

**STATEMENT SUPPORTING FOR THE RENEWAL OF INFORMATION
COLLECTION: DISTRIBUTION OF OFFSITE CONSEQUENCE ANALYSIS
INFORMATION
UNDER SECTION 112(r)(7)(H) OF THE CLEAN AIR ACT
EPA #1981.07**

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 – EPA No. 1981.07, OMB Control Number 2050-0172.

1(b) Short Characterization

This ICR renewal is for the collection developed to support 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 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 for 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, 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 where the public can read, but not mechanically copy or remove, paper copies of OCA information for up to 10 stationary sources per calendar month. Reading rooms also provide access to OCA information that the Local Emergency Planning Committee (LEPC), in whose jurisdiction the individual lives or works, is authorized to provide.

A few federal reading rooms provide walk-in access, but most require an appointment. 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 they have 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 provide documentation demonstrating that he or she lives or works in the LEPC jurisdiction for which the OCA information is requested. Access will be limited to paper copies of OCA information for a total of 10 stationary sources during a calendar month, regardless of how many reading rooms the requestor visits during a single month.

EPA also established a Vulnerable Zone Indicator System (VZIS) which indicates whether any given address is within the vulnerable zone of one or more stationary sources, according to the data reported in RMPs. The VZIS is available on the Internet and individuals with no Internet access can obtain the same information by regular mail request to the EPA.

The final rule also 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 receive OCA information upon request to EPA 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 to the public for reading, but not copying mechanically. Those 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.

State government agencies, such as emergency management, environmental protection, health, and natural resources departments, can receive OCA data upon request to EPA, 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 a state chooses to provide this information, staff must verify the person's address or place of employment. State agencies are not required to provide public access to OCA information.

CSISSFRRRA 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 may also obtain OCA information for their official use. These officials must send a request on 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

This information collection is authorized under the Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (CSISSFRRRA). Members of the public wishing to view OCA information at a federal reading room provide 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 check photo identification of the requestor and 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 who contact the central office will be asked to provide 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 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 collection from the public under 40 CFR Part 1400 assures compliance with 40 CFR 1400.3 (“Public access to paper copies of off-site consequence analysis information”). Signatures and certifications are collected to ensure that members of the public comply with 40 CFR 1400.3(c), which provides that a federal 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 CSISSFERRA 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].

A person wishing to view OCA information at a federal reading room first must show photo identification to the reading room staff to satisfy the statutory requirement that individuals have access “to a limited number” of paper copies of OCA information. The photo identification significantly reduces 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 work, is authorized to provide. Individuals will be asked to sign-in and provide documentation that they live or work in the LEPC whose jurisdiction for which the OCA information has been requested. The purpose of this requirement is to assure that the individual will be given only the OCA information to which he or she is entitled.

A member of the public who calls the central office to obtain OCA data will be asked to provide his/her name, telephone number, and the names of the stationary sources for which OCA information is being requested. This information will enable the central office to schedule an appointment for the requestor at a reading room, relay the request for copies of OCA information to that reading room, and, if necessary, contact the requestor.

This collection also covers the letters sent by state and local agencies to EPA to request 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 wish to obtain OCA information for their own official use must send a request on 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 collected under this ICR renewal by the central office includes signatures, certifications, personal identification data and names of the stationary sources for which the individuals would like to view OCA data. The information collection also covers letters from state or local officials to EPA requesting OCA information. This collection does not duplicate any other federal collection because it is specific to this rule and necessary to ensure implementation of the rule.

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 November 23, 2018 (83 FR59379). No comments were received.

3(c) Consultations

EPA contacted the EPA Headquarters reading room, in addition to a subset of EPA Regions, and state and local agencies that receive OCA data, to determine how many members of the public visited a reading room over the previous ICR period. Given the total number of state and local agencies (52 states offices and 3,000 LEPCs), the number of visits for read-only access to OCA data was very low in the previous ICR period, and with the establishment of the website, <http://www.rtk.net>, (rtk is the acronym for Right to Know), reading room visits are expected to continue to become largely unnecessary. EPA contacted several state agencies and found that none had recorded even a single reading room visit. To err on the conservative side, EPA is assuming five reading room visits annually to all state and local agency reading rooms (15 for three years).

