

# SUPPORTING STATEMENT FOR RadNet ICR# 0877.14

## Section I: Part A

### 1. Identification of the Information Collection

#### 1.(a) Title of the Information Collection

RadNet (EPA ICR No. 0877.14, OMB Control No. 2060-0015)

#### 1.(b) Short Characterization

RadNet in this ICR refers to the EPA's national environmental radiation monitoring network. The objectives of RadNet are to provide a means of estimating ambient levels of radioactive pollutants in our environment, to follow trends in environmental radioactivity levels, and to detect and assess the impact of fallout and other intrusions of radioactive materials. Data generated from the EPA's RadNet system have been and are being used to provide the information base for making decisions necessary to ensure the protection of public health. The system enables the Agency to determine if additional sampling or other actions are required in particular cases of radioactive releases to the environment, and, where necessary, RadNet can provide ancillary information on population exposure, radiation trends, and other aspects of such releases.

The RadNet network is used to collect air particulate, precipitation, and drinking water samples. RadNet air particulate monitors are capable of measuring radiation from the filter in real-time, sending the data hourly to the EPA. The data from analysis of these samples constitute the nation's single major source of environmental radiation data. The responsibility for operating RadNet is assigned by the EPA's Office of Radiation and Indoor Air to the Director, National Analytical Radiation Environmental Laboratory (NAREL), in Montgomery, Alabama. The component sampling locations are distributed throughout the United States and cover each geographical region, individual states, and most major population centers. The respondents, primarily state and some local officials, voluntarily collect the samples and complete the information forms. The forms request descriptive information related to sample collections (e.g., sample type, sample location, length of sampling, and volume represented). Requested sampling frequencies are as follows:

- Air particulate samples are requested twice weekly. \*
- Precipitation samples are collected after each measurable rainfall and composited into monthly samples.
- Drinking water samples are collected quarterly.

\* Many variable, site-specific conditions may preclude predicting a specific number of filters changed by a respondent weekly. For example, operator safety may be compromised by construction or severe weather, which may preclude routine air sample collection. Reduced operator availability may cause reduced filter change frequency if an operator's non-volunteer job duties increase, or if frequency of visits to a monitor site decreases, such as may occur with sites at remote locations generally visited in conjunction with non-volunteer job duties. The RadNet Quality Assurance Project Plan contains a detailed discussion of these conditions. It is important to recognize that these variations do not affect the quality of the results of the analyses.

The samples are sent to NAREL for radiochemical analyses. To ensure that the data generated at NAREL are of known quality, a quality assurance plan (available upon request) is followed during all phases of sample collection and analysis activities.

Data are stored electronically at NAREL and are available online at [www.epa.gov/radnet](http://www.epa.gov/radnet). See Attachment 1 for the forms used by respondents and NAREL personnel to document sampling in all RadNet media: air, precipitation, and drinking water.

The utility of RadNet data is evidenced by its extensive use by a number of federal, state and commercial entities. The DOE's National Laboratories (including Oak Ridge, Savannah River, Brookhaven, and Argonne) and many universities across the country utilize the data generated by the operation of the RadNet network. RadNet data are also used by the Nuclear Regulatory Commission (NRC) and NRC licensed nuclear power plants and their environmental contractors to establish background data. These data are used by some power plant operators as a baseline to ensure compliance with NRC release limits. The states also use RadNet data to supplement or compare with environmental radiation information generated by their own programs. RadNet data are also available to the public via the EPA website. More than one-million "hits" were recorded on the EPA website following the Fukushima nuclear reactor accidents.

Data from this program have been used to measure fallout following atmospheric nuclear weapon tests until 1980, when atmospheric testing of nuclear weapons ceased. During and following the accident at Three Mile Island, RadNet stations in the adjacent states demonstrated to the public that there were no radioactive materials in their areas as a result of the accident. Increased monitoring following the nuclear incident at Chernobyl in 1986 provided daily reports of atmospheric concentrations of radionuclides across the United States. RadNet was the largest source of radiological data following the Fukushima reactor accidents in 2011. Most recently, the EPA used data from the RadNet air monitoring program to respond to information requests about the 2017 detections of ruthenium-106 in Europe.

