United States Environmental Protection Agency (EPA) INFORMATION COLLECTION REQUEST (ICR) March 2019

Part A of the Supporting Statement

1. IDENTIFICATION OF THE INFORMATION COLLECTION

- 1(a) Title: Recordkeeping and Reporting Requirements for the Performance-Based Measurement System for Fuels (Renewal)
 EPA ICR Number 2459.03
 OMB Control Number 2060-0692
 Docket ID Number EPA-HQ-OAR-2018-0663
- 1(b) Abstract

EPA regulations at 40 CFR 80 restrict certain properties of gasoline and diesel fuel, such as sulfur content, to limit harmful vehicle emissions. To promote compliance, the regulations require fuel producers and importers to test for these properties and report the results. The regulations at 40 CFR 80.47 (Performance-based Analytical Test Method Approach), 40 CFR 80.584 (precision and accuracy criteria), and 40 CFR 80.585 (process for approval of a test method) require each test method to demonstrate compliance with performance-based accuracy and precision criteria. This ICR covers the recordkeeping and reporting requirements for the test methods employed by refiners' and importers' fuel testing laboratories, and independent fuel testing laboratories, to measure certain fuel properties. This program is known as the Performance-Based Measurement System (PBMS).

In the past, a test method for measuring compliance with a fuel property was designated in the regulations. Typically, this method was an American Society for Testing and Materials (ASTM) procedure used by an EPA laboratory. Regulated parties would have to use this method for compliance purposes. In certain circumstances, alternative test methods were named in the regulations. If a regulated party used a named alternative test method, all results would have to be correlated to the designated test method. The party would have to develop and apply a correlation equation to all its results to bring them in line with the designated test method. A limited performance-based test method approach was adopted to address the measurement of sulfur in diesel fuel per 40 CFR 80.584-.585. However, outside of the diesel program, there was no opportunity for a laboratory to use a test method not designated in the regulations. The regulations at 40 CFR 80.47 permit a laboratory to qualify itself to use an alternative test method if the method meets the precision, accuracy, and other criteria specified in 40 CFR 80.47.

To be qualified to use an alternative test method, a refiner's or importer's laboratory, or an independent laboratory, is required to develop certain information. Having to report to EPA, or

¹ Reporting the test results is covered by another information collection.

² Certain test methods specified in the regulations and in use prior to October 28, 2013 are recognized as meeting the criteria and are exempt from the precision and accuracy demonstrations. These are known as "designated primary" test methods.

just retain the information, will depend upon the nature of the method. A test method developed by a voluntary consensus-based standards body (VCSB) will self-qualify provided it meets performance-based requirements for accuracy and precision specified in the regulations. A laboratory will only need to generate and store the records specified in the regulations. Likewise, for a non-VCSB method for an absolute fuel parameter. For a non-VCSB test method for a method-defined fuel parameter, essentially one developed "in-house," the laboratory will be required to generate, store, and submit certain records to EPA, and obtain approval, to become qualified. In addition, the regulations require laboratories to engage in statistical quality control (SQC) activities. While SQC activities are a customary business practice (CBP) for a laboratory, they are not necessarily as stringent as required by the regulations. Thus, there is an estimated burden for the development of the SQC records required by the regulations and their retention for five years.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Vehicle emissions constitute a significant source of air pollution in the United States. The regulations at 40 CFR 80, Regulation of Fuels and Fuel Additives, restrict certain properties of gasoline and diesel fuel to limit harmful emissions and their impact on public health. Accurate measurements of these properties, and the recordkeeping and reporting requirements, are essential for enforcement and compliance. 1Sections 114 and 208 of the Clean Air Act (CAA), 42 U.S.C. §§ 7414 and 7542, authorize EPA to require recordkeeping and reporting regarding enforcement of the provisions of Title II of the CAA.

2(b) Practical Utility/Uses of the Data

The data will:

- 1) Enable laboratories to self-qualify certain test methods based upon accuracy and precision criteria.
- 2) Enable EPA to qualify certain non-VCSB test methods based upon accuracy and precision criteria.
- 3) Promote compliance with the reformulated gasoline (RFG), conventional gasoline (CG) and diesel fuel standards at 40 CFR 80 and the associated benefits to human health and the environment.

