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**Supporting Statement**  
**Data Requirements Rule for the 1-Hour Sulfur Dioxide Primary National Ambient Air  
Quality Standard (NAAQS) (Renewal)**

**EPA ICR #2495.04**

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**PART A**

**1. Identification of the Information Collection**

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

**“Data Requirements Rule for the 1-Hour Sulfur Dioxide Primary National Ambient Air  
Quality Standard (NAAQS) - Renewal”**

**(b) Short Characterization/Abstract**

This ICR includes 1) estimates for ambient air monitoring data reporting, and other supporting measurements, as well as record keeping activities, and 2) estimates for emissions and emissions-related information and ambient air dispersion modeling reporting and activities, associated with the 40 CFR part 51 Requirements for Preparation, Adoption and Submittal of Implementation Plans.<sup>1</sup> These data and information are collected by various state and local air quality management agencies and reported to the U.S. Environmental Protection Agency (EPA). State and local air management agencies chose to submit either monitoring or modeling information in order to meet the initial and ongoing requirements, as applicable, under the final Data Requirements for the 2010 1-Hour Sulfur dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standards rule (SO<sub>2</sub> Data Requirements Rule) (*See* 80 FR 51052, August 21, 2015). This ICR reflects revisions to the initial ICR, covers the period of October 1, 2019–September 30, 2022, and includes estimates of the burden for sources, state and local air agencies, and EPA associated with developing, submitting, and processing the information described for purposes of satisfying ongoing requirements under the SO<sub>2</sub> Data Requirements Rule.

The SO<sub>2</sub> Data Requirements Rule directed state, local, and tribal air quality management agencies to provide data to initially characterize current air quality in areas with certain sources of SO<sub>2</sub> emissions. The rule described the criteria for identifying and listing the source areas where air agencies needed to characterize SO<sub>2</sub> air quality. The rule also requires states to continue to provide monitoring, modeling, and emissions data from a subset of these sources, that meet certain requirements under the rule, which may serve to inform an air agency’s continued understanding of whether these areas meet the 2010 SO<sub>2</sub> NAAQS. It described the process and timetables by which air quality management agencies were required to characterize air quality in source areas through ambient monitoring and/or air quality modeling techniques and submit this data to EPA, both initially and for the ongoing requirements. The air quality data

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<sup>1</sup> Subpart J of part 51: Ambient Air Quality Surveillance refers back to 40 CFR part 58; through the rest of this ICR, reference will be made to part 51 and part 58 for monitoring requirements and part 51 and Appendix W of part 51 for modeling requirements.

developed by the states in accordance with this rule may be used in designations as well as other programs, and are intended to be used by EPA to assist in the remaining round(s) of area designations for the 2010 SO<sub>2</sub> NAAQS.

More specifically, through the SO<sub>2</sub> Data Requirements Rule and the initial ICR, EPA required states to characterize ambient air quality around SO<sub>2</sub> sources with emissions that were greater than 2,000 tons per year (tpy) or that were otherwise included as a listed source. Based upon 2011 emissions data, the initial action identified approximately 412 SO<sub>2</sub> sources in 43 states. In this ICR renewal, EPA is addressing ongoing requirements that 1) apply to listed sources for which air agencies chose the monitoring pathway, and 2) apply to listed sources for which air agencies chose the modeling pathway and which were designated attainment/unclassifiable or unclassifiable/attainment based on air quality modeling of actual emissions. The number of listed sources for which air agencies chose the monitoring pathway, and thus are required to submit ongoing monitoring information, are 73 sources in 24 states (77 monitors total). The number of listed sources for which air agencies chose the modeling pathway that are required to submit ongoing data reports, and, potentially, updated modeling, are 170 sources in 43 states.

For those air quality management agencies that elected to conduct ambient monitoring for listed DRR sources to provide the necessary ongoing air quality data to EPA, the state and local air quality management agencies are responsible for reporting ambient air quality data information, as requested in this ICR, and will submit these data electronically to EPA's Air Quality System (AQS) and voluntary databases. Quality assurance/quality control records and monitoring network documentation are also maintained by each state and local agency, in AQS electronic format where possible.