The collection of samples will involve 237 respondents with an annual respondent burden cost of approximately 146,759 dollars, including costs of benefits and overhead. The respondents are not asked or required to keep records and all supplies and equipment relating to RadNet activities are provided by NAREL at no cost to the respondents.

RadNet data back to 1981 may be found at the EPA web site <http://www.epa.gov/radnet>. RadNet data on the web are interactive – the database can be queried and searched. Quarterly reports are no longer produced in hard copy, due to the availability of RadNet data online. NAREL does not survey respondents, other than on specific issues regarding their work as sample collectors. That is done through routine conversations with them via telephone or e-mail as part of the process of maintaining the flow of samples and supplies between NAREL and respondents.

Beginning in July 2016, the EPA began adding exposure rate measurement to the real-time RadNet air monitors. Exposure rate data provide more useful information to the public and general scientists concerning gamma radiation in the environment. To date, 55 RadNet air monitors have this capability. Addition of exposure rate measurement capability will continue as the gamma radiation components require servicing and funding becomes available. This is expected to take many years.

Expansion of the real-time air network of RadNet to 140 monitors is complete. The size of the other media networks (drinking water and precipitation) are expected to remain essentially unchanged, except for the normal fluctuation of volunteer participants. Since the sampling

program is not expected to change in the next three years, neither the respondent burden nor costs are expected to change since the last ICR, with exception of increased cost due to salary increases of the last three years.

## **2. Need for and Use of the Collection**

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

The legal basis of RadNet originated and resides in Executive Order 10831 and Public Law 86-373. Executive order 10831 was announced to the public on July 31, 1959 and issued August 4, 1959. This order came in response to recommendations contained in a memorandum to the President from Elmer B. Staats on July 31, 1959. As reiterated before the Joint Committee on Atomic Energy by Maurice H. Stans, these recommendations also became a part of the legislative history of the 1959 amendments to the Atomic Energy Act. Radioactive fallout and environmental radiation monitoring became a responsibility of the Department of Health, Education and Welfare (HEW) under these legal mandates. In 1970, Reorganization Plan No. 3 transferred HEW's fallout and radioactive monitoring responsibilities to the Environmental Protection Agency (EPA). On July 1, 1973, through its Office of Radiation Programs (ORP), EPA developed and implemented a new continuous monitoring system. This system, originally termed ERAMS and now called RadNet, was designed to complete and complement the monitoring system previously instituted by HEW's Public Health Service under Executive Order 10831.

The objectives of RadNet are to provide a means of estimating ambient levels of radioactive pollutants in our environment, to follow trends in environmental radioactivity levels, and to assess the impact of fallout and other intrusions of radioactive materials. Data generated from the EPA's RadNet system have been and are being used to provide the information base for making decisions necessary to ensure the protection of public health. The system enables the Agency to determine if additional sampling or other actions are required in particular cases of radioactive releases to the environment, and, where necessary, RadNet can provide ancillary information on population exposure, radiation trends, and other aspects of such releases.

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

Data generated by RadNet are used to provide a means of estimating ambient levels of radioactive pollutants in our environment, to follow trends in environmental radioactivity levels, and to detect and assess the impact of fallout and other intrusions of radioactive materials. The data are also being used to provide the information base for making decisions necessary to ensure the protection of public health. The system enables the EPA to determine if additional sampling or other actions are required in particular cases of radioactive releases to the environment and, where necessary, RadNet can provide ancillary information on population exposure, radiation trends, and other aspects of such releases.

The utility of the RadNet data is evidenced by its extensive use by a number of federal, state and commercial entities. The DOE's national laboratories (including Oak Ridge, Savannah River, Brookhaven, and Argonne) and many universities across the country utilize the data generated by the operation of the RadNet network. RadNet data are also used by the Nuclear Regulatory Commission (NRC) and NRC-licensed nuclear power plants and their environmental contractors to establish background data. These data are used by some power plant operators as a baseline to ensure compliance with NRC release limits. The states also use RadNet data to supplement or compare with environmental radiation information generated by their own programs.

