA information for more than 10 stationary sources in a calendar month. This limitation on access is consistent with CSISSFRRRA section 3(a), which states in relevant part that the regulations promulgated thereunder “[allow] access by any member of the public to paper copies of [OCA] information *for a limited number of stationary sources* located anywhere in the United States . . .” [emphasis added].

The person wishing to view OCA information at a federal reading room must show photo identification to the reading room staff prior to obtaining OCA information. This requirement is a reasonable means of accomplishing the statutory requirement that individuals have access “to a limited number” of paper copies of OCA information. The photo identification will significantly reduce the risk that someone will attempt to use identification that is not his or her own.

At federal reading rooms, members of the public also have access to OCA information that the LEPC in whose jurisdiction the person lives or works is authorized to provide. Each individual will be asked to sign-in and to display documentation demonstrating that he or she lives or works in the LEPC whose jurisdiction for which the OCA information has been requested. This requirement is to assure that the individual will only get the OCA information to which he is entitled.

If an individual calls the central office to obtain OCA data, he/she will be asked to give his/her name, telephone number, and the names of the stationary sources for which OCA information are being requested. This information will enable the central office to schedule an appointment for the requestor at a reading room, relay the requested copies of OCA information to that reading room, and, if necessary, contact the requestor.

This collection also covers the letters of request sent by state and local agencies for OCA information either for their own use such as emergency planning and/or to provide read-only access to the public. State and local officials who decide to obtain OCA information for their official use must send a request on their official letterhead to EPA certifying that they are covered persons under P.L. 106-40 and that they will use the information for official use only.

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

### **3(a) Non-Duplication**

The information being collected under this rule includes signatures, certifications, personal identification data and names of the stationary sources for which the individuals would like to view OCA data (for those who call the central office to view OCA data). The letters from

state or local officials to EPA requesting OCA information are also collected. This information does not duplicate any other federal collection as it is specific to this rule and necessary to ensure that the rule can be implemented.

### **3(b) Public Notice**

In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 *et seq.*), the Agency notified the public through a *Federal Register* notice on the resubmission of this ICR on December 23, 2015 (80 FR 79891). No comments were received.

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

This section is not applicable. The only data being collected are the signatures and self-certification; these are only collected at the time of visit.

### **3(d) General Guidelines**

This section is not applicable.

### **3(e) Confidentiality**

The only data being collected are signatures and self-certifications, neither of which are confidential. EPA and DOJ have not created and will not be creating a tracking system according to individual's names to enforce the limit on access to paper copies at the reading rooms.

### **3(f) Sensitive Questions**

This section is not applicable.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents/NAICS Codes**

The respondent universe for this rule is state and local officials and members of the public. The most significant users are likely to be state and local agencies (NAICS code 92111).

### **4(b) Information Requested**

Members of the public are required to give their name, telephone number, and the names of the stationary sources for which OCA information is being requested, when they contact the central office to schedule an appointment to view OCA information. Individuals visiting the reading rooms are required to sign-in and self-certify that they have not viewed OCA information for more than 10 stationary sources during that calendar month. Individuals wishing to view OCA information that the LEPC in whose jurisdiction the person lives or works is authorized to provide will also be asked to sign-in and display documentation demonstrating that he or she lives or works in the LEPC jurisdiction for which the OCA information has been requested.

State and local agencies are required to send a written request to EPA for OCA information. State and local officials must send the request on their official letterhead certifying that they are covered persons under P. L. 106-40 and that they will use the data for official use only.

**(i) Data Elements**

Members of the public requesting to view OCA information at federal reading rooms are required to sign in and self-certify. If asking for OCA information from federal reading rooms for the stationary sources in the area where they live or work, they would be required to provide proof that they live or work in that area. Members of the public are required to give their name, telephone number, and the names of the stationary sources for which OCA information is being requested, when they contact the central office to schedule an appointment to view OCA information.

**(ii) Respondent Activities**

The respondent activities for state and local agencies include:

- Reading and understanding the Security Notice to Federal, state, and local officials and researchers;
- Submitting a written request to EPA for OCA information;
- Providing a location for the public to review OCA information for local stationary sources;
- Ensuring that members of the public do not remove or copy OCA information they review;
- Making OCA information available in formats other than sections 2 through 5 of the RMP.