For those air quality management agencies that elected to conduct air quality modeling of the areas containing listed DRR sources to provide the necessary air quality data to EPA and which were designated either unclassifiable/attainment or attainment/unclassifiable based on modeling of actual emissions of the area, state and local air quality management agencies are responsible for submitting ongoing data reports. These reports are required to be submitted annually as either a stand-alone document made available for public inspection or as an appendix to the air agency's Annual Monitoring Network Plan, and are required to include the annual SO<sub>2</sub> emissions of each applicable source in each such area, provide an assessment of the cause of any emissions increase from the previous year, and include a recommendation from the air agency regarding whether additional modeling is needed to characterize air quality in the area to determine whether the area meets or does not meet the 2010 SO<sub>2</sub> NAAQS. If EPA requires that the air agency conduct updated air quality modeling for the area, the air agency has 12 months to submit the updated modeling to EPA.

There are two cost estimates included in this ICR renewal: 1) total ongoing estimated costs for the modeling option if air agencies determined it was necessary to conduct additional modeling for all listed sources subject to the ongoing modeling requirements, which includes within it the estimation of costs for the required submission of the ongoing data reports for such source areas, and 2) total ongoing estimated costs incurred for the monitoring option sources regardless of the source of the funding.

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

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

The information requirements included within this ICR are necessary to provide EPA with ambient air quality surveillance data, which includes monitoring data, emissions data, and/or modeling data, to determine the United States air quality status, to make attainment decisions with respect to the NAAQS, to assist in developing necessary control strategies to ensure attainment of the NAAQS, to assess national trends in air pollution, to inform the public of air quality, and to determine the population's exposure to various ambient air pollutants. EPA's goal of attaining the NAAQS in all areas of the United States is directly dependent upon the availability of ambient air quality data (monitoring, emissions, and/or modeling data) requested in this information collection. Additionally, EPA, state, and local air quality management agencies, environmental groups, industrial groups, and academic organizations use these data to study atmospheric chemistry, e.g., the formation and fate of SO<sub>2</sub>, to determine the most appropriate and effective control strategies necessary to reduce air pollution.

The principal legal authority for this information collection is the Clean Air Act, 42 U.S.C. 7403, 7410, and 7511a, from which the 40 CFR part 51 regulations were promulgated.

Under 7403(c), the Administrator is required to conduct a program of research, testing, and development of methods for sampling, measurement, monitoring, analysis, and modeling of air pollutants, specifically including a requirement to establish a national network to monitor, collect, and compile data with quantification of certainty in the status and trends of air emissions and air quality. This program will also include the development of improved methods and technologies to increase the understanding of the sources of nitrogen oxides, its formation, transport, regional influences and trends, and interactions with other pollutants.

Section 7410 (a) and (k) contain the SIP requirements, which include a requirement that each state submit a SIP that: 1) provides for the establishment and operation of appropriate devices, methods, systems, and procedures necessary to monitor, compile, analyze, and make available to the Administrator data on ambient air quality, and 2) provides for the performance of such air quality modeling as the Administrator may prescribe for the purpose of predicting the effect on ambient air quality of any emissions of any air pollutant for which the Administrator has established a national ambient air quality standard, and the submission, upon request, of data related to such air quality modeling to the designee as stipulated in the rule.

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

The EPA may use the ambient air quality data (monitoring, emissions, and/or the modeling data) submitted pursuant to this collection for area designations and other decisions with respect to the SO<sub>2</sub> NAAQS and SO<sub>2</sub> air quality. Affected state or local air quality management agencies must develop an appropriate SIP for any area designated as nonattainment in order to improve air quality in the area such that it meets the applicable NAAQS

expeditiously. The EPA and air agencies would also use the ongoing submission of ambient air quality monitoring data, emissions data, and/or modeling data to increase their understanding regarding whether areas under the rule ongoing requirements are meeting the standard.

To identify how the nation is progressing in improving air quality, the OAQPS prepares annually the National Air Quality and Emissions Trends report (<http://www.epa.gov/airtrends>) using the ambient air quality data collected through monitoring-related ICRs. The state and local air quality management agencies use these data for multiple purposes including tracking their progress toward achieving and maintaining air quality within the established NAAQS and any statewide standards they have established.