3. NONDUPLICATION, CONSULTATION, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

Efforts have been made to eliminate duplication in this information collection. The information collected is unique to the closed EPA database. EPA has provided a spreadsheet in which the parties can submit data in the Unified Report Form (XLS) to EPA's Central Data Exchange (CDX). VCSB test methods self-qualify and the records are maintained by the laboratory for five years. Non-VCSB test methods need to provide data, usually confidential, to obtain EPA approval. Since these test methods have not undergone the peer review associated with VCSB test methods, the data relate to individual lab results in the testing of fuel parameters and are not available from another source.

3(b) Public Notice

A notice was published in the <u>Federal Register</u> on November 5, 2018 (83 FR 55362) announcing this ICR renewal and inviting public comments on the previous burden estimate and any proposed changes. No comments were received.

3(c) Consultations

For this renewal, we consulted with a representative of Weaver, provider of energy compliance services, and a representative of Intertek, a major provider of laboratory testing services. Both are in general agreement with our estimates, with the exception of the weekly burden to generate and maintain statistical quality control (SQC) records. With the use of computers, we consider that 0.5 hour per week in of screen time is more reasonable than the 1.0 to 1.5 hours suggested by Intertek for these routine and mostly customary lab records.

3(d) Effects of Less Frequent Collection

The frequency of response is controlled by the individual laboratory. A laboratory will determine how many test methods it wishes to qualify. For existing laboratories, it is reasonable to conclude that this has essentially occurred over the past three years and little new activity from them is expected. All qualified methods since 2015 have been VCSB methods. We are not aware of new laboratories entering the market.

3(e) General Guidelines

The regulations require record retention for five years. Records can be kept either electronically or on paper. EPA needs to make sure regulated parties keep records long enough to be evaluated for compliance during this time. Section 40 CFR Part 80.47(q) requires record retention for five years from the date the records were created. Any information submitted to EPA and claimed as confidential will be treated in accordance with 40 CFR 2 and established EPA procedures. Information that is received without a claim of confidentiality may be made available to the public without further notice to the submitter under 40 CFR 2.203.

3(f) Confidentiality

EPA informs respondents that they may assert claims of business confidentiality for any of the information they submit. Information claimed as confidential will be treated in accordance with 40 CFR 2 and established procedures. Information that is received <u>without</u> a claim of confidentiality may be made available to the public without further notice to the submitter under 40 CFR 2.203.

3(g) Sensitive Information

This information collection does not require submission of any sensitive information such as social security numbers or credit card information, sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

4. THE RESPONDENTS AND THE INFORMATION COLLECTED

4(a) Respondents/SIC Codes

1The respondents to this information collection are:

- Refiners' testing laboratories (i.e., refiners)
- Importers' testing laboratories (i.e., importers)
- Independent fuel testing laboratories (i.e., laboratories)

Recordkeeping and reporting are required by the following industries, *with SIC Code/2002 NAICS Code indicated in parentheses*: refiners (2911/324110), importers (5172/424720), and laboratories (8734/541380).

We estimate that there are 1,000 fuel testing labs for gasoline and diesel fuel. All are required to engage in SQC activities. These labs test for compliance with various fuel properties. Fuel refiners and importers are required to hire independent certified public accountants or certified internal auditors to audit all fuel test results, volume reports, and other information that is submitted.³ EPA rules place liability on refiners, importers, distributors, carriers, resellers, retail and wholesale purchase-consumers to sell or use gasoline and diesel fuel that meet the sulfur, benzene, volatility, toxics, and lead contamination standards. When a violation is found, both the party in possession of the non-compliant fuel as well as the upstream parties in the fuel distribution system are presumed liable unless they establish a credible defense. To protect themselves, and make sure compliance is maintained after a product leaves their hands, many refiners and importers whose brands appear at retail outlets implement downstream quality assurance programs. EPA can file criminal charges against refiners, importers and independent labs should they be found to have falsified, or assisted in falsifying, test results.

4(b) Information Requested

i. Data Items

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³ These requirements are covered by a separate information collection.