The respondent activities for members of the public include the following:

- Calling the central office to make an appointment at a reading room, and providing name, phone number, and the names of the stationary sources for which OCA information is requested;
- Displaying a photo identification (e.g., driver's license) at reading rooms and proof of place of residence or employment (when seeking to view OCA information for stationary sources located near place of residence or employment); signing-in and certifying that they have not viewed OCA information for more than 10 stationary sources during that calendar month.
- Submitting a request for information from the vulnerable zone indicator system (VZIS) (by Internet or mail); and
- Making follow-up calls or contacts to obtain additional information on stationary sources that may affect them.

Members of the public are permitted to read and take notes from the OCA information, but not to remove or mechanically reproduce it. The regulation imposes no limit on the number of local stationary sources (within the LEPC district or affecting the LEPC district) for which members of the public may review paper copies of OCA information made available by local agencies. The regulation does not require local agencies to ask members of the public to show any identification to gain access to the information. State agencies are permitted to provide a person the same access to paper copies of OCA information to a member of the public as that person would receive at his or her local agency. State agencies will need to verify that a person seeking information for an area lives or works in the area.

The burden estimates for documentation and reporting are discussed in section 6 of this

ICR.

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

**5(a) Federal, State, and Local Government Activities**

**Burden to State and Local Agencies and Others**

State and local officials who decide to obtain OCA information must send a written request on their official letterhead to EPA certifying that they are covered persons under P.L. 106-40, and that they will use the information for official use only. After approving a request, EPA can provide OCA information to state and local officials in one of three ways. OCA information can be mailed to the requester on a compact disk, the information can be provided via the EPA Central Data Exchange (CDX) system (i.e., over the Internet), or EPA can provide paper copies of RMPs to state and local agencies on request. In addition to submitting the written request to EPA, state and local covered persons who opt to receive OCA information via CDX must also register with EPA for access to CDX. This is a one-time registration requirement for each new CDX user.

The rule authorizes and encourages state and local agencies to set up public reading rooms. The local reading rooms would provide read-only access to OCA information for all the sources in the LEPC's jurisdiction and for any source where the vulnerable zone extends into the LEPC's jurisdiction.

These agencies are not required to carry out these activities. However the costs and burden are detailed in section 6.

**Burden to the Federal Government**

The federal government operates the reading rooms and maintains the VZIS software. The federal government also supplies the state and local agencies with OCA information and provides technical support. The government may also engage in other activities to provide access to OCA information.

**5(b) Collection Methodology and Management**

The federal reading rooms will maintain records of reading room use and certifications in accordance with procedures established by the Administrator and the Attorney General. These records shall be retained for no more than three years.

The federal reading room staff will view the photo identification of requestors to ensure that the identification belongs to the person requesting OCA information. Requiring an individual to show identification may decrease the likelihood that OCA information would be obtained by individuals seeking it for criminal purposes.

The reading room staff will also view proof of residence and employment to ensure that the requestor only receives access to the local OCA information to which he or she is entitled. The requirement for signature and self-certification is to prevent individuals from obtaining more than their authorized allotment of national OCA information (10 stationary sources per calendar month). To further deter individuals from attempting to exceed their allotment by visiting more

than one federal reading room in a month, reading room personnel will be instructed to provide access to OCA information only to individuals who have signed a certification that they have not exceeded their allotment. The certification will inform members of the public that they may be subject to criminal penalties under federal law for falsely certifying that they have not received OCA information for more than 10 stationary sources that month. The information recorded on sign-in sheets may be used by law enforcement in the event of a duly authorized investigation of a violation of civil or criminal law. Therefore, these sign-in sheets shall be retained for three years.

The information collected during telephone calls received by the central office from a requestor of OCA information will enable the central office to schedule an appointment for the requestor at a reading room, relay the requested copies of OCA information to that reading room, and, if necessary, contact the requestor. This information would not be retained beyond the requestor's appointment date.

The requests from state and local officials for OCA information would also be retained for three years.

#### **5(c) Small Entity Flexibility**

The rule does not require small entities, such as local emergency planning committees or related local government agencies, to provide public access to OCA information, hence no special requirements are needed for small entities.

#### **5(d) Collection Schedule**

The information collected at the federal reading rooms occurs only when an individual requests OCA information.

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

#### **6(a) Respondent Burden**

##### **State/Local Agencies**

During the previous ICR period, EPA mailed OCA data CDs to 26 state and local agencies each year. These agencies submitted their letter of request for OCA data in the previous years. Therefore, this ICR will not account for the burden associated with these agencies' requests for OCA data.