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

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

This collection of monitoring, emissions data, and modeling information, including the use of air dispersion modeling to characterize air quality and calculate design values for comparison to the NAAQS, is not unnecessarily duplicative of information otherwise reasonably accessible to the agency. The AQS and AIRNow systems, which contain information for these sources based solely on this collection, are the only national air quality data repositories available to EPA. AERMOD is the preferred regulatory air quality model and states use this as their primary mechanism for modeling and meeting the ongoing reporting requirements. The ambient air quality surveillance data and related information collected through this information collection are not otherwise reasonably accessible to EPA.

A few state and local air quality management agencies have their own data storage systems (e.g., the California Air Resources Board); however, most state and local air quality management agencies use the AQS and AIRNow as their primary repositories for all air quality data.

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

The 1995 Paperwork Reduction Act requires that, except as provided under 44 U.S.C. §3507(j) or in the case of proposed collections of information contained in proposed rules, any agency proposing an ICR or extension of an ICR must solicit public comments for a 60-day period prior to submitting the ICR to OMB. Notice of a 60-day comment period on the proposed renewal of this ICR was published in the Federal Register prior to submitting to OMB. See 84 FR 33257, July 12, 2019.

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

Through the course of planning, monitoring, and improving upon this collection and its associated regulation, EPA regularly consults with affected state and local air quality management agencies through various methods including the regulatory process, regular meetings, and training courses. The EPA conducts workshops and training on the AQS reporting system. The EPA Regional offices conduct annual ambient air monitoring meetings with their

affected state and local air quality management agencies to assist these affected agencies with this collection and its associated regulation. The EPA's OAQPS also meets regularly with leading state and local air monitoring managers to discuss the Nation's ambient air monitoring program and this collection, via large monthly phone calls and smaller in person meetings two or three times per year. Prior to the initial ICR, EPA conducted several stakeholder meetings to discuss issues associated with implementation of the SO<sub>2</sub> standard. In addition, EPA developed two Technical Assistance Documents for monitoring and modeling. These documents provide technical advice on the use of modeling and monitoring to determine if an area meets the 2010 SO<sub>2</sub> NAAQS.

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

Sanctions do not automatically accrue to state or local air quality management agencies that fail to meet these requirements. The effects of less frequent collection include:

- A national database that is not consistently updated and available for public consumption;
- Less timely attainment designations with respect to the NAAQS;
- More difficulty in identifying and repairing problems with an ambient air monitor-- i.e., data are used to check a monitor's operating condition, and reporting data less frequently would delay a state or local agency's ability to recognize a problem with a monitor or a laboratory procedure; and
- The EPA would not be able to consistently answer questions from the public in a timely fashion regarding air quality in various areas of the country.

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

With the following exceptions, all of the OMB's general guidelines for information collections in 5 CFR 1320.6 are met by this ICR.

- Monitoring data reporting is required on a quarterly basis. Nearly all respondents voluntarily report on a monthly basis. If the modeling of ongoing requirements applies to a source, annual data reports are required, and updated dispersion modeling could be determined necessary and/or required where needed to determine whether the area meets or does not meet the 2010 SO<sub>2</sub> NAAQS.
- Record retention is for no more than 3 years (most records are kept by EPA data repository, not the affected state and local air quality management agencies)
- Monitoring information is maintained and reported in the standardized electronic AQS format.

### **3(f) Confidentiality**

Information that is considered personal, private, proprietary, or confidential is not required for this collection. One purpose of collecting ambient air data through AQS and AIRNow, or modeling with AERMOD, is to inform the public of general air quality in ambient air (air considered generally accessible to the public), and as such, does not present a need for maintaining a confidential nature. Security measures are taken to prevent tampering with the AQS electronic database by limiting the access to the AQS mainframe only to authorized users.

### **3(g) Sensitive Questions**

This section is not applicable to this ICR because no information involving matters of a sensitive nature is collected related to this rule.

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

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

This ICR affects state and local governments (SIC code 951, Administration of Environmental Quality Program) that are currently operating and maintaining established ambient air quality networks. The 40 CFR part 51 regulations associated with this request require that state and local air quality management agencies on an ongoing basis either 1) submit annual emissions data reports, and may require submission of additional updated modeling, or 2) conduct ambient air quality monitoring and report the data to EPA quarterly each year. Although industrial, environmental, and research organizations may use the data available through the AQS, they are not required to report any information for this information collection. Monitoring data submitted to AIRNow is voluntary for all organizations, but most state and local agencies reporting to AQS also report to AIRNow.