Most OCA reading room visits occur at the reading room operated by EPA Headquarters in Washington, DC. During the previous ICR period of 2016-2018, the number of reading room visits was 76, or 25 per year, which declined from 227 for the ICR period prior to that. Based on contacts with four EPA Regions, the total number of visits to those reading rooms for the previous ICR period was five, or an average of 1.5 visits per Region. Extrapolating to all 10 EPA Regions, over a three-year period the total would have been 15 visits, or five per year. Thus, the estimated total for EPA HQ and the EPA Regional offices is assumed to be 30 visits annual (90 visits for three years).

3(d) 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(e) General Guidelines

This section is not applicable.

3(f) Confidentiality

The signatures and self-certifications data collected are not confidential information. EPA and DOJ have not created a tracking system to enforce the limit on access to paper copies (10 per month total) at the reading rooms.

3(g) Sensitive Questions

This section is not applicable.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The respondent universe for this ICR renewal 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 provide their name, telephone number, and the names of the stationary sources for which they request OCA information when they contact the central office to schedule a reading room appointment. 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 which the relevant LEPC is authorized to provide will also be asked to sign-in and document 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 are required to provide 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 requesting to view OCA information at federal reading rooms are required to sign in and self-certify. A person requesting OCA information from a federal reading room for the stationary sources in the area where they live or work is required to provide proof that they live or work in that area.

(ii) Respondent Activities

The respondent activities for state and local agencies include:

- Read and understand the Security Notice to Federal, state, and local officials and researchers;
- Submit a written request to EPA for OCA information;
- Provide a location for the public to review OCA information for local stationary sources;
- Ensure that members of the public do not remove or copy OCA information they review;
- Make 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:

- Call 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;

- Display 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); and sign-in and certify that they have not viewed OCA information for more than 10 stationary sources during that calendar month.
- Submit a request for information from the vulnerable zone indicator system (VZIS) (by Internet or mail); and
- Make 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) Agency Activities

State and Local Agencies, and LEPCs

State and local officials who wish to obtain OCA information must send a written request on their official letterhead to EPA to certify that they are covered persons under P.L. 106-40, and that they will use the information for official use only. 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 final rule authorizes and encourages state and local agencies to set up public reading rooms to 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.

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

Federal Government

The federal government provides OCA information and technical support to the state and local agencies. After approving a request for OCA information from state and local officials, EPA can mail the requester a compact disk with the information, provide access through the EPA Central Data Exchange (CDX) system (i.e., over the Internet), or provide paper copies of RMPs to state and local agencies on request.

The federal government also operates reading rooms, maintains the VZIS software and may engage in other activities to provide access to OCA information.

5(b) Collection Methodology and Management

State and Local Agencies, and LEPCs

State and local agencies, and LEPCs, do not collect any information from the public.

Federal Government

The federal reading rooms maintain records of reading room use and certifications in accordance with procedures established by the Administrator and the Attorney General. These records are retained a maximum of three years.

The federal reading room staff views the photo identification of requestors to verify the identity of the person requesting OCA information to decrease the likelihood that OCA information would be obtained by individuals seeking it for criminal purposes.

The reading room staff also views proof of residence and employment to ensure that the requestor receives access only to the local OCA information to which he or she is entitled. The purposed of 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 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 are 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 also are 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 flexibilities are needed for small entities.