Data from this program have been used to measure fallout following atmospheric nuclear weapon tests until 1980, when atmospheric testing of nuclear weapons ceased. During and following the accident at Three Mile Island, RadNet stations in the adjacent states demonstrated to the public that there were no radioactive materials in their areas as a result of the accident. Increased monitoring following the nuclear incident at Chernobyl in 1986 provided daily reports of atmospheric concentrations of radionuclides across the United States. RadNet was the largest source of radiological data following the Fukushima reactor accidents in 2011. Most recently, the EPA used data from the RadNet air monitoring program to respond to information requests about the 2017 detections of ruthenium-106 in Europe.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

#### **3.(a) Non-duplication**

RadNet has been in operation for over 45 years. During that time, data derived from the system have been disseminated nationally and internationally. The professional/information network developed over the life of RadNet has identified other environmental radiation data systems in the United States, but none have RadNet's national scope or exact collection and analytical structure.

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

The first Federal Register 84 FR 20880 notice was published May 13, 2019. No public comments were received.

#### **3.(c) Consultations**

The National Analytical Radiation Environmental Laboratory (NAREL) is involved in telephone and written communication with the respondents who supply the samples. In addition, NAREL is an active participant in the Council of Radiation Control Program Directors (CRCPD), which is an association of individuals from radiation programs from all fifty states. These individuals and their associates make up a significant number of RadNet data users. NAREL's participation in this association allows for frequent consultations on a variety of issues involving RadNet with many RadNet data users. Comments from federal and state agencies and other organizations concerning RadNet are welcomed and are noted at NAREL.

Specifically, NAREL has consulted with Mr. Larry Sims (334) 270-3488, an experienced respondent, to gain information on potential improvements to the reporting process. Mr. Sims had no considerations for process improvement.

EPA also communicates with the public through ORIA's Center for Radiation information and Outreach and the RadNet website, [www.epa.gov/radnet](http://www.epa.gov/radnet), which allows feedback with CRIO and RadNet personnel at NAREL.

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

Alternate, less frequent collection intervals have been considered but not adopted because these would not provide the continuous current "picture" of the radiation levels across the United States now available with the current system. Less frequent collection would eliminate the ability to

determine and respond to elevated radiation levels soon after they occur and would dramatically decrease the ability to map trends in radiation data following a release and would likely result in significant loss of data availability.

### **3.(e) General Guidelines**

The respondents are requested to supply precipitation samples and air filters and accompanying forms more often than on a quarterly basis. This is done so that elevated levels of radiation will be detected as soon as possible to allow for the quickest response possible to potential health threats.

The respondents submit sample collection information on a one-page form that accompanies the sample to NAREL. Since most samples are collected in the field, electronic means of recording or sending the information are not feasible. In addition, to avoid assigning incorrect sampling information to a sample, the sample and sampling information need to be linked when they are sent to the lab. The most effective means to do this is to attach a form with the information to the sample.

### **3.(f-g) Confidentiality and Sensitive Questions**

The section on confidentiality and sensitive questions does not apply to RadNet. The respondents do not supply confidential or sensitive information.

## **4. The Respondents and the Information Requested**

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

All fifty states, primarily Public Health Departments (NAICS Code 92312), send samples along with one-page sample collection forms to NAREL. The respondents were chosen for two basic reasons: most of them routinely collect samples of this type as part of their normal activities, and in order to obtain meaningful information concerning ambient radiation levels for the entire United States samples must be collected from as many parts of the country as feasible.

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

Respondents provide actual samples of air, precipitation, and drinking water. Respondents do provide descriptive information about their samples on one-page forms (see Attachment). The respondents are not requested or required to maintain records. Since the forms, as shown in the attachment, have had only very minor changes over time expiration dates are not included on them.

### **4.(b)(ii) Respondent Activities**

RadNet respondents perform the following tasks in order to provide samples to NAREL:

- Read instructions concerning the sampling process
- Collect samples in appropriate containers
- Complete description forms regarding samples
- Mail/ship samples and forms to NAREL in Montgomery, Alabama

Most respondents are employees of state or local health agencies and routinely perform sampling

of their own that is analogous to RadNet sampling.