### **4(b) Information Requested for Areas Where the Monitoring Option is Implemented**

#### *(i) Data items, including record keeping requirements (Monitoring Option)*

These data items are submitted electronically to EPA's AQS as required by 40 CFR parts 51 and 58. These data are stored electronically within EPA's AQS, and separate records kept by the state or local air quality management agency are not required.

- Hourly and sub-hourly (5-minute) ambient air pollutant concentrations of SO<sub>2</sub> collected at SLAMS sites or any third-party monitoring sites identified and eligible to satisfy the requirements of the rule.
- Precision and accuracy data for all SLAMS sites, Special Purpose Monitors (SPM), and any third-party monitor identified as eligible to satisfy requirements of the rule.
- Monitoring network description information, including the site AQS identification number, site location, sampling and analysis method, operating schedule, monitoring

objective, site's scale of representation, identity of the urban area represented, and quality assurance plan.

- Results of the annual ambient air monitoring network and quality assurance plan review.
- Annual SLAMS summary report which includes the location, date, pollution source, and duration of each incident of air pollution during which ambient levels of a pollutant reached or exceeded the significant harm levels as defined in 40 CFR 51.151, the certification of the report's accuracy by a designated state air pollution control officer, and various other summary statistics as provided by the AQS system.

*(ii) Respondent Activities (Monitoring Option)*

A typical respondent would engage in the following activities to comply with this information request:

- Conduct or otherwise provide oversight to ambient air quality monitoring, incorporating all appropriate quality assurance procedures such as calibrations, precision and accuracy checks, and, if necessary, concurrent monitoring.
- Validate the ambient air data for quality assurance considerations.
- Electronically submit the complete and validated ambient air data to AQS.
- Prepare and submit to EPA annually the SLAMS sites summary report.

**4(c) Information Requested for Areas Where the Modeling Option is Implemented**

*(i) Data items, including record keeping requirements (Modeling Option)*

These data items are submitted to EPA's Regional offices as required by the SO<sub>2</sub> Data Requirements Rule under 40 CFR section 51.1205(b). These data are stored electronically, or by hard copy, at EPA's Regional offices, and separate records kept by the state or local air quality management agency are not required.

- A report, submitted annually, that assesses the annual SO<sub>2</sub> emissions of each applicable source in the area and provides the cause of any emissions increase from the previous year, along with a recommendation for whether updated modeling is needed to determine whether the area is currently meeting the 2010 SO<sub>2</sub> NAAQS.
- If updated modeling is required for an area, revised modeling with updated emission and meteorological inputs and any other input parameters that may be needed to conduct an accurate updated characterization of the area within 12 months of the modeling having been determined necessary.

*(ii) Respondent Activities (Modeling Option)*

- Gather most recent emissions data for source(s) in designated area and compare against previous emissions data.
- If emissions have increased, determine why emissions have increased and include that reasoning in annual report along with a recommendation of whether updated modeling is needed under the DRR.
- Submit annual report to EPA after making available for public inspection.
- If emissions have increased to the point that modeling is needed, gather meteorological data, emissions data, source characterization data (i.e. building information) to conduct modeling with the latest emissions following the SO<sub>2</sub> Modeling Technical Assistance Document. Specifically, if updated modeling is required under the ongoing reporting requirements, air agencies should use EPA's preferred near-field dispersion model, the AERMOD modeling system.<sup>2</sup> The use of AERMOD includes the following regulatory components:
  - AERMOD dispersion model
  - AERMAP terrain processor
  - AERMET meteorological processor

Other components can be used with AERMOD, depending on the application, including:

- BPIPFRM building processor (for downwash)
- AERMINUTE 1-minute ASOS winds pre-processor for input into AERMET
- AERSURFACE surface characteristics pre-processor for input into AERMET
- AERSCREEN, a screening version of AERMOD.

The dispersion modeling for the ongoing reporting requirements for SO<sub>2</sub> under the Data Requirements Rule uses:

- Source characterization information and emissions inputs for modeled sources
- Representative meteorological data of the area
- Terrain data to generate elevations for sources and receptors
- Receptor locations
- Background concentrations, and
- Building data for sources that will be affected by downwash.