5(d) Collection Schedule

The information collection 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 and Local Agencies, and LEPCs

OCA Data Requests and CDX Registration

States, state government agencies, local governments and LEPCs can obtain OCA data in three ways: by CD, via RMP*Info and via RMP Dataset Download. All three ways require that the government or agency write a letter of request to EPA for the data to ensure that they are covered persons and entitled to receive the data. Originally, EPA's RMP Reporting Center sent OCA data on a CD to EPA Regional offices, implementing state/local agencies, and other covered persons in such agencies, who would use the data. In 2009, the RMP Reporting Center made the use of the CDs largely obsolete, except for those agencies using the Download Dataset (mostly, for running Access queries of the data). For the 2013 – 2015 ICR period, EPA received only one new request to receive OCA via CD. During the previous reporting period, EPA received no new requests. This means that nationally, the only new OCA request letters coming in are for the OCA version of RMP*Info (access to view facility-submitted RMPs with OCA via the internet).

During the previous ICR period, EPA mailed a total of 397 OCA data CDs (132 CDs per year), to 26 state and local agencies based on standing requests (Note that these 26 agencies are not counted as respondents because they do not need to take any action to receive the data once they have submitted a standing request to EPA.) The burden to create and mail these CDs is discussed under section 6 (c) of this supporting statement. EPA expects the number to remain the same for the ICR renewal period. State and local agency standing requests for OCA data include monthly, bimonthly, quarterly or annual bases. During the previous ICR period, EPA also made OCA data available to some state and local agencies via the EPA Central Data Exchange (CDX). 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, 45 state and local agencies registered for OCA data access via CDX via either RMP*Info or RMP Dataset Download. This ICR assumes the same number will register for OCA data access via CDX during this ICR renewal period, or 15 per year. The ICR accounts for the burden associated with submitting letters of request to EPA and registering within CDX. State and local agencies requesting OCA data include members of SERCs, environmental protection agencies, emergency management agencies, etc. During the previous ICR period, EPA also received nine requests from LEPCs for OCA data. Therefore, EPA estimates that the same number will submit requests for OCA data during this ICR renewal period, or, three LEPCs will submit a request for OCA data for each year covered by this ICR. EPA also assumes that these LEPCs will opt to receive the OCA data via CDX (via either RMP*Info or RMP Dataset Download), which will require them to register with CDX.

For purposes of estimating the burden, EPA assumes that a state agency, a local agency or LEPC will spend one hour preparing and submitting an OCA request letter, and one hour registering with CDX for on-line access to OCA data. Therefore, EPA expects a total of 18 state and local agencies and LEPCs will spend two hours each, or a total of 36 hours annually (108 hours for three years) on activities associated with OCA request letters and CDX registration.

Public Meetings

LEPCs hold public meetings to discuss OCA information for facilities in their jurisdiction that facilities have authorized to be released. EPA assumes that the same three LEPCs that submit letters of request to EPA for OCA data also hold, on average, one public meeting per year each during each of the three years covered by this ICR. Each meeting is assumed to require eight hours for meeting preparation and to hold the meeting. Therefore, EPA expects that LEPCs will spend a total of 24 hours (3 meetings x 8 hours per meeting) annually on public meetings (72 hours for three years).

Reading Rooms

In previous ICRs renewals, EPA estimated that 200 members of the public would visit state and local reading rooms for OCA data annually. In the most recent previous ICR period, as described in section 3(c) of this supporting statement, the state agencies EPA contacted reported not a single reading room visit occurred. To err on the conservative side, EPA is assuming five visits will occur annually (15 visits for three years).

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. Therefore, based on EPA's estimate of five visits annually, the state and local agency burden is 15 hours annually (45 hours for three years).

Total Burden

The total burden hours for state and local agencies are estimated to be 75 hours annually (225 hours for three years). (See Exhibit 1).