During the previous ICR period, EPA also made OCA data available to some state and local agencies via the EPA Central Data Exchange (CDX), an on-line information exchange system. In addition to submitting the written request letter required of all covered persons desiring access to OCA data, covered persons who opt to receive OCA data via CDX must also register within that system. During the previous ICR period, 131 state and local agencies registered for OCA data access via CDX. This ICR accounts for the burden associated with submitting letters of request and registering within CDX.

State and local agencies requesting OCA data include members of SERCs, environmental protection agencies, emergency management agencies, etc. EPA expects approximately 45 state and local agencies to submit requests for access to OCA data via CDX for each year covered by this ICR.

In the ICR developed for the final rule, it was estimated that 1,500 active LEPCs (based on the EPCRA program) would request OCA information from EPA for their own use such as emergency planning and some of these LEPCs may also provide public read-only access. During the previous ICR period, EPA received only 40 requests from LEPCs (over 3 years) for OCA data. Therefore, EPA estimates that 15 LEPCs will submit request for OCA data for each year covered by this ICR, and that all of these LEPCs will opt to receive the OCA data via CDX, which will require them to register within that system.

For purposes of estimating the burden associated with these activities, EPA assumes that a state agency, local agency or LEPC will spend one hour preparing and submitting a request letter, and one hour registering within CDX for on-line access to OCA data.

EPA contacted a subset of state and local agencies that receive OCA data to determine how many members of the public visited state and local reading rooms over the previous ICR period. Based on those contacts, EPA found that very few members of the public visit state and local agencies for read-only access to OCA data, and that most OCA public visits occur at the reading room operated by EPA Headquarters in Washington, DC. Therefore, EPA assumes that 200 people will visit state and local reading rooms for OCA data annually. For each visit by a member of the public, the state and local agencies are assumed to spend two hours providing information to the public. State and local reading room staff will also spend one hour learning how to handle OCA information securely.

The 15 LEPCs are also assumed to hold three public meetings in the three years covered by this ICR, which would take eight hours each for preparation and to hold the meeting. The total burden hours for state and local agencies are estimated to be 700 hours annually (2100 hours for three years) at a cost of \$28,077 annually (\$84,231 for three years).

### **Public (Individuals)**

It is assumed that each member of the public would take approximately one hour to sign-in and certify; call the central office to give his/her name, address, telephone number, names of the stationary sources for which OCA information is requested, display documentation demonstrating proof of residence and employment, and view OCA information for local facilities at a federal reading room. Based on the information received from federal reading rooms for the last three years, EPA assumes that approximately 300 people may visit the federal reading rooms annually in the three years covered by this ICR. EPA also estimates that at least 200 people will visit the state and local reading rooms annually in the next three years covered by this ICR. So, we assume a total of 500 people visiting federal, state and local reading rooms annually.

Additionally, it is assumed that the public will use the vulnerable zone indicator system (VZIS). In the previous ICR period, the EPA reporting center received about 260 VZIS inquiries annually from the public. Therefore, EPA estimates that the Agency will receive approximately 300 VZIS inquiries from the public for each year covered by this ICR. EPA estimates that it may take approximately one hour for a member of the public to submit a request for the VZIS. The total burden to the public for signing in at the reading room and VZIS inquiries is estimated to be 800 hours annually (2400 hours over three years) at a cost of \$18,168 annually (\$54,504 for three years).



## **6(b) Estimating Respondent Costs**

To estimate costs for state and local agencies to submit a written request to EPA for OCA information, provide the OCA information to the public and monitor its use, and prepare for and hold public meetings, the administrative services managers hourly rate for local government employees of \$40.11 was used (Bureau of Labor Statistics Occupational Employment and Wages data, May 2014, table 11-3011).

The value of the public time is estimated to be at \$22.71 per hour, the average wage for all U.S. occupations (Bureau of Labor Statistics data, May 2014).

## **6(c) Estimating Annual Respondent Cost Burden**

### **Capital and O&M Costs - State, local agencies and the public**

The total annual O&M cost for state and local agencies to mail letters to EPA requesting OCA information is approximately \$60. Using a cost of \$7.00 for a ream of recycled copy paper, EPA estimates that the annual paper cost for state and local agencies is \$560, assuming each person visiting a reading room reviews 10 RMPs.

## **6(d) Estimating Costs for the Federal Government**

EPA and DOJ currently operate 55 reading rooms located at federal buildings. The EPA Headquarters reading room is operated on a walk-in basis and the others are by appointment only.