Each modeling application is unique; therefore the following inputs may be needed for analyses, which may affect modeling costs:

- Determining the appropriate size of the modeling domain to capture potential modeled NAAQS violations

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<sup>2</sup> EPA's preferred near-field dispersion model is AERMOD, the American Meteorological Society/Environmental Protection Agency Regulatory Model. See 40 CFR part 51, Appendix W for more information.



- Determining sources to model explicitly in the modeling, and sources to characterize in the modeling via background concentrations
- Estimating time-varying emissions for modeled sources
- Obtaining stack parameters for modeled sources
- Obtaining building information for sources subject to downwash effects
- Determining the receptor grid spacing and creating the elevations in the receptor grid via AERMAP
- Determining the representative meteorological surface and upper air stations for the model domain, downloading the meteorological and land use data for input into AERMINUTE, AERMET and AERSURFACE
- Calculating the appropriate background concentrations

Once these inputs have been generated and processed through the appropriate programs, AERMOD can be run and post-processed to generate design values to compare against the NAAQS. The level of post-processing (charts, tables, maps, etc.) can affect modeling costs as well.

- Post-process model output to calculate design concentrations to compare against the NAAQS to assess if the area is violating the NAAQS.
- Submit modeling to EPA within 12 months in accordance with the final rule.

Each of these activities can be conducted using existing reporting and recordkeeping practices.

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

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

The EPA conducts the following activities to implement the modeling and monitoring option of this ICR and associated regulation:

- Periodically review the 40 CFR part 58 regulations to update the information collection and monitoring requirements in light of new technological developments or new air pollutant standards. Develop revisions to the regulations in response to legislative action and program changes.
- Establish, maintain, and support the AQS national repository for all state and local air quality management agency ambient air quality data and monitoring information. Periodically evaluate and improve upon this system as new technologies, and new regulatory requirements would dictate.
- Answer respondent (generally state and local air quality management agencies, but also industrial organizations, environmental groups, and others) questions about

ambient air monitoring, the 40 CFR part 58 regulatory requirements, and AQS. This includes the establishment of the Ambient Monitoring Technology Information Center bulletin board, the AQS toll-free hotline, and other written or verbal communication.

- Support the quality assurance program by working within EPA and with the respondents to evaluate precision and accuracy data, oversee the National Performance Audit Program, participate in systems audits, and conduct data validation checks on the AQS data submittal.
- Provide within the AQS mechanisms for statistical calculations, such as the number of times a particular ambient air quality monitoring site exceeds the NAAQS. Distribute the AQS data in various ways including upon written request, by Freedom of Information Act request, by press release, and in the annual National Air Quality and Emissions Trends Report.
- Provide adequate electronic storage space within the AQS for all ambient air quality surveillance data and information.
- When necessary, post-process model outputs to calculate design concentrations to compare against the NAAQS to assess if the area is violating the NAAQS.
- Review emissions information submitted by air management agencies to determine whether there are increases in emissions in the affected area that may warrant updated modeling to determine whether the area continues to meet the standard.
- For areas for which EPA is requiring updated modeling for the ongoing reporting requirements, per 51.1205(b), analyze and compare the updated modeling results to the NAAQS.
- Answer respondent (generally state and local air quality management agencies, but also industrial organizations, environmental groups, and others) questions about modeling submitted to meet the requirements of the SO<sub>2</sub> Data Requirements Rule, including meteorological and emissions data.

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

All state and local ambient air monitoring networks have access to and use well-established quality assurance procedures as defined in the Quality Assurance Handbook for Air Pollution Measurement Systems, Volumes I and II, EPA/600/R-94/038a & b. These documents ensure that all ambient air quality data are accurate and reliable.

The EPA has provided and will continue to provide resources for the maintenance and operation of AQS. All monitoring data required by this collection are submitted electronically to

reduce the burden of the collection and to improve data quality, agency efficiency, and responsiveness to the public. Various statistical and graphical summaries are also provided by AQS which enhance the utility of the information for consumption by the public and all affected state and local air quality management agencies. In submitting ambient air data into AQS, we ensure that the data are publicly available, electronically stored, and electronically retrievable. State and local air quality management agencies and EPA have been submitting data to the AQS since its inception in 1987.