Public (Individuals)

Reading Room Visits

EPA assumes that each member of the public would spend 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 previous ICR renewal period, EPA assumes approximately 25 visits to the federal reading rooms annually (76 visits in three years) for the current ICR renewal period. State and local agency reading rooms contacted by EPA reported not a single visit to a reading room from a member of the public during the previous ICR period. However, to err on the conservative side, EPA is assuming that there will be five public visitors to state and local reading rooms (15 visits over three years). In total, EPA assume a total of 30 visits to federal, state and local reading rooms annually (90 visits over three years), with public burden estimates of 30 hours annually, and 90 hours over the three-year ICR renewal period. This estimate is significantly below reading room visit numbers estimated for the previous ICR renewal.

VZIS Inquiries

Additionally, EPA assumes that the public will use the vulnerable zone indicator system (VZIS). In the previous ICR period, the EPA reporting center received approximately 262 VZIS inquiries annually from the public. Therefore, EPA estimates that the Agency will receive the same number of VZIS inquiries, or 767 inquiries over the three-year ICR renewal period. EPA estimates that it requires approximately one hour for a member of the public to submit a request for the VZIS.

Total Burden

The total burden to the public for reading room activities and VZIS inquiries is estimated to be 292 hours annually (30 hours for reading room activities plus 262 hours for VZIS inquiries) (876 hours over three years).

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

State and Local Agencies, and LEPCs

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, EPA used the administrative services manager hourly mean, fully loaded wage rate for local government employees of \$74.55 (\$49.70 x 1.5 loading factor) (BLS Occupational Employment and Wages data, May 2017, Table 11-3011, https://www.bls.gov/oes/2017/may/oes_nat.htm#11-0000).

The total labor cost for state and local agencies is estimated to be \$5,591 annually (\$16,774 for three years).

Public (Individuals)

The value of the public's time is estimated for reading room visits and VZIS data requests using the hourly mean, fully loaded wage rate for all occupations from the BLS National Occupational Employment and Wage Estimates, United States, from May 2017 of \$36.51 (\$24.34 x 1.5 loading factor) (https://www.bls.gov/oes/2017/may/oes_nat.htm#00-0000).

The total value of the public's time is estimated to be \$10,661 annually (\$31,983 for three years).

(ii) Estimating Capital and O&M Costs

State and Local Agencies, and LEPCs

The total annual O&M cost for state and local agencies to mail letters to EPA requesting OCA information is approximately \$9.00 (18 letters per year with \$.50 postage per letter), or \$27.00 over three years. Using a cost of \$7.00 for a ream of recycled copy paper (from GSA Advantage website) and assuming each person visiting a reading room reviews 10 RMPs of 20 pages each, the paper cost per visit is \$2.80. Assuming five visits per year, the annual paper cost is \$14.00, or \$42 over three years. The total O&M cost for state and local agencies is estimated at \$23 annually (\$69 for three years).

Public (Individuals)

The public does not incur any capital or O&M costs when making reading room visits or VZIS data requests for OCA data.

6(c) Estimating Agency Burden and Cost

Reading Rooms

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 levels and the FY 2018 GS wage schedule for the Washington-Baltimore-Northern Virginia locality (www.OPM.gov), using a GS-9, step 5 fully loaded hourly wage rate of \$45.81 (\$30.54 x 1.5).

Reading room staff activities are 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. However, reading room usage has declined significantly with the public availability of RMP data through rtk.net, which was most recently updated for RMP on April 30, 2018.

EPA Headquarters and EPA Region reading rooms logged a total of 81 visits per year during the previous ICR renewal period (76 visits at Headquarters and conservatively, an estimated five visits at EPA Region reading rooms). EPA is maintaining that estimate for this ICR renewal period. Therefore, EPA staff will spend three hours per reading room visit, or 243 hours annually (729 hours for three years), at a cost of \$11,132 annually (\$33,395 for three years).

VZIS and Data Requests

EPA operates the VZIS system, prepares and mails data CDs, creates CDX accounts, and responds to queries through the RMP Reporting Center. The RMP Reporting Center spends \$1,500 per month, or \$18,000 per year (\$54,000 for three years) responding to VZIS and data requests.