Knowledge of the following definitions at 40 CFR 80.47(a) is important for a thorough understanding of the recordkeeping and reporting requirements:

- 1) *Performance-based Analytical Test Method Approach* means a measurement system based upon established performance criteria for accuracy and precision with use of analytical test methods. As used in this subpart, this is a measurement system used by laboratories to demonstrate that a particular analytical test method is acceptable for demonstrating compliance.
- 2) Accuracy means the closeness of agreement between an observed value from a single test measurement and an accepted reference value.
- 3) *Precision* means the degree of agreement in a set of measurements performed on the same property of identical test material.
- 4) Absolute fuel parameter means a fuel parameter for which a gravimetric standard is practical to construct and use. Sulfur content of gasoline, butane, or diesel fuel are examples of an absolute fuel parameter.
- 5) *Gravimetric standard* means a test material made by adding a carefully weighed quantity of the analyte to a measured quantity of another substance known not to contain any of the analyte, resulting in a solution with an accurately known concentrate of the analyte.
- 6) Consensus named fuels are homogeneous quantities of fuel that have been analyzed by a number of different laboratories (by sending around small samples). The average concentration of some parameter of interest across all of the different laboratories is then used as the "consensus name" for that material.
- 7) Locally-named reference materials are gasoline or diesel fuels that are usually from the regular production of the facility where they are used in laboratory quality control efforts and have been analyzed using the designated method (either by the facility's lab or by a reference lab) to obtain an estimate of their concentration.
- 8) Method-defined fuel parameter means a fuel parameter for which an EPA-prescribed primary test method or designated method defines the regulatory standard. Examples of method-defined fuel parameters include olefin content in gasoline, Reid vapor pressure (RVP) of gasoline, distillation parameters of gasoline, benzene content of gasoline, aromatic content of gasoline and diesel fuel, and oxygen/oxygenates content of gasoline.
- 9) *Reference installations* are designated test method installations that are used to qualify the accuracy of other method-defined parameter instruments.

Reference installations of the designated test method will be used to evaluate the accuracy of other method-defined alternative test methods and to establish correlation equations if necessary.

- 10) *Correlation equation* is a correction equation as determined by the use of ASTM D6708. This standard practice determines whether the comparison between the alternative test method and the designated test method is a null result. If the comparison is not null, then the standard practice provides for a correlation equation that predicts designated test method results from the applicable method-defined alternative test method.
- 11) *Statistical quality control (SQC)* means a planned system of activities whose purpose is to provide a level of quality that meets the needs of compliance with the standards of this part. This subpart prescribes specific SQC requirements for both absolute and method driven fuel parameters for both voluntary and non-voluntary consensus-based standards bodies.
- 12) *Voluntary consensus-based standards body (VCSB)* means a domestic or international organization that plans, develops, establishes, or coordinates voluntary consensus standards using agreed-upon procedures and which possesses the attributes of openness, balance of interest, due process, and consensus, as explained in OMB Circular A-119 and the National Technology Transfer and Advancement Act of 1995, P.L. 104-113, sec. 12(d).
- 13) *Non-voluntary consensus-based standards body (non-VCSB)* means a domestic or international regulated party that has developed a proprietary analytical test method that has not been adopted by a VCSB organization.
- Recordkeeping and Reporting Requirements for a Laboratory (generation, storage, and reporting of test method records per the cited regulations below in 40 CFR 80)
 - (a) Sulfur in Gasoline (absolute fuel parameter) (Designated Primary Test Method (DPTM) ASTM D2622-10)

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VCSB Alternative Test Method (ATM) – Self-qualification Precision and accuracy – 80.47(b) SQC – 80.47(n) Recordkeeping – 80.47(q)
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Non-VCSB ATM – Self-qualification Precision and accuracy – 80.47(b) Qualification – 80.47(l) SQC – 80.47(n) Recordkeeping – 80.47(q)