For air quality modeling, EPA has provided the SO<sub>2</sub> Modeling Technical Assistance Document and the Guideline on Air Quality Models, Appendix W to 40 CFR Part 51 to assist the air agencies and ensure that they can successfully use AERMOD to estimate design values that are accurate and conform to the DRR requirements. Appendix W is updated via the public review and comment process to incorporate the latest regulatory changes and model performance enhancements into EPA's suite of regulatory models, including AERMOD. All regulatory modeling is made available to the public upon request.

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

This collection contains a minimum amount of information in order to manage the air quality program for the United States. The smallest entities affected by this collection are local air quality management agencies, typically consisting of the governing agencies for a county or group of counties, or a smaller metropolitan area (e.g., cities with a population of 50,000). This collection reduces to the extent practicable and appropriate the burden on entities that provide ambient air quality data and information to or for EPA, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:

- Clarification, consolidation, or simplification of compliance and reporting requirements (e.g., by establishing, maintaining, and improving as needed the AQS and AIRNow national repositories for ambient air quality data and information).

### **5(d) Collection Schedule for Monitoring Data**

Ambient air quality monitoring data and precision and accuracy data for criteria air pollutants are submitted according to the schedule defined in 40 CFR 58.16. These current regulations require that state and local air quality management agencies report their data within 90 days after the end of the quarter during which the data were collected.

The annual SLAMS report is submitted by May 1 of each year for data collected from January 1 through December 31 of the previous year in accordance with 40 CFR 58.15. This certification applies to all SLAMS and all SPM monitoring data that have been submitted by May 1.

The annual air quality surveillance network reviews are conducted and reports are submitted to EPA on a schedule that is determined by the affected state or local air quality management agency and EPA Regional office.

Ambient air quality data and information are made available to the public **at any time** in various ways, including:

- Upon request to the appropriate EPA Regional office, or to the OAQPS;
- By Freedom of Information Act Request to the appropriate EPA Regional office or the OAQPS;
- From the state or local air quality management agency responsible for collecting the ambient air quality data and information;
- By obtaining access, through appropriate EPA channels, to AQS;
- Through EPA public reports, such as the annual “National Air Quality and Emissions Trends Report”; or
- Through AQI reporting mechanisms which include newspaper, television, Internet and other publicly available notices (see [www.epa.gov/airnow](http://www.epa.gov/airnow)).

#### **5(e) Collection Schedule for Annual Data Reports and Potential Modeling Revisions**

For areas where modeling of actual SO<sub>2</sub> emissions served as the basis for designating the area attainment/unclassifiable or unclassifiable/attainment for the 2010 SO<sub>2</sub> NAAQs, an annual report is required to be submitted to EPA Regional Administrator by July 1 of each year that documents the annual SO<sub>2</sub> emissions of each applicable source and assesses the cause of any emissions increase from the previous year, per 51.1205(b). For any areas that EPA Regional Administrator, as a result of evaluating the annual report, requires the air agency to update its air quality modeling, the air agency must submit that modeling to EPA within 12 months.

### **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION FOR THE MONITORING AND MODELING OPTIONS**

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

All activities listed within section 4(b)(ii) of this ICR Supporting Statement are presented in Worksheet 1. The detailed burden and cost estimates for the different types of monitors are based on information provided in the version of *Guidance for Estimating Ambient Air Monitoring Costs for Criteria Pollutants and Selected Air Toxic Pollutants* (prepared by Desert Research Institute for EPA Office of Air Quality Planning and Standards, Air Quality Assessment Division, Ambient Air Monitoring Group, January 2005). The monitoring cost estimates presented in this guidance document were based on existing literature and direct monitoring experience. The costs for equipment and supplies were verified with vendors. The monitoring costs were based on vendor quotes for the monitor type that EPA expects respondents to use to comply with the requirements. Costs for level of effort estimates were verified with selected state and local agencies.

For use in preparing the burden estimates for the monitoring option of this ICR, costs for the monitoring requirements were inflated to 2019, 2020, and 2021. The cost escalation factors were estimated based on the appropriate Gross Domestic Product (GDP) price indices. Tables showing the detailed burden estimate calculations are presented below. A summary of the average annual respondent burden costs follows.