RMP Reporting Center Costs for OCA Data

EPA's RMP Reporting Center maintains OCA data, processes OCA data requests, creates OCA databases, burns CDs and generates CD labels and performs quality control activities. The

RMP Reporting Center spends \$7,200 per month, or \$86,400 per year (\$259,200 for three years) on these activities.

Agency O&M Costs

The RMP Reporting Center spends \$400 to purchase CDs and \$400 to mail CDs with OCA data each year. The total cost to purchase and mail data CDs therefore is estimated to be \$800 annually (\$2,400 for three years).

In addition, EPA reading rooms (Headquarters and EPA Regions) print paper copies of RMPs. Using a cost of \$7.00 for a ream of recycled copy paper (from GSA Advantage website) and assuming each person visiting a reading room reviews 10 RMPs of 20 pages each, the paper cost per visit is \$2.80. Assuming 81 visits to EPA federal reading rooms per year (243 visits for three years), the paper cost is \$227 annually (\$680 for three years).

The total O&M cost for the federal government, for both reading room and CDs is estimated at \$1,027 annually (\$3,080 for three years).

The combined annual labor and O&M cost to the federal government is thus estimated to \$116,559 annually (\$349,676 for three years).

6(d) Estimating Respondent Universe and Total Burden and Cost

The annual respondent universe for this ICR is 315 state and local agencies, LEPCs and individuals (public). The total includes 15 state agencies and three LEPCs that send letters of request for OCA data, five states that experience reading room visits, three LEPCs that hold a public meeting; the public component of the total includes 30 individuals who visit federal and state reading rooms and 262 individuals who request VZIS data. The three LEPCs that hold public meetings are assumed to be the same three LEPCs that send letters of request for OCA data. All other respondents are assumed to be unique.

Total annual burden for all respondents is 367 hours and total annual cost is estimated to be \$16,252.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

Respondents for this ICR are state and local officials requesting OCA data from EPA, handling reading room visits and the members of the public visiting reading rooms and making inquiries for data through VZIS. The total number of annual respondents is 315 (again, the three LEPCs that hold public meetings are assumed to be the same three LEPCs that send letters of request for OCA data, and thus are not unique).

The annual burden for respondents during the period covered by this ICR is estimated to be 367 hours at a cost of \$16,252.

(ii) Agency Tally

EPA Headquarters and Region offices burden to operate reading rooms is estimated to be

243 hours annually at a cost of \$11,132. Annual costs to operate the RMP Reporting Center related to OCA data are \$140,400, in addition to O&M costs of \$1,027 to print RMPs at reading rooms and purchase and mail CDs with OCA data. Total labor costs are estimated at \$151,532 annually, and O&M costs are estimated at \$1,027 annually.

6(f) Reasons for Change in Burden

There is a significant decrease in the estimated burden for this ICR renewal compared to the previous ICR renewal. The burden reduction is attributable to the reduced number of reading room visits by the public, the reduced number of letters of request for OCA from state and local governments and LEPCs, and a reduced number of public meetings assumed to be held by LEPCs resulting from the lower of letters of request submitted by LEPCs. To a large extent, the reductions are the result of the respondents increasingly obtaining the OCA data through electronic methods, for example, through rtk.net, RMP*Info and RMP Data Download.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately 1.2 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, 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. 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 AGENCY BURDEN AND COSTS

	Annual		Three-Year	
	Hours	Cost	Hours	Cost
Preparing Letters of Request	36	\$2,684	108	\$8,051
Reading Room Activities	15	\$1,118	45	\$3,355
Holding Public Meetings	24	\$1,789	72	\$5,368
Total	75	\$5,591	225	\$16,774

Exhibit 2

PUBLIC BURDEN AND COSTS

	Annual		Three-Year	
	Hours	Cost	Hours	Cost
Reading Room Visits	30	\$1,095	90	\$3,286
VZIS Inquiries	262	\$9,566	876	\$28,697
Total	292	\$10,661	966	\$31,983