## **5. The Information Collected**

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

Since RadNet began operating in the early 1970's, the following functions have been part of EPA's inventory of Agency activities:

- Maintain a master database
- Answer respondent questions
- Coordinate respondent sample submissions
- Maintain records of sample submissions
- Publish and disseminate data from sample analyses
- Analyze samples submitted by respondents
- Prepare and send sampling material
- Provide maintenance and or replacements for sampling instruments

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

The RadNet network involves the collection of a variety of samples including air filters, drinking water, and rain water (precipitation) samples. Standard Operating Procedures (available upon request) contain the detailed procedures used to ensure uniform collection of the samples and the standard forms filled out by the respondents when they collect the samples. The forms were designed to minimize the burden on the respondents. In most cases only the date of sampling, location of sampling, and the name of the individual taking the sample are required. Since most samples are taken in the field, an electronic means of recording and sending this information is not feasible. To ensure that the sample collection information accompanies the correct sample, the sample and the information need to be sent together. This is best accomplished by attaching the one-page form to each sample when it is sent to the NAREL.

When the samples and accompanying forms arrive at NAREL, the samples are assigned an identification number. This number and information from the accompanying forms are entered into the NAREL computer. The samples are then analyzed for a variety of radionuclides. Data from the analyses performed at NAREL are also entered into the computer. The data are stored in a database and are available to the public online at the EPA website <https://www.epa.gov/radnet>. When necessitated by unique circumstances, data from the RadNet network can be made available daily. The data are verified by at least two individuals at NAREL. To ensure that the data are accurate and reliable, all activities associated with the RadNet network must conform to the RadNet Quality Assurance Project Plan and the Quality Assurance Manual, which detail the data quality objectives, project organization and responsibility, internal quality control checks, and other areas relating to quality assurance.

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

This section is not applicable because most respondents are state agencies.

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

Listed below are the requested sample collection frequencies that require completion of sample collection forms.

<u>Sample</u>	<u>Requested Collection frequency</u>
Drinking water	Quarterly
Precipitation	As measureable precipitation occurs
Air filters	Two times per week*

\* Many variable, site-specific conditions may preclude predicting a specific number of filters changed by a respondent weekly. For example, operator safety may be compromised by construction or severe weather, which may preclude routine air sample collection. Reduced operator availability may cause reduced filter change frequency if an operator's non-volunteer job duties increase, or if frequency of visits to a monitor site decreases, such as may occur with sites at remote locations generally visited in conjunction with non-volunteer job duties. The RadNet Quality Assurance Project Plan contains a detailed discussion of these conditions. It is important to recognize that these variations do not affect the quality of the results of the analyses.

In the rare case of an emergency, such as Three Mile Island, Chernobyl, or Fukushima, the EPA may request an increased sample collection frequency.

## **6. Estimating the Burden and Cost of Collection**

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

Total individual respondent burden for RadNet is estimated to be 3,721 hours annually. This 0.2 percent reduction in burden from 3,726 hours annually indicates the RadNet network is fully established and operating with essentially no changes expected. However, the EPA continues to look for ways to reduce operator burden.

Burden hour estimates are based primarily on sample collection times tested by NAREL personnel and informal telephone conversations with respondents over the years. Additional information used in estimating burden hours was obtained through discussions of NAREL personnel with personnel from state radiation departments at Council of Radiation Control Program Directors (CRCPD) meetings. Discussions with respondents and RadNet management revealed that the technical labor category is the most appropriate one for all RadNet burden activities.

Although the respondent burden assumes 237 total sampling locations, there can be times when the actual number of stations reporting is less than that, mainly due to unexpected nonparticipation by some stations. However, participation is not anticipated to decrease by more than 15 percent.

### **6.(b) Estimating Respondent Cost**

Total respondent cost for RadNet is estimated to be about \$146,759 annually. This 5 percent increase in cost from \$139,843 annually is caused by increasing the hourly salary estimate for the respondents as discussed in the next paragraph. As stated in 6.(a), costs are not expected to change significantly because the network is operating in essentially steady-state.