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(b) Sulfur in Butane (absolute fuel parameter)
   (DPTM – ASTM D6667-10)
   VCSB ATM – Self-qualification
       Precision and accuracy -80.47(c)
                        SQC - 80.47(n)
              Recordkeeping -80.47(q)
   Non-VCSB ATM - Self-qualification
       Precision and accuracy – 80.47(c)
                Qualification – 80.47(1)
                        SQC - 80.47(n)
              Recordkeeping -80.47(q)
(c) Olefins in Gasoline (method-defined fuel parameter)
   (DPTM – ASTM D1319-13)
   VCSB ATM – Self-qualified
              Precision -80.47(d)
              Accuracy – 80.47(k) (reference installations/labs required)
           Qualification – 80.47(1)
                   SQC - 80.47(0)
         Recordkeeping -80.47(q)
   Non-VCSB ATM – EPA approval required
              Precision -80.47(d)
              Accuracy – 80.47(k) (reference installations required)
           Qualification -80.47(m) (report to EPA)
                  SQC - 80.47(p)
         Recordkeeping – 80.47(q) (lab seeking approval)
         Recordkeeping -80.47(m) (reference installations)
(d) Aromatics in Gasoline (method-defined fuel parameter)
   (DPMT – ASTM D5769-10)
   VCSB ATM – Self-qualified
              Precision -80.47(e)
              Accuracy – 80.47(k) (reference installations required)
          Qualification – 80.47(1)
                   SQC - 80.47(0)
         Recordkeeping -80.47(q)
    Non -VCSB ATM – EPA approval required
              Precision -80.47(e)
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Qualification -80.47(m) (report to EPA)

Accuracy – 80.47(k) (reference installations required)

SQC – 80.47(p) Recordkeeping – 80.47(q) (lab seeking approval) Recordkeeping – 80.47(m) (reference installations)

(e) Oxygen and Oxygen Content in Gasoline (method-defined fuel parameters) (DPMT – ASTM D5599-00 (Reapproved 2010))

VCSB ATM - Self-qualified

Precision -80.47(f)

Accuracy – 80.47(k) (reference installations required)

Qualification – 80.47(l)

SQC - 80.47(0)

Recordkeeping -80.47(q)

Non-VCSB ATM – EPA approval required

Precision -80.47(f)

Accuracy – 80.47(k) (reference installations required)

Qualification – 80.47(m) (report to EPA)

SQC - 80.47(p)

Recordkeeping – 80.47(q) (lab seeking approval)

Recordkeeping – 80.47(m) (reference installations)

(f) Reid Vapor Pressure (RVP) in Gasoline (method-defined fuel parameter) (DPTM – ASTM D5191-13)

VCSB ATM – Self-qualified

Precision -80.47(g)

Accuracy – 80.47(k) (reference installations required)

Qualification – 80.47(l)

SQC - 80.47(0)

Recordkeeping -80.47(q)

Non-VCSB ATM – EPA approval required

Precision -80.47(g)

Accuracy – 80.47(k) (reference installations required)

Qualification -80.47(m) (report to EPA)

SQC - 80.47(p)

Recordkeeping – 80.47(q) (lab seeking approval)

Recordkeeping – 80.47(m) (reference installations)

(g) Gasoline Distillation (method-defined fuel parameter) (DPTM – ASTM D86-12)

VCSB ATM – Self-qualified

Precision -80.47(h)

Accuracy – 80.47(k) (reference installations required)

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Qualification – 80.47(l)
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SQC - 80.47(0)

Recordkeeping – 80.47(q)

Non-VCSB ATM – EPA approval required

Precision -80.47(h)

Accuracy – 80.47(k) (reference installations required)

Qualification – 80.47(m) (report to EPA)

SQC - 80.47(p)

Recordkeeping -80.47(q) (lab seeking approval)

Recordkeeping – 80.47(m) (reference installations)

(h) Benzene in Gasoline (method-defined fuel parameter)

(DPTM – ASTM D3606-10)

VCSB ATM - Self-qualified

Precision - 80.47(i)

Accuracy – 80.47(k) (reference installations required)

Qualification – 80.47(l)

SQC - 80.47(0)

Recordkeeping -80.47(q)

Non-VCSB ATM – EPA approval required

Precision -80.47(i)

Accuracy – 80.47(k) (reference installations required)

Qualification -80.47(m) (report to EPA)

SQC - 80.47(p)

Recordkeeping -80.47(q) (lab seeking approval)

Recordkeeping – 80.47(m) (reference installations)

(i) Aromatics in Diesel (method-defined fuel parameter)

(DPTM – ASTM D1319-13)

VCSB ATM – Self-qualified

Precision -80.47(j)

Accuracy – 80.47(k) (reference installations required)