**Worksheet 1: Annual Average Respondent Burden Estimates (Monitoring Option)**

<b>Collection Activities</b>	<b>Total Labor Hours Per Respondent Per Year ( 24 respondents)</b>
1. Network design	0
2. Site installation	9
3. Sampling & analysis	385
4. Maintenance & repairs	218
5. Data management	125
6. Quality assurance	251
7. Supervision	135
TOTAL	1,123

For the modeling option, we are using a simplified, turnkey estimate (\$30,000 per model run) for the costs (see section 6(b) below) associated with assessing the emissions inventory, generating the annual report, and updating the modeling as required. This includes a labor burden of 5 percent of the overall cost per source per year.

**6(b) Estimating Respondent Costs**

All activities listed with section 4(b)(ii) of this ICR Supporting Statement are included in the Worksheet 2 for the monitoring option. A summary of the average annual respondent burden costs follows.

## Worksheet 2: Annual Average Respondent Cost Estimates<sup>3</sup> (Monitoring Option)

<b>Collection Activities</b>	<b>Total Labor Cost Per Respondent Per Year (24 respondents)</b>
1. Network design	\$0
2. Site installation	\$661
3. Sampling & analysis	\$31,005
4. Maintenance & repairs	\$16,338
5. Data management	\$9,604
6. Quality assurance	\$19,741
7. Supervision	\$11,129
<b>TOTAL</b>	<b>\$88,478</b>

A total of 170 sources in 43 states chose to characterize air quality via the modeling pathway. Of those 170 sources, some will be required to remodel their emissions in addition to and as part of their annual reporting obligation. Others will not have to remodel but will have to submit only a report on their emissions changes. The report-only obligation is a much lower annual burden than one in which updated modeling is required. However, for the purposes of this ICR, we are assuming that all 170 sources will undergo annual revised modeling, the results of which are incorporated into the annual report.

Based on market research, stakeholder feedback, and the assumptions of the use of modeling for the ongoing data verification reports, a conservative estimate of modeling costs, where additional modeling is determined to be necessary, is \$30,000 for a single modeling run centered on an identified source. This cost estimate also includes the time necessary to develop an appropriate emissions inventory for the modeling run. In the unlikely event that air agencies/EPA determined that it was necessary for all 170 sources that are subject to the ongoing modeling requirements conduct additional modeling, the total annual national costs are estimated at approximately \$5,100,000. For purposes of the burden calculations in this ICR renewal, we are being highly conservative and assuming this scenario will occur in each of the three years that this collection will be active.

In instances where additional modeling is not required, our burden estimate for model execution, analysis, and report preparation, is equal to 5 percent of the overall costs of the full-scale modeling estimate. Should it be the case that all 170 sources require no new modeling for the duration of this collection, the annual burden cost estimate would be \$255,000.

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<sup>3</sup> See associated DRR ICR spreadsheets for detailed estimates for labor costs.

Regardless of which response type is required, for burden associated with sources using the modeling option, we are assuming that most of the cost (approximately 90%) is for labor, leaving 10% as non-labor burden.

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

We estimated the Agency burden and cost by using current burden and cost of the ambient air monitoring program related to this collection. We included burden and cost for the OAQPS, the ten Regional offices, and associated contract activities. The in-house activities for this collection are completed by a variety of individuals with a variety of salaries; therefore, we used the actual salary as an average for computing the program costs. Actual contractor expenses were used for those activities completed using extramural resources. We estimated a total annual average of 52,717 hours and \$827,507 in agency burden.

For the modeling option, we assumed that on average, 40 hours would be needed to review each of the annual reports, including an evaluation of the modeling analysis. If all 170 sources are assumed to update modeling as part of the annual requirement, then 6800 hours would be the total labor estimate for OAQPS, the ten Regional offices, and associated contract activities. Using a rough average hourly rate of \$100, the average annual agency cost would be \$680,000. If no modeling is being submitted for all 170 sources, we assume that 8 hours would be needed to review the annual submission for each source. Thus, the low end of the cost range would be \$136,000. For total burden estimates below we are assuming that all 170 sources are submitting modeling.