Informal conversations and discussions with respondents and RadNet management have revealed that the technical labor category is the correct one for all RadNet respondent burden activities. Since the hourly wages of the respondents depend on years of employment and the pay scales of

their respective states, an actual average hourly wage would require obtaining confidential information from the respondents. Based on our informal discussions with respondents and RadNet managers, the hourly rate at the GS-9(1) level, 39.44 dollars/hour (\$24.65 per hour times a 1.6 overhead multiplication factor, based upon OPM salary tables for “rest of U.S.” effective April 2019 as displayed at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx)), is a good approximation of the respondents’ hourly wage for this technical labor category.

The respondents are not asked or required to keep records, and all supplies and materials relating to RadNet activities are provided by the NAREL at no cost to the respondents.

There are no capital costs for sample collectors (respondents). All equipment and materials are supplied by NAREL.

### **6.(c) Estimating Agency Burden and Cost**

Agency burden estimates are based on our years of experience in operating the RadNet network. Since the activities for the operation of RadNet involve workers at various GS levels, we used composite burden hours and calculated hourly costs at the GS-13 level (step 1) times 1.6 (the overhead multiplication factor) to be 68.00 dollars/hour. The total number of annual hours devoted to RadNet by Agency personnel is estimated to be 27,672 hours, as shown in Table 2 on page 12.

Total agency burden and cost for RadNet activities and capital costs, including supplies, are estimated to be about \$2,363,476 annually. The estimated burden remains 27,672 hours as in the previous ICR because operations are essentially constant. The 3.5% estimated increase in agency personnel cost from \$1,770,004 to \$1,831,176 annually reflects updated civil service salaries to 2019 levels. Additionally, the EPA estimates the cost for supplies for the RadNet program to be \$70,000 annually, which is essentially the same as the previous ICR cost. Finally, the Agency estimates the capital costs to decrease minimally from \$498,300 to about \$462,300 due to elimination of site preparation costs for installing new air monitors since expansion is complete. Hence, the total burden for capital costs on the agency is \$532,300 (\$462,300 + \$70,000), as shown in Table 3 on page 13.

### **6.(d) Bottom Line Burden Hours and Cost/Burden Tables**

See burden tables on pages 11-13.

### **6.(e) Reasons For Change in Burden**

Total respondent burden has remained relatively stable since 2010. This renewal package however, will show a significant increase in responses -- from 277 in the 2016 ICR to 15,644 now. That uptick is not as a result of any change to the collection itself; it merely corrects an error in the previous submission. Note, as evidence, that the 2013 renewal included 17,541 responses and before that, the 2010 renewal cited 16,680. Burden and costs were not misreported in the 2016 ICR and have, as expected, remained almost unchanged throughout the cited renewals. Slight variation in respondent and burden figures are a result of each new estimate accounting for the latest information available (as discussed in section 6a). The EPA will continue to look for ways to reduce burden while maintaining an effective monitoring program.

### **6.(f) Burden Statement**



The annual public reporting and recordkeeping burden for this collection of information is estimated to average just under 0.24 hours per response. Burden means the total time and effort 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 the 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 No. EPA-HQ-OAR-2003-0041, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Office of Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8 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 Office of Air and Radiation Docket is 202-566-1742. Use the EPA's electronic docket and comment system at [www.regulations.gov](http://www.regulations.gov), to submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the docket that are available electronically. Once in the system, select "docket search," then key in the docket ID number identified above. Please note that the EPA's policy is that public comments, whether submitted electronically or in paper, will be made available for public viewing at [www.regulations.gov](http://www.regulations.gov) as the Agency receives them and without change, unless the comment contains copyrighted material, CBI, or other information whose public disclosure is restricted by statute. For further information about the electronic docket, go to [www.regulations.gov](http://www.regulations.gov).