Qualification – 80.47(1)

SQC - 80.47(0)

Recordkeeping -80.47(q)

Non-VCSB ATM – EPA approval required

Precision -80.47(i)

Accuracy – 80.47(k) (reference installations required)

Qualification – 80.47(m) (report to EPA)

SQC - 80.47(p)

Recordkeeping – 80.47(q) (lab seeking approval)

Recordkeeping - 80.47(m) (reference installations)

(j) Sulfur in Diesel (absolute fuel parameter)(DPTM – Not applicable)

VCSB ATM – Self-qualified
Precision – 80.584(a)
Accuracy – 80.584(b)
Recordkeeping – 80.585(a)(2)
QC procedures – 80.585(e)

Non-VCSB ATM – EPA approval required
Precision – 80.584(a)
Accuracy – 80.584(b)
Qualification – 80.585(b) (report to EPA)
QC procedures – 80.585(e)

To summarize, to qualify a test method, the following information must be stored or, in certain cases, provided to the EPA:

- A. Laboratories must submit information that will establish that certain non-VCSB test methods meet the accuracy and precision requirements. They must also generate and retain the subsequent SQC records for five years.
- B. Laboratories must retain the information that will establish that VCSB test methods and certain non-VCSB test methods meet the accuracy and precision requirements. They must also generate and maintain the subsequent SQC records for five years. This period is consistent with the required record retention for all 40 CFR fuels programs.

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

- 5(a) Agency Activities
- All reported data will be reviewed by EPA.
- EPA will review the data to determine if the non-VCSB test method meets the
 accuracy and precision criteria of the regulation and whether a correlation is
 necessary for the candidate alternative test method.
- EPA will prepare a written response qualifying (or not qualifying) the laboratory to perform the test method.
- The data will be stored.
- 5(b) Collection and Methodology and Management

Data will be collected by industry and reported to EPA in the form of a template, typically submitted with an accompanying letter and contact information. Sample templets are on our web site for each eligible fuel parameter.

5(c) Small Entity Flexibility

This collection will not adversely affect small entities. The regulation provides a means of qualifying alternative test methods that may encourage development of new test methods by entities of all sizes.

5(d) Collection Schedule

Test methods are expected to be submitted on a one-time basis by parties wishing to seek approval of non-VCSB test methods. The time of collection is driven by the respondent. Laboratories have qualified VCSB methods in the previous three years and we are not aware of recent activity. There have been no applications for qualification of a non-VCSB method since 2015.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

We drew upon experience implementing similar regulations among the same entities to develop estimates of the burden associated with this collection. We estimated 1,000 laboratories would be impacted by the SQC requirements, based upon registration data and industry knowledge.

It is estimated that the average burden to qualify a new alternative test method is 180 hours. The bulk of new-qualification activity has occurred. We estimate two new qualifications annually, one VCSB method and one non-VCSB method, primarily as placeholders for a total of 360 hours. There appears to be little new activity in this area. The previous ICR estimated 52 new methods but at only 6.66 hours per qualification, for a total of 346 hours. We believe that the 6.66 figure was in error.

We estimate that each of the 1,000 fuel test labs will spend one-half hour per week in the generation and retention of SQC records. Thus, 26 hours per lab per year by 1,000 labs gives an annual burden of 26,000 hours. The previous ICR estimated only 52 labs for a total of 5,408 hours. We believe that the only 52 labs was in error.

Reference installations/labs are required for certain qualifications. For two annual qualifications we estimate that 12 installations would be involved, at 24 hours each annually, for a total of 288 hours. The previous ICR estimated 52 installations for a total of 1,248 hours.

A non-VCSB method may require a third-party engineering review. We estimate one annually at 48 hours. The previous ICR estimated 52 annually at 48 hours each for a total of 2,496 hours.