Federal costs were estimated based on activity and the FY 2015 GS wage schedule for the Washington-Baltimore-Northern Virginia locality pay area. Reading room activities were estimated using a GS-9, step 5 wage rate. VZIS operation and preparation of data CDs was estimated using a GS-13, step 5 wage rate. The wages for these staff were loaded with fringe, but no overhead.

Reading room staff are expected to take phone calls from the public, schedule appointments for use of the reading rooms, print the requested RMPs, review the identification presented, monitor the use of the RMPs to ensure that they are not mechanically copied, and shred them when the user is finished. Federal reading room staff are assumed to spend two hours performing these activities for each reading room visit by a member of the public. Reading room staff will also spend one hour learning how to handle OCA information securely.

EPA will also have to operate the VZIS system, prepare and mail data CDs, create CDX accounts, and respond to queries. EPA staff are estimated to spend 15 minutes responding to each VZIS query and an equal amount of time answering follow up calls for VZIS queries. EPA staff require approximately 1 hour to prepare and mail each data CD and 0.5 hours to establish each CDX account.

The total labor burden on the federal government is estimated to be 1,235 hours annually (3,705 hours for three years) at a cost of \$71,008 annually (\$213,024 for three years).

### **O&M Costs – federal government**

In previous ICRs, reading rooms were assumed to have a computer, monitor, printer, and shredder. The cost for this equipment was calculated in previous ICRs, and was assumed to be

depreciated over five years. This equipment is standard office equipment that is now expected to be available in all government offices. Therefore, in this ICR, EPA did not calculate the costs for this equipment.

The annual cost to purchase and mail data CDs is estimated at approximately \$800. In addition, reading rooms are assumed to print out paper copies of RMPs. Using a cost of \$7.00 for a ream of recycled copy paper, EPA estimates that its annual paper cost is \$1,680, assuming each person visiting a reading room reviews 20 RMPs (10 local and 10 from outside the person's area).

The combined annual labor and O&M cost to the federal government is thus estimated to be \$73,488.

#### **6(e) Bottom Line Burden Hours and Costs**

Respondents for this ICR are state and local officials requesting OCA data from EPA and the members of the public visiting reading rooms and making inquiries on the VZIS. The total number of annual respondents is 860 (60 SERCs/LEPCs + 800 Individuals)

The annualized cost burden for respondents during the time period covered by this ICR is estimated to be 1,500 hours at a cost of \$46,865 (\$46,245 labor + \$620 O&M costs). For more details, see Exhibits 1 and 2 below.

#### **6(f) Reasons for Change in Burden**

There is a slight decrease in the burden and costs to respondents from the previous ICR due to updated information indicating that slightly fewer state and local agencies are requesting OCA data, and due to updating costs to reflect the most current wage rate data from BLS (the average public wage rate increased slightly and the administrative service managers wage rate decreased slightly). There is an increase in cost to the federal government because the previous ICR did not account for the costs to the government of creating and mailing data CDs and creating CDX accounts. This increase more than offset the small decrease in federal burden due to fewer state and local agencies requesting OCA data.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately 1.32 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under

Docket ID Number EPA-HQ-OAR-2003-0073, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the EPA Docket Center, 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. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2003-0073 and OMB Control Number 2050-0172 in any correspondence.

**Exhibit 1**

**STATE AND LOCAL AGENCIES BURDEN AND COSTS**

	<b>Annualized</b>		<b>Three-Year</b>	
	<b>Hours</b>	<b>Dollars</b>	<b>Hours</b>	<b>Dollars</b>
<b>Reading Room</b>	400	\$16,044	1,200	\$48,132
<b>Covered Person Request for OCA &amp; CDX Registration</b>	120	\$4,813	360	\$14,440
<b>Public Meeting</b>	120	\$4,813	360	\$14,440
<b>Train Reading Room Staff</b>	60	\$2,407	180	\$7,220
<b>Total</b>	<b>700</b>	<b>\$28,077</b>	<b>2,100</b>	<b>\$84,231</b>

**Exhibit 2**

**PUBLIC BURDEN AND COSTS**

	<b>Annualized</b>		<b>Three-Year</b>	
	<b>Hours</b>	<b>Dollars</b>	<b>Hours</b>	<b>Dollars</b>
<b>Reading Room</b>	500	\$11,355	1,500	\$34,065
<b>VZIS</b>	300	\$6,813	900	\$20,439
<b>Total</b>	<b>800</b>	<b>\$18,168</b>	<b>2,400</b>	<b>\$54,504</b>