**TABLE 1\***

<b>Annual Respondent Burden Cost Estimates</b>						
<b>Activity</b>	<b>Hours per Occurrence (A)</b>	<b>Occurrences per Year (B)</b>	<b>Hours per Respondent per Year (C = A x B)</b>	<b>Respondents per Year (D)</b>	<b>Burden-hours per years (E = C x D)</b>	<b>Cost per year (F = E x \$39.44/hr)**</b>
<b>Read Instructions</b>						
Air	0.5	1	0.50	140	70	2,761
Precipitation	0.5	4	2.00	29	58	2,288
Drinking water	0.5	4	2.00	68	136	5,364
<b>Collect Samples</b>						
Air	0.167	104	17.33	140	2427	95,708
Precipitation	0.250	28	7.00	29	203	8006
Drinking Water	0.033	4	0.13	68	9	358
<b>Complete and Mail Forms</b>						
Air	0.050	104	5.20	140	728	28,712
Precipitation	0.083	28	2.33	29	68	2,669
Drinking Water	0.083	4	0.33	68	23	894
<b>TOTAL ANNUAL HOURS</b>					<b>3722</b>	
<b>TOTAL ANNUAL LABOR COST</b>						<b>146,759</b>
<b>RESPONDENTS' TOTAL ANNUAL COST***</b>						<b>146,759</b>

\* Round-off errors may affect the numbers as shown. These errors are insignificant.

\*\* The rate used in this table is that of a GS-9/1 for 2019. The \$39.44 per hour amounts to the GS-9/1 "Rest of US" rate of \$24.65/hour multiplied by an overhead rate of 1.6.

\*\*\* Record keeping costs, capital costs, and maintenance costs are zero (0) for respondents.

**TABLE 2**

<b>Annual Agency Burden/Cost Estimates (Activities)</b>			
<b>Line Item</b>	<b>Burden Activity</b>	<b>Annual Hours</b>	<b>Agency Costs*</b>
1	Maintaining master database	50	3,400.00
2	Monitoring real-time data (contractor)	3,288	207,144.00 **
3	Monitoring real-time data (NAREL)	500	34,000.00
4	Maintain real-time monitors (contractor)	6,480	427,680.00 **
5	Maintain system operations (NAREL)	1,500	102,000.00
6	IT support (contractor)	1,920	109,440.00 **
7	Answering respondent questions	210	14,280.00
8	Coordinating respondent submissions	1,462	99,416.00
9	Maintaining records of samples	1,462	99,416.00
10	Publishing and disseminating data	300	20,400.00
11	Analyzing samples	10,000	680,000.00
12	Providing sampling supplies	500	34,000.00
	<b>TOTAL</b>	<b>27,672</b>	<b>1,831,176.00</b>

\* For federal employees, the activity costs assume an average of GS-13/1 rate time 1.6 (\$68.00/hr). Lines 2, 4, and 6 are contractor costs. GS hourly rates are based upon 2019 data from the Office of Personnel Management ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx)).

\*\* For contractor activities, costs of those activities are estimated based on previous costs for those activities.

**TABLE 3**

<b>Agency Burden/Cost Estimates (Capital Costs)</b>			
<b>Line Item</b>	<b>Unit Cost (\$)</b>	<b>No. Units</b>	<b>Total (\$)</b>
Physical site preparation for air samplers	3,000	3	9,000
Supplies to field stations	500	140	70,000
Maintain real-time monitors parts (annual total)	150,000	1	150,000
Maintain real-time monitors (contractor site visits, annual total)	180,000	1	180,000
IT costs			
• Data disaster recovery site	22,000	1	22,000
• Oracle license	15,000	1	15,000
• Internet access	18,000	1	18,000
• FTP software	500	1	500
• Records retention	1,800	1	1,800
• Backup software	6,000	1	6,000
• Equipment refresh	10,000	1	10,000
• CDX website host	50,000	1	50,000
<b>Grand Total</b>			<b>532,300</b>

**TABLE 4**

<b>Summary of Respondent and Agency Total Costs</b>	
<b>Line Item</b>	<b>Total (\$)</b>
Annual Respondent Burden	146,759
Annual Agency Burden for Activities	1,831,176
Annual Agency Burden for Capital Costs	532,300
Combined (activity and capital cost) Agency Burden	2,363,476

**ATTACHMENT**

**Forms Used by RadNet Respondents**  
 (click on PDF icon below)



Forms for 2016 ICR  
 Supporting Statement