6(b) Estimating Respondent Cost

Three labor categories are involved: managerial (includes legal and professional review), technical, and clerical. Estimates were derived from average wages reported in the Bureau of Labor Statistics - May 2017 National Industry-Specific Occupational Employment and Wage Estimates NAICS; 541380 – Testing Laboratories found at https://www.bls.gov/oes/current/naics5 541380.htm with a 3% annual inflation factor applied to bring the values to the present. Using this method, the following wages and benefits apply by category:

Wages and Benefits

Managerial	\$65.69 per hour
Technical	\$50.49 per hour
Clerical	\$20.57 per hour

Doubling for company overhead beyond wages and benefits, and for convenience, rounding to the dollar, gives the following rates for this final ICR:

Total Employer Cost

Managerial	\$ 131	per hour
Technical	\$ 101	per hour
Clerical	\$ 41	per hour

It is assumed that for each hour of activity the mix will be about 0.1 hour managerial, 0.7 hour technical, and 0.2 hour clerical. This gives an average labor cost of \$92 per hour, which will be used in this ICR. For purchased services related to laboratory testing, third party engineering review, we have doubled this hourly cost to \$184 in order to more accurately reflect the overhead cost associated with this service, but in this collection there is no O&M associated with the cost. We estimate the following burden:

Table 1

						Total	
		Annual	Annual	Hours		Hours	
Collection	No. of	Reports per	Reports	per	Hours	Previous	
Activity	Respondents	Respondent	Total	Report/	Total	ICR	Cost
ATMs	2	1	2	180	360	346	\$33,120
SQC	1,000	26	26,000	1	26,000	5,408	\$2,392,000
Ref. Instls.	12	1	12	24	288	1,248	\$26,496
Eng. Rev	1	1	1	48	78	2,496	\$8,838
			26,015		26,696	9,498	
Totals	1,015		Reports		Hours	Hours	\$2,460,454

[All hours are recordkeeping except ATM is reporting.]

6(c) Estimating the Agency Burden and Cost

Due to the significant reduction in anticipated activity, the EPA burden is estimated to consist of one GS-13 chemist and one GS-13 statistician for 40 hours per year each. Based on the federal pay rate of January 2019, an upper step GS-13 is around \$120,000 that gives a typical federal salary of \$60 per hour, which when doubled for overhead results in the estimate of \$120/hour.

GS-13 chemist (40 hours)	\$ 4,800
GS-13 statistician (40 hours)	<u>\$ 4,800</u>
TOTAL	\$ 9,600

6(d) Estimating the Respondent Universe

We estimated the total number of regulated entities by drawing upon experience regulating the same entities.

6(e) Bottom Line Annual Burden Hours and Costs

From the table, we estimate the following annual totals:

TOTAL NO. OF RESPONDENTS:	1,015
TOTAL NO. OF RESPONSES:	26,015
TOTAL BURDEN HOURS:	26,696
TOTAL COST TO RESPONDENTS:	\$2,460,454

Importers and refiners with fuel testing laboratories and independent fuel testing laboratories have the burden to qualify by testing the identified fuel parameters describing the precision of a VCSB method or non-VCSB method to comply with the Performance-Based Measurement System for Fuels Rule. EPA has identified a laboratory party size of 2 respondents

preparing 2 laboratory qualification submissions. The respondents will produce 2 reports describing VCSB methods precision and documentation on method evaluation as it relates to the comparability to ASTM D6708. The cost to industry to report in this collection is estimated to be \$33,120 and 360 total burden hours per year.

We estimate an annual recordkeeping associated with statistical quality control with one record generated every two weeks and taking one hour for each report to produce a burden of 26,000 hours and a cost to industry of \$2,392,000. For those laboratories that wish to be reference installations, with one response per respondent, we estimate 288 hours costing \$26,496. For third party engineering reviews EPA estimates one per respondent a year requiring 48 hours costing industry \$8,838.

6(f) Reason for Change in Burden

The burden increased 17,198 hours due to a significant increase in the estimated number of labs generating and retaining SQC data, which was underestimated in the previous ICR.

6(g) Burden Statement

We estimate an average annual reporting burden of one hour per response. For those laboratories that elect to be reference installations, the annual reporting burden would be 48 hours per response. For an ATM the estimate is 180 hours.

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 the instructions; develop, acquire, install, and utilize technology and systems for the purpose 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 transit 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. 11Interested parties are urged to comment on the Agency's need for this information collection, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection technique.

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-2018-0663, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202)

566-1744, and the telephone number for the Air and Radiation 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-2018-0663 and OMB Control Number 2060-0692 in any correspondence.

Part B of the Supporting Statement – This part of the supporting statement is not applicable.