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

Worksheet 3 shows the total annual respondent hourly burdens and costs which was taken from section 6(b) above for the estimated 24 respondents. The total estimated annual burden for monitoring is 26,948 hours at a total cost of \$2,123,474.

#### Worksheet 3: Annual Total Respondent Labor Burden/Cost Estimates (Monitoring Option)

Collection Activities	Total Labor Hours Per Year	Total Labor Cost Per Year
1. Network design	0	\$0
2. Site installation	222	\$15,864
3. Sampling & analysis	9240	\$744,114
4. Maintenance & repairs	5236	\$392,117
5. Data management	3003	\$230,501
6. Quality assurance	6013	\$473,789

7. Supervision	3234	\$267,089
TOTAL	26,948	\$2,123,474

For the modeling option, the average annual respondent cost is \$5,100,000 if modeling is submitted for all 170 sources. Specific hours for modeling have not been estimated, but labor costs are included in the modeling estimate above.

**6(e) Bottom Line Burden Hours and Cost Tables**

*(i) Respondent Tally*

For the monitoring option:

- Number of Respondents: 24
- Number of Annual Responses: 96
- Respondent Annual Burden: 26,948
- Respondent Total Annual Costs: \$2,539,814
- Respondent Annual Non-Labor Costs \$416,340

For the modeling option:

- Number of Respondents: 43
- Number of Annual Responses: 170
- Respondent Annual Burden: Number of hours not calculated
- Respondent Total Annual Costs: \$5,100,000
- Respondent Annual Non-Labor Costs \$510,000

Respondent grant total:

- Number of Annual Responses: 266
- Respondent Annual Burden: 26,948
- Respondent Total Annual Costs: \$7,639,814
- Respondent Annual Non-Labor Costs: \$926,340

*(ii) The Agency Tally*

For the monitoring option:

- Agency total annual Burden: 45,917 hours
- Agency total annual Cost: \$147,507

For the modeling option:

- Agency total annual burden: 6,800 hours
- Agency Total Annual Cost: \$680,000

Agency grand total:

- Agency total annual burden: 52,717
- Agency Total Annual Cost: \$827,507



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

The revisions in the monitoring and modeling burden requested result, in large part, from EPA having resolved much of the uncertainty that was built into the calculations from the previous ICR – issued at to support the SO<sub>2</sub> Data Requirements Rule. The final rule gave the air monitoring agencies the flexibility to characterize air quality using either appropriately sited ambient air quality monitors or modeling of source emissions. Each agency was required to identify for each source area with emissions above 2,000 tpy of SO<sub>2</sub> which approach (ambient monitoring or air quality modeling) it would use to characterize air quality. Not knowing at that time which approach agencies would choose for each source, the initial ICR calculated burden for both the monitoring and the modeling scenarios with each model assuming the full cohort of all possible sources. The agencies have now submitted their selected approach and this ICR revises the burden estimates to accurately reflect the burden for agencies which have chosen to conduct ambient air monitoring as well as the burden for those agencies which have chosen to conduct air quality modeling. As a result of agencies having now positively affirmed their selections, EPA has also gained a more refined understanding of the total number of sources that must be included in this information collection. Furthermore, in the burden estimates for the modeling choice, EPA has more accurately expressed the split between labor and non-labor costs. EPA modeling estimates are still conservative, and therefore on the high end, due to the assumption that all agencies will need to re-model when in fact, based on their review of updated emissions data, a new modeling run may not always be required. EPA will continue to work closely with those agencies and update burden estimates as appropriate in future ICR renewals.

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

The annual public reporting and recordkeeping burden for this collection of information for state and local air agencies is estimated to average 1122.3 hours per respondent under the monitoring option. Under the modeling option, the labor burden was estimated as a percentage of the overall cost of the project rather than an estimated number of hours per respondent. 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-2013-0711, which is available for online viewing at

*www.regulations.gov*, or in person viewing at the Air Docket in EPA Docket Center (EPA/DC), EPA William Jefferson Clinton West Building, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1742. An electronic version of the public docket is available at *www.regulations.gov*. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include EPA Docket ID Number EPA-HQ-OAR-2013-0711 and OMB Control Number 2060-0696 in any correspondence.

#### **PART B OF SUPPORTING STATEMENT**

This section is not applicable to this ICR because statistical methods are not used in the data collection associated with the rule